



Item 1 – Cover Page

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This brochure provides information about the qualifications and business practices of Plan2Thrive Financial Services, LLC d/b/a True Wealth Stewardship. If you have any questions about the contents of this brochure, please contact Jeff Newburn at 563-323-5790 or at jeff.newburn@truewealthstewardship.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about True Wealth Stewardship is also available on the Internet at www.adviserinfo.sec.gov. You can view our firm's information on this website by searching for our firm name True Wealth Stewardship. You also may search for information by using the firm's CRD number **155015**. Financial Planning offered through Plan2Thrive Financial Services, LLC, d/b/a True Wealth Stewardship, a Registered Investment Advisor, not affiliated with LPL Financial, LLC.

*Registration as an investment advisor does not imply a certain level of skill or training.

Item 2 – Material Changes

Annual Update: The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update: We have added our new doing business as name, True Wealth Stewardship. We have added Sean Tobin and Robert Joy as Investment Advisor Representatives. Doug Weir has left the firm. We will ensure that you receive a summary of any material changes to this and subsequent Disclosure Brochures within 120 days after our fiscal year ends. Our fiscal year ends on December 31 so you will receive the summary of material changes no later than April 30 each year. At that time we will also offer a copy of the most current Disclosure Brochure. We may also provide other ongoing disclosure information about material changes as necessary.

Item 3 – Table of Contents

***This Table of Contents and the headings used throughout the Disclosure Brochure are written in a manner designed to comply with the specific heading requirements of the Illinois Securities Department.**

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Item 4 – Advisory Business

A. Description of Advisory Firm

Description of Advisory Firm – True Wealth Stewardship is an investment advisor registered with the Iowa Securities Bureau and the Illinois Securities Department and is a Limited Liability Company formed under the laws of the State of Iowa.

Number of Years in Business - True Wealth Stewardship has been registered as an investment advisor since October 2010.

Principal Owners Identified - The firm's controlling owner and managing member is Jeff Newburn. Full details of his education and business background are provided at Item 19 of this Disclosure Brochure.

B. Description of Advisory Services Offered

The following are brief descriptions of True Wealth Stewardship's primary advisory services. A more detailed description of our services is provided in *Item 5 – Fees and Compensation* so that clients and prospective clients can review the description of services and description of fees in a side-by-side manner.

Financial Planning Services - True Wealth Stewardship provides advisory services in the form of financial planning services. Financial planning services do not involve the active management of client accounts, but instead focuses on a client's overall financial situation. Financial planning can be described as helping individuals determine and set their long-term financial goals, through investments, tax planning, asset allocation, risk management, retirement planning, and other areas. The role of a financial planner is to find ways to help the client understand his/her overall financial situation and help the client set financial objectives.

Limits Advice to Certain Types of Investments - True Wealth Stewardship provides investment advice on the following types of investments:

- Load Mutual Fund Shares (A, B, & C Shares)
- No-Load (i.e. no trading fee) and Load-Waived (i.e. trading fee waived) Mutual Fund Shares
- Exchange-listed securities (i.e. stocks)
- Securities traded over-the-counter (i.e. stocks)
- Fixed income securities (i.e. bonds)
- Closed-End Funds and Exchange Traded Funds (ETFs)
- Certificates of deposit
- Municipal securities
- Variable life insurance
- Variable annuities
- United States government securities
- Real Estate Investment Trusts (REITs)

- Interests in partnerships investing in real estate and oil and gas interests

True Wealth Stewardship does not provide advice on foreign issues, warrants, corporate debt securities (other than commercial paper), commercial paper, options contracts on securities and commodities, futures contracts on tangibles and intangibles, or hedge funds and other types of private (i.e. non-registered) securities.

C. Client Tailored Services and Any Client Imposed Restrictions

True Wealth Stewardship's advisory services are always provided based on the individual needs of each client. We work with each client on a one-on-one basis through interviews and questionnaires to determine the client's investment objectives and suitability information.

D. Wrap Fee Programs

True Wealth Stewardship does not participate or sponsor any wrap fee programs. A wrap fee program is a program whereby advisory services and transactions services are provided under one all-inclusive fee.

E. Client Assets Under Management

True Wealth Stewardship does not manage client assets.

Item 5 – Fees and Compensation

In addition to the information provide in *Item 4 – Advisory Business*, this section provides additional details regarding our firm's services along with descriptions of each service's fees and compensation arrangements.

A. Means of Compensation Described

This section provides descriptions of each service's fees and compensation arrangements. True Wealth Stewardship provides financial planning services in the form of consultations, and written and web-based financial plans. Financial planning services will be specific in their preparation according to your requested topics for review and requested depth of preparation. Financial planning services take into consideration your objectives, risk tolerance, investment knowledge, net worth, income, age, and other factors which may include projected retirement, unusual or material funding requirements, inheritance possibilities, pensions, social security, children/relative funding issues, estate issues, and living expenses expressed in today's dollars requested for retirement. Based on the information compiled and reviewed for you, suitable investment recommendations are prepared for you.

Fee Schedule Included

Fees for financial planning services are billed on both a fixed and hourly fee basis. The minimum fee for financial planning services is \$250. There is no minimum net worth requirement. Annual retainer fees generally range from \$500 for a limited scope engagement to \$3,000 or more for more expansive annual retainer engagements. Financial planning services outside the scope of the services included with an annual retainer will be billed at hourly rates. The hourly rate for financial planning services is \$150/hour.

Whether a fixed or hourly fee is charged and the amount of the fee will depend upon the complexity of your situation and the actual services to be provided. The following are examples of the typical scope of services and the corresponding fees. The actual scope of services and actual fees will be agreed upon based on your specific situation, needs and interests.

Level One—Simple Asset Allocation Consulting

\$500/year

Services

- Meet annually
- Review of client's 401(K) or employer retirement plan and other investments such as variable annuities and mutual funds

Deliverables

- Recommendations for selection of investments options within each investment account, based on client's chosen risk level.

Level One Service is most appropriate for Clients

- With portfolios less than \$100,000
- Who want no retirement planning or financial planning services
- Who are not interested in account aggregation services

Level Two—Retirement Planning and Asset Allocation Consulting

\$1,000/year Plus \$1,000 Setup Fee

Initial Retirement Plan

- Review current investments and make recommendations on portfolio
- Collect data on projected Social Security and pension benefits
- Discuss desired retirement scenarios
- Investment assets may be linked to Wealth Management System (WMS) web-based financial planning software
- Develop retirement plan.

Services

- Meet twice a year
- Review of client's 401(K) or employer retirement plan and other investments such as variable annuities and mutual funds
- Update retirement plan inputs

Deliverables

- Recommendations for selection of investment options within each investment, based on client's chosen risk level.
- Updated retirement plan available on client's personal website

Level Two Service is most appropriate for Clients

- With portfolios \$100,000-\$250,000
- Who want only retirement planning services
- Who are interested in account aggregation services

Level Three—Basic Comprehensive Financial Life Planning® and Asset Allocation Consulting **\$1,500/year Plus \$1,000 Setup Fee**

Initial Plan Development:

Retirement Plan

- Collect data on projected Social Security and pension benefits
- Discuss desired retirement scenarios
- Investment assets may be linked to Wealth Management System (WMS) web-based financial planning software
- Develop retirement plan.

Other Financial Planning Services

- College Funding
- Review of risk management through insurance: life insurance, long-term care insurance, disability insurance
- Estate planning
- Cash Management
- Cash flow management
- Tax planning

Asset Allocation Consulting

- Determine appropriate risk profile, based on client's comfort with risk, age and other factors from their financial plan
- Review of each investment and make recommendations on how it should fit into the financial plan
- Review current investments and make recommendations on portfolio
- Asset allocation of individual portfolios and overall portfolio.

Financial Life Planning®

- Integration of the client's goals and values with their finances

Services

- Meet quarterly
- Review of client's investment assets
- Update financial plan inputs
- Review cash and liquidity management
- Review cash flow management

Deliverables

- Recommendations for selection of investment options within each investment, based on client's chosen risk level.
- Updated financial plan available on client's personal website
- Recommendations for cash and liquidity management
- Recommendations for cash flow management

Level Three Service is most appropriate for Clients

- With portfolios \$250,000-\$1,000,000
- Who want basic comprehensive financial planning services
- Who are interested in account aggregation services
- Who want to integrate their goals and values with their financial planning

Level Four—Complex Comprehensive Financial Life Planning® and Asset Allocation Consulting **\$3,000/year Plus \$2,000 Setup Fee, or more, depending on complexity**

Initial Plan Development:

Business Owner Planning, if applicable

- Business exit and succession planning
- Integration of business finances and personal financial planning
- Integration of estate planning and business long-term plans

Retirement Plan

- Review current investments and make recommendations on portfolio
- Collect data on projected Social Security and pension benefits
- Discuss desired retirement scenarios
- Link investment assets to Wealth Management System (WMS) web-based financial planning software
- Develop retirement plan on WMS.

Other Financial Planning Services

- College Funding
- Review of risk management through insurance: life insurance, long-term care insurance, disability insurance
- Estate planning
- Cash Management
- Cash flow management
- Tax planning

Asset Allocation Consulting

- Determine appropriate risk profile, based on client's comfort with risk, age and other factors from their financial plan
- Review of each investment and make recommendations on how it should fit into the financial plan
- Asset allocation of individual portfolios and overall portfolio.

Financial Life Planning®

- Integration of the client's goals and values with their finances

Services

- Meet 4-6 times per year or more, depending on scope
- Review of client's investment assets
- Update financial plan inputs
- Review cash and liquidity management
- Review cash flow management
- Review business plan, if applicable
- Goal-setting and monitoring, if applicable

Deliverables

- Recommendations for selection of investment options within each investment, based on client's chosen risk level.
- Updated financial plan available on client's personal website
- Recommendations for cash and liquidity management
- Recommendations for cash flow management
- Updated business exit plan, if applicable
- Updated personal goals and their integration with the financial plan

Level Four Service is most appropriate for Clients

- With portfolios over \$1,000,000
- Who want complex comprehensive financial planning services
- Who are business owners
- Who are interested in account aggregation services
- Who want to integrate their goals and values with their financial planning

Fees Are Negotiable or Not

Whether a fixed or hourly fee is charged and the amount of the can be negotiable based upon the complexity of your situation and the actual services to be provided. The actual scope of services and actual fees will be agreed upon based on your specific situation, needs and interests.

B. Fees Deducted From Assets or Clients Billed

Clients are billed for our financial planning fees.

How Often Clients Billed or Fees Deducted

Generally, one-half of True Wealth Stewardship's estimated fee for completion of the requested financial planning services is due at the time of the engagement with the remainder of the fee due upon presentation of the written financial plan or completion of the financial planning services. For a financial planning engagement billed at an hourly rate, at the onset of the engagement True Wealth Stewardship will provide you with a written estimate in advance stating the amount of hours needed to complete the requested financial planning services, the hourly rate that will be charged, and the terms of payment. If it is later determined that the total cost will exceed the maximum amount quoted, True Wealth Stewardship will contact you to receive authorization to provide additional services.

For a financial planning engagement billed on a fixed fee basis, at the onset of the engagement, True Wealth Stewardship will provide you with a written notification of the fixed fee to be charged. The interval for payment of annual retainer fees may be quarterly, semi-annually, or annually as mutually agreed-upon by True Wealth Stewardship and you in the client services agreement.

C. Additional Client Fees Charged

There are not additional fees charged to client in connection with True Wealth Stewardship's financial planning services. However, in the event that the client elects to implement recommended transactions, the client will incur customary charges related to implementation of the transactions, such as commission charges on the purchase of securities or insurance transactions, ticket charges and commissions for transactions, and custodial fees and other charges for brokerage accounts.

D. Prepayment of Client Fees Disclosed

Generally, one-half of True Wealth Stewardship's estimated fee for completion of the requested financial planning services is due at the time of the engagement with the remainder of the fee due upon presentation of the written financial plan or completion of the financial planning services. True Wealth Stewardship does not collect fees of more than \$500 or six or more months in advance.

Client Refund of Pre-Paid Fees

Financial planning services of a limited scope terminate upon presentation of the written plan or completion of the requested services. However, either party can terminate services at any time by providing written notice to the other party. Termination will be effective immediately upon receipt of such notice. If services are terminated within five business days of signing the client services agreement, services will be terminated without penalty. If services are terminated at any time after the initial five business days after signing the client services agreement, you will be responsible for True Wealth Stewardship's time expended for you to the date of termination and True Wealth Stewardship will provide you with a billing statement detailing the prorated charge or prorated refund due.

Financial planning services provided on an annual retainer basis can be terminated by either party by providing written notice to the other party. If you terminate the agreement for annual retainer services, you will be responsible for True Wealth Stewardship's time expended for you prior to the date of termination and True Wealth Stewardship will provide you with a billing statement detailing the prorated charge or prorated refund due.

E. External Compensation for the Sale of Securities to Clients

All Investment Adviser Representatives of True Wealth Stewardship are also Registered Representatives with LPL Financial, ("LPL"). In their capacity as Registered Representatives, they offer securities and receive normal and customary commissions for securities transactions. This presents a conflict of interest to the extent that the Representatives recommend that you invest in a security which results in a commission being paid to the Representative in the Representative's capacity as a Registered Representative. Providing brokerage services through LPL is a separate business activity from the Representative's role as an Investment Adviser Representative of True Wealth Stewardship.

Item 6 – Performance-Based Fees and Side-By-Side Management

Performance Based Fees Disclosed

Item 6 is **not** applicable to this Disclosure Brochure because my firm **does not charge or accept performance-based fees**, which are fees based on a share of capital gains on or capital appreciation of the assets held within a client's account.

Item 7 – Types of Clients

Description of Types of Clients Provided Advice

True Wealth Stewardship offers advisory services to individuals and high net worth individuals.

All clients are required to execute an agreement for services in order to establish a client arrangement with True Wealth Stewardship.

Account Requirements Disclosed (e.g., minimum account size)

The minimum fee for financial planning is \$250.

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

A. Methods of Analysis and Investment Strategies

True Wealth Stewardship uses the following methods of analysis in formulating investment advice:

Fundamental - A method of evaluating a security by attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and individually specific factors (like the financial condition and management of companies). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short). This method of security analysis is considered to be the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

True Wealth Stewardship uses the following investment strategies when providing investment advice:

Long term purchases. Investments held at least a year.

Short term purchases. Investments sold within a year.

Margin transactions. When an investor buys a stock on margin, the investor pays for part of the purchase and borrows the rest from a brokerage firm. For example, an investor may buy \$5,000 worth of stock in a margin account by paying for \$2,500 and borrowing \$2,500 from a brokerage firm. Clients cannot borrow stock from True Wealth Stewardship.

B. Investment Strategy and Method of Analysis Material Risks

Your investments will vary with the success and failure of our investment strategies, research, analysis and recommendations of portfolio securities. If our investment strategies do not produce the expected returns, the value of your investments will decrease.

The risk associated with **Fundamental** analysis is that it is somewhat subjective. While a quantitative approach is possible, fundamental analysis usually entails a qualitative assessment of how market forces interact with one another in their impact on the investment in question. It is possible for those market forces to point in different directions, thus necessitating an interpretation of which forces will be dominant. This interpretation may be wrong, and could therefore lead to an unfavorable investment decision.

C. Security Specific Material Risks

True Wealth Stewardship offers advice on the following types of investments:

- Load Mutual Fund Shares (A, B, & C Shares)
- No-Load (i.e. no trading fee) and Load-Waived (i.e. trading fee waived) Mutual Fund Shares
- Exchange-listed securities (i.e. stocks)
- Securities traded over-the-counter (i.e. stocks)
- Fixed income securities (i.e. bonds)
- Closed-End Funds and Exchange Traded Funds (ETFs)
- Certificates of deposit
- Municipal securities
- Variable life insurance
- Variable annuities
- United States government securities
- Real Estate Investment Trusts (REITs)
- Interests in partnerships investing in real estate and oil and gas interests

True Wealth Stewardship does not provide advice on foreign issues, warrants, corporate debt securities (other than commercial paper), commercial paper, options contracts on securities and commodities, futures contracts on tangibles and intangibles, or on private offerings and other unregistered securities.

Clients must understand that past performance is not indicative of future results. Therefore, clients should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. Clients and prospective clients should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, True Wealth Stewardship is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated when investing in securities, including the following:

- Market Risk – Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- Equity (stock) market risk – Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be

exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.

- Company Risk. When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.
- Fixed Income Risk. When investing in bonds, there is the risk that issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- Options Risk. Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- ETF and Mutual Fund Risk – When investing in a an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETFs or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. Clients will also incur brokerage costs when purchasing ETFs.
- Management Risk – Your investments will vary with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our investment strategies do not produce the expected returns, the value of the investment will decrease.

Item 9 – Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of True Wealth Stewardship's business or integrity.

A. Criminal or Civil Actions

True Wealth Stewardship and Jeff Newburn have no criminal or civil actions in a domestic, foreign or military court of competent jurisdiction.

B. Administrative Enforcement Proceedings

True Wealth Stewardship and Jeff Newburn have no administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.

C. Self Regulatory Organization Enforcement Proceedings

True Wealth Stewardship and Jeff Newburn have no Self Regulatory Organization proceedings.

Item 10 – Other Financial Industry Activities and Affiliations

A. Broker-Dealer or Representative Registration

Jeff Newburn is a Registered Representative with LPL Financial, Inc. (“LPL”). In his capacity as a Registered Representative, he offers securities and receives normal and customary commissions for securities transactions. This presents a conflict of interest to the extent that he recommends that a client invest in a security which results in a commission being paid to him as a Registered Representative. Providing brokerage services through LPL is a primary business activity of Jeff Newburn, who is the principal of True Wealth Stewardship. Mr. Newburn spends approximately 20% of his time on activities as a Registered Representative.

B. Futures or Commodity Registration

True Wealth Stewardship is **not** and does **not** have a related company that is a futures commission merchant, commodity pool operator, or a commodity trading advisor. Further, we do not have an application pending for registration as any of the foregoing entities. Jeff Newburn is **not** a representative of and does not have any application pending as a representative of a futures commission merchant, commodity pool operator, or a commodity trading advisor.

C. Material Relationships Maintained by this Advisory Business and Conflicts of Interest

True Wealth Stewardship is **not** and does **not** have a related company that is a (1) 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), (2) other investment adviser or financial planner, (3) futures commission merchant, commodity pool operator, or commodity trading advisor, (4) banking or thrift institution, (5) accountant or accounting firm, (6) lawyer or law firm, (7) pension consultant, (8) real estate broker or dealer, or (9) sponsor or syndicator of limited partnerships.

Firm staff are licensed insurance agents with various insurance companies. In their capacity as insurance agents, they may offer insurance products and receive normal and customary commissions for purchase transactions. This presents a conflict of interest to the extent that he recommends the purchase of an insurance product which results in a commission being paid to him as an insurance agent. Mr. Newburn spends approximately 5% of his time on activities as an insurance agent.

In addition to his acting as an Investment Adviser Representative providing financial planning services through True Wealth Stewardship, Jeff Newburn is also an Investment Adviser Representative (“IAR”) with LPL. As an IAR with LPL, firm staff may offer advisory accounts through LPL, the details of which are fully described in LPL’s Form ADV. Mr. Newburn’s role as an IAR with LPL presents a conflict of interest to the extent that he recommends a client open an advisory account for which he receives compensation as an IAR with LPL. Mr. Newburn spends approximately 25% of his time on activities as an IAR with LPL.

Jeff D Newburn provides Life Coaching through Plan2Thrive Life Coaching, where he works with clients to help them determine and achieve their life goals. This business is separate and distinct from the financial planning services offered through True Wealth Stewardship. Mr. Newburn spends approximately 15% of his time on this business.

Mr. Newburn is the general manager of Sparrow Thicket Investments, LLC, which owns commercial real estate. He is a member of the LLC with other family members.

Mr. Newburn and his wife Sharon Newburn own residential rental properties. Both of the above real estate investments require an insignificant amount of time during normal business hours.

D. Recommendation or Selection of Other Investment Advisers and Conflicts of Interest

True Wealth Stewardship does **not** recommend the use of third-party investment advisors to clients and does **not** have any relationships or arrangements with third-party investment advisors.

Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

A. Code of Ethics Description

True Wealth Stewardship has established a Code of Ethics that will apply to all of its associated persons. True Wealth Stewardship acknowledges that our firm has a fiduciary duty to you and all of our other clients. As a fiduciary, it is our responsibility to provide fair and full disclosure of all material facts and to act solely in your best interest at all times. This fiduciary duty is considered the core underlying principle for our firm's Code of Ethics, which also covers our insider trading and personal securities transactions policies and procedures. True Wealth Stewardship requires all of its supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and when changes occur, all supervised persons will sign an acknowledgment that they have read, understand and agree to comply with our firm's Code of Ethics.

True Wealth Stewardship will make sure that your interests are placed ahead of the interests of True Wealth Stewardship or its supervised person's own investment interests. Full disclosure of all material facts and potential conflicts of interest will be provided to you prior to any services being conducted. True Wealth Stewardship and its supervised persons must conduct business in an honest, ethical and fair manner and avoid all circumstances that might negatively affect or appear to affect its duty of complete loyalty to all clients. This disclosure is provided to give you a summary of Advisor's Code of Ethics. You may request a copy of our firm's Code of Ethics in its entirety and upon receipt of any such request, a copy will promptly be provided to you.

B. Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

True Wealth Stewardship does not buy or sell for client accounts, securities in which True Wealth Stewardship or any of its supervised persons have a material financial interest. Examples of material financial interests (all of which do **not** apply to our firm) include acting as principal to buy securities from or sell securities to clients; serving as general partner in a partnership solicited to clients; acting as investment adviser to an investment company recommended to clients.

C. Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Supervised persons of True Wealth Stewardship may buy or sell securities that are also recommended to clients. In order to minimize this conflict of interest, securities that they recommend for clients are generally widely held and publicly traded.

D. Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

True Wealth Stewardship is now and will continue to be in compliance with *The Insider Trading and Securities Fraud Enforcement Act of 1988*. To prevent conflicts of interest, our firm developed written

supervisory procedures that include personal investment and trading policies for its IARs, employees and their immediate family members (collectively, associated persons):

- Associated persons cannot prefer their own interests to that of the client
- Associated persons cannot purchase or sell any security for their personal accounts prior to implementing transactions for client accounts
- Associated persons cannot buy or sell securities for their personal accounts when those decision are based on information obtained as a result of their employment, unless that information is also available to the investment public upon reasonable inquiry
- Associated persons are prohibited from purchasing or selling securities of companies in which any client is deemed an “insider”
- Associated persons are discouraged from frequent personal trading
- Associated persons are generally prohibited from serving as board members of publicly-traded companies unless an exception has been granted by our Chief Compliance Officer.

Any associated persons not observing our firm’s policies is subject to sanctions up to and including termination.

Item 12 – Brokerage Practices

A. Factors Used to Select Broker-Dealers for Client Transactions

When implementing the advice of True Wealth Stewardship, you are free to select any broker you wish and are so informed. If you wish to have one of the Investment Adviser Representatives of True Wealth Stewardship implement advice in their separate capacity as a registered representative, LPL will be used. Investment Adviser Representatives of True Wealth Stewardship are required to use the services of LPL when acting in the separate capacity as a registered representative. LPL has a wide range of approved securities products for which it performs due diligence prior to selection. LPL’s registered representatives are required to use these products that have been approved by LPL when implementing securities transactions through LPL. Commissions charged for these products may be higher or lower than commissions you may be charged if transactions were implemented through another broker/dealer.

Because the Investment Adviser Representatives of True Wealth Stewardship are also registered representatives of LPL, they receive compliance support from LPL. In addition, LPL provides them, and therefore True Wealth Stewardship, with back-office operational, technology and other administrative support.

While there is no direct linkage between the investment advice given to you and the recommendation of True Wealth Stewardship to use LPL, economic benefits may be provided by LPL to True Wealth Stewardship that will not be provided if the client selects another broker/dealer or account custodian. These benefits may include negotiated costs for transaction implementation, a dedicated trade desk that services LPL participants exclusively, a dedicated service group and an account services manager dedicated to True Wealth Stewardship accounts, access to a real-time order matching system, electronic download of trades, balances and position information, access, for a fee, to an electronic interface with

the account custodian's software, duplicate and batched client statements, confirmations and year-end reports.

True Wealth Stewardship does not have any verbal or written agreements whereby it receives soft dollars from a broker/dealer firm. True Wealth Stewardship does not pay for any research received from LPL or any other broker/dealer. True Wealth Stewardship uses research received from LPL in formulating investment advice that is provided to clients of True Wealth Stewardship.

In their separate capacity as registered representatives, the Investment Adviser Representatives of True Wealth Stewardship may receive commissions from executing securities transactions. In addition, they may receive 12b-1 fees from certain mutual fund companies as outlined in the fund's prospectus. These 12b-1 fees come from assets and, therefore, indirectly from client assets. Receipt of such fees could represent an incentive for the Representatives to recommend funds with 12b-1 fees over funds that have no fees or lower fees. As a part of its fiduciary duty, True Wealth Stewardship endeavors at all times to put your interests first. However, you should be aware that receipt of additional compensation itself creates a conflict of interest and may affect the judgment of individuals when making recommendations.

B. Aggregating Securities Transactions for Client Accounts

The advisory services offered by True Wealth Stewardship are limited to financial planning services, as described above. True Wealth Stewardship may recommend but does not place transactions; therefore, True Wealth Stewardship does not aggregate securities transactions.

Item 13 – Review of Accounts

A. Schedule for Periodic Review of Client Accounts and Advisory Persons Involved

All reviews are conducted by an Investor Advisor Representatives. Financial planning services of a limited scope and duration terminate upon presentation of the written plan or completion of the requested financial planning services. Accounts will be reviewed according to the scope of work that is agreed to in the client services agreement. If you elect to have a review and update to an original financial plan, additional fees may be charged and you may be required to sign a new client agreement.

For financial planning services provided on an annual retainer basis, accounts will be reviewed when the meetings are held according to the interval determined in the services agreement (annually, semi-annually, quarterly, or as otherwise agreed).

B. Review of Client Accounts on Non-Periodic Basis

The calendar is the main triggering factor for account reviews, although more frequent reviews may also be triggered by changes in your circumstances, at your request, or by changes within the market.

C. Content of Client Provided Reports and Frequency

If you elect to open advisory accounts with LPL through Investment Adviser Representatives (IARs) acting in their separate capacity as IARs with LPL, you will receive account statements directly from LPL during any month in which there is activity in your account. You will also receive a confirmation of each transaction that occurs in any LPL advisory account unless that transaction is the result of a systematic purchase, redemption or exchange. Additionally, you will receive a detailed quarterly report showing performance, positions and activity from True Wealth Stewardship (but prepared by LPL) and you can review statements and reports through LPL's online portal.

State Whether Reports are Written

True Wealth Stewardship does not provide position or performance reports to clients. You will receive written account statements directly from the broker/dealer or from the product sponsor through which the client implements transactions.

Item 14 – Client Referrals and Other Compensation

Economic Benefits Provided to the Advisory Firm From External Sources and Conflicts of Interest

The only form of compensation received for advisory services is the fees charged for providing investment advisory services (as described in Item 5 of this brochure). True Wealth Stewardship and its Investment Adviser Representatives receive other benefits and non-economic benefits for interactions with LPL based upon their association as registered representatives and investment adviser representatives with LPL (see description in Item 12 of this brochure).

Advisory Firm Payments for Client Referrals

True Wealth Stewardship does not directly or indirectly compensate any person for client referrals.

Item 15 – Custody

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment advisor has the ability to access or control client funds or securities, the investment advisor is deemed to have custody and must ensure proper procedures are implemented. According to this definition, True Wealth Stewardship does not have custody of client funds or securities.

Include Statement That Custodian Send Reports

Account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly.

If Statements Go Out From Advisor and Custodian, Include Statement to Clients to Compare

Clients should carefully review account statements and are urged to compare account statements against any reports received from True Wealth Stewardship. When clients have questions about their account statements, they should contact True Wealth Stewardship or the qualified custodian preparing the statement.

Item 16 – Investment Discretion

True Wealth Stewardship does not maintain trading authorization over any client accounts.

Item 17 – Voting Client Securities

A. Describe Whether Clients Can Direct the Adviser How to Vote/Describe Policy

True Wealth Stewardship will not vote proxies on behalf of your account.

Statement That Clients May Obtain Copy of Adviser Voting Policies

If you would like to view our internal compliance policy describing the fact that True Wealth Stewardship does not **vote** proxies on your behalf, please let them know.

Item 18 – Financial Information

True Wealth Stewardship does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not subject to providing the additional financial information required of firms that do solicit such prepayment.

A. Balance Sheet

True Wealth Stewardship is not required to include a balance sheet for its most recent fiscal year.

B. Financial Conditions Reasonably Likely to Impair Advisory Firm’s Ability to Meet Commitments to Clients

True Wealth Stewardship is not subject to a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients.

C. Bankruptcy Petition During the Past Ten Years

Finally, True Wealth Stewardship has not been the subject of a bankruptcy petition at any time.

Item 19 – Requirements for State-Registered Advisers

A. Educational Background and Business Experience

Jeff D. Newburn, Born 1956
President and Chief Compliance Officer

Educational Background:

Iowa State University, BS, Industrial Technology

Business Experience:

Owner and sole member of True Wealth Stewardship, October 2010 to present

Financial Advisor, LPL Financial, October 2010 to present

Financial Advisor, Securian Financial Services, Inc., October 2006 – September 2010

Agent and Registered Representative, New York Life, October 2000 – September 2006

Manager in various positions, MidAmerican Energy Co. and predecessor companies, Nov 1985-Sept 2000

Professional Designation:

Jeff Newburn is a Certified Financial Planner® (CFP®) Practitioner (2007). Following is a description of this professional designation.

CFP Acknowledgment: Jeff Newburn acknowledges his responsibility as a CFP® Certificant to adhere to the standards that have been established in the CFP Board's Standards of Professional Conduct. If you become aware that Mr. Newburn's conduct may violate the Standards of Professional Conduct, you may file a complaint with the CFP Board at www.CFP.net/complaint.

Description of CFP® Designation:

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 62,000 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, administered in 10 hours over a two-day period, 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 *Standards 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.

B. Other Business Activities

Please refer to Item 10 of the True Wealth Stewardship Disclosure Brochure for a description of Jeff Newburn's other business activities.

C. Additional Compensation

Additionally, please refer to Item 10 and Item 14 of the True Wealth Stewardship Disclosure Brochure for a description of additional compensation earned.

D. Requirements for State-Registered Advisers

Jeff Newburn has not been the subject of any client arbitrations or similar legal disputes.

Jeff Newburn has not been the subject of a bankruptcy proceeding.

Item 20 - Customer Privacy Policy

In November of 1999, Congress enacted the *Gramm-Leach-Bliley Act (GLBA)*. The GLBA requires certain financial institutions, such as investment advisor firms, to protect the privacy of customer information. In situations where a financial institution does disclose customer information to non-affiliated third parties, other than permitted or required by law, customers must be given the opportunity to opt out or prevent such disclosure. True Wealth Stewardship does not share or disclose customer information to non-affiliated third parties except as permitted or required by law or as required by broker/dealer firms with supervisory obligations over certain of our firm's activities.

True Wealth Stewardship is committed to safeguarding the confidential information of its clients. True Wealth Stewardship holds all personal information provided by clients in the strictest confidence and it is the objective of True Wealth Stewardship to protect the privacy of all clients. Except as permitted or required by law, or as required by broker/dealer firms with supervisory obligations, True Wealth Stewardship does not share confidential information about clients with non-affiliated parties. In the event that there is a scheduled change to this policy, True Wealth Stewardship will provide clients with written notice and clients will be provided an opportunity to direct True Wealth Stewardship as to whether such disclosure is permissible.

To conduct regular business, True Wealth Stewardship may collect personal information from sources such as:

- Information reported by the client on applications or other forms the client provides to True Wealth Stewardship
- Information about the client's transactions implemented by others
- Information developed as part of financial consultations and analyses

To provide related services for client accounts, it is necessary for True Wealth Stewardship to provide access to customer information within the firm and to non-affiliated companies with whom True Wealth Stewardship has entered agreements. To provide the utmost service, True Wealth Stewardship may disclose the information below regarding customers and former customers, as necessary, to companies to perform certain services on behalf of True Wealth Stewardship:

- Information True Wealth Stewardship receives from the client on applications (name, social security number, address, assets, etc.)
- Information about the client's transactions with others (account information, payment history, parties to transactions, etc.)
- Information about a client's financial products and services transaction with True Wealth Stewardship

Since True Wealth Stewardship shares non-public information solely to service its client, True Wealth Stewardship does not disclose any non-public personal information about its customers or former customers to anyone, except as permitted by law. However, True Wealth Stewardship may also provide customer information outside of the firm as required by law, such as to government entities, consumer reporting agencies or other third parties in response to subpoenas.

Sean Tobin
Plan2Thrive Financial Services, LLC
d/b/a True Wealth Stewardship
www.plan2thrivefinancialservices.com

Date of Supplement: January 2016

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201 W 2nd Street, Suite 700
Davenport, IA 52801
Ph. 563-323-5790

Sean Tobin Office Address
250 12th Avenue, Suite 155
Coralville, IA 52241
Ph: 319-337-3477

This brochure supplement provides information about Sean Tobin that supplements the Form ADV Part 2A Disclosure Brochure for Plan2Thrive Financial Services d/b/a True Wealth Stewardship (“TWS”). You should have received a copy of that Disclosure Brochure. Please contact Jeff Newburn at 563-323-5790 if you did not receive the TWS Disclosure Brochure or if you have any questions about the contents of this supplement. Financial Planning offered through Plan2Thrive Financial Services, LLC, d/b/a True Wealth Stewardship, a Registered Investment Advisor, not affiliated with LPL Financial LLC.

Additional information about Sean Tobin is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Sean Tobin
Year of Birth: 1966
CRD # 4824809

Sean Tobin has a high school diploma, as well as a Bachelor’s of Arts degree from Canisius College.

Business Background:

- Plan2Thrive Financial Services d/b/a True Wealth Stewardship, Investment Advisor Representative, 01/2016 to Present
- LPL Financial, Inc., Registered Representative & Investment Adviser Representative, 12/2010 to Present
- Wealth Enhancement Brokerage Services, Registered Representative, 12/2010 to 02/2014
- Wealth Enhancement Group, Financial Advisor, 12/2010 to 02/2014
- Edward Jones, Investment Representative, 07/2004 to 12/2010

Item 3 – Disciplinary Information

Sean Tobin has never been subject to a legal or disciplinary event.

Item 4 – Other Business Activities

Affiliation with LPL Financial:

Sean Tobin is separately licensed as a registered representative and is registered as an investment adviser representative with LPL Financial, Inc. (“LPL Financial”). He spends approximately 90% of his time on activities through LPL Financial which is a registered securities broker/dealer, member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investors Protection Corporation (SIPC). Additionally, LPL Financial is a registered investment adviser firm. LPL Financial is not affiliated with TWS.

When acting in his separate capacity as a registered representative of LPL Financial, Inc., Mr. Tobin may sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, variable annuity

and variable life products to advisory clients. As such, he may suggest that advisory clients implement investment advice by purchasing securities products through a commission-based LPL Financial account. The receipt of commissions creates an incentive for Mr. Tobin to recommend those products for which he will receive a commission. Consequently, the objectivity of the advice he provides to clients could be biased. Mr. Tobin controls for this potential conflict of interest by discussing with clients the advantages and disadvantages of establishing a fee-based account versus establishing a commission-based account.

Mr. Tobin will receive 12b-1 fees from certain mutual fund companies as outlined in the fund's prospectus. 12b-1 fees come from fund assets, therefore, indirectly from client assets. The receipt of such fees could represent an incentive for him to recommend funds with 12b-1 fees over funds that have no fees or lower fees. Typically, he will receive 12b-1 fees only in commission-based brokerage accounts. However, such fees can be earned in fee-based accounts managed by him if 12b-1 fee paying mutual funds are held in the managed account. For ERISA accounts, there is an offset for any amount of 12b-1 fees. In such a situation, Mr. Tobin discusses with clients the selection of a 12b-1 or other trail paying mutual funds.

As an investment advisor representative of LPL Financial, Mr. Tobin provides asset management and similar services through LPL Financial. He provides financial planning services through TWS and spends approximately 10% of his time on financial planning. Fees for financial planning services provided through TWS are separate and distinct from the advisory fees paid to Mr. Tobin in his capacity as an investment adviser representative providing asset management and similar services through LPL Financial. Clients that engage LPL Financial will receive a copy of the LPL Financial Form ADV Part 2A Disclosure Brochure and will execute a client agreement specifying the services provided and fees charged by LPL Financial.

TWS does not require its advisor representatives to encourage clients to implement investment advice through LPL Financial and clients are never obligated or required to establish accounts through LPL Financial. However, if a client chooses not to accept Mr. Tobin's advice or decides not to establish an account through LPL Financial, Mr. Tobin may not be able to provide management and advisory services to the client. Clients should understand that, due to certain regulatory constraints, Mr. Tobin, in his capacity as a registered representative of LPL Financial must place all purchases and sales of securities products in commission-based brokerage accounts through LPL Financial or its other approved institutions.

Item 5 – Additional Compensation

Sean Tobin does not receive compensation or economic benefits for the provision of advisory services from any party who is not an advisory services client.

Item 6 – Supervision

Jeff Newburn is the Chief Compliance Officer of TWS. He is responsible for overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives, including Sean Tobin. Jeff Newburn can be contacted at 563-323-5790.

Item 7 – Requirements for State-Registered Advisers

Sean Tobin has not been involved in an arbitration award and has not been found liable in an arbitration claim alleging damages in excess of \$2,500. He has not been involved in any award or found liable in any civil, self-regulatory organization, or administrative proceeding. Additionally, he has not been the subject of a bankruptcy petition.