

Part 2A of Form ADV: Firm Brochure

Form ADV, Part 2A, Item 1

*Cover Page*



**PLATINUM PLANNING, INC.**

• REGISTERED INVESTMENT ADVISER •

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PLATINUM PLANNING, INC.

534 SOUTH PINEAPPLE AVENUE  
SARASOTA, FLORIDA 34236

Tel: (941) 444-5260

January 24, 2021

**FORM ADV PART 2  
FIRM BROCHURE**

This brochure provides information about the qualifications and business practices of Platinum Planning, Inc. If you have any questions about the contents of this brochure, please contact us at (941) 444-5260 or [rw@platinumplanninginc.com](mailto:rw@platinumplanninginc.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Platinum Planning, Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Platinum Planning, Inc. is 120213.

Platinum Planning, Inc. is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

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***Material Changes***

Platinum Planning, Inc. has had the following changes since our last annual update on January 20, 2020:

- No material changes.

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***Advisory Business***

Platinum Planning, Inc. (hereinafter referred to as "Platinum Planning") is a Registered Investment Adviser based in Sarasota, Florida, and incorporated under the laws of the State of Florida. Founded in 1999, Platinum Planning, Inc. provides investment advice and portfolio management services on a continuing basis, which may include the review of client investment objectives and goals, recommending asset allocation strategies of managed assets among investment products such as cash, stocks, options, mutual funds and bonds, exchange traded funds, annuities, and/or preparing written investment strategies. Our investment advice is tailored to meet our clients' needs and investment objectives. Clients may impose restrictions on investing in certain securities or types of securities (such as a product type, specific companies, specific sectors, etc.) by providing a signed and dated written notification, of which an e-mail is also an acceptable form of notification. If a client chooses to notify Platinum Planning, Inc. of investment restrictions via e-mail, it must be understood that Platinum Planning, Inc. will not be held responsible for the terms of the notification until Platinum Planning, Inc. acknowledges receipt of the notification by e-mail to the client. This is to prevent there being a miscommunication between the client and Platinum Planning, Inc. in an instance where an e-mail is either not received or is not seen by the staff of Platinum Planning, Inc. Should there ever be an instance where Platinum Planning, Inc. makes a transaction that is in conflict with the client's revised investment restrictions prior to receiving said notification, the staff of Platinum Planning, Inc. will consult with the client to determine the best course of action. Platinum Planning, Inc. also provides financial planning consulting services including risk assessment/management, investment planning, estate planning, financial organization, or financial decision making/negotiation.

Platinum Planning, Inc. provides investment advisory and other financial services through its Investment Advisory Representatives ("IAR") to accounts opened with Platinum Planning, Inc. Managed Accounts are available to both retail clients (for example, smaller accounts of individuals, IRAs, trusts and employee benefit plans) and institutional clients (for example, corporate pension plans, corporations and foundations). In addition, some programs will provide for the selection of specific securities to help meet the client's stated investment objectives or identifying, evaluating, and hiring independent, unaffiliated money management firms on behalf of clients.

Platinum Planning, Inc., in providing the services agreed upon with the client, may retain hereafter ("the sub-adviser"), an investment adviser registered under applicable securities laws, as a sub-adviser to manage all or a portion of the managed assets in the Client's account. If this occurs, Platinum Planning will be responsible for the continuing supervision of the Client's account, and the actions of the sub-adviser in connection with the Client's account and the managed assets. Platinum Planning also will be responsible for the payment of any advisory fee or other charges of the sub-adviser with respect to the managed assets unless or except as specifically authorized in advance by the Client. Platinum Planning agrees that upon proper notice by the Client, Platinum Planning will refrain from the appointment of, or terminate as permitted under applicable contracts, any sub-adviser appointed pursuant to this authority.

Platinum Planning, Inc. is wholly-owned by James Russell Williamson. Platinum Planning, Inc. is registered with the State of Florida and is subject to its rules and regulations.

Platinum Planning, Inc. provides discretionary and non-discretionary investment advisory services to some of its clients through various managed account programs. Platinum Planning, Inc. will assist clients in determining the suitability of the Managed Account Programs for the client. The IAR is compensated through a comprehensive single fee and the account may be assessed other charges associated with conducting a brokerage business. Platinum Planning, Inc. and its IAR, as appropriate, will be responsible for the following:

- Performing due diligence
- Recommending strategic asset and style allocations
- Providing research on investment product options, as needed
- Providing client risk profile questionnaire
- Obtaining investment advisory contract from client with required financial, risk tolerance, suitability and investment vehicle selection information for each new account
- Performing client suitability check on account documentation, review the investment objectives and evaluate the investment vehicle selections
- Providing Firm Brochure (this document)

Discretionary Assets Under Management as of January 14, 2021: \$11,169,509

Non-Discretionary Assets Under Management as of January 14, 2021: \$143,690

***Fees and Compensation***

The following types of fees will be assessed:

**Asset Management** – Fees are charged in advance and are based primarily on asset size and the level of complexity of the services provided. In individual cases, Platinum Planning has the sole discretion to negotiate fees that are lower than the standard fee shown or to waive fees. Fees are not based on the share of capital gains or capital appreciation of the funds or any portion of the funds. Comparable services for lower fees may be available from other sources. Fees for the initial quarter will be prorated based upon the number of calendar days in the calendar quarter that the advisory agreement is in effect. Fees are based on the market value of the assets on the last day of the previous quarter. Annual fees range from .5% - 3.00% depending on the amount of assets under management (“AUM”) – See chart below. Consulting services are included in these fees for asset management services with the exception of unique circumstances that may require a separate agreement for financial planning services (description and fees are discussed below). If the situation warrants separate financial planning fees, it will be discussed upfront and a separate agreement will be negotiated.

Fee Schedule for Asset Management:

Total Account Value	Maximum Annual Advisory Fee
Up to \$500,000	3.00%
\$500,001 - \$1,000,000	2.50%
\$1,000,001 - \$1,500,000	2.00%
\$1,500,001 - \$2,000,000	1.50%
\$2,000,001 - \$2,500,000	1.00%
\$2,500,001 and greater	0.50%

As authorized in the client agreement, the account custodian withdraws Platinum Planning’s advisory fees directly from the clients’ accounts according to the custodian’s policies, practices, and procedures. The custodian in turn remits these fees to Platinum Planning. The custodial statement includes the amount of any fees paid directly to Platinum Planning to manage the account. Platinum Planning also sends quarterly invoices detailing the manner and amount of advisory fees to all clients. You should compare the statement we send to your custodian/broker-dealer’s statement and verify the calculation of fees. Your custodian/broker-dealer does not verify the accuracy of fees calculations. If the account does not contain sufficient funds to pay advisory fees, Platinum Planning has limited authority to sell or redeem securities in sufficient

amounts to pay advisory fees. With the exception of IRA accounts, clients may reimburse the account for advisory fees paid to Platinum Planning.

Fees are charged in advance on a quarterly basis, meaning that advisory fees for a quarter are charged on the first day of the following quarter. Clients may terminate investment advisory services obtained from Platinum Planning, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with Platinum Planning. The client is responsible for any fees and charges incurred by the client from third parties as a result of maintaining the account such as transaction fees for any securities transactions executed and account maintenance or custodial fees. Thereafter, the client may terminate advisory services upon written notice delivered to and received by Platinum Planning. Clients who terminate investment advisory services during a quarter are charged a prorated advisory fee based on the date of Platinum Planning's receipt of client's written notice to terminate. Any earned but unpaid fees are immediately due and payable.

If we manage only mutual funds or variable contracts that are not held in your brokerage account, you may pay management fees by check directly to Platinum Planning, Inc.

**Financial Planning** – Financial planning services are charged in arrears through a fixed fee or hourly arrangement as agreed upon between the client and Platinum Planning. There will never be an instance where \$500 or more in fees is charged six or more months in advance. Hourly fees are charged when the scope of services cannot be determined or if the services are limited to one meeting. Fixed fees are quoted to the client for longer term consulting projects. Fees are negotiable and vary depending upon the complexity of the client situation and services to be provided. Hourly fees range from \$100 - \$400 per hour, depending on what is negotiated between Platinum Planning and the client. Similar financial planning services may be available elsewhere for a lower cost to the client. Fixed fees for longer-term consulting projects generally range from \$2,000 to \$20,000 per project, depending on the scope of the services to be provided. An estimate for total hours and charges is determined at the start of the advisory relationship.

Typically, clients will be invoiced monthly for all time spent by Platinum Planning as agreed upon by client or upon completion of the services if less than a month. Clients who wish to terminate the planning process prior to completion may do so with written notice. The client may obtain a refund of a pre-paid fee if the advisory contract is terminated before the end of the billing period by contacting James Russell Williamson at (941) 444-5260. Upon receipt of written notification, any earned fee will immediately become due and payable. A client may terminate an advisory agreement without being assessed any fees or expenses within five (5) days of its signing.

### **Additional Fees and Expenses**

In addition to advisory fees paid to Platinum Planning as explained above, clients may pay custodial service, account maintenance, transaction, and other fees associated with maintaining the account. These fees vary by broker and/or custodian. Clients should ask Platinum Planning for details on transaction fees or other custodial fees specific to their account, as these fees are not included in the annual advisory fee. Platinum Planning does not share any portion of such fees. Additionally, for any mutual funds purchased, the client may pay their proportionate share

of the funds' distribution, internal management, investment advisory and administrative fees. Such fees are not shared with Platinum Planning and are compensation to the fund manager. Clients are urged to read the mutual fund prospectus prior to investing.

Mutual fund companies impose internal fees and expenses on clients. These fees are in addition to the costs associated with the investment advisory services as described above. Complete details of such internal expenses are specified and disclosed in each mutual fund company's prospectus. Clients are strongly advised to review the prospectus(es) prior to investing in such securities.

Mutual funds purchased or sold in broker-dealer accounts may generate transaction fees that would not exist if the purchase or sale were made directly with the mutual fund company. Mutual funds held in broker-dealer accounts also charge management fees. These mutual fund management fees may be more or less than the mutual fund management fees charged if the client held the mutual fund directly with the mutual fund company.

Clients may purchase shares of mutual funds directly from the mutual fund issuer, its principal underwriter, or a distributor without purchasing the services of Platinum Planning or paying the advisory fee on such shares (but subject to any applicable sales charges). Certain mutual funds are offered to the public without a sales charge. In the case of mutual funds offered with a sales charge, the prevailing sales charge (as described in the mutual fund prospectus) may be more or less than the applicable advisory fee. However, clients would not receive Platinum Planning's assistance in developing an investment strategy, selecting securities, monitoring performance of the account, and making changes as necessary.

Please refer to Item 12 "Brokerage Practices" of this brochure for additional information.

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### ***Performance-Based Fees and Side-By-Side Management***

Platinum Planning, Inc. does not charge performance-based fees or participate in side-by-side management. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Performance-based fees are fees that are based on a share of capital gains or appreciation of the assets of a client. Our fees are calculated as described in Fees and Compensation section above, and are not charged on the basis of performance of your advisory account.

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### ***Types of Clients***

Platinum Planning, Inc. offers investment advisory services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations, and other business entities. There are no minimum account balances and/or fees required to manage accounts, although there is a \$2,000 minimum fee when we provide a complete financial plan.



***Methods of Analysis, Investment Strategies, and Risk of Loss***

Platinum Planning's methods of analysis and investment strategies incorporate the client's needs and investment objectives, time horizon, and risk tolerance. Platinum Planning is not bound to a specific investment strategy for the management of investment portfolios, but rather consider the risk tolerance levels pre-determined gathered at the account opening, as well as on an on-going basis. Examples of methodologies that our investment strategies may incorporate include:

**Asset Allocation** – Asset Allocation is a broad term used to define the process of selecting a mix of asset classes and the efficient allocation of capital to those assets by matching rates of return to a specified and quantifiable tolerance for risk.

**Dollar-Cost Averaging** – Dollar-cost averaging is the technique of buying a fixed dollar amount of securities at regularly scheduled intervals, regardless of the price per share. This will gradually, over time, decrease the average share price of the security. Dollar-cost averaging lessens the risk of investing a large amount in a single investment at the wrong time.

**Technical Analysis** – involves studying past price patterns and trends in the financial markets to predict the direction of both the overall market and specific stocks.

**Long-Term Purchases** – securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

**Short-Term Purchases** – securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short term price fluctuations.

Our strategies and investments may have unique and significant tax implications. Regardless of your account size or other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

Investing in securities involves risk of loss that clients should be prepared to bear. Although we manage your portfolio with strategies and in a manner consistent with your risk tolerances, there can be no guarantee that our efforts will be successful. You should be prepared to bear the risk of loss.

Since your account may allow margin transactions, we want you to understand the risks of margin transactions and recommend that you read your broker dealer's written disclosure document describing margin trading and its related risks. Some of our recommendations may include trading options. We attempt to mitigate risk through diversification, managing accounts with discipline and resisting the temptation to react to short-term market fluctuations. We encourage you to discuss any concerns you may have with us.

All investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends, and other distributions), and the loss of future earnings. These risks include market risk, interest rate risk, issuer risk, and general economic risk. Regardless of the methods of analysis or strategies suggested for your particular investment goals, you should carefully consider these risks, as they all bear risks.

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### ***Disciplinary Information***

Platinum Planning or its Principal Executive Officers have not had any reportable disclosable events in the past ten years.

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### ***Other Financial Industry Activities and Affiliations***

James R. Williamson, owner and sole IAR of Platinum Planning, is not currently registered with any broker dealer.

Neither Platinum Planning nor its representatives are registered as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

James R. Williamson is also a licensed insurance agent. From time to time, he will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Platinum Planning always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Platinum Planning in their capacity as an insurance agent. Not more than 30% of James R. Williamson's time is spent on this activity.

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### ***Code of Ethics, Participation or Interest in Client Transactions and Personal Trading***

Platinum Planning's Code of Ethics includes guidelines for professional standards of conduct for our Associated Persons. Our goal is to protect client interests at all times and to demonstrate our commitment to fiduciary duties of honesty, good faith, and fair dealing. All of Platinum Planning's Associated Persons are expected to strictly adhere to these guidelines. Persons associated with Platinum Planning are also required to report any violations to the Code of Ethics. Additionally, the firm maintains and enforces written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about our clients or client accounts by persons associated with our firm.

Platinum Planning and its employees may buy or sell securities that are also held by clients. It is the expressed policy of the advisor that no person employed by our firm purchase or sell any security prior to the transaction being implemented for an advisory account; therefore, preventing such employees from benefiting from transactions placed on behalf of the advisory clients.

The advisor may have an interest or position in a certain security, which may also be recommended to the client. As these situations may present a conflict of interest, the advisor has established the following restrictions in order to ensure its fiduciary responsibilities:

1. A director, officer or employee of the advisor shall not buy or sell a security for their personal portfolio(s) where their decision is substantially derived, in whole or part, by reason of his or her employment, unless the information is also available to the investing public. No owner/employee of Platinum Planning shall prefer their own interest to that of the client.
2. The advisor maintains a list of all securities held by the company and all directors, officers, and employees. These holdings are reviewed on a quarterly basis by the principal of the firm.
3. The advisor requires that all employees must act in accordance with all applicable Federal and State regulations governing registered investment advisors.
4. The advisor may block personal trades with those of clients but only if the clients are never at a disadvantage.

Platinum Planning's Code of Ethics is available to you upon request. You may obtain a copy of our Code of Ethics by contacting James R. Williamson at (941) 444-5260.

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### ***Brokerage Practices***

Platinum Planning, Inc. recommends the services of TradePMR, Inc. ("TradePMR"), an introducing securities broker-dealer and a member of the Financial Industry Regulatory Authority and the Securities Investor Protection Corporation. TradePMR has entered into an agreement with Wells Fargo Clearing Services, LLC (Clearing Broker) to execute and clear all transactions on a fully disclosed basis. Wells Fargo Clearing Services, LLC maintains custody of all funds and securities. We believe that TradePMR and its clearing firm, Wells Fargo Clearing Services, LLC, provide quality execution services for you at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by TradePMR and Wells Fargo Clearing Services, LLC, including the value of research provided, the firm's reputation, execution capabilities, commission rates, reporting capabilities, and responsiveness to our clients and our firm. In recognition of the value of research services and additional brokerage products and services TradePMR and Wells Fargo Clearing Services, LLC provides, you may pay higher commissions and/or trading costs than those that may be available elsewhere.

Platinum Planning, Inc. may also occasionally receive travel and related expenses for industry conferences from the sponsoring organization.

We routinely recommend that you direct our firm to execute transactions through TradePMR. As such, we may be unable to achieve the most favorable execution of your transactions and you

may pay higher brokerage commissions than you might otherwise pay through another broker-dealer that offers the same types of services.

You may direct us in writing to use a particular broker-dealer to execute some or all of the transactions for your account. If you do so, you are responsible for negotiating the terms and arrangements for the account with that broker-dealer. We may not be able to negotiate commissions, obtain volume discounts, or best execution. In addition, under these circumstances a difference in commission charges may exist between the commissions charged to clients who direct us to use a particular broker or dealer and other clients who do not direct us to use a particular broker or dealer.

Platinum Planning, Inc. does not have any soft dollar arrangements.

Platinum Planning, Inc. does not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

When Platinum Planning, Inc. buys or sells the same security for two or more clients (including our personal accounts), we may place concurrent orders to be executed together as a single “block” in order to facilitate orderly and efficient execution. Each client account will be charged or credited with the average price per unit. We receive no additional compensation or remuneration of any kind because we aggregate client transactions. No client is favored over any other client. If an order is not completely filled, it is allocated pro-rata based on an allocation statement prepared by Platinum Planning, Inc. prior to placing the order. Because of an order’s aggregation, some clients may pay higher transaction costs, or greater spreads, or receive less favorable net prices on transactions than would otherwise be the case if the order had not been aggregated. Platinum Planning, Inc. may choose to aggregate orders for its proprietary or personnel’s accounts with those of its clients. Platinum Planning, Inc. will receive no additional compensation or remuneration resulting from the aggregation of client transactions.

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### ***Review of Accounts***

Accounts are managed on a continuous basis and are reviewed at least quarterly by the Principal Executive Officer of the firm, James R. Williamson. Trades are reviewed on a daily basis. Confirmations of all buys and sells are sent to the client by the custodian, unless the client opts to suppress confirmations, if available to do so. Statements are provided to the client from the custodian at least quarterly if there is no activity, and monthly if there is activity. In addition, clients may receive a quarterly performance report. IARs may meet with clients as frequently as is agreed or as requested by the client or IAR, but will meet with the clients at least annually.

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### ***Client Referrals and Other Compensation***

Platinum Planning, Inc. does not compensate any individual or firm for client referrals.

### ***Custody***

Any investment advisor having custody or access to customer funds or securities must comply with certain rules and regulations designed to protect the clients' assets. Rule 206(4)-2 of the Investment Advisers Act of 1940 details strict requirements governing investment advisors that have "custody" over client securities or funds. With written authorization to do so, we directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities.

Platinum Planning, Inc. does not have physical custody of any client funds and/or securities. Client funds and securities will be held with a bank, broker dealer, or other independent qualified custodian. You will receive account statements from the independent, qualified custodian holding your funds at least quarterly. The account statement from your custodian will indicate the amount of advisory fees deducted from your account(s) each billing cycle. Clients should carefully review statements received from the custodian.

### ***Investment Discretion***

Before Platinum Planning, Inc. can buy or sell securities on your behalf, you must first sign our discretionary management agreement, a limited power of attorney, and/or trading authorization forms. By choosing to do so, you may grant the firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. Clients may impose limitations on discretionary authority, such as frequency of trading, restrictions on investing in certain securities or types of securities (such as a product type, specific companies, specific sectors, etc.), as well as other limitations as expressed by the client. Limitations on discretionary authority are required to be provided to the IAR in writing. Please refer to the "Advisory Business" section of this Brochure for more information on our discretionary management services.

### ***Voting Client Securities***

We do not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of common stock or mutual funds, you are responsible for exercising your right to vote as a shareholder.

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 any electronic solicitation to vote proxies.

A written copy of the proxy policies and procedures are available upon request.

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***Financial Information***

Platinum Planning, Inc. has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients nor has it been the subject of a bankruptcy proceeding. In addition, we are not required to provide financial information to our clients because we do not require or solicit the prepayment of more than \$500 six or more months in advance.

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***Requirements for State-Registered Advisers***

Principal Executive Officers and Management Persons Education and Business Background:

James Russell Williamson  
Managing Principal and CCO

**Business Background:**

Platinum Planning, Inc., President/Chief Compliance Officer/Investment Advisor  
Representative, 6/2013 – present  
Platinum Planning, Inc. Investment Advisor Representative, 3/2012 – 6/2013  
Sterling Enterprises Group, Inc., Registered Representative, 4/2011 – 1/2013  
Franklin Templeton Distributors, Wholesaler, 2006 - 2009

**Educational Background:**

Graduate Morehead State University, Bachelor of Arts.

None of the Principal Executive Officers and Management persons listed have had any complaints or any events required to be disclosed in this section.