

## Item 1: Cover Page



# REAL WEALTH PLANNING

FINANCIAL PLANNING, INVESTMENT MANAGEMENT, AND TAX STRATEGY

## Real Wealth Planning

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[www.RealWealthPlanning.com](http://www.RealWealthPlanning.com)

### **Form ADV Part 2A – Firm Brochure**

Dated: March 26, 2025

This Brochure provides information about the qualifications and business practices of Fiduciary Financial Planning Group LLC doing business as Real Wealth Planning. If you have any questions about the contents of this Brochure, please contact us at 512-222-9280. 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.

Real Wealth Planning is registered as an Investment Adviser located in Texas. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about Real Wealth Planning is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov), which can be found using the firm's identification number, 311106.

## Item 2: Material Changes

Since our previous ADV Update dated December 20, 2024, the following material changes have been made:

- We have updated fee language in Item 5
- We have updated our discretionary assets under management.

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations, and routine annual updates as required by the securities regulators. Either this complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Real Wealth Planning.

# Item 3: Table of Contents

## Contents

<b>Item 1: Cover Page</b>	<b>1</b>
<b>Item 2: Material Changes</b>	<b>2</b>
<b>Item 3: Table of Contents</b>	<b>3</b>
<b>Item 4: Advisory Business</b>	<b>4</b>
<b>Item 5: Fees and Compensation</b>	<b>8</b>
<b>Item 6: Performance-Based Fees and Side-By-Side Management</b>	<b>12</b>
<b>Item 7: Types of Clients</b>	<b>12</b>
<b>Item 8: Methods of Analysis, Investment Strategies and Risk of Loss</b>	<b>12</b>
<b>Item 9: Disciplinary Information</b>	<b>14</b>
<b>Item 10: Other Financial Industry Activities and Affiliations</b>	<b>15</b>
<b>Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</b>	<b>16</b>
<b>Item 12: Brokerage Practices</b>	<b>17</b>
<b>Item 13: Review of Accounts</b>	<b>19</b>
<b>Item 14: Client Referrals and Other Compensation</b>	<b>20</b>
<b>Item 15: Custody</b>	<b>20</b>
<b>Item 16: Investment Discretion</b>	<b>20</b>
<b>Item 17: Voting Client Securities</b>	<b>21</b>
<b>Item 18: Financial Information</b>	<b>21</b>
<b>Item 19: Requirements for State-Registered Advisers</b>	<b>21</b>
<b>Form ADV Part 2B – Brochure Supplement</b>	<b>22</b>
<b>Form ADV Part 2B – Brochure Supplement</b>	<b>25</b>
<b>Form ADV Part 2B – Brochure Supplement</b>	<b>27</b>

# Item 4: Advisory Business

## **Description of Advisory Firm**

Fiduciary Financial Planning Group LLC doing business as Real Wealth Planning (hereinafter referred to as “Adviser”, the “firm”, or “RWP”) is registered as an Investment Adviser with the State of Texas. We are a limited liability company founded in September 2020 and registered in November of the same year. Sarah Ponder is the principal owner of RWP.

## **Types of Advisory Services**

### **Ongoing Comprehensive Financial Planning**

This service involves working one-on-one with a financial planner (“planner”) over an extended period of time. By paying a fixed annual fee, Clients get to work with a planner who will work with them to develop and implement their financial plan (the “plan”). The planner will monitor the plan, recommend any changes and ensure the plan is up to date. In addition, ongoing comprehensive financial planning clients receive investment management services as further described below.

Upon desiring a comprehensive plan, a Client will be taken through establishing their goals and values around money. They will be required to provide information to help complete the following areas of analysis: net worth, cash flow, insurance, credit scores/reports, employee benefit, retirement planning, insurance, investments, college planning, and estate planning. Once the Client's information is reviewed, their plan will be built and analyzed, and then the findings, analysis and potential changes to their current situation will be reviewed with the Client. Clients subscribing to this service will receive a written report, providing the Client with a detailed financial plan designed to help achieve his or her stated financial goals and objectives. If a follow-up meeting is required, we will meet at the Client's convenience. The plan and the Client's financial situation and goals will be monitored throughout the year and follow-up phone calls and emails will be made to the Client to confirm that any agreed upon action steps have been carried out. On an annual basis, there will be a full review of this plan to ensure its accuracy and ongoing appropriateness. Any needed updates will be implemented at that time.

As a part of Comprehensive Financial 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. This will include comprehensive business consulting for business owners, including things such as employee benefits advice, hiring advice, asset protection, risk management, business-related tax planning, and retirement planning.

### **Investment Management**

We are in the business of managing individually tailored investment portfolios. Our firm provides continuous advice to a Client regarding the investment of Client funds based on the individual needs of the Client. Through personal discussions in which goals and objectives based on a Client's particular circumstances are established, we develop a Client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation targets. We will also review and discuss a Client's prior investment history, as well as family composition and background.

Account supervision is guided by the stated objectives of the Client (e.g., maximum capital appreciation, growth, income, or growth and income), risk tolerance, as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. We manage accounts on a discretionary basis. More information about discretion can be found in Item 16 of this Brochure.

### **Project-Based Financial Planning**

We provide project-based financial planning services on various financial planning topics. For select clients who desire a one-time plan, we will work together to tackle a select number of topics. A list of topics include:

- **Investment Analysis:** A thorough review of all investable assets and investment education.
- **Retirement Strategy Review:** A thorough review of current retirement savings, potential changes, and future trajectory; includes recommendations for investments within employee-sponsored plans.
- **Employee Benefits Optimization:** A review of all fringe benefits available to household and discuss optimal changes.
- **Windfall/Inheritance Review:** RWP will review the inheritance or windfall and make personalized investment or spending recommendations.
- **Education Savings Strategy:** RWP will perform a review of education savings and investment options; includes opening 529 (or other) accounts.
- **Debt/Cash Flow Review:** RWP will review budget, credit/loans, and cash flow recommendations for changes. If needed, we will also recommend changes to account types/structures.
- **Mortgage Purchase/Refinance Review:** An analysis of your current mortgage(s) or potential real estate transactions to determine if a purchase, sale, or refinance is appropriate.
- **Insurance Review:** A thorough review of life, property, and disability policies. RWP does not sell insurance products. RWP will refer to external providers when necessary. We will also review the options that external providers propose for purchase.
- **Estate Planning Strategy:** A review of the status of the estate plan to prepare for work with an attorney.
- **Real Estate Analysis:** Per individual residential property (single family, duplex, triplex, or quadplex). Client will provide all raw financial data including income and expenses, and financing documents.

### **Non-profit Advisory Services**

This service includes a review of financial governing documents such as investment policy statements, spending policy, and budget. RWP will also review current investments and make recommendations for changes when appropriate.

## **Employee Benefit Plan Services**

Our firm provides employee benefit plan services to employer plan sponsors on an ongoing basis. Generally, such services consist of assisting employer plan sponsors in establishing, monitoring and reviewing their company's participant-directed retirement plan. As the needs of the plan sponsor dictate, areas of advising could include: investment options, plan structure, and participant education.

In providing employee benefit plan services, our firm does not provide any advisory services with respect to the following types of assets: employer securities, real estate (excluding real estate funds and publicly traded REITS), participant loans, non-publicly traded securities or assets, other illiquid investments, or brokerage window programs (collectively, "Excluded Assets").

## **Educational Seminars and Speaking Engagements**

We may provide educational seminars and/or speaking engagement on an "as announced" basis for groups seeking general advice on investments and other areas of personal finance. The content of these seminars and speaking engagements will vary depending upon the needs of the attendees. These seminars and speaking engagements are purely educational in nature and do not involve the sale of any investment products. Information presented will not be based on any individual's person's need, nor does RWP provide individualized investment advice to attendees during these seminars.

## **Add-On Services**

For Business Owners, we offer the use and access to Quickbooks Online, a third-party accounting software. RWP and Quickbooks are unaffiliated and separate entities. We provide this add-on service as a benefit to our existing clients in order to provide a lower cost solution to their bookkeeping needs. RWP may also monitor a client's Quickbooks account for financial planning purposes.

Adviser will not have access to take action on behalf of the client within Quickbooks and does not have any discretionary authority, signatory authority, or maintain custody of client's funds within Quickbooks. Clients are not obligated to use any third-party provider we recommend.

## **Client Tailored Services and Client Imposed Restrictions**

We tailor the delivery of our services to meet the individual needs of our Clients. We consult with Clients initially and on an ongoing basis, through the duration of their engagement with us, to determine risk tolerance, time horizon and other factors that may impact the Clients' investment and/or planning needs.

Clients are able to specify, within reason, any limitations they would like to place on discretionary authority as it pertains to individual securities and/or sectors that will be traded in their account, by notating these items on the executed advisory agreement.

## **Wrap Fee Programs**

We do not participate in wrap fee programs.

## **Assets under Management**

As of December 31, 2024, RWP has \$24,195,737 in discretionary assets under management.



# Item 5: Fees and Compensation

Please note, unless a Client has received the firm's Disclosure Brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the Client within five (5) business days of signing the contract without penalty. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below.

## Ongoing Comprehensive Financial Planning

Fees for Ongoing Financial Planning consist of an upfront charge of \$2,000 - \$10,000 based on the Clients net worth and complexity of the plan (can be waived at firm's discretion) and an ongoing fee that is paid quarterly, in arrears, at a rate determined by the following schedule:

Net Worth	Ongoing Annual Advisory Fee
\$0 - \$2,000,000	\$12,500
\$2,000,001 +	0.60% x Net Worth <b>or</b> Account Value Fee Schedule

The upfront portion of the fee is for Client onboarding, data gathering, and setting the basis for the financial plan. This work will commence immediately after the fee is paid, and will be completed within the first 90 days of the date the fee is paid. Therefore, the upfront portion of the fee will not be paid more than 6 months in advance. Ongoing financial planning clients are offered Investment Management services as part of the comprehensive financial planning fee.

Net Worth is calculated as follows: Assets - Liabilities = Net Worth. Net worth is defined as the sum of the following assets: Cash & Cash Equivalents, all investment accounts, cash surrender value of life insurance/annuities, raw land and direct rental properties, less associated liabilities such as mortgages and revolving credit card balances. For purposes of determining a client's net worth, RWP has the discretion to include or exclude the client's main residence and any debts associated with the main residence. Privately-held investments (i.e. businesses, real estate, etc.) are included if the client seeks advice that takes those assets into consideration. RWP will rely on its Clients' estimates of the value of their private assets. Net Worth values are reassessed at least annually on each client's contract anniversary date. Should the fee change as a result of the reassessment, a new advisory contract will be executed. Ongoing Comprehensive Financial Planning fees do not include third party fees such as tax preparation and filing fees. If RWP contracts a third party licensed tax preparer for the Client, those fees will be provided and agreed to in advance of the tax preparation engagement.

The minimum annual fee is \$12,500. The annual fixed fee and the minimum annual fee may be negotiable, reduced, or waived depending on several factors including: the scope and complexity of the Client needs, the time it takes to implement the actional tasks of the plan, the accountability needs of the client, the size of the household, pre-existing relationship, familial relationship, among other factors. The annual fee shall be adjusted upwards by 4% every year on the anniversary of the advisory contract. For example, an initial annual fee of \$12,500 will increase to \$13,000 (+4%) after 1 year. No other increase in the annual fee shall be effective without prior client consent.



Fees for this service may be directly debited from a managed investment account or paid by electronic funds transfer or check. This service may be terminated with 30 days' written notice.

Since fees are paid in arrears, no refund will be needed upon termination of the engagement. For fees paid by electronic funds transfer, debit card or credit card, we use an independent 3rd party payment processor in which the client can securely input their banking information and pay their fee. We do not have access to the client's banking information at any time. The client will be provided with their own secure portal in order to make payments. Clients may be subject to fees applicable to the 3rd party payment processor.

**Investment Management Services (Stand-Alone)**

Fees for Investment Management consist of an upfront charge of \$2,000 - \$10,000 based on the complexity of investment needs, as well as an ongoing annual advisory fee based on the market value of the assets under management, which is calculated as follows:

Account Value	Annual Advisory Fee
\$0 - \$500,000	1.50%
\$500,001 - \$1,000,000	1.00%
\$1,000,001 - \$3,000,000	0.80%
\$3,000,001 - \$5,000,000	0.60%
\$5,000,001 - \$10,000,000	0.40%
\$10,000,001 and Above	0.40%

The upfront portion of the fee is for Client onboarding, data gathering, account opening, and savings plan implementation. This work will commence immediately after the fee is paid, and will be completed within the first 90 days of the date the fee is paid. Therefore, the upfront portion of the fee will not be paid more than 6 months in advance

The minimum annual fee for standalone investment management is \$3,600.

The annual fees are paid quarterly in arrears based on the last business day of the prior quarter. The advisory fee is a blended tier fee.

For example:

- An account with an ending balance of \$4,000,000 would be assessed the following quarterly fee:  $(\$500,000 \times (1.50\%/4)) + (\$500,000 \times (1.00\%/4)) + (\$2,000,000 \times (0.80\%/4)) + (\$1,000,000 \times (0.60\%/4)) = \$8,625$ .
- An account with an ending balance of \$1,000,000 would be assessed an annual fee of \$12,500, to be paid quarterly or monthly in arrears.

No increase in the annual fee schedule shall be effective without agreement from the Client by signing a new agreement or amendment to their current advisory agreement.

Advisory fees are directly debited from Client account(s) held at a qualified custodian, or the Client may choose to pay by electronic funds transfer or check. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 30 calendar days in advance. Since fees are paid in arrears, no refund will be needed upon termination of the account.

Annual fees are negotiable, prorated and paid in arrears. RWP’s fees are billed on a quarterly basis. No increase in the annual fee shall be effective without agreement from the client by signing a new agreement or amendment to their current advisory agreement.

Accounts initiated or terminated during a calendar quarter will be charged a prorated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 30 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

**Project-Based Financial Planning**

Project-Based Financial Planning is offered on a fixed fee basis. Fees are based on our hourly rate of \$500 with a two-hour minimum. The fixed fee will be agreed upon before the start of any work. The fixed fee can range between \$1,000 and \$10,000, depending on complexity and the needs of the client. The fee is negotiable.

If a fixed fee program is chosen, the fee is due at the beginning of the process. For hourly engagements, an estimated number of hours are provided to the Client and fees are due at the completion of the engagement. Fees for this service may be paid by electronic funds transfer or check.

In the event of early termination any prepaid but unearned fees will be refunded to the Client and any fees for the hours already worked will be due and payable. Any completed deliverables of the project will be provided to the Client upon termination. RWP will not bill an amount above \$500.00 more than 6 months in advance.

**Non-profit Advisory Services**

Fees for Non-profit Advisory Services are paid quarterly, in arrears, at a rate determined by the following schedule:

Account Value	Annual Advisory Fee
\$0 - \$500,000	Pro bono account set-up and model portfolio recommendation
\$500,001 - \$2,000,000	\$10,000
\$2,000,001 - \$3,000,000	\$12,500
\$3,000,001 - \$5,000,000	\$15,000
\$5,000,001 and Above	Negotiable. Maximum annual fee of 0.40%

Fees will be customized and negotiated based on the specific scope of work to be provided. Fees for this service may be paid by electronic funds transfer or check. This service may be terminated with 30 days’ written notice. Since fees are paid in arrears, no refund will be needed upon termination of the engagement.

**Employee Benefit Plan Services**

Our standard advisory fee is based on the market value of the assets under management and is calculated as follows:

Account Value	Annual Advisory Fee
<b>\$0 - \$1,000,000</b>	1.00%
<b>\$1,000,001 - \$3,000,000</b>	0.80%
<b>\$3,000,001 - \$5,000,000</b>	0.60%
<b>\$5,000,001 and Above</b>	0.40%

RWP will be compensated for Retirement Plan Consulting services according to the value of plan assets not to exceed 1% of the total plan assets. This does not include fees to other parties, such as record keepers, custodians, or third-party administrators.

The annual fees are negotiable, prorated and paid in arrears on a quarterly basis. The advisory fee is a blended tier fee. For example, an account with an ending balance of \$4,000,000 would be assessed the following quarterly fee:  $(\$1,000,000 \times (1.00\%/4)) + (\$2,000,000 \times (0.80\%/4)) + (\$1,000,000 \times (0.60\%/4)) = \$8,000$ . Accounts initiated or terminated during a calendar quarter will be charged a prorated fee based on the amount of time remaining in the billing period.

No increase in the annual fee shall be effective without agreement from the Client by signing a new agreement or amendment to their current advisory agreement. Upon Client's written authorization, a third-party such as the Custodian shall directly debit the Plan's account for the above fees upon receipt of an invoice from Advisor. This engagement may be terminated with written notice at least 30 calendar days in advance. Since fees are paid in arrears, no refund will be needed upon termination of the Agreement.

### **Educational Seminars and Speaking Engagements**

Seminars and Speaking Engagements are offered to organizations and the public on a variety of financial topics. Fees range from \$0 to \$50,000 per seminar or \$0 to \$5,000 per attendee, plus travel expenses, depending on sponsor, date, location, and program requested. Half of the fees are due prior to the engagement, and the other half are to be paid the day of, no later than the conclusion of the Seminar/engagement. The fee range is based on the content, amount of research conducted, number of hours of preparation needed, and the number of attendees.

In the event of inclement weather or a flight cancellation, the Speaker shall make all reasonable attempts to make alternative travel arrangements to arrive in time for the presentation. If travel proves impossible, or the event is otherwise canceled, the Speaker's fee is waived, but the Client will still be responsible for reimbursement of any non-refundable travel expenses already incurred.

In the event Client wishes to cancel the engagement, Client must provide 30 days prior written notice to the Speaker. Clients will receive a refund of any fees collected in advance, minus any non-refundable travel expenses already incurred, within 30 days of receipt of the notice of termination. If Client cancels with less than 30 days written notice, Client is responsible for all non-refundable travel expenses and any upfront fee collected will be absorbed by the Client.

In the event that the Speaker must cancel due to health or similar unforeseen circumstances, the Speaker will make all attempts to find a reasonable alternative engagement date and will absorb any incremental additional costs for obtaining alternative travel arrangements. If an alternative date cannot be obtained, the Client will not be responsible for any travel costs already incurred by the Speaker or any portion of the Speaker's fee.

## **Add-On Services**

Fees related to Quickbooks are disclosed to the client through the online application and are dependent upon the type of package and number of employees. Upon enrolling in Quickbooks online, Adviser shall pay the fees to Quickbooks and client shall reimburse the Adviser the same fee. Fees will be debited from the client's account through Adviser's third party payment processor. Clients are responsible for any fees related to the third party payment processor. An invoice will be provided to the client outlining the applicable fees. Clients shall be given thirty (30) days' prior written notice of any increase in fees. Clients may terminate this service at any time provided written notice to the Adviser. Termination will become effective at the end of the monthly billing cycle.

## **Other Types of Fees and Expenses**

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the Client. Clients may incur certain charges imposed by custodians, brokers, 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 exchange-traded funds 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 selecting or recommending broker-dealers for Client's transactions and determining the reasonableness of their compensation (e.g., commissions).

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

# **Item 6: Performance-Based Fees and Side-By-Side Management**

We do not offer performance-based fees and do not engage in side-by-side management.

# **Item 7: Types of Clients**

We provide financial planning and investment management services to individuals, high net-worth individuals, pension and profit sharing plans, charitable organizations, and corporations or other businesses.

We do not have a minimum account size requirement, however, we do have a minimum annual investment management fee of \$3,600.

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

We primarily practice passive and systematic investment management. Our investment analysis is largely based on academic studies and research concerning the performance benefits of using a passive, index-oriented approach

to building model portfolios combining multiple asset classes. Passive investing involves building portfolios that are composed 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 exchange traded funds. Passive investment management is characterized by low portfolio expenses, minimal trading costs and relative tax efficiency.

This is in contrast to active management which involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate above benchmark returns. Academic research indicates most active managers underperform the market.

## **Material Risks Involved**

**All investing strategies we offer involve risk and may 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. Material risks associated with our investment strategies are listed below.

**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 Adviser's 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 may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

**Turnover Risk:** At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

**Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may 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 may impact the value of investments, or the securities' claim on the issuer's assets and finances.

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

## **Risks Associated with Securities**

**Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.**

**Common stocks** may 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 may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may 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** prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected.

**Investment Companies 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 may be duplicative. In addition, the client's overall portfolio may 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) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are delisted 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 Adviser has no control over the risks taken by the underlying funds in which client's invest.

## Item 9: Disciplinary Information

### **Criminal or Civil Actions**

RWP and its management have not been involved in any criminal or civil action.

### **Administrative Enforcement Proceedings**

RWP and its management have not been involved in administrative enforcement proceedings.

### **Self-Regulatory Organization Enforcement Proceedings**

RWP and its management have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of RWP or the integrity of its management.

## **Item 10: Other Financial Industry Activities and Affiliations**

No RWP employee is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No RWP employee is registered, or has an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

RWP does not have any related parties.

Sarah Ponder is currently employed as the Owner, Content Creator, & Instructor at Fiduciary Financial Education, LLC, a separate and unaffiliated entity. The two entities do not share revenue. This activity accounts for approximately 20% of her time.

RWP only receives compensation directly from Clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

### **Recommendations or Selections of Other Investment Advisers**

RWP does not recommend or select other investment advisers for our clients.

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

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each Client. Our Clients entrust us with their funds and 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.

## **Code of Ethics Description**

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory Clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to Clients.
- Competence - Associated persons shall provide services to Clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to Clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Associated persons shall not disclose confidential Client information without the specific consent of the Client unless in response to proper legal process, or as required by law.
- Professionalism - Associated persons' conduct in all matters shall reflect the credit of the profession.
- Diligence - Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any Client or prospective Client upon request.

## **Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest**

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, adviser to the issuer, etc.

## **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

Our firm and its “related persons” may buy or sell securities similar to, or different from, those we recommend to Clients for their accounts. In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates’ transactions in specific reportable



securities transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

### **Trading Securities At/Around the Same Time as Client's Securities**

From time to time, our firm or its "related persons" may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of RWP to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, RWP will never engage in trading that operates to the client's disadvantage if representatives of RWP buy or sell securities at or around the same time as clients.

## **Item 12: Brokerage Practices**

### **Factors Used to Select Custodians and/or Broker-Dealers**

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

### **Research and Other Soft-Dollar Benefits**

We do not have any soft-dollar arrangements with broker-dealers whereby soft-dollar credits, used to purchase products and services, are earned directly in proportion to the amount of commissions paid by a client. However, as a result of being on their institutional platform, certain Custodians may provide us with certain services that may benefit us. Please see below for more information about each Custodian's benefits.

### **Brokerage for Client Referrals**

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

### **Clients Directing Which Broker/Dealer/Custodian to Use**

We do recommend a specific custodian for Clients to use, however, Clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing Clients to choose a specific custodian, we may be unable to achieve the most favorable execution of Client transaction and this may cost Clients money over using a lower-cost custodian.

### **The Custodian and Brokers We Use**

RWP utilizes Charles Schwab & Co., Inc., Utah's my529, Guideline Inc., Saveday, Inc., and Health Equity Administrators as the custodian and/or third party administrators for client accounts depending on the needs of the client. RWP has chosen to utilize these custodians based on customer service, quality and timely execution of trades, investment options, and cost. RWP always ensures the decision to use a specific custodian is in the client's best interest and will review these custodians periodically to ensure they are still in the best interest of the client.

## **Altruist Financial LLC**

For the benefit of no commissions or transaction fees, fully digital account opening, a large variety of security options and complete integration with software tools to produce better client outcomes, RWP recommends Altruist Financial LLC, an unaffiliated SEC-registered broker dealer and FINRA/SIPC member, as the introducing broker to DriveWealth, LLC, an unaffiliated SEC-registered broker dealer and FINRA/SIPC member, as the introducing broker to Apex Clearing Corporation, an unaffiliated SEC-registered broker dealer and FINRA/SIPC member, as the clients' custodian. RWP does not receive any research or other soft-dollar benefit by nature from its relationship with Altruist Financial LLC, nor does RWP receive any referrals in exchange for using Altruist Financial LLC as a broker dealer.

## **Charles Schwab & Co., Inc. (“Schwab”)**

Schwab Advisor Services<sup>TM</sup> is Schwab’s business serving independent investment advisory firms like us. They provide our clients and us with access to their institutional brokerage services (trading, custody, reporting and related services), many of which are not typically available to Schwab’s retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business. Schwab’s support services are generally available on an unsolicited basis (we don’t have to request them) and at no charge to us. Following is a more detailed description of Schwab’s support services:

1. **SERVICES THAT BENEFIT YOU.** Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab’s services described in this paragraph generally benefit you and your account.
2. **SERVICES THAT MAY NOT DIRECTLY BENEFIT YOU.** Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients’ accounts. They include investment research, both Schwab’s own and that of third parties. We may use this research to service all or a substantial number of our clients’ accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:
  - provide access to client account data (such as duplicate trade confirmations and account statements)
  - facilitate trade execution and allocate aggregated trade orders for multiple client accounts
  - provide pricing and other market data
  - facilitate payment of our fees from our clients’ accounts
  - assist with back-office functions, recordkeeping, and client reporting
3. **SERVICES THAT GENERALLY BENEFIT ONLY US.** Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:
  - Educational conferences and events
  - Consulting on technology, compliance, legal, and business needs
  - Publications and conferences on practice management and business succession

Clients should be aware that the receipt of economic benefits by RWP or its related persons in and of itself creates a potential conflict of interest and may indirectly influence RWP’s choice of Schwab for custody and brokerage services. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab’s services and not Schwab’s services that benefit only us.

## **Utah my529, Guideline, Inc., Saveday, Inc., and Health Equity Administrators**

RWP occasionally uses and recommends other financial companies to help clients meet their goals. These financial companies are only used in certain specific circumstances, as described below.

**Employer-Sponsored Retirement Plans** - Our firm recommends Guideline, Inc. (“Guideline”) to plan sponsors seeking 401(k), IRA, and SEP IRA services. Guideline offers a Guideline for Advisors® program which allows third-party advisors to assist with managing the accounts of mutual clients. Guideline does not charge additional fees to, nor does it receive any additional compensation from, third-party advisors. Guideline, Inc. requires clients to use Benefit Trust Company as their custodian. In addition, RWP may also recommend Saveday, Inc. for 401(k) services. Saveday, Inc. utilizes Kapital Generation LLC, an SEC registered broker-dealer and member FINRA/SIPC, to provide brokerage services as introducing broker and Apex Clearing Corporation, a third-party SEC registered broker-dealer and member FINRA/SIPC, to provide clearing and execution services and serves as qualified custodian.

**529 Plans** - my529 is a 529 college savings plan sponsored by the State of Utah. Although money contributed to my529 may be invested in portfolios that invest in underlying mutual funds, my529 is not itself a mutual fund. The State of Utah has created a trust specifically for the purpose of offering 529 college savings plans, including my529. My529 is a 529 plan legally known as a “qualified tuition program.” Section 529 qualified tuition programs are intended to be used to save only for qualified education expenses of a beneficiary. Investments in my529 are not insured or guaranteed. However, Federal Deposit Insurance Corporation (FDIC) insurance is provided for the FDIC-insured accounts up to certain limits. Units in my529 are not registered with the United States Securities and Exchange Commission (SEC) or with any state securities regulators.

**Health Savings Accounts** - RWP may recommend clients engage with Health Equity Administrators (“Health Equity”) to open and manage their health savings account. Health Equity lets clients invest in low expense ratio mutual funds with no minimums and no trading fees. Funds are custodied at FPS Trust Company, LLC.

## **Aggregating (Block) Trading for Multiple Client Accounts**

Generally, we combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as “block trading”). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

# **Item 13: Review of Accounts**

Sarah Ponder, Founder and CCO of RWP, Bailee Beauchamp or Becca Whites, Investment Specialists, will work with Clients to obtain current information regarding their assets and investment holdings and will review this information as part of our financial planning services. RWP does not provide specific reports to financial planning Clients, other than financial plans.

Client accounts with the Investment Management Service will be reviewed regularly on a quarterly basis by Sarah Ponder, Founder and CCO, Bailee Beauchamp or Becca Whites, Investment Specialists. The account is reviewed

with regards to the Client's investment policies and risk tolerance levels. Events that may trigger a special review would be unusual performance, addition or deletions of Client imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per Client's needs.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

RWP will not provide written reports to Investment Management Clients in addition to what they already receive from their custodian(s).

## Item 14: Client Referrals and Other Compensation

Except as mentioned in Item 12 above, we do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our Clients. Nor do we, directly or indirectly, compensate any person who is not advisory personnel for Client referrals.

## Item 15: Custody

If RWP deducts its advisory fee from Client's account(s), the following safeguards will be applied:

- i. Client will provide written authorization to RWP, permitting us to be paid directly from Client's accounts held by the custodian.
- ii. The custodian will send at least quarterly statements to the Client showing all disbursements from the accounts, including the amount of the advisory fee.

In jurisdictions where required, RWP will send an itemized invoice to the Client at the same time it instructs the custodian to debit the advisory fee. Itemization includes the formula used to calculate the fee, the amount of assets under management the fee is based on, and the time period covered by the fee.

We urge you to carefully review custodial statements and compare them to the account invoices or reports that we may provide to you and notify us of any discrepancies. Clients are responsible for verifying the accuracy of these fees as listed on the custodian's brokerage statement as the custodian does not assume this responsibility. Our invoices or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## Item 16: Investment Discretion

For those Client accounts where we provide Investment Management Services, we maintain discretion over Client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. Investment discretion is explained to Clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the Client will execute a Limited Power of Attorney, which will grant our firm discretion over the account. Additionally, the discretionary relationship will be outlined in the advisory contract

and signed by the Client. Clients may limit our discretion by requesting certain restrictions on investments. However, approval of such requests are at the firm's sole discretion.

## Item 17: Voting Client Securities

We do not vote Client proxies. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the Client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

## Item 18: Financial Information

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to Clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of Client funds or securities or require or solicit prepayment of more than \$500 in fees per Client six months or more in advance.

## Item 19: Requirements for State-Registered Advisers

Sarah Ponder serves as RWP's sole principal. Information about Sarah Ponder's education, business background, and outside business activities can be found on her ADV Part 2B, Brochure Supplement attached to this Brochure.

### **Performance-Based Fees**

Neither RWP or Sarah Ponder is compensated by performance-based fees.

### **Material Disciplinary Disclosures**

No management person at RWP has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

### **Material Relationships That Management Persons Have With Issuers of Securities**

RWP, nor Sarah Ponder, have any relationship or arrangement with issuers of securities.



# REAL WEALTH PLANNING

FINANCIAL PLANNING, INVESTMENT MANAGEMENT, AND TAX STRATEGY

## Real Wealth Planning

1030 Sunflower Trail  
Sunset Valley, Texas 78745  
(512) 222-9280

[www.RealWealthPlanning.com](http://www.RealWealthPlanning.com)

### **Form ADV Part 2B – Brochure Supplement**

Dated: March 26, 2025

*For*

**Sarah Ponder, CFP®**

Founder and Chief Compliance Officer

This brochure supplement provides information about Sarah Ponder that supplements the Fiduciary Financial Planning Group LLC d/b/a Real Wealth Planning (“Real Wealth Planning and/or RWP”) brochure. A copy of that brochure precedes this supplement. Please contact Sarah Ponder if the RWP brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Sarah Ponder is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number 6710703.

# Item 2: Educational Background and Business Experience

## **Sarah Ponder**

Born: 1985

### **Educational Background:**

- 2016 – Masters Of Business Administration, The University Of Texas At Austin
- 2006 – Bachelors Of Arts In Sociology, The University Of Texas At Austin

### **Business Experience:**

- 10/2020 – Present, Real Wealth Planning, Founder and CCO
- 08/2020 – Present, Fiduciary Financial Education, LLC, Manager
- 08/2016 – 10/2020, Dimensional Fund Advisors, Regional Director

### **Professional Designation(s):**

**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 *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.

## Item 3: Disciplinary Information

Sarah Ponder has never been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

## Item 4: Other Business Activities

Sarah Ponder is currently employed as the Owner, Content Creator, & Instructor at Fiduciary Financial Education, LLC, a separate and unaffiliated entity. The two entities do not share clients or revenue. This activity accounts for approximately 20% of her time.

## Item 5: Additional Compensation

Sarah Ponder does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through RWP.

## Item 6: Supervision

Sarah Ponder, as Founder and Chief Compliance Officer of RWP, is responsible for supervision. She may be contacted at the phone number on this brochure supplement.

## Item 7: Requirements for State Registered Advisers

Sarah Ponder has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.





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### **Form ADV Part 2B – Brochure Supplement**

Dated: March 26, 2025

*For*

### **Bailee Beauchamp**

Paraplanner/ Investment Specialist

This brochure supplement provides information about Bailee Beauchamp that supplements the Fiduciary Financial Planning Group LLC d/b/a Real Wealth Planning (“Real Wealth Planning and/or RWP”) brochure. A copy of that brochure precedes this supplement. Please contact Bailee Beauchamp if the RWP brochure is not included with this supplement or if you have any questions about the contents of this supplement. Additional information about Bailee Beauchamp is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number 6728793.

## Item 2: Educational Background and Business Experience

### **Bailee Beauchamp**

Born: 1992

#### **Educational Background:**

- 2014 – Bachelor of Arts, Biology, The University Of Texas At Austin

#### **Business Experience:**

- 09/2023 – Present, Real Wealth Planning, Paraplanner/ Investment Specialist
- 08/2015 – 08/2023, Dimensional Fund Advisors, Client Relationship Manager

## Item 3: Disciplinary Information

Bailee Beauchamp has never been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

## Item 4: Other Business Activities

Bailee Beauchamp is not involved in any outside business activities.

## Item 5: Additional Compensation

Bailee Beauchamp does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through RWP.

## Item 6: Supervision

Sarah Ponder as Chief Compliance Officer of RWP, supervises the advisory activities of Bailee Beauchamp. Clients may contact Sarah Ponder at the phone number on this brochure supplement.

## Item 7: Requirements for State Registered Advisers

Bailee Beauchamp has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.



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### **Form ADV Part 2B – Brochure Supplement**

Dated: March 26, 2025

*For*

**Rebecca “Becca” Anne Whites**

Paraplanner/ Investment Specialist

This brochure supplement provides information about Becca Whites that supplements the Fiduciary Financial Planning Group LLC d/b/a Real Wealth Planning (“Real Wealth Planning and/or RWP”) brochure. A copy of that brochure precedes this supplement. Please contact Sarah Ponder if the RWP brochure is not included with this supplement or if you have any questions about the contents of this supplement. Additional information about Becca Whites is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number 6710692.

## Item 2: Educational Background and Business Experience

### **Becca Whites**

Born: 1994

#### **Educational Background:**

- 2016 – Bachelor in Finance, University of Texas

#### **Business Experience:**

- 06/2024 – Present, Real Wealth Planning, Paraplanner/ Investment Specialist
- 05/2023 – 10/2024, The Well Community Church, Executive Assistant
- 10/2022 – 05/2023, Ark Wealth Management, LLC, Associate Financial Advisor
- 07/2021 – 08/2022, Dimensional Fund Advisors, Regional Director
- 01/2019 – 06/2021, Dimensional Fund Advisors, Senior Associate
- 08/2016 – 12/2018, Dimensional Fund Advisors, Associate

## Item 3: Disciplinary Information

Becca Whites has never been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

## Item 4: Other Business Activities

Becca Whites is not involved in any outside business activities.

## Item 5: Additional Compensation

Becca Whites does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through RWP.

## Item 6: Supervision

Sarah Ponder as Chief Compliance Officer of RWP, supervises the advisory activities of Becca Whites. Clients may contact Sarah Ponder at the phone number on this brochure supplement.

# Item 7: Requirements for State Registered Advisers

Becca Whites has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.