Item 1: Cover Page

Willow Planning Group, LLC

79 Route 113

Holderness, NH 03245

Form ADV Part 2A – Firm Brochure

March 6, 2026

This brochure provides information about the qualifications and business practices of Willow Planning Group, LLC. If you have any questions about the contents of this brochure, please contact Ms. Kelly Luethje at 617-943-1433 or kelly@willowpg.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Willow Planning Group, LLC is registered as an Investment Advisor with the States of Massachusetts, New Hampshire and Colorado. Registration of an Investment Advisor does not imply a certain level of skill or training.

Additional information about Willow Planning Group, LLC is available on the SEC's website at http://www.adviserinfo.sec.gov which can be found using the firm's identification number 174085.

Item 2: Material Changes

Since the filing of our last annual amendment, dated February 26, 2025, we have not made any material changes to this Brochure.

From time to time, we will amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. The complete Disclosure Brochure or a Summary of Material Change shall be provided to each client annually and if a material change occurs in the business practices of Willow Planning Group, LLC.

You can request a copy of this Disclosure Brochure at any time by contacting Kelly Luethje at 617-943-1433 or kelly@willowpg.com.

Item 3: Table of Contents

Brochure

Item 1: Cover Page 1
Item 2: Material Changes 2
Item 3: Table of Contents 3
Item 4: Advisory Business 4
Item 5: Fees and Compensation 7
Item 6: Performance-Based Fees and Side-by-Side Management 8
Item 7: Types of Clients 9
Item 8: Methods of Analysis, Investment Strategies and Risk of Loss 9
Item 9: Disciplinary Information 11
Item 10: Other Financial Industry Activities and Affiliations 11
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading 12
Item 12: Brokerage Practices 12
Item 13: Review of Accounts 12
Item 14: Client Referrals and Other Compensation 13
Item 15: Custody 13
Item 16: Investment Discretion 13
Item 17: Voting Client Securities 13
Item 18: Financial Information 13
Item 19: Requirements for State-Registered Advisers 13

Throughout this Brochure Willow Planning Group, LLC may be referred to as “Willow”, “the firm”, “advisor”, “we”, “us”, or “our”.

Item 4: Advisory Business

Description of Advisory Firm

Willow Planning Group, LLC is a registered investment advisor firm registered with the state securities regulators in the following states; Massachusetts since January 2, 2015; New Hampshire since February 5, 2019; and Colorado as of October 14, 2022. Kelly Luethje is the principal owner and Chief Compliance Officer of the firm. Willow Planning Group, LLC does not directly manage client portfolios but rather provides advice to clients concerning their assets.

Description of Advisory Services

Financial Planning

Financial planning involves working one-on-one with a planner on a continuous basis over an extended period of time and covering client-specific financial planning topics. We continuously evaluate your financial and personal situation and provide financial education throughout the process. You will receive ongoing access to a planner who will work with you to develop your plan, help you implement the agreed upon recommendations, and monitor your plan as your circumstances change. We meet on a quarterly basis during the first year of working together. After the first year, we formally meet on a bi-annual basis. We encourage clients to contact us between meetings with questions or when circumstances change.

Our financial planning service begins with a thorough understanding of your financial goals and your values toward money. Prior to the first kick off meeting you will provide us with personal documentation and information to comprehensively analyze your situation. We believe a complete evaluation of your current financial position is a vital component of the process and allows us to customize your planning experience. As we develop your plan, we will carefully consider your current situation and other variables to predict future cash flows, asset values and withdrawal plans. At our second meeting, we will provide you with a financial plan and review with you our analysis and outcomes. Throughout the process you will be provided with detailed written or electronic reports, which are designed to achieve your stated financial goals and objectives. In addition, in some cases, you will have access to an online financial planning portal, shared with your planner, to help you track your progress and monitor your plan. Clients who engage us for ongoing financial planning will pay an ongoing fee collected in advance. For more information about our fees see Item 5.

We will communicate through emails, telephone calls, and video conferences.

The financial planning topics covered may include, but are not limited to, the following:

- **Business Planning:** We provide consulting services for clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.
- **Cash Flow and Debt Management:** We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice can also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We will also recommend what we believe to be an appropriate cash reserve

that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.

- **College Savings:** Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren (if appropriate).
- **Employee Benefits Optimization:** We will provide a review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals. We will provide guidance and advice on accounts to save for retirement, such as SEP IRAs and/or asset allocation within a 401(k) plan.
- **Estate Planning:** This usually includes an analysis of your exposure to estate taxes and your current estate plan, which will include whether you have a will, powers of attorney, trusts and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. If requested, we will provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes.
- **Financial Goals:** We will help you identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- **Insurance Review:** Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile. If no coverage exists, advice will be provided on ways to minimize risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance ("self-insuring").
- **Investment Analysis:** This will involve developing an asset allocation strategy to meet your financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker-dealer or custodian. The strategies and types of investments we recommend are further discussed in Item 8 of this brochure.
- **Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we will make recommendations, including those that impact the original projections by adjusting certain variables (i.e., working longer, saving more, spending less, taking more risk with investments). If you are near retirement or already retired, advice will be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.
- **Tax Planning Strategies:** Advice includes ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we make recommendations on which type of account(s) or specific investments should be owned based in part on their "tax efficiency,"

with consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that likely will impact your situation. We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we can provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes.

Clients may elect to engage the Advisor for a one-time, two-hour, financial planning session based on Client-specific topics. Those topics may include, but not be limited to, any of the topics described above.

Let's Get Started Programs

Our *Let's Get Started Programs* are introductory financial planning sessions that include a net worth analysis and advice on cash flow, debt and savings. This program is currently offered in two ways: 1) During a 90-minute one-time session with a financial planner, or 2) Do It Yourself (DIY) online program, followed by a 30-minute session with a financial planner. We will review with you the planner's analysis and recommendations. Ongoing guidance on cash flow and debt is available on a quarterly basis.

You will be required provide us with personal documentation and information to analyze your situation under the scope of the agreement. Following the analysis, you will receive a written or an electronic report with a detailed financial plan designed to achieve your stated financial goals and objectives.

Consulting Services

We provide consulting services for small business owners and retirement plan administrators. Under this type of engagement, we work with you to assess the current situation, identify objectives, and develop a plan aimed at achieving the goal(s). We can consult on pension and profit-sharing plans, company benefit plans, and other financial matters.

The Consulting Services topics may include, but not be limited to the following:

- Review business goals (short, medium and long-term).
- Prepare a pro forma financial model and statement of cash flows
- Track financial progress against business goals.
- Explore and research methods for reducing income tax by way of corporate structure, retirement plans, or other deductions for small business owners.
- Provide monthly meetings for updates on progress toward goals, major changes to company circumstances, and other new information.
- Be available for phone calls and emails, up to a predetermined (number of hours) per month.
- Work with other advisors to implement changes (CPA, attorney).
- Analyze and provide recommendations on cash management.
- Review and co-manage QuickBooks: Chart of accounts, reconciliation of bank and credit card transactions, create reports that are helpful.
- Monitor implementation of recommendations and, in some cases, complete action items on Client's behalf.
- Create systems for inventory tracking, return on investment, and seasonal projections.
- Create and monitor department budgets.
- Research and recommendations on employee benefits and retirement plans.
- Advisory sessions with employees to review current benefits and retirement plan allocation.

Educational Sessions and Workshops

We offer group educational sessions and workshops for those looking for general advice on personal finance and investing. A variety of financial planning topics will be included in the presentation and any educational materials provided. Information presented will be educational in nature. We do not base a presentation on one individual's need nor do we provide personalized investment advice during these events.

Newsletters

From time to time, we will provide our clients with an email newsletter on topics to include, but not limited to, financial planning, budgeting, insurance, investment education or general topics relating to current market conditions. We do not charge for this email newsletter.

Client Tailored Services and Client Imposed Restrictions

We offer the same suite of services to all of our clients. However, specific client financial plans and their implementation are dependent upon the information supplied by the client, their objectives, suitability and goals.

Wrap Fee Programs

We do not participate in wrap fee programs.

Item 5: Fees and Compensation

Please note, unless a client has received this disclosure brochure at least 48 hours prior to signing the advisory agreement, the advisory agreement may be terminated by the client within five (5) business days of signing the agreement without incurring any advisory fees or penalty. How we are paid depends on the type of advisory service we are performing. With every engagement, a signed agreement is required before planning work can begin. Fees are negotiable in certain cases and payable via check, bill pay, or an online payment processing tool.

Financial Planning Fees

Financial Planning consists of an initial fee in the range of $1,000.00 - $3,000.00 and an ongoing fee between $125.00 - $500.00 per month, which begins 30 days after the first Kick-off meeting. The fee is based on the complexity of the situation. Ongoing service may be terminated with 30 days' advanced written notice. Any fees paid in advance will be prorated to the date of termination. No increase in the monthly fee shall be effective without agreement from the client by signing a new agreement or amendment to their current agreement. We do not collect more than $500 in fees more than six months in advance, before our services are provided to the client.

Two-hour Session: Adviser will provide a one-time, two-hour, financial planning session based on Client-specific topics, as described in Item 4. Clients will be charged the $900 fixed rate for this service. The fee is due upon commencement of the engagement.

Financial Planning Fixed Fees

The *Let's Get Started Programs* range from $400.00 - $600.00. For a one-time 90-minute session with a financial planner, a deposit equal to one half of the fee is required before planning work can begin. The remaining balance is due upon meeting and delivery of the plan. For the DIY online program, followed by a 30-minute session with a financial planner, the fee is due upon commencement of the program.

For clients who have completed this program and would like to continue to receive cash flow and debt guidance, the fee for this continued service ranges from $120.00 to $180.00 per quarter, due upon meeting and delivery of the review.

Clients who require a la carte or custom services will contract to have financial planning services provided based off an hourly rate of $200.00 per hour. The scope of work will be agreed upon before the start of any work and a $200.00 deposit is required upfront. Hourly work is billed monthly based upon the number of hours consumed during that period.

For clients not currently engaged in our ongoing Financial Planning service, and with more than 12 months since our last planning meeting, the fee for an annual plan review is $1,000.00. A deposit of $500.00 is required before the review can begin. The remaining $500.00 is due upon meeting and delivery of the annual review.

Consulting Services

Clients who require consultation services will contract to have services provided based off an hourly rate of $200.00 per hour. The scope of work will be agreed upon before the start of any work. Fees may be billed quarterly or monthly, depending on the scope of the project.

Educational Sessions and Workshops

We can host or be invited to present an educational session or workshop on financial planning topics. Attendees will be charged a flat fee not to exceed to $50.00 per person. The fee will be determined by the cost of materials, the presenters involved, and the length of the event.

Other Types of Fees and Expenses

When implementing an investment recommendation, the client will incur additional fees such as brokerage commissions, transaction fees, and other related costs and expenses. Clients will incur certain charges imposed by broker-dealers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and ETFs also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in recommending broker-dealers.

Item 6: Performance-Based Fees and Side-by-Side Management

Willow does not manage the assets in client accounts and therefore does not charge performance-based fees and therefore does not engage in side-by-side management.

Item 7: Types of Clients

Willow offers its services to individuals, couples, families, participants of employer-sponsored pension and profit-sharing plans, business entities, and plan administrators. The Advisor does not have any minimum requirements for providing financial planning services.

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

When we engage with our clients to provide an investment analysis, we will first gather and consider several factors, including the client's current financial situation, financial goals and objectives, current and long-term needs, level of investment knowledge, and risk tolerance. Other sources information could include financial periodicals, research reports prepared by others, regulatory filings, and company press releases.

Willow does not manage the assets in client accounts. Rather we when we make recommendations to clients, it is typically for investment in mutual funds and/or Exchange Traded Funds. However, there are times when we make recommendations in other assets. All investments have risks. The following description of risks are provided to clients to understand the risks of working with Willow and general investment risks.

Passive Investment

As stated, we primarily recommend passive investment strategies. Passive investing involves building portfolios that are comprised of various distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or ETFs.

Passive investment management is characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a single manager or managers who employ some method, strategy, or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Academic research indicates most active managers underperform the market.

Clients need to be aware that all investing involve risk and could result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities and any other investment or security. Some of the risks involved with investing include the following:

Market Risk: Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Strategy Risk: The investment managers of mutual funds and ETFs investment strategies and/or investment techniques may not work as intended.

Small and Medium Cap Company Risk: Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies could face a greater risk of business failure, which could increase the volatility of the client's portfolio.

Concentration Risk: Depending upon how the client's portfolio is invested, if in one or a small number of asset-classes, this would be concentration risk. Concentration risk can be focused on particular asset-classes, industries, sectors or types of investment. From time to time this strategy could be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

Interest Rate Risk: Bond (fixed income) prices generally fall when interest rates rise, and the value can fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

Legal or Legislative Risk: Legislative changes or Court rulings can impact the value of investments, or the securities' claim on the issuer's assets and finances.

Inflation: Inflation can erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

Apart from the general risks outlined above which apply to all types of investments, specific securities can have other risks. The following securities have risks that can affect a portion of your overall portfolio should you invest in them.

Common stocks can go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

Corporate Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero-coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on such factors as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

Bank Obligations including bonds and certificates of deposit can be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and can be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

Municipal Bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the

relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

Exchange Traded Funds Non-indexed ETFs trade at a price above (premium) or below (discount) its net asset value and an ETF purchased at a premium may ultimately be sold at a discount. (ETFs) prices can vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected.

Mutual Fund Risk. When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which can be duplicative. In addition, the client's overall portfolio can be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) trading of an ETF's shares can be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Advisor has no control over the risks taken by the underlying funds in which clients invest.

Item 9: Disciplinary Information

Willow and Kelly Luethje have voluntarily entered into a Consent Order with the State of New Hampshire Bureau of Securities Regulation as of January 14, 2019 in resolution of failure to register the firm in the state of New Hampshire prior to doing business from the state. The administrative fine has been paid and this matter is now resolved.

Item 10: Other Financial Industry Activities and Affiliations

Neither Willow nor any of its management persons are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Neither Willow nor any of its management persons are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Willow does not currently have any relationships or arrangements that are material to its advisory business or clients with either a broker-dealer, municipal securities dealer, or government securities dealer or broker, investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund" and offshore fund), other investment advisor or financial planner, futures commission merchant, commodity pool operator, or commodity trading advisor, banking or thrift institution, accountant or accounting firm, lawyer or law firm, insurance company or agency, pension consultant, real estate broker or dealer or sponsor of syndicator of limited partnerships.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Willow is a fiduciary, and we have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

Neither our firm, its associates or any related person is authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, advisor to the issuer, etc.

Willow and/or its investment advisory representatives may from time to time purchase or sell products that they recommend to clients. Willow will not trade in her own account for a 48-hour period.

Item 12: Brokerage Practices

Factors Used to Select Custodians and/or Broker-Dealers

Willow does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to clients based on their need for such services. We recommend custodians based on the reputation and services provided by the custodian.

1. **Research and Other Soft-Dollar Benefits**. We currently do not receive soft dollar benefits.
2. **Brokerage for Client Referrals.** We receive no referrals from a broker-dealer or third party in exchange for recommending that broker-dealer or third party.
3. **Clients Directing Which Broker/Dealer/Custodian to Use.** If a client requests, we can recommend a custodian for clients to use, however, clients can custody their assets at a custodian of their choice. Willow does not provide investment management services to its clients. We only make recommendations as a service to our clients.

Item 13: Review of Accounts

For Financial Planning clients, client circumstances are monitored on an ongoing basis, until the agreement has ended or is terminated. For clients who subscribe to the firm's Financial Planning services on a one-time or occasional basis, client circumstances are reviewed as necessary to provide the services at the time the services are provided. Financial plans are reviewed by Ms. Luethje, Owner and Chief Compliance Officer. The nature of the review is to determine if the client plan is still in line with the client's stated objectives. Reviews are conducted under a new or amended agreement and will be assessed at our current fee rate.

The client is promptly encouraged to notify Ms. Luethje if changes occur in his/her personal financial situation that might materially affect his/her financial plan.

Item 14: Client Referrals and Other Compensation

We are not compensated by anyone for providing investment advice or other advisory services except as previously disclosed in this Brochure. We do not directly or indirectly compensate any person who is not a supervised person for client referrals.

Item 15: Custody

Willow does not accept custody of client funds.

Item 16: Investment Discretion

Willow does not have investment discretion as we do not manage the assets of client portfolios.

Item 17: Voting Client Securities

Willow will not vote, nor advise clients how to vote, proxies for securities held in client accounts. Clients will receive proxy solicitations from their custodian and/or transfer agent.

Item 18: Financial Information

Willow does not collect more than $500 in fees more than six months in advance, before our services are provided to the client. Therefore, we are not required to file a balance sheet.

Willow has never been subject to a bankruptcy petition.

Item 19: Requirements for State-Registered Advisers

Kelly Luethje, Principal, was born in 1977. Ms. Luethje earned a Bachelor of Arts in Communications, with a minor in Business from the University of Nebraska, a Master of Business Administration from Simmons School of Management, and a Certificate of Financial Planning from Boston University.

Prior to forming Willow Planning Group, LLC in November 2014, Ms. Luethje was self-employed as a Communications Consultant from June 2014 to November 2014, a Financial Planner at Journey Financial Planners from October 2012 to June 2014, self-employed as a Communications Consultant from November 2010 to October 2012, and Manager, Investor Relations & Corporate Communications at Idera Pharmaceuticals, Inc. from October 2006 to August 2010.

Professional Designations

CFP (Certified Financial Planner)®: The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States. To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the S*tandards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Willow is not engaged in any other business other than giving financial planning advice.

Willow and Kelly Luethje have voluntarily entered into a Consent Order with the State of New Hampshire Bureau of Securities Regulation as of January 14, 2019 in resolution of failure to register the firm in the state of New Hampshire prior to doing business from the state. The administrative fine has been paid and this matter is now resolved.

There are no material relationships maintained by Willow or its management persons with any issuers of securities.

Massachusetts's law (950 CMR 12-205(9)(C) 13 MGL 110A) prohibits us from disclosing the nonpublic personal information about you to other third parties unless we have your prior written consent. If you decide at some point to either terminate my services or become an inactive customer, we shall continue to adhere to this privacy policy.

***** NOTICE TO MASSACHUSETTS CLIENTS *****

A disciplinary history of the Registrant or its representatives, if any, can be obtained by calling the Massachusetts Securities Division at (617) 727-3548.