Item 1: Cover Page

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FINANCIAL PLANNING

MainStreet Financial Planning, Inc.

A Registered Investment Adviser

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Form ADV Part 2

April 26, 2018

If you have questions about the contents of this brochure, please contact MainStreet Financial Planning, Inc. by telephone at (888) 897-6743, or by e-mail at Anna@mainstreetplanning.com. Additional information about the firm is available on the SEC's website at www.adviserinfo.sec.gov.

This brochure provides clients and prospective clients with information about MainStreet Financial Planning, Inc. and the qualifications, business practices, and nature of its services that should be carefully considered before becoming an advisory client. The contents of this brochure have not been approved or verified by the Securities and Exchange Commission (SEC) or any other state or federal authority. While the firm is an investment adviser registered in the jurisdictions of California, Maryland, Virginia, New York and the District of Columbia, such registration alone does not imply a certain level of skill or training on the part of the firm or its associated personnel.

Throughout this document, MainStreet Financial Planning, Inc. will be referred to by the following terms: "MainStreet Financial Planning," "the firm," "we," "us," or "our." The client or prospective client will be referred to those terms as well as "you," "your," etc.

Item 2: Material Changes

Since its most recent previous brochure dated March 16, 2018, our services and fee descriptions have been updated; please see Items 4 and 5. We encourage clients and prospective clients to read this document in its entirety.

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Owner/CEO/President/Chief Compliance Officer/Financial Planner/Investment Adviser Representative: Anna Sergunina 22

Vice President/Founder/Financial Planner/Investment Adviser Representative: Jim Ludwick 23

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Item 4: Advisory Business

MainStreet Financial Planning, Inc. is a registered investment adviser domiciled and registered in California. MSFP may also be registered or meet exemptions to registration in other states where it conducts business. James F. Ludwick founded the firm in 2002 and was the principal owner until 2014. Anna Sergunina, who has been an associate of the firm since 2006, became the firm's sole owner and President on January 1, 2014. Mr. Ludwick remains affiliated with the firm as its founder and Vice President.

We are a fee-only, project or hourly practice. MSFP does not sell products or manage money — we solely provide advice. We provide a wide range of comprehensive or a la carte services for individuals, families and employers including non-profit organizations. This includes financial planning, investment advice, real estate advice, insurance advice, and seminars for employees along with individual counseling sessions at the work site. Our services may be general in nature, or focused on particular areas of interest or need, depending upon each client's unique circumstances.

The firm holds itself to a *fiduciary standard*, which means MSFP and our associates will act in the utmost good faith and perform in a manner believed to be in the best interest of our clients. As investment advisers we are *legally required* to put you, the client, first. This sets us apart from investment brokers, who are held to a lower "suitability" standard and are not legally required to place their clients' interests ahead of their own, or to disclose their conflicts of interest involving their clients' transactions.

An estimated 50% of MSFP's advisory activities involve providing investment consultation with respect to client portfolios. This investment consultation does not involve continuous investment monitoring, sometimes called "investment management" or "investment supervisory services." In other words, we do not have client assets directly under our management.

Approximately 50% of the firm's efforts are oriented toward "non-securities advice." Such advice may be given on matters including:

- cash flow and debt management,
- college funding,
- retirement planning,
- military and federal benefits planning,
- estate planning,
- income real estate planning,
- tax planning,
- property and casualty insurance,
- life and disability insurance,
- health insurance, and
- long term care insurance

Initial Meeting

MSFP conducts an introductory interview with each prospective client; we call this our "Initial Meeting." During our Initial Meeting, we discuss your goals and current financial situation, our background and services, whether our services could provide you with a plan to meet your goals, and the cost of these services. This meeting will also provide you with an opportunity to ask any questions you may have of us. There is a fee for this meeting (please see **Item 5: Fees and Compensation**) that is applied to your future charges if you choose to become a client.

During or prior to the Initial Meeting, we provide each prospective client with a current ADV Part 2 Brochure (the document you're reading now) as well as our Privacy Policy. Should you wish to engage MSFP for our services, you (the client) and we (the firm) must enter into a written agreement. Once we have signed an agreement, we will obtain additional information from you or from anyone else you tell us is legally acceptable (e.g., another advisor, legal counsel, etc.). We may request this information through further discussions, financial statements and documents, questionnaires, etc. This information will help us to understand your financial need, goals, holdings, etc.

Our financial advice and/or financial plans are based upon the information disclosed by you or your legal agent, and reflect your financial situation at the time the plan is presented. In performing our services MSFP may, but is not required to, verify any information received from legal agents providing information on your behalf.

Comprehensive Financial Planning:

Our most popular model is to develop an initial financial plan over a series of 4 meetings, to include a Goals session to review budget and spending, identify financial goals; review results with the client in an Interactive session using sophisticated financial planning software; followed by a Presentation session with written recommendations in all contracted areas. In addition, we assist with implementation of recommendations and follow up to encourage completion of recommended actions. Comprehensive Financial Planning packages (described below) include Ongoing Services to further support implementation and maintenance of their plans. Ongoing Services will start following the completion of the client's Presentation.

Financial Planning and Investment Consultation Services

The firm provides financial planning and investment consultation services which may be either broad based or more narrowly focused, depending on the client's needs and wishes. Advice is rendered in the areas of cash flow and debt management, college funding, retirement planning, military and federal benefits planning, estate planning, income real estate planning, tax planning, asset allocation and investment selection, property and casualty insurance, life and disability insurance, health insurance and long-term care insurance, and other specific needs as indicated by the client. Such services typically involve providing a variety of advice or services to clients regarding the management of their financial resources, as based upon the analysis of their individual needs.

If you request that we focus our financial planning and investment consultation services only on certain areas, you must understand that you overall financial situation or needs may not be fully addressed due to the limitations you have established.

We typically employ a long-term investment perspective, unless a client specifically requests otherwise. If you engage MSFP, we may assist you in developing a portfolio we believe is appropriate given your unique investment objectives and tolerance for risk.

As a client of MSFP, you will retain absolute discretion (control) over whether and how to implement the advice we give you. You are always free to accept or reject any recommendation we make. If there is any change in your financial situation or investment objectives, you should let us know right away so that we may work with you to review and possibly revise our recommendations and stay on track with your goals.

As an investment adviser, MSFP does not provide legal or accounting advice. With your permission, however, we may work together with your other professional advisers, such as your attorney or accountant, to coordinate and implement the strategies we have agreed on. You should be aware that these other professional advisers will bill you separately for their services, and these fees will be in addition to those of MSFP. We do not share our fees with other professionals, and they don't share their fees with us.

Because the quality of our services depends on information, we need you to provide an adequate level of information and supporting documentation to us throughout the term of our engagement. This information may include the source of funds to be invested, your current and desired future income levels, evidence of your legal agent's authority to act on behalf of your account, among others. This information allows MSFP to determine the appropriateness of its financial planning and/or investment strategy.

When you engage MSFP for financial planning and investment consultation services, that engagement will conclude when we deliver the requested service (such as a financial plan.) We encourage you to engage us in the future so we may review your situation and recommend any changes needed to keep your portfolio in line with your goals. We recommend periodic reviews, and it is each client's responsibility to contact us and initiate these review meetings. Unless we have a written agreement already in place that specifically includes review and updates, it is each client's responsibility to initiate these additional services under a new or amended written agreement.

We typically meet with prospective and existing clients at our offices, or via telephone. Appointments at the home of an existing client may be available upon request and entail a fee (see **Item 5: Fees and Compensation**.)

Financial Planning and Investment Consultation Packages

MSFP offers several packages designed to meet some of the more common needs and objectives our clients may have. The client and advisor will work together to select the specific areas to cover. These areas may include, but are not limited to, the following:

● **Cash Flow and Debt Management:** We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.

● **Financial Goals:** We will help clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.

● **College Savings:** Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren (if appropriate).

● **Investment Analysis:** This may involve developing an asset allocation strategy to meet clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend.

● **Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting some variables (i.e., working longer, saving more, spending less, taking more risk with investments). If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

● **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance ("self-insuring").

● **Employee Benefits Optimization:** We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.

● **Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their "tax efficiency," with consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation. We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval or request.

● **Estate Planning:** This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with

contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

● **Business Planning:** We provide consulting services for clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.

Most popular Comprehensive Financial Planning packages (covering above outlined topics):

1. **A New Start**
2. **Starting, Growing Family**
3. **Near or Entering Retirement**

Most popular stand-alone services packages (covering above outlined topics):

4. **Topic Specific (Hourly)**
5. **Financial File Setup & Organization**
6. **Investment Manager Selection Assistance**

Topic Specific Help (Hourly)

A detailed evaluation and recommendation of a specific question such as Real Estate, College Planning, Roth IRA conversion, Home purchase, Life, Disability or Long-Term Care insurance, Investment Implementation Help, or Portfolio Analysis and Rebalance recommendations. Followed up with email summary of recommendations and 30 days free availability for questions on topics covered in the session.

Financial File Setup & Organization
A three to four-hour home/office visit to set up, organize, mark and systematize your financial records along with shredding unnecessary or outdated records.

Investment Manager Selection Assistance
Development of an Investment Policy Statement, incorporated into a Request for Proposal sent to 6-12 investment managers based upon the client's desired style(s) of management. Includes client education and interviews along with recommendations.

All Comprehensive Financial Planning engagements include enrollment in Ongoing Services after the initial plan is completed.

For new and existing clients, we also offer these packages of Ongoing Services:

"Continuous Service Silver Program" (CSS)

- Regular review of your financial plan: goals, financial profile, spending, and investments. Recalculate if necessary.

Areas where we help:

- Spending/Budgeting
- Retirement Planning
- Debt Management
- Healthcare/Employee Benefit Plans
- Life Insurance & Disability
- Property/Casualty Insurance
- College Savings
- Identity Theft/Credit Scores
- Asset Allocation/Portfolio Rebalancing
- Tax Analysis (year-end, savings, etc.)
- Estate Planning

Features:

- Two scheduled online/in-person sessions per year
- Status updates on financial goals and action steps (Accountability & Monitoring)
- Advisor Hotline – access to your advisor via e-mail/portal
- Access a CFP® Financial Advisor to answer questions and address challenges.
- Bi-monthly email alerts covering financial best practices, legislation, IRS or other events that may affect your financial plan and more.
- Quarterly Educational Bootcamp, 4 times per year *(covering topics above)* (Quarter 1- Organize; Quarter 2- Update; Quarter 3 – Review; Quarter 4 – Plan).
- Monthly Educational Webinars *(covering topics above)*
- One year subscription or addition to Money Magazine or Kiplinger Personal Finance, your choice.

Continuous Service Gold Program (CSG)

- **"Continuous Service Silver Program" (CSS) benefits, plus:**
- 2 additional quarterly online or in person sessions per year (Total 4) with your advisor to Organize, Update, Review, and Plan. Advisor will provide suggestions and written recommendations concerning all aspects of your financial plan as needed. Portfolio rebalance recommendations (duplicate statements required).
- Full time, business hours access by email or phone for questions (up to one billable hour per quarter including research time).

- Money manager/Broker or other financial institutions three-way conference call (if requested).
- Intervention assistance with bank, insurance company, credit card company, or securities custodians to help with problem resolution (one, up to one-hour intervention per year).
- Complimentary one-hour training session via phone on software, website, topic or issue to facilitate your use/knowledge (within our expertise only).
- Up to one-hour annual complimentary telephone advice for an immediate family member to include parents and children (excludes grandchildren).

"Continuous Service Bronze Program" (CSB)

- Annual check-up review of your financial plan: goals, financial profile, spending, and investments. Recalculate if necessary.

Areas where we help:

- Spending/Budgeting
- Retirement Planning
- Debt Management
- Healthcare/Employee Benefit Plans
- Life Insurance & Disability
- Property/Casualty Insurance
- College Savings
- Identity Theft/Credit Scores
- Asset Allocation/Portfolio Rebalancing
- Tax Analysis (year-end, savings, etc.)
- Estate Planning

Features:

- One scheduled online/in-person session
- Status updates on financial goals and action steps (Accountability & Monitoring)
- Access a CFP® Financial Advisor to answer questions and address challenges once a month for up to six months after the online/in-person session
- Bi-monthly email alerts covering financial best practices, legislation, IRS or other events that may affect your financial plan and more.

For businesses and employers, we offer the following packaged services:

Retirement Plan Type and Provider Selection Assistance
An evaluation of a current retirement plan provider, if there is one, and ranking and help with selection of a new provider using a proposal process.

Investment Recommendation for Retirement Plan

Evaluation of current investment choices and recommendations on new investments.

Money@Work Financial Wellness Program

Our workplace financial wellness solution is designed to help employers bring a comprehensive financial planning benefit to their employees. It is designed to help reduce employee financial stress, increase retention and productivity, and help employees get their financial house in order to benefit themselves and their families.

The Money@Work financial wellness program provides unbiased, fee-only financial planning advice, which means our planners don't sell any products or manage investments. We provide advice and a comprehensive financial plan starting with an actionable budget, emergency savings, debt pay down and retirement contribution recommendations. The advice also includes longer-term financial planning goals like saving for a house, children's education, insurance programs to manage risk, estate planning guidance and other custom financial planning goals.

The Money@Work program includes:

- Online portal
    - Online portal to keep track of all your finances
    - Spending, Income, Assets
- Education
    - Current Employee Benefits Review Webinar
    - Money Library Platform
    - Webinars, live or archived online
- Planning
    - **Annual Session with a CFP®**
    - Monitoring & Reminders – by email
- Advisor Hotline
    - Questions by email
    - Speak to a Certified Financial Planner (CFP®)

Firm Services and Limitations of Liability

MSFP will use its best judgment and good faith effort in rendering its services to its clients. Like every investment adviser, however, we cannot guarantee any particular level of account performance, or that any investment or account will be profitable over time. With all investments, past performance is not necessarily indicative of future results. Nothing within our client services agreement or this ADV Part 2 is intended to diminish in any way our fiduciary obligation to act in the client's best interest at all times. This also does not in any way limit any rights clients have under federal or state securities laws, regulations or rules.

Termination of Services

Either you or MSFP may terminate an agreement at any time by providing written notice of termination to the other party. If you verbally notify MSFP of your desire to terminate the agreement, and if you have not provided written termination notice within in two business days, we will document your termination request in our

records and provide you with written termination notice. Once a termination notice is submitted, we will no longer be responsible for monitoring your account or providing further advice or recommendations.

A new client may terminate an agreement with us without penalty or charge within five business days after the signing of the services agreement. Thereafter, we will return a *pro rata* portion of any prepaid, unearned fees no later than 30 days after we receive termination notice.

Item 5: Fees and Compensation

Initial Meetings

The firm charges a $100 fee for an initial in-person meeting with any associate. That fee is applied to contracted fees if engaged. Otherwise, this is a non-refundable meeting fee except in unusual circumstances based on our sole discretion. A signed agreement will be required at the time of payment.

Financial Planning and Investment Consultation Services

MSFP charges on a fee-only basis for financial planning and investment consultation services. Fees may be hourly or fixed as noted in this section.

Hourly fees for financial planning and investment consultation services vary by associate. Mr. Ludwick's hourly fee is $400; Ms. Sergunina's hourly fee is $400. All hourly fees are billed in quarter-hour increments with a partial increment rounded up to a whole increment. The number of hours to complete the plan will be estimated in advance in the client agreement, and will depend on the level and scope of services required.

Comprehensive Financial Planning Fees

Comprehensive Financial Planning: consists of initial deposit of $1,200 and the rest of proposed project estimate fee is due at the Presentation meeting unless otherwise specified in advance.

Fees for Financial Planning and Investment Consultation Packages

Initial Planning Package	**Fee/Fee Range**
For Individuals: Comprehensive Financial Planning	Starting at $3,000, for one year of services **Most popular packages:** 1. A New Start - $3,100* 2. Starting, Growing Family- $3,700* 3. Near or Entering Retirement- $4,300*

	*Normal complexity, beyond that billed hourly
Topic Specific Help (Hourly) Real Estate, College planning, Portfolio Assessment & Rebalance Recommendations, Buying a Home	Hourly
Financial File Setup & Organization	$375 plus $60 travel charge up to 40 miles from one of our offices. Supplies extra.
Investment Manager Selection Assistance	Starting at $1,600
Ongoing Service Planning Package	**Fee/Fee Range**
Continuous Service Silver Program (CSS)	$1,800* per year (or $450 per quarter) (for clients with more than 24 months since our last Presentation meeting there is an additional one-time fee of $800) *Normal complexity, beyond that billed hourly
Continuous Service Gold Program (CSG)	Starting at $3,300* per year (or $825 per quarter or $275 per month) (For clients with more than 24 months since our last Presentation meeting there is an additional one-time fee of $800) *Normal complexity, beyond that billed hourly
Continuous Service Bronze Program (CSB)	$1,500* per year or $125 per quarter (for clients with more than 24 months since our last Presentation meeting there is an additional one-time fee of $800) *Normal complexity, beyond that billed hourly
For Businesses: Retirement Plan Type and Provider Selection Assistance	Starting at $1600
Money@Work Financial Wellness Program	• $15 to $60 per month, per employee (depending on the group size) • Employer paid or offered as Voluntary benefit through payroll deduction

For existing clients, we may offer home appointments. The charge for this is $75 and is in addition to any other fees that would apply to the meeting.

We also may provide administrative services at the rate of $80 per hour, billed in quarter-hour increments.

Payment of Fees

Clients agree to submit the lesser of one-third of the lower end of estimated fee range or $1,200, whichever is less, upon signing of the Client Agreement. After this initial payment, clients will be billed every 30 days up to $1,200 for the remaining balance until the account is paid in full or the balance of actual fees for initial services provided will be due and payable to MSFP immediately upon presentation of recommendations. We plan on presenting these recommendations within three months or less. In no case will we charge you for work not performed more than six months in advance and will refund any fees not earned within this initial period. MSFP will invoice the client for the amount of fees for any future services performed. Payment of such invoices shall be made within twenty (20) days of the date of the invoice. Any initial non-refundable Commitment Fee ($100) paid by you will be applied to your balance.

The client agrees to pay the Continuous Services fees either up-front or by automatic payment using the Advice Pay processor system (ACH or credit card). The client agrees that the processor system may automatically charge your account each payment period (annually, quarterly, or monthly) as long as this Agreement is in effect. MSFP reserves the right to increase annual fees upon written notice to the client.

MSFP reserves the right to waive or reduce certain of its fees based on unique individual circumstances, special arrangements, pre-existing relationships or as otherwise determined by the firm principal.

A new client may terminate an agreement with the firm within five business days after the signing of the services agreement without penalty or charge. Thereafter, a *pro rata* portion of any prepaid, unearned fees will be promptly returned and not later than 30 days following receipt of termination notice.

Educational Workshops

MSFP may conduct group educational workshops for which we may impose a fee. Generally, the employer, civic or non-profit group sponsoring the workshop pays any fees charged by MSFP. In the event there is a charge to workshop attendees, however, the fee will be published on the workshop announcement or invitation.

Recommendations, Including No-Load Products

You will be responsible for paying the transactional or custodial fees assessed by the broker/dealer or custodian that holds your accounts. This includes individual retirement account (IRA) or qualified retirement plan account termination fees, if applicable. You can see these fees in the current, separate fee schedule of the selected broker/dealer or custodian.

Fees you pay to MSFP for our services are separate and distinct from any charges you may pay for mutual funds, exchange-traded funds (ETFs), exchange-traded notes (ETNs), or other similar investments. Because we are "fee-only," we do not receive so-called "trailer" or 12b-1 fees from any investment company we recommend. These companies' fees and charges are detailed in the prospectuses or product descriptions provided to you when we make a recommendation. You should read and consider these documents carefully before investing.

Specific product recommendations made by MSFP may be for "no-load" (i.e., no commission) products, if available. In some cases, such as with certain insurance products, there may not be a suitable selection of no-load products available for recommendation; in any case, we will not be paid a commission on the purchase.

For more information on MSFP's brokerage practices, please refer to Item 12 of this Brochure.

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

Our investment supervisory services fees are not based on a share of the capital gains or capital appreciation (i.e., growth in value) of the funds in a client's account (*aka* "performance-based fees"). We choose not to use a performance-based fee structure because of the potential conflict of interest this may create. Performance-based compensation can pose an incentive for an adviser to recommend an investment that may carry a higher

degree of risk to the client in order to potentially earn higher fees. Side-by-side management refers to an adviser simultaneously managing accounts that do pay performance based fees (typically, hedge funds) and those that do not; this can create potential conflicts of interest. We do not engage in side-by-side management.

Item 7: Types of Clients

MSFP provides its services to individual investors, trusts and estates, corporations and business entities. Unlike some firms, we do not require minimum income levels, dollar value of assets, or other conditions for its financial planning and investment consultation engagements.
Our most frequent client categories are newly married couples, often with small children; 50'ish couples contemplating retirement and college funding; independent women; unmarried or non-traditional couples; business owners and non-profit organizations.

We reserve the right to decline services to any prospective client for any nondiscriminatory reason.

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

Methods of Analysis

If MSFP is engaged to provide investment consultation, we will first evaluate several factors, including:

- your current financial situation,
- your current and long-term needs,
- your investment goals and objectives, and
- your tolerance for risk.

We make asset allocation and investment policy decisions based on these and other factors. We will then discuss with you how, in our best judgment, to meet your objectives while at the same time minimizing your risk exposure. To achieve this, we typically employ fundamental analyses to develop long-term investment strategies.

Recommendations we provide to you are based on publicly available reports, analysis and research materials, computerized asset allocation modeling programs, and various industry subscription services. Examples include

Morningstar; Standard & Poors; Moody's; Bloomberg; Journal of Indexes; Vanguard, Fidelity and ETF newsletters; and other providers of investment information and analysis.

We read popular newspapers like the Wall St. Journal, New York Times and Investors Business Daily to provide us immediate and in-depth analysis of the investment markets. We also read industry publications like Financial Planning, Investment Advisor, Journal of Financial Planning, Investment News, along with other financial industry association publications. We also suggest our clients read Money or Kiplinger Personal Finance magazines, like we do, as a way to keep up on many different facets of their financial lives.

Investment Strategies

We strongly believe that low cost, passive investments return the best results over time. We prefer to recommend index funds and index related Exchange Traded Funds (ETFs); however the client's expressed wishes and direction are always paramount. In situations such as a 401(k) account, where choice is limited by the plan sponsor, we recommend the most cost effective choice that captures the portion of the securities market(s) that best matches the client's goals and their other investments.

The firm's asset allocation and investment policy decisions are made, in the firm's best judgment, to help the client achieve their overall financial objectives while minimizing risk exposure. The firm believes asset allocation is a key component of investment portfolio design. The firm believes that the appropriate allocation of assets across diverse investment categories (stock vs. bond, foreign vs. domestic, large cap vs. small cap, etc.) is the primary determinant of portfolio returns and critical in the long-term success of its financial objectives, and generally employs a passive investment management strategy which is designed for investors who seek long-term, tax efficient growth while controlling risk and volatility.

Cost-efficient (passive) index funds or ETFs/ETNs may be recommended for each asset class in the allocation. Existing positions within a client account will be evaluated and may be recommended to remain when deemed appropriate. The firm will assist in rebalancing a portfolio, when engaged, in an attempt to maintain an optimal allocation while minimizing tax exposures, trading costs, etc.

Risk of Loss

While we at MSFP believe our strategies and investment selection are designed to potentially produce the highest possible return for a given level of risk, we cannot guarantee that an investment objective or planning goal will be achieved.

Some investment decisions you make based on our recommendations may result in loss, including potential loss of the original principal you invested. You must be able to bear the various risks involved in the investment of account assets, which may include market, currency, interest rate, liquidity, operational or political risk, among others.

When our research and analyses is based upon commercially available software, rating services, general market and financial information, or due diligence reviews, we are relying upon the accuracy and validity of the information we are provided by those third parties. We make reasonable effort to determine the accuracy of the information received, but we cannot predict events or which may or may not affect the advice to or investment strategy of a client account or financial plan. No one can predict future market performance, and we are no different.

When employing passive, efficient markets theory (such as that associated with efficient markets theory), an investor should consider the potential risk that their broader allocation may generate lower-than-expected returns than that from a specific asset, and that the risk on each type of asset is a deviation from the average return from the asset class. The firm believes this variance from the "expected return" is generally low under normal market conditions if the portfolio is made up of diverse, non-correlated assets.

Further, while many ETFs/ETNs are known for their potential tax-efficiency and higher "qualified dividend income" (QDI) percentages, there are certain asset classes or holding periods within an ETF/ ETN that may not benefit. Shorter holding periods and certain commodities and currencies may be considered nonqualified and the holding's QDI will be considered if tax efficiency is an important aspect of the portfolio.
Clients who desire more frequent trading strategies may experience additional transactional costs or taxable events that are likely to reduce or negate any benefit derived from shorter term investing.

Item 9: Disciplinary Information

Neither MSFP nor any of its associated personnel have been the subject of a reportable legal or disciplinary event under the Investment Advisers Act of 1940 (as amended) or similar state statute.

Item 10: Other Financial Industry Activities and Affiliations

Our firm's policies require us and our personnel to conduct business activities in a manner that avoids actual or potential conflicts of interest between the firm, employees and clients, or that may be contrary to law. Prior to and throughout an engagement, we will disclose any conflicts of interest which might compromise our impartiality or independence.

Neither MSFP nor any associate is affiliated with any broker/dealer firm.

Ms. Sergunina and Mr. Ludwick are members of the Garrett Planning Network (Garrett), an organization that assists financial planners in fee-only, financial planning practices. Garrett is not, nor believed required to be, a registered financial industry participant. The firm pays an annual membership fee to Garrett for extensive services that include their hosting training, compliance and operational support to enhance the firm's ability to provide quality service and advice to the investing public.

Investment adviser representatives of the firm may also hold individual membership or serve on boards or committees of professional industry associations or organizations such as the Financial Planning Association (FPA), the National Association of Personal Financial Planners (NAPFA), XY Planning Network, and the Certified Financial Planner Board of Standards, Inc. Generally, participation in any of these entities require membership fees to be paid, adherence to ethical guidelines, and meeting experiential and educational requirements.

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

Code of Ethics

The firm has adopted a Code of Ethics that sets forth the policies of ethical conduct for all personnel and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulation but also to take responsibility to act in an ethical and professionally responsible manner in all professional services

and activities. The firm's policies include the prohibition against insider trading, circulation of industry rumor, certain political contributions, among others.

Firm personnel that are CFP® designees also adhere to the Certified Financial Planner Board of Standards and Code of Ethics. These principles include:

Principle 1 – Integrity
An adviser will provide professional services with integrity. Integrity demands honesty and candor which must not be subordinated to personal gain and advantage. Advisers are placed by clients in positions of trust by clients, and the ultimate source of that trust is the adviser's personal integrity. Allowance can be made for innocent error and legitimate differences of opinion; but integrity cannot co-exist with deceit or subordination of one's principles.

Principle 2 – Objectivity
An adviser will provide professional services objectively. Objectivity requires intellectual honesty and impartiality. Regardless of the particular service rendered or the capacity in which an adviser functions, an adviser should protect the integrity of their work, maintain objectivity and avoid subordination of their judgment.

Principle 3 – Competence
Advisers will maintain the necessary knowledge and skill to provide professional services competently.

Competence means attaining and maintaining an adequate level of knowledge and skill, and applies that knowledge effectively in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation with other professionals is appropriate or referral to other professionals necessary. Advisers make a continuing commitment to learning and professional improvement.

Principle 4 – Fairness
Advisers will be fair and reasonable in all professional relationships. Fairness requires impartiality, intellectual honesty and disclosure of material conflict(s) of interest. It involves a subordination of one's own feelings, prejudices and desires so as to achieve a proper balance of conflicting interests. Fairness is treating others in the same fashion that you would want to be treated and is an essential trait of any professional.

Principle 5 – Confidentiality
Advisers will protect the confidentiality of all client information. Confidentiality means ensuring that information is accessible only to those authorized to have access. A relationship of trust and confidence with the client can only be built upon the understanding that the client's information will remain confidential.

Principle 6 – Professionalism
Advisers will act in a manner that demonstrates exemplary professional conduct. Professionalism requires behaving with dignity and courtesy to all who use their services, fellow professionals, and those in related professions. Advisers cooperate with fellow advisers to enhance and maintain the profession's public image and improve the quality of services.

Principle 7 – Diligence
Advisers will provide professional services diligently. Diligence is the provision of services in a reasonably prompt and thorough manner, including the proper planning for, and supervision of, the rendering of professional services.

Due to the fact that we are a small firm, it is not possible for us to segregate all organizational duties; in other words, one person may have several responsibilities. Our firm employs policies and procedures to ensure timely recordkeeping and adequate supervision. We may outsource certain functions to qualified professional services to assist in these efforts if and when necessary.

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 policy on an annual basis.

MSFP will provide of copy of its Code of Ethics to any client or prospective client upon request.

Privacy Policy Statement

At MSFP we take the privacy of our clients very seriously. All non-public, personal information exchanged between the client and the firm will be treated as confidential and will not be disclosed to third parties, except as expressly requested by the client or as required by law.

To ensure security and confidentiality, MSFP maintains physical, electronic, and procedural safeguards to protect the privacy of its clients. Identifiable information about the client or prospective client will be maintained during the span of the engagement and for the period thereafter as required by both securities industry and privacy laws. After that time, information may be destroyed per firm policy.

The firm's current privacy policy will be provided to clients under separate document at the beginning of the engagement, and annually thereafter or in advance of a policy change.

Participation or Interest in Client Transactions

Neither MSFP nor any related person are authorized to recommend to a client, or effect a transaction for a client, involving any security in which the firm or a related person has a material financial interest, such as in the capacity of an underwriter, adviser to the issuer, etc.

Additionally, employees are prohibited from borrowing from or lending to a client unless the client is an approved financial institution.

Personal Trading

MSFP and its related persons may buy or sell securities similar to those we recommend to clients for their accounts. A recommendation made to one client may be different in nature or in timing from a recommendation made to a different client. At no time will MSFP or any related party receive preferential treatment over its clients.

In an effort to reduce or eliminate certain conflicts of interest involving personal trading by MSFP personnel, our policy may require that we use lists of restricted or prohibited transactions in specific reportable securities. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in any related person's account. We maintain personal securities transaction records required by industry regulation.

Item 12: Brokerage Practices

MSFP is not affiliated with and does not maintain an ongoing agreement with a "service provider" such as a bank, custodian, or broker-dealer firm. However, several custodians including Vanguard, TD Ameritrade, T. Rowe Price and Fidelity provide us "View Only Access" of holdings as authorized by client. This access does not include the ability for our firm or any associate to make trades, effect withdrawals, or make any type of change to your account.

When engaged to provide investment consultation services, we will first offer to use the service provider with which your assets are currently maintained. Should you prefer a new service provider, our recommendation will be based on your needs, overall cost, and ease of use.

It MSFP's policy to restrict any non-cash compensation we may receive from any service provider (termed "soft dollars" in certain jurisdictions) to that which enhances our ability to render quality advice and service to all of our clients. (An example of this type of benefit would be our access to online research through the company that holds your account assets.) Although we may recommend one or more service providers to our clients, we derive no material benefit from doing so, nor do we "pay up" to receive additional services.

In light of the nature of its advisory services, MSFP believes it is not obligated to conduct "best execution" assessments of client transactions under current guidelines. We will, however, periodically conduct an assessment of any service provider it recommends, to include the range of services and capabilities, reasonableness of fees, among other factors, in comparison to other equivalent industry providers.

Referrals of Clients to Service Providers

All compensation paid to the firm is paid directly by the client and, therefore, the firm does not receive any additional compensation when a client engages a recommended service provider.

Directed Brokerage

MainStreet Financial Planning does not engage in directed brokerage involving its accounts. Due to the nature of the firm's advisory services, each client is free to use any particular service provider to execute some or all of their transactions for his or her account. Accordingly, each client is responsible for negotiating the terms and/or arrangements for the account; MSFP is not obligated to conduct due diligence, seek better execution services or prices from these broker/dealers, or aggregate client transactions for execution.

Trade Aggregation

Since we do not directly provide continuous investment supervisory services, we do not have the opportunity to aggregate trades on behalf of client accounts.

Item 13: Review of Accounts

Periodic financial check-ups or portfolio reviews are encouraged for financial planning and investment consultation clients, and it is the client's responsibility to initiate these reviews. Please review the packaged services detailed in **Item 4: Advisory Business** and the associated fees listed in **Item 5: Fees and Compensation.**

Item 14: Client Referrals and Other Compensation

MSFP does not engage in "solicitation" activities as defined by Rule 206(4)-3 of the Investment Advisers Act of 1940 (as amended), or similar state statute. We also do not pay a direct or indirect fee for referrals.

As earlier stated, MSFP and associated personnel may be members of the Garrett Planning Network, FPA, NAPFA, XY Planning Network, and the Certified Financial Planning Board of Standards, Inc. These associations may provide search tool on their websites that allow interested parties and prospective clients to search for participant firms (such as MSFP) or individual financial planners within a selected state or region. These search tools may include advisory firm or individual financial planner contact information, and these passive websites may also provide means for interested persons to contact a firm or planner via electronic mail or telephone number so that the interested person may interview the participant firm or planner. Members of the public may also choose to telephone an association's staff to inquire about a firm or individual planner within their area, and would receive the same or similar information.

Prospective clients locating MSFP or an individual associate via these websites are not actively marketed, nor do they pay more for their services than another client who may be referred in another fashion, such as a personal referral. We do not pay for prospective client referrals, nor do we have a fee-sharing arrangement reflective of a solicitor engagement.[1]

Item 15: Custody

Our clients' funds and securities are maintained by unaffiliated, qualified custodians such as banks, broker-dealers, mutual fund companies, or transfer agents. MSFP does not and will not take custody of clients' funds or securities.

In keeping with our policy of not accepting custody:

- Our firm's policies restrict MSFP and our associated persons from acting as trustee for or having full power of attorney over a client account.
- Firm fees are not to be collected for its services to be performed more than six months in advance *and* in excess of $500.
- At no time will a firm employee be authorized to have knowledge of a client's account access information (i.e., online 401(k), personal brokerage, or bank accounts), even for the client's convenience.

[1] *The firm believes this arrangement is in consonance with SEC No-Action Letter No. 1251421 in its response to the National Football League Players Association.*

You will receive transaction confirmations and account statements directly from your selected service provider. Typically, these statements are provided on a monthly or quarterly basis, or as transactions occur. These statements and confirmations are not generated or distributed by MSFP. Clients should always review these account statements and confirmations carefully.

MSFP may periodically provide you with "snapshots" or other reports that contain investment performance information. It is important for you to understand that these are not the same as the official account statements and trade confirmations provided by your account custodian. You should compare the account statements received from your service provider with any report you receive from us.

Item 16: Investment Discretion

MainStreet Financial Planning does not directly provide continuous investment management or investment supervisory services, nor does it engage in discretionary trading within a client account.

Item 17: Voting Client Securities

Proxy Voting

Clients will receive information regarding the voting of proxies directly from their service provider. MSFP does not vote client proxies. Clients maintain exclusive responsibility for directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted as well as making all other elections relative to mergers, acquisitions, tender offers or other events pertaining to the client's investment assets.

Other Corporate Actions

MSFP will have no power, authority, responsibility, or obligation to take any action with regard to any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise or monitor class action or other litigation involving client assets.

Firm's Receipt of Materials

If we receive correspondence for a client relating to the voting of their securities, class action litigation, or other corporate actions, we will typically forward the correspondence to the client or, at the client's direction, to another party such as his or her attorney.

Item 18: Financial Information

The firm has not been the subject of any bankruptcy petition at any time.

Due to the nature of the firm's services, an audited balance sheet is not required nor included in this disclosure. No further material financial information is required.

Item 19: Requirements for State-Registered Advisers (Advisory Personnel Information)

Owner/CEO/President/Chief Compliance Officer/Financial Planner/Investment Adviser Representative: Anna Sergunina

Anna Sergunina, CFP,®[1] ChFEBC℠ [2]

Year of Birth: 1983

Educational Background and Business Experience

Education:
B.S. in Finance, Towson University, Maryland

CERTIFIED FINANCIAL PLANNER™ (CFP®) Designation[1]

Chartered Federal Employee Benefits Consultant (ChFEBC) Designation[2]

Experience:
President, CEO, Chief Compliance Officer, Financial Planner: MainStreet Financial Planning, Inc., Burlingame, CA 01/2014 - Present

Vice President, Financial Planner: MainStreet Financial Planning, Inc., Odenton, MD 07/2006 - 01/2014

Sales Assistant: Alliance Benefit Group, Baltimore, MD 01/2006 – 06/2006

Ambassador: College Savings Plans of Maryland, Baltimore, MD, 10/2007 – 6/2010

Financial Intern: Salomon Smith Barney, Baltimore, MD, 1/2004 – 10/2004

Disciplinary Information	Other Business Activities
None	None

Additional Compensation

Firm employees do not accept or receive additional economic benefit (i.e., sales awards or other prizes) for providing advisory services to its clients.

Supervision

Ms. Sergunina serves in multiple capacities including investment adviser representative, President, and Chief Compliance Officer; she is responsible for supervision of the firm's other associates. The firm recognizes the inherent conflict involved in personnel serving in various positions; to address this conflict, the firm may engage the services of outside entities when appropriate to ensure it meets its oversight obligations and carries out its stated policies and procedures.

Questions about this document or other matters may be directed to Ms. Sergunina at (888) 897-6743.

Vice President/Founder/Financial Planner/Investment Adviser Representative: Jim Ludwick

James F. Ludwick, CFP®

Year of Birth: 1946

Educational Background and Business Experience

Education:
B.S., University of Arizona

M.S., Troy State University, M.S.

M.H.A., University of Minnesota

CERTIFIED FINANCIAL PLANNER™ (CFP®) Designation[1]

Experience:
Vice President, Founding Financial Planner: MainStreet Financial Planning, Inc., Odenton, MD 10/2002 - Present

Regional Vice-President, Mid-Atlantic States Investment Management Sales and Service: Fisher Investments, Inc., Woodside, California 02/2001 to 10/2002

Vice President, Investment Counselor, Trust Division: City National Bank, Beverly Hills, California 12/1998 to 02/2001

Vice President, Private Banking, Investment Management & Trust Services: Bank of America, Santa Barbara, California 09/1996 to 10/1998

Disciplinary Information

None

Additional Compensation

Firm employees do not accept or receive additional economic benefit (i.e., sales awards or other prizes) for providing advisory services to its clients.

Supervision

Mr. Ludwick is supervised by Anna Sergunina, the firm's owner, President, and Chief Compliance Officer, who can be reached at (888) 897-6743.

Financial Planner/Investment Adviser Representative: Elizabeth Grace Gillette

Elizabeth Grace Gillette

Year of Birth: 1987

Educational Background and Business Experience

Education:
B.S. in Business Administration - The George Washington University, Washington, DC
Certificate in Financial Planning – Northwestern University, Evanston, IL

Experience:
MainStreet Financial Planning, Inc. (3/2018 – Present)
Odenton, MD
Associate Financial Planner/Investment Advisor Representative

Lifetime Wealth Planning & Management, LLC (6/2013 - 3/2018)
National Harbor, MD
Associate Financial Planner / Director of Client Services

The CSI Companies (6/2009 - 6/2013)
Jacksonville, FL
Regional Business Development Manager

Disciplinary Information

Registered investment advisers are required to disclose certain material facts regarding any legal or disciplinary events that would be material to your evaluation of each officer or a supervised person providing investment advice. No reportable information is applicable to this section for Mrs. Gillette

Other Business Activities

None

Additional Compensation

Firm employees do not accept or receive additional economic benefit (i.e., sales awards or other prizes) for providing advisory services to its clients.

Supervision

Mrs. Gillette is supervised by Anna Sergunina, the firm's owner, President, and Chief Compliance Officer.

Questions relative to the firm, staff, its services, or this ADV Part 2 may be made to the attention of Mrs. Sergunina at (410) 695-1556.

Additional information about the firm, other advisory firms, or an associated representative is available at www.adviserinfo.sec.gov. A search for firms or associated personnel can be accomplished by name or firm identifier, known as an IARD number. The IARD number for MainStreet Financial Planning, Inc. is 123189.

About Professional Designations

[1]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.

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.

[2] A **ChFEBC℠ (Chartered Federal Employee Benefits Consultant)** is a prestigious designation for Financial Advisors, CPAs, Attorneys, and certain employees of the Federal Government, who have successfully completed an intensive training course and passed a rigorous examination covering all federal employee benefits. The training consists of a 16 module assignment curriculum. The ChFEBC℠ course covers all federal employee benefits including:

- CSRS and FERS annuities (pensions)
- Health Insurance
- Social Security
- Life Insurance
- and much more

This designation requires an annual examination on federal benefits and ten (10) hours of continuing education on federal benefits every two years.