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Form ADV Part 2A - Firm Brochure

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

Dated December 21, 2020

This brochure provides information about the qualifications and business practices of Create, LLC, who acts as a fiduciary and is a fee only financial planning firm. If you have any questions about the content of this firm brochure, please contact Ms. Lindy Venustus, CFP® at (612) 401-9755.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or any state securities administrator.

Additional information about Create, LLC is available on the SEC website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Click on the "Investment Adviser Search" link and then search for "Investment Adviser Firm" using Create, LLC's IARD identification number, which is 309648.

While the firm and its associates may be registered and/or licensed within a particular jurisdiction, that registration and/or licensing in itself does not imply an endorsement by any regulatory authority, nor does it imply a certain level of skill or training on the part of the firm or its associated personnel.

Item 1: Cover Page

## Item 2: Material Changes

Since the last annual amendment filing of this Form ADV Part 2, dated November 5, 2020, the following material changes have occurred:

- Item 3, Page 3: Update page number on Table of Contents due to following changes
- Item 4, Page 8: Pricing removed from CREATE Process description
- Item 4, Page 9: One Act Play initial fee lowered from \$499.50 to \$250
- Item 4, Page 9: Update to Advisory Business Wrap Fee. Create, LLC does not charge a Wrap Fee, but Betterment for Advisors does for the collection of their fees and to compensate Advisors.
- Item 5, Page 11: Add updated Client Service Models and Billing Structure
- Item 5, Page 12: Lower fees on sliding scale for clients with income lower than \$85,000
- Item 5, Page 14: Portfolio Management Service Fee at Betterment Investment Co changed from quarterly to monthly
- Item 5, Pages 14: More information on Betterment fees and Advisor compensation
- Item 4, Page 14: Add Betterment fees to graph: AUM Fee Examples
- Item 10, Page 21-22: Added potential conflict of interest related to Betterment Securities
- Item 12, Page 25: Additional information about Betterment Brokerage Services execution of securities transaction
- Item 15, Page 27: Update on Betterment Custody Services
- Item 16, Page 29-30: Update on Betterment's Investment Discretion
- Item 17, Page 30: Update of Voting Client Securities
- Item 19, Page 33: Outside Business Activity - Remove US Census 2020, add BakerTilly Tax Prep
- ADV Part 2B, Page 37, Part 4: OBA – Remove US Census 2020, add BakerTilly Tax Prep

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations, and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each client annually, and if a material change occurs in the business practices of Create, LLC, each client will either be sent a copy of Create's updated brochure or provided with a summary of material changes to its brochure along with an offer to send an electronic or hard copy form of the updated brochure.

At any time, you may view and download the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at <http://www.adviserinfo.sec.gov> by searching for our firm name or by our CRD number 309648 or you may contact Ms. Venustus at Create, LLC at (612) 401-9755 to request a copy at any time.

As with all firm documents, clients and prospective clients are encouraged to read this brochure in its entirety and are encouraged to ask questions at any time prior to or throughout the engagement

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## Item 4: Advisory Business

### Description of Advisory Firm

Create, LLC is registered as an Investment Advisor with the State of MN. We were founded in January 2020. We may operate under the assumed names of Create Financial Planning, Create Planning and CreateFP. We are not a subsidiary of, nor do we control another financial services industry entity. Our firm and its associates may register or meet certain exemptions to registration and/or licensing in other jurisdictions in which we conduct investment advisory business.

Ms. Lindy Venustus, CFP® is the firm's Founder, Managing Member, Chief Compliance Officer, and only/Principal Owner of Create, LLC. Additional information about Ms. Lindy Venustus may be found in the accompanying Form ADV Part 2B brochure supplement.

Create currently reports \$0 in discretionary and nondiscretionary Assets Under Management, as of December 21, 2020.

### Types of Advisory Services

#### Investment Portfolio Management and Socially Responsible Investing Services

Create, LLC through personal discussion in which your goals and objectives based on your individual circumstances are established will develop your Personal Investment Policy Statement or investment plan with an asset allocation target. During our Canvas and Realism conversations we determine your individual objectives, time horizons, and liquidity needs. We may also review and discuss your prior investment history, as well as business and family goals, commitments, and history.

Create, LLC offers investment advisory services through the use of Betterment, LLC ("Betterment") for portfolio management services. We assist you in choosing your comfortable risk tolerance and allocation model, completing Betterment's investor profile questionnaire, interacting with Betterment, and reviewing Betterment.

Betterment offers socially responsible investing (SRI) in addition to the usual investment options. SRI is an approach to investing that reduces exposure to companies that are deemed to have a negative social impact, for example companies that profit from poor labor standards or environmental devastation. Betterment's SRI model focuses on investing in companies that are deemed to have a positive social impact, for example companies that foster inclusive workplaces or commit to environmentally sustainable practices.

The Betterment SRI portfolio strategy aims to maintain the diversified, low-fee approach of Betterment's core portfolio while increasing investments in companies that meet SRI criteria.

Create, LLC will meet with each client on a periodic basis to discuss changes in your personal or financial situation, suitability of investments, and any new or revised restrictions to be applied to the account. Fees pertaining to this service are outlined in Item 5 of this brochure.

#### Comprehensive Financial Planning Services

This service involves working one-on-one with a planner over an extended period of time. By paying an annual fee broken into monthly retainers you have continuous access to a planner who will work with you on a broad range of financial planning areas based on your goals. Your advisor will design a plan tailored to you that may include elements of our *comprehensive financial planning services* called the

CREATE Process (outlined in Item 5), such as: business planning, cash flow and debt management including separation of business and personal assets, life events, short, medium, and long term financial goal planning, education planning, retirement planning, Social Security planning, insurance and risk management review, employer and employee benefits, age in place planning, estate planning, charitable gifting, tax planning, as well as investment consultation.

The incorporation of most or all of the listed components allows for not only a more thorough analysis but also an in-depth view of your plans to assist you in reaching your specific goals and objectives.

Upon both Create, LLC and the client indicating and approving of moving forward with a comprehensive plan, you will be taken through a process of defining and sharing your goals and values around money. Financial planning is a comprehensive evaluation of your current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information and analysis will be considered as they affect and are affected by your entire financial and life situation.

If you are a personal financial planning client and married, Create Financial Planning requests that both spouses participate in the financial planning process and periodic reviews.

Clients will be asked to share information to help the planner complete the comprehensive financial plan. Once your information is reviewed, your plan will be built and analyzed, and then the findings, analysis and potential changes to your current situation will be reviewed with you. Clients purchasing this service will receive a written or an electronic report, providing you with a detailed financial plan designed to achieve your stated financial goals and objectives. If a follow up meeting is required, we will meet via phone or online at your convenience, by appointment. The plan and your financial situation and goals will be monitored throughout the year and follow-up phone calls and emails will be made to you to confirm that any agreed upon action steps have been completed. On an annual basis, through periodic review, there will be a full review of this plan to ensure its accuracy and ongoing appropriateness. Any needed updates will be implemented at that time.

In general, the financial plan will address any or all of the following areas of concern. You and your advisor will work together to select the specific areas to cover. These areas may include, but are not limited to, the following:

- **Business Planning:** We provide consulting services for clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.
- **Wealth Planning:** Including estate, tax, philanthropic, asset protections, business planning and educating the next generations. We will work in coordination with your CPA, estate attorney, and insurance professional or make referrals. From time-to-time, we will participate in meetings or phone calls between you and your affiliated professionals with your prior approval or request.
- **Family Governance:** With your approval and authorization, at your request we will prepare for and facilitate family meetings to make sure that all generations understand your philosophy, goals, and values. We will document and implement the action items we are responsible for resulting from those meetings and send meeting notes to you, along with next steps. We will initiate strategic planning for your beneficiaries. We believe in a multi-generational approach

and would like all generations of your family to share a family philosophy and a family goal. We believe in keeping families in harmony for generations.

- **Cash Flow and Debt Management - Business and Personal:** We conduct a review of your income and expenses to determine 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 debt priority 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. We will also make recommendations and help with implementation of establishing separate accounts for business and personal cash flows.
- **Life Events:** As part of the comprehensive financial plan we discuss your current situation and goals relating to starting a business, adding a business partner, transition of your business, saving for and planning a wedding, property purchases and sales, the addition to your family, a divorce, a change in health or capacity, aging in place, loss of a loved one, and inheritance. We will help you identify your options, potential benefits and drawbacks, next steps, what resources you will need, and be empathetic while holding you accountable.
- **Short, Medium, and Long-Term Financial Goal Planning:** We will help you identify and prioritize 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 to allocate for each of your goals.
- **Education Planning:** Includes projecting the amount that will be needed to achieve a private education, college, or other post-secondary education funding goal, along with advice on ways to save the desired amount and the “pros-and-cons” of various savings vehicles available. 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).
- **Retirement Planning:** Typically includes projections showing the likelihood of reaching your financial goals, with financial independence usually the primary objective. For situations where projections show results that are below the desired results, a recommendation may include showing you the impact on those projections of making changes to different variables (for example; working longer, working part time, saving more, spending less, taking more risk with investments, goal prioritization). If you are near retirement or already retired, advice may be given on distribution strategies to minimize the likelihood of running out of money or having to lower spending during your retirement years.
- **Social Security Planning:** Based on your attitudes, work situation, personal health, and family longevity, we help to identify your cash flow needs as well as the claiming strategies available to you based on your age and marital status. We will discuss how different scenarios impact the Social Security Benefit expected and include it as a part of the comprehensive financial plan so you can make an informed decision on when to begin claiming Social Security.
- **Insurance and Risk Management Review:** We will review existing policies and may ask you to assist us in obtaining the most accurate information to ensure the correct coverage for business liability, errors and omissions, life, health, disability, long term care, personal liability, home, auto, and other property insurance. 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”). We may offer to refer (an) insurance specialist(s) in your area of need if you are not acquainted with one.

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

- **Charitable Gifting:** Includes strategies for gifting to family and not for profit organizations during life as well as after, coordinating charitable distributions of retirement savings, and funding of trusts. Charitable gifting may be a part of the Family Governance, Estate Planning, and/or Tax Planning Process.
- **Tax Planning:** 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 for 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 if you wish.

- **Investment Consultation:** Our investment consultation services may involve providing information on the types of investment accounts available, employer and employee retirement plans and/or stock options, investment analysis and strategies, asset selection and portfolio design, as well as assisting you with setting up your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.
- **Periodic Review:** Create encourages our clients to notify us and to schedule a review any time there is a change in your circumstances. An annual review should be considered even if you do not experience a substantial change; because tax laws, estate laws, and investment vehicles are subject to change. Additional information may be found in Item 13 of this brochure.

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

We offer the same suite of services to all of our clients. However, individual financial plans and their implementation are dependent upon your unique Investment Policy Statement which outlines your current individual situation (income, tax levels, and risk tolerance) and it is used to create a tailored plan specifically to aid in the selection of a portfolio that matches your restrictions, needs, and targets.

#### **Broad-Based (CREATE Process) vs. Modular (One Act Play) Financial Planning**

**CREATE Process:** Comprehensive Financial Planning & Investment Management

To build your initial plan, and potentially for periodic reviews, the CREATE Financial Planning Process takes your advisor ten to 80 hours of skilled advisor planning time, working independently on your behalf, between your Canvas and Expression conversations, before your tailored plan is prepared.

- **Canvas** - 15-minute initial get to know each other phone or video conversation
- **Realism** - 60-90-minute Initial Discovery Meeting via video conferencing; talk in depth about your financial goals and most pressing financial concerns. After this meeting your planner will work on your plan independently and may contact you with follow up questions.
- **Expression** - 60-minute Plan Presentation and Recommendations Meeting via video conferencing, usually two to four weeks after the Realism Meeting, which includes:
  - An easy to read summary of your current net worth, goals, action items, and more.
  - Recommendations in the following areas: business vs personal cash flow, savings targets, debt repayments, investment goals, education planning, retirement planning, Social Security planning, insurance, estate planning, and tax planning.
- **Action** - 30-minute phone or video meeting to help put your recommendations in place
- **Texture** - 15 - 60 minute follow up meeting via phone or video conferencing every three to six months, or as major life events come up, to check your progress.
- **Encore** - 60 minutes via video conferencing for your annual customized plan and goal review.
- **Unlimited email support\*** - During office hours while not in another meeting.
  - \* Two weeks from date of completion for hourly only clients.
- **Budget meetings upon request** - Some clients like this support monthly.

#### Engagement with Create Financial Planning

During or prior to your first meeting with Create Financial Planning you will be provided with a current Form ADV Part 2 firm brochure that includes a statement with regard to our privacy policy (found in Item 11). We will also ensure that we disclose any material conflicts of interest that could be reasonably expected to impair the rendering of unbiased and objective advice.

Should you wish to engage Create Financial Planning for its advisory services, you must first enter into a written agreement with Create. Thereafter, discussion and analysis will be conducted to determine your financial needs, goals, holdings, etc. Depending on the scope of the engagement, you may be asked to provide information about your lifestyle, goals, and cash flow as well as prior and current copies of the following documents early in the process, for annual reviews, or major life changes:

- Wills, codicils, and trusts
- Divorce decree
- Insurance policies
- Mortgage information
- Financial data that may include tax returns, schedules, W-2s, or 1099s and/or pay stubs
- Information on retirement plans and benefits
- Statements reflecting current investments in retirement and non-retirement accounts
- Employment or other business agreements you may have in place
- Credit card balances, interest rates, minimum payments, credit scores and reports
- Student loan documents
- Auto, home loans, HELOCs, and other liabilities
- Social Security Benefit reports
- Completed risk profile questionnaires or other forms provided by our firm

It is important that the information and/or financial statements you share are accurate. Our firm may, but is not obligated to, verify the information you have provided, which will then be used in the



investment advisory process. It is also necessary that you provide us with an adequate level of information and supporting documentation throughout the term of the engagement including, but not limited to: source of funds, income levels, and an account holder or their legal agent's authority to act on behalf of the account, among other information. This helps us determine the appropriateness of our planning and/or investment strategies for your portfolio. It is also very important that you keep us informed of significant changes that may call for an update to your investment plans. Events such as changes in employment or marital status, an unplanned windfall, etc., can have an impact on your circumstances and needs. We need to be aware of such events, so that we may make adjustments as necessary in order to keep you on track toward your goals.

### **The One Act Play:** Planning around a specific financial issue

The One Act Play is an entry level financial planning process designed to get you started with just the basics or address a topic specific issue. The One Act Play is meant for those with little to no experience with financial planning or who are looking for financial education about a specific issue such as debt or budget management, a first time property purchase, marriage planning, education funding, or a Social Security Strategy; this package will get you started on the right financial footing and will provide:

- A 15-minute complimentary get to know you Canvas conversation.
- A 60-minute Realism meeting where we will discuss your goals, specific money questions, current financial status (including net worth, income, expenses and debts) along with recommendations for steps. \$250.00 due at this meeting.
- A 60-minute Expression meeting, if necessary, usually held two to four weeks after the Realism meeting, which includes; recommendations and targeted actions. Time for preparation and presentation will be agreed upon in advance and billed at \$250 an hour at the beginning of this meeting. If the engagement is cancelled prior to the Expression meeting, an invoice will be sent for the time worked, and any substantial planning elements will be shared when paid.
- A follow-up email delivering a summary of our call and action checklist for you to implement.
- 13 days of email access from the date of receiving your recommendations for questions that arise in conjunction to the topic or situation addressed during our call (within reason, please).

If the service you choose focuses only on a certain area of interest or need, your overall situation or needs may not be fully addressed due to the limitations you have established by choosing a limited scope of service. In all instances involving our financial planning our clients retain full discretion over all implementation decisions and are able to accept or reject any recommendation we make.

### **Wrap Fee Programs**

Create does not participate in wrap fee programs. Betterment charges Clients an asset-based wrap fee on amounts invested via the Betterment for Advisors platform that is tiered based on the aggregate balance of all of your firm's client accounts at Betterment (not including funds held in Betterment Everyday Cash Reserve). That wrap fee currently ranges from 0.12% to 0.20% of account balances. The XYPN – Betterment negotiated fee is 0.15%. The asset-based wrap fee is charged monthly in arrears. The services included for the wrap fee include all of the services provided by Betterment and Betterment Securities through the Betterment for Advisors platform, including advisory services, custody of assets, execution and clearing of transactions, and account reporting. Betterment collects wrap fees directly from Clients pursuant to the terms of the sub-advisory agreement between Betterment and each Client. Clients utilizing the Betterment for Advisors platform may pay a higher aggregate fee than if the advisory, custodial, trade execution, and other services were purchased separately. Advisors (e.g.,

Create, LLC) in the XYPN community with clients on this pricing structure typically also pay a fixed monthly fee of \$100 to Betterment, this is the Advisor's responsibility and not passed onto the client.

#### **CCR Section 260.235.2 Disclosure**

For Clients who receive our Financial Planning services, we must state when a conflict exists between the interests of our firm and the interests of our client. The client is under no obligation to act upon our recommendations. If the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through our firm.

#### **Client Assets Under Management**

Create, LLC was newly organized in January 2020 and was organized with no reportable client assets under our management via discretionary or nondiscretionary engagements.

#### **General Information**

Create Financial Planning does not provide legal, accounting, or insurance services. With your consent, we may work with other professional advisors such as an accountant, attorney, or an insurance representative to assist with coordination and implementation of accepted strategies. You should be aware that these other entities will charge you separately for their services and these fees will be in addition to our fee.

Our firm will use its best judgement and good faith effort in rendering its services. Create cannot warrant or guarantee the achievement of a planning goal or any particular level or account performance or that your account(s) will be profitable over time. Past performance is not necessarily indicative of future results.

Except as may otherwise be provided by law, our firm will not be liable to the client, heirs, or assignees for any loss an account may suffer by reason of an investment decision made or other action taken or omitted in good faith by our firm with that degree of care, skill, prudence, and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; any loss arising from our adherence to your direction or that of your legal agent; or any act or failure to act by a service provider maintaining an account. Federal and state securities laws impose liabilities under certain circumstances on persons who act in good faith and, therefore, nothing contained in this document or our client engagement agreement shall constitute a waiver of any rights that a client may have under federal and state securities laws.

## **Item 5: Fees and Compensation**

#### **Ongoing Financial Planning**

All fees are due upon engagement; however, we will not bill an amount above \$500.00 more than six months in advance of the delivery of your financial plan. Payment is made through a third-party payment processor such as AdvicePay, QuickBooks Online (Intuit Payment Network) and/or PayPal. In the event of early termination, you will be billed for at a rate of \$250.00 per hour worked and be refunded the difference if any. Keep in mind, the base planning fee is \$600, and most plans take more than three hours to prepare; early termination and not enrolling in ongoing financial planning may result in expenses greater than \$600. Fees are negotiable.

Ongoing Financial Planning consists of an upfront charge that varies depending on the service model you choose. Please refer to [www.CreateFP.com](http://www.CreateFP.com) or this section for pricing and choose your service model

prior to our Canvas introduction meeting. Payment will be billed at the Realism – Discovery Meeting. The upfront portion of the Ongoing Financial Planning fee is for client onboarding, data gathering, and setting the basis for the financial plan. This work will commence immediately after the fee is paid for the Realism - Discovery meeting and will be completed within the first 30 days of the date the fee is paid. Therefore, the upfront portion of the fee will not be paid more than 6 months in advance.

Ongoing Financial Planning fees are payable monthly in arrears four weeks after the Expression meeting and presentation and/or delivery of your financial plan. No increase in the annual fee shall be effective without your agreement by signing a new agreement or amendment to your current agreement. This service may be terminated with 28 days’ notice. Since fees are paid in arrears, no rebate will be needed upon termination of the agreement.

### Create Financial Planning: Client Service Models and Billing Structure

Elements	One Act Play	Clay	Masters <i>Most Popular</i>	Ovation
	Cash-Flow Focus	Start to Save Pay Down Debt	Grow Savings and Create Your Future	Income and Legacy Planning
	<b>\$250 / hour</b>	<b>\$100 / month</b>	<b>\$200 / month</b>	<b>\$300 / month</b>
		\$600 Upfront	\$1,200 Upfront	\$1,800 Upfront
	Billed in 15 minute increments	+ 0.30% of investments we manage	+ 0.30% of investments we manage	+ 0.30% of investments we manage
	<b>Get Started</b>	<b>Get Started</b>	<b>Get Started</b>	<b>Get Started</b>
Reviews Per Year	Email support for 2 weeks after project	Zoom Annual Review + Monthly Check In	Zoom Annual Review + Quarterly Check In	Zoom Quarterly Review + Monthly Check In
Goal Planning / Budgeting	✓	✓	✓	✓
Saving Strategy	✓	✓	✓	✓
Debt Strategy	✓	✓	✓	✓
Home Buying Consultation		✓	✓	✓
Investment Risk Analysis		✓	✓	✓
Investment Management		✓	✓	✓
Family Meeting			✓	✓
Estate Planning Coordination			✓	✓
Risk Management Coordination			✓	✓
Education Planning			✓	✓
Employer and Employee Benefits			✓	✓
Business Planning			✓	✓
Rental Real Estate Analysis				✓ Up to 3 Properties
Tax Strategy				✓
Charitable Gifting				✓
Pension Benefit Strategy				✓
Social Security Planning				✓
Income Planning				✓

### Financial Planning Fixed and Sliding Scale Fees – Households with under \$85,000 Gross Annual Income

The ongoing annual fee which is paid in monthly installments will be equal to 2% of household gross income with a minimum annual fee of \$900. The fee includes ongoing financial planning and is in addition to the Realism and Expression meeting fees and in addition to portfolio management fees (as outlined in Portfolio Management Fees later in this section).

This comprehensive service and its fee arrangement are intended to provide flexibility for clients in various financial stages and to align their overall wealth goals with the advisor while removing any biases towards the form or fashion of their wealth.

Our services typically begin via a financial planning engagement so that each of our clients has a foundation: a personalized plan that includes stated goals and objectives. This service is offered on a fixed fee basis of \$600 per plan which may be paid in one or two payments: in full or in part at the Realism - Discovery Meeting, and the remainder at the Expression - Plan Delivery Meeting. Additionally, this service requires a twelve-month contract, with an annual fee, which is paid monthly.

Realism: Discovery Meeting / Set Up Fee	Expression: Initial Plan Delivery	Yearly Fee: Equal to 2% Household Gross Income	Yearly Fee: Paid Monthly
\$600 (may pay ½ now, ½ later)	Remainder of \$600	\$900 - \$1,200	\$75 - \$100

All fees are due upon engagement; however, we will not bill an amount above \$500.00 more than six months in advance of the delivery of your financial plan. Payment is made through a third-party payment processor such as AdvicePay, QuickBooks Online (Intuit Payment Network) and/or PayPal. In the event of early termination, you will be billed for at a rate of \$250.00 per hour worked and be refunded the difference if any. Keep in mind, the base planning fee is \$600, and most plans take more than three hours to prepare; early termination and not enrolling in ongoing financial planning may result in expenses greater than \$600.

Fees for our planning services and ongoing support take into consideration factors such as the complexity of your financial profile; the time involved developing your plan and assisting you in its execution, assets and number of individual accounts that make up your overall portfolio.

### Project-Based Financial Planning – The One Act Play

Financial Planning may be offered on a one-time project basis, The One Act Play, for a fixed fee. The fixed fee will be agreed upon before the start of any work and will be \$250 per hour. The fixed fee can range between \$600 and \$10,000. Fees are negotiable.

If a fixed fee program is chosen, we will agree in advance that either \$600 or half of the fee is due at the beginning of the process and the remainder is due at the beginning of the Expression Meeting upon completion of work, however, Create will not bill an amount above \$500.00 more than 6 months in advance.

Fees for this service may be paid through AdvicePay, QuickBooks Online (Intuit Payment Network) and/or PayPal. In the event of early termination any prepaid but unearned fees will be refunded to the client and any completed deliverables of the project will be provided to the client and no further fees will be charged.

### Hourly Financial Planning

In special circumstances and on a limited basis, financial planning may be offered on an hourly fee basis. This is typically for those clients requiring a narrowly focused plan, incidental advice, a second opinion, or an abbreviated planning session. The hourly rate is \$250.00 per hour, billed in 15 minute increments, and a partial increment will be treated as a whole increment. Fees may be negotiable. Prior to the engagement you will receive an estimate of the overall cost based on your requirements and the time involved. The fee is due at the completion of the engagement, at the beginning of the Expression Meeting. In the event of early termination by client, any fees for the hours already worked will be due and any work completed will be shared at the receipt of payment if the client requests it at the time of early termination.

### Discounting Fees

The services to be provided to you and their specific fees will be detailed in your engagement agreement. We strive to offer fees that are fair and reasonable in light of the experience of the firm and the services to be rendered to our clients, however, similar services may be made available from other providers and potentially at a lower fee.

### Group Education Seminars

Group education seminars may be presented on financial planning topics. There may be a fee for educational seminars. Seminar fees are flat fees based on material costs and internal estimates for preparation and presentation time at \$250 per hour. The number of hours will depend upon the complexity of the situation and the needs of the client. Fees are paid in arrears upon completion. Because fees are charged in arrears, no refund is necessary. In the event there is a charge to seminar attendees, the fee will be published on the seminar announcement. Fees may be negotiable.

### Other Types of Fees and Expenses

Please note, unless a client has received the firm's disclosure brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees.

Forms of payment are based on the types of services being provided, term of service, etc., and will be stated in your engagement agreement with Create. Payment is made via check or draft from a U.S. financial institution as well as through qualified, unaffiliated third-party processors which requires your prior authorization, or by Betterment for portfolio management clients. Advisory fee deduction by Betterment requires your prior written authorization. We do not accept cash, money orders, or similar forms of payment for advisory engagements.

Our fees are exclusive of brokerage commissions, transaction fees or service fees (sometimes termed *brokerage fees*), and other related costs and expenses which may be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as individual retirement account fees, qualified retirement plan fees, account termination fees, wire transfer fees may be borne by the account holder, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. We will ensure you receive a copy of the custodian's fee schedule at the beginning of the engagement, and you will be notified of any future changes to these fees by the custodian of record and/or third-party administrator for certain tax-qualified plans. Such

charges, fees and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and/or costs.

Fees paid by our clients to our firm for our advisory services are separate from any transactional charges a client may pay, as well as those internal management and administrative fees for mutual funds, exchange traded funds (ETFs), index mutual funds or other investments of this type. Create does not accept commission, mark-ups, or compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds. Create does not accept commission, mark-ups, or compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

Per annum interest at the current statutory rate may be assessed on fee balances due more than 30 days; we may refer past due accounts to collections or legal counsel for processing. We reserve the right to suspend some or all services once an account is deemed past due.

Additional information about our fees in relation to our business practices are noted in Item 12 and Item 14 of this document.

**Advisor’s Portfolio Management Services Fee**

Portfolio management service accounts are assessed an annualized asset-based flat fee that is based on the average daily balance during the calendar month. Using an average daily balance allows our firm to readily adjust for additions and withdrawals, as well as mid-cycle account openings or closures. We bill on a monthly basis, in arrears: All Assets Under Management are billed on a flat fee of 0.30% (30 basis points (bp)), which is a Monthly Asset-Based Fee of 0.025% (2.5 bp). For example, \$1,000,000 in assets under management would be assessed an annual fee of \$3,000 = (\$1,000,000 x 0.003) billed as \$250 a month (\$3,000/12). Fee is not negotiable. Create does not accept commission, mark-ups, or compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

**Assets Under Management Flat Annual Expenses: Examples of Client’s Managed Balances**

Assets Under Management	Create, LLC’s 0.30% *Annual Expense (30bp)	Create, LLC’s 0.025% (2.5bp) Billed Monthly	Betterment 0.15% Annual Expense (15bp)	Betterment 0.0125% (1.25bp) Billed Monthly	Expected Total Monthly Expenses	Expected Total Annual Management Expenses Maximum
E.g. \$100,000	\$300	\$25	\$150	\$12.50	<b>\$37.50</b>	\$450
E.g. \$250,000	\$750	\$62.50	\$375	\$31.25	<b>\$93.75</b>	\$1,125
E.g. \$500,000	\$1,500	\$125	\$750	\$62.50	<b>\$187.50</b>	\$2,250
E.g. \$1,000,000	\$3,000	\$250	\$1,500	\$125.00	<b>\$375.00</b>	\$4,500
E.g. \$3,000,000	\$9,000	\$750	\$4,500	\$375.00	<b>\$875.00</b>	\$10,500
E.g. \$10,000,000	\$30,000	\$2,500	\$15,000	\$1,250.00	<b>\$3,750.00</b>	\$45,000

The above portfolio management services fees are in addition to a client's financial planning fees. Account asset values are determined by the statement you receive from your custodian of record for the purpose of verifying the computation of our advisory fee.

#### **Betterment Fees and Compensation**

Create, LLC through its affiliation with the XY Planning Network (XYPN) has the benefit of an XYPN and Betterment negotiated fee discount, normally Betterment charges Clients an asset-based wrap fee on amounts invested via the Betterment for Advisors platform that is tiered based on the aggregate balance of all of your firm's client accounts at Betterment (not including funds held in Betterment Everyday Cash Reserve). That wrap fee currently ranges from 0.12% to 0.20% of account balances. The XYPN – Betterment negotiated fee is 0.15%. The asset-based wrap fee is charged monthly in arrears. The services included for the wrap fee include all of the services provided by Betterment and Betterment Securities through the Betterment for Advisors platform, including advisory services, custody of assets, execution and clearing of transactions, and account reporting. Betterment collects wrap fees directly from Clients pursuant to the terms of the sub-advisory agreement between Betterment and each Client. Clients utilizing the Betterment for Advisors platform may pay a higher aggregate fee than if the advisory, custodial, trade execution, and other services were purchased separately. Advisors (e.g., Create, LLC) with clients on this pricing structure typically also pay a fixed monthly fee to Betterment.

The above "Advisor's Portfolio Management Fee" is in addition to the Betterment for Advisors platform fee for assets held on the Betterment for Advisors platform, Betterment will collect both its and the Advisor's fee from each Client and remit the Advisor's portion of the fee directly to Create, LLC. Clients should be made aware of this arrangement.

Additional information regarding Betterment's fees and compensation is described in Betterment's Form ADV Part 2A.

Betterment aggregates portfolio management services accounts for the same individual, or two or more accounts within the same family, or accounts where a family member has power of attorney over another family member, or incompetent person's account. Should investment objectives be substantially different for any two or more household accounts, requiring different investment approaches or operational requirements, we reserve the right to apply our fee schedule separately to each account.

Your first billing cycle will begin once your agreement is executed with Create. Fee payments will generally be assessed within the first 10 days of the following month.

All fees deducted by Betterment will be clearly noted on account statements that you will receive directly from the custodian of record on a monthly basis. Please note you share the responsibility of verifying the accuracy of fee calculations; the custodian may not verify the accuracy for you.

By signing Betterment's agreement, as well as the account opening documents, you will be authorizing the withdrawal of both advisory and transactional fees (see following section) from your account. The withdrawal of these fees will be accomplished by the selected custodian, not by our firm, and the custodian will remit our fees directly to Create.

#### **CCR Section 260.238(j) Disclosure**

Please note, lower fees for comparable services may be available from other sources.

### External Compensation for the Sale of Securities to Clients

We do not charge or receive a commission or mark-up on your securities transactions, nor will the firm or an associate be paid a commission on your purchase of securities holdings that we recommend.

We do not receive a “trailer” or SEC Rule 12b-1 fees from an investment company we may recommend for your portfolio. Fees charged by issuers are detailed in prospectuses or product descriptions and you are encouraged to read these documents before investing. Our firm and its associates receive none of these describe or similar fees or charges.

You will always have the option to purchase recommended or similar investments through your own selected service provider.

### Charged Prepayment of Client Fees

#### Advanced Payment for Certain Services

As stated in your agreement with our firm, we may require advance payment under the following engagements:

- A set-up fee based on the Service Model chosen is assessed to begin our financial planning engagement
- A deposit of 50% of the quoted estimate for The One Act Play modular or hourly planning

### Termination of Services

Either party may terminate the agreement at any time by written notice to the other party. If you verbally notify our firm of the termination and, if in two business days following this notification we have not received your notice in writing, we will make a written notice of the termination in our records and send you our own termination notice as a substitute. Our firm will not be responsible for future allocations, investment advice or transactional services upon receipt of a termination notice. Upon termination, it will also be necessary that we inform the custodian of record that the relationship between the firm and the client has been terminated.

If our Form ADV Part 2 brochure was not delivered to you at least 48 hours prior to entering into the investment advisory contract with our firm, then you have the right to terminate the engagement without fee or penalty within five business days after entering into the agreement. Should you terminate a financial planning engagement with us after this time period, you may be assessed a fee based upon the uppermost range of our disclosed hourly rate for any time that may have been incurred by our firm in the preparation of your analysis or plan.

For portfolio management services engagements, should you terminate the agreement after the five-day period, you will be assess fees on a prorated basis for services incurred from either (i) as a new client, the date of the engagement to the date of the firm’s receipt of the written notice of termination; or (ii) all other accounts, the last billing period to the date of the firm’s physical or constructive receipt of written termination notice.

Earned fees in excess of any prepaid deposit will be billed at the time of termination and will be due upon receipt of our invoice. We will return any prepaid, unearned advisory fees within 30 days of our receipt of a termination notice. This will only be provided via check from a US-based financial institution; no credits or “transaction reversals” will be issued to an account.

Surety Bond by Western Surety Company; Policy 72306956 in the amount of \$25,000 eff 10/1/2020.



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

Create's advisory fees will not be based on a share of capital gains or capital appreciation (growth) of any portion of managed funds, also known as performance-based fees, and therefore we do not engage in side-by-side management.

## Item 7: Types of Clients

While Create is targeted to serving the needs of artist entrepreneurs and the not-for-profit organizations and foundations who serve creatives, we are available to individual investors, families, their trusts and estates, in addition to serving entrepreneurs with pension and profit-sharing plans. We encourage interested parties of all economic levels to seek our advisory services. We do not require a minimum income, minimum asset levels, or similar preconditions. Create reserves the right to waive or reduce certain fees based on unique individual circumstances, special arrangements, or preexisting relationships. We also reserve the right to decline services to any prospective client for any non-discriminatory reason.

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

### Methods of Analysis and Investment Strategies

#### Methods of Analysis

For all of our advisory services, we will first gather and consider several factors, including your:

- Current financial situation
- Current and long-term needs
- Investment goals and objectives
- Level of investment knowledge
- Tolerance or appetite for risk
- Reasonable investment restrictions involving your account(s)

Our research is drawn from sources that include financial periodicals, reports from economists and other industry professionals, annual reports, as well as prospectuses, and other regulatory filings.

#### Investment Strategies

We recognize that each client's needs and goals are different; subsequently portfolio strategies and underlying investment vehicles may vary. Generally, our investment advice is based on *Modern Portfolio Theory* and the belief that proper diversification and risk management will provide an investor client with a stable and consistent return over time. The Practice of *Modern Portfolio Theory* does not employ market timing or stock selection methods of investing but rather a long term buy-and-hold strategy with periodic rebalancing of the account to maintain desired risk levels.

We employ a *Core + Satellite Strategy*: blending passive (or index) and active investing, in accordance with *Modern Portfolio Theory*, where passive investments are used as the basis, or "core" of a portfolio and actively managed investments are added as "satellite" positions. For example, the core of a portfolio may be built with low-cost index funds or ETFs, and the satellite holdings would include active holdings believed capable of adding value beyond a stated benchmark over a full market cycle. The core

represents the majority of the portfolio and the remainder of the portfolio employs holdings that take a shorter duration to assist in the over-or-under allocation to specific sectors, regions, asset classes, etc.

### **Investment Vehicles Generally Recommended**

We typically recommend portfolios that contain investment vehicles considered diversified, tax-efficient, and low-cost whenever practical. It would be common to find a broad range of no-load and/or no transaction fee mutual funds, ETFs, and other mutual funds within a portfolio that we have designed. We may also recommend an investor retain pre-existing holdings when appropriate.

Create Financial Planning makes asset allocation decisions based on these and other factors. We will discuss with you how, in our best judgement, to meet your objectives while at the same time seeking a prudent level of risk exposure.

### **Investment Strategy and Method of Analysis Material Risks**

Create believes its strategies and investment recommendations are designed to produce the appropriate potential return for the given level of risk. We cannot guarantee that an investment objective or planning goal will be achieved. Investing in securities involves risk of loss that clients should be prepared to bear.

Examples of risk include:

#### **Company Risk**

When investing in securities, such as stocks, there is always a certain level of company or industry-specific risk that is inherent in each company or issuer. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. This is also referred to as an *unsystematic risk* and can be reduced or mitigated through appropriate diversification.

#### **Core + Satellite Strategy**

Strategies involving Core + Satellite investing have the potential to be affected by “active risk” (*aka*. “tracking error risk”), or a deviation from a stated benchmark. Since the core portfolio attempts to closely replicate a stated benchmark, the source of the tracking error or deviation may come from a satellite portfolio or position that may not as closely align with the benchmark.

#### **Failure to Implement**

As a financial planning client, you always have the right to accept or reject any or all of the recommendations made to you. While no advisory firm can guarantee future performance, no plan can succeed if it is not implemented. Clients who choose not to take the steps recommended in their financial plan may face an increased risk that their stated goals and objectives will not be achieved.

#### **Financial Risk**

Excessive borrowing to finance a business operation increases profitability risk because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

#### **Inflation Risk**

When any type of inflation is present, a dollar today will not buy as much as a dollar next year because purchasing power is eroding at the rate of inflation.

#### **Market Risk**

When the stock market as a whole or an industry as a whole fails, it can cause the prices of individual stocks to fall indiscriminately. This is also called *systemic* or *systematic* risk.

### **Passive Markets Theory**

A portfolio that employs a passive, efficient markets approach (representative of Modern Portfolio Theory) has the potential risk at times to generate lower-than-expected returns for the broader allocation than might be the case for a more narrowly focused asset class, and the return on each type of asset may be a deviation from the average return for the asset class. We believe this variance from the “expected return” is generally low under normal market conditions when a portfolio is made up of diverse, low, or non-correlated assets.

### **Research Data**

When research analyses are based on commercially available software, rating services, general market and financial information, or due diligence reviews, a firm is relying on the accuracy and validity of the information or capabilities provided by selected vendors, rating services, market data, and the issuers themselves. While our firm makes every effort to determine the accuracy of the information received, we cannot predict the outcome of events or actions taken or not taken, or the validity of all information researched or provided which may not affect the advice on or investment management of an account.

### **Socially Conscious Investing**

If you require your portfolio to be invested according to socially conscious principles, you should note that returns on investments of this type may be limited and because of this limitation you may not be able to be as well diversified among various asset classes. The number of publicly traded companies that meet socially conscious investment parameters is also limited, and due to this limitation, there is a probability of similarity or overlap of holdings, especially among socially conscious mutual funds or ETFs. Therefore, there could be a more pronounced positive or negative impact on a socially conscious portfolio, which could be more volatile than a fully diversified portfolio.

### **Security-Specific Material Risks of Investment Vehicles Generally Recommended**

#### **ETF and Mutual Fund Risks**

When a client invests in open end mutual funds or exchange traded funds (ETFs), the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client’s overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF’s shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF’s shares may be halted if the listing exchange’s officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide “circuit breakers” (which are tied to large decreases in stock prices) halts stock trading generally. The advisor has no control over the risks taken by the underlying funds in which the clients invest. We do not recommend leveraged or inverse ETFs due to inherent heightened risk.

### **Index Investing**

You will need to keep in mind that investment vehicles such as certain ETFs and indexed funds have the potential to be affected by “tracking error risk” (see Core + Satellite Strategy).

### **Risks Associated with Securities and Bonds**

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

### **Commercial Paper**

In most cases, commercial paper is an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured; the risk to the investor is that the issuer may default.

### **Common Stocks**

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

### **Corporate Bonds**

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

### **Bank Obligations**

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

### **Municipal Bonds**

Municipal bonds, also called "munies", are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, liquidity risk, and valuation risk.

### **Exchange Traded Funds**

ETF prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The adviser has no control over the risks taken by the underlying funds in which the clients invest.

### **Fixed Income Risks**

Various forms of fixed income instruments, such as bonds, money market or bond funds may be affected by various forms of risk, including:

**Credit Risk**

The potential risk that an issuer would be unable to pay scheduled interest or repay principal at maturity, sometimes referred to as “default risk.” Credit risk may also occur when an issuer’s ability to make payments of principal and interest when due is interrupted. This may result in a negative impact on all forms of debt instruments, as well as funds or ETF share values that hold these issues. Bondholders are creditors of an issuer and have priority to assets before equity holders (i.e., stockholders) when receiving a payout from liquidation or restructuring. When defaults occur due to bankruptcy, the type of bond held will determine seniority of payment.

**Duration Risk**

Duration is a measure of a bond’s volatility, expressed in years to be repaid by its internal cash flow (interest payments). Bonds with longer durations carry more risk and have higher price volatility than bonds with shorter durations.

**Interest Rate Risk**

The risk that the value of the fixed income holding will decrease because of an increase in interest rates.

**Liquidity Risk**

The inability to readily buy or sell an investment for a price close to the true underlying value of the asset due to a lack of buyers or sellers. While certain types of fixed income are generally liquid (i.e., bonds), there are risks which may occur such as when an issue trading in any given period does not readily support buys and sells at an efficient price. Conversely, when trading volume is high, there is also a risk of not being able to purchase a particular issue at the desired price.

**Reinvestment Risk**

With declining interest rates, investors may have to reinvest interest income or principal at a lower rate.

**QDI Ratios**

While many ETFs and index mutual funds are known for their potential tax-efficiency and higher “qualified dividend income” (QDI) percentages, there are asset classes with these investment vehicles or holding periods within that may not benefit. Shorter holding periods, as well as commodities and currencies (that may be a part of an ETF or mutual portfolio), may be considered “non-qualified” under certain tax code provisions. A holding’s QDI will be considered when tax-efficiency is an important aspect of the client’s portfolio.

## Item 9: Disciplinary Information

Neither Create, LLC nor its management have been involved in a material criminal or civil action in a domestic, foreign, or military jurisdiction, an administrative enforcement action, or self-regulatory organization proceeding that would reflect poorly upon our offering advisory business or its integrity.

## Item 10: Other Financial Industry Activities and Affiliations - Other Services and Potential Conflicts

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

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

Create does not have any related parties. As a result, we do not have a relationship with any related parties.

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

We do not recommend individual investment advisors to our clients. We recommend that our clients use MTG, LLC dba Betterment Securities (“Betterment Securities”), a registered broker-dealer and member of the SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Betterment Securities. While we recommend that you use Betterment Securities as your custodian, you will decide whether to do so and will open your account with them by entering into an account agreement directly with them. Betterment does not compensate Create directly, but the asset under management fee is pulled from the client account by Betterment to pay Create, LLC. This does not cause a conflict of interest as you have the choice to invest at Betterment.

As part of Create, LLC’s relationship with Betterment and Betterment Securities, Betterment may offer Create services intended to help manage and further develop Create’s business, such as access to webinars and advice about using the Betterment for Advisors platform to grow business. Betterment may offer different or expanded services in the future. These services could cause an incentive for Create to recommend that Clients invest through the Betterment for Advisors platform. This is a potential conflict given that Create’s interest in recommending Betterment could be influenced by its receipt of Betterment’s and Betterment Securities’ services to its business. Other potential conflicts may exist regarding Create’s use of the Betterment for Advisors platform.

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

Create Financial Planning holds itself to a *fiduciary standard*, which means our firm and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities. Firm policies include prohibitions against insider trading, circulation of industry rumors, and certain political contributions, among others.

Create Financial Planning believes that its business methodologies, ethics, rules, and adopted policies are appropriate to mitigate material conflicts of interest and to appropriately manage any material conflicts of interest that may remain. Clients should be aware that no set of rules can possibly anticipate or relieve all potential material conflicts of interest. Our firm will disclose to its advisory clients any material conflict of interest relating to the firm, its representatives, or any of its employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

Create, LLC periodically reviews and amends its Code of Ethics to ensure that it remains current and requires firm personnel to annually attest to their understanding of and adherence to the firm's Code of Ethics.

A copy of Create's Code of Ethics is made available to any client or prospective client upon request.

#### **Code of Ethics Description**

CERTIFIED FINANCIAL PLANNER™ Professionals, such as Ms. Venustus, adhere to the Certified Financial Planner Board of Standards, Inc. Code of Ethics principles, which state:

- Act with honesty, integrity, competence, and diligence.
- Act in the client's best interests.
- Exercise due care.
- Avoid or disclose and manage conflicts of interest.
- Maintain confidentiality and protect the privacy of client information.
- Act in a manner that reflects positively on the financial planning profession and CFP® certification.

#### **Statement Involving Our Privacy Policy**

We respect the privacy of all clients and prospective clients (collectively termed "clients"), both past and present. It is recognized that you have entrusted Create with non-public personal information, and it is important that both access persons and clients are aware of the firm policy concerning what may be done with that information.

The firm collects personal information about clients from the following sources:

- Information clients provide to complete their financial plan or investment recommendation.
- Information that clients provide in engagement agreements and other documents completed in connection with the opening and maintenance of an account.
- Information clients provide verbally; and
- Information received from service providers, such as custodians, about client's transactions.

The firm does not disclose non-public personal information about our clients to anyone, except in the following circumstances:

- When required to provide services, our clients have requested.
- When our clients have specifically authorized us to do so.
- When required during the course of a firm assessment (i.e., an independent audit); or
- When permitted, or required by law (i.e., periodic regulatory examination).

Within the firm, access to client information is restricted to personnel that need to know that information. All access persons and service providers understand that everything handled in firm offices are confidential and they are instructed not to discuss client information with someone else that may request information about an account unless they are specifically authorized in writing by the client to do so. This includes providing information about a spouse's IRA, an adult child, or a parent's account.

To ensure security and confidentiality, the firm maintains physical, electronic, and procedural safeguards to protect the privacy of client information.

The firm will provide our clients with its privacy policy on a cyclical basis per regulatory guidelines and at any time, in advance, if firm privacy policies are expected to change.

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

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

Our firm is able to provide a broad range of advisory services to its clients, including financial planning and portfolio management. A fee may be earned by the firm for both of these services. A conflict of interest exists within these various client relationships and we hereby note that you always have the right to decide whether to act on a recommendation from an associate. If you elect to do so, you always have the right to do so through the professional of your choosing.

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

Create does not trade for its own account (e.g., proprietary trading). The firm's related persons may buy or sell securities that are the same as, similar to, or different from, those recommended 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; clients often have different objectives and risk tolerances. At no time, however, will the firm or a related person receive preferential treatment over a client or be permitted to front run or disadvantage trading for clients.

### **Trading Securities at/around the Same Time as Client's Securities**

In an effort to reduce or eliminate certain conflicts of interest involving personal trading (i.e., trading ahead of client recommendations, etc.), firm policy may require that we periodically restrict or prohibit related parties' transactions. Any exceptions must be approved by the firm, and we will maintain personal securities transaction records as required.

## **Item 12: Brokerage Practices**

### **Factors Used to Select Custodian and/or Broker Dealers**

We recommend that our clients use MTG, LLC dba Betterment Securities ("Betterment Securities"), a registered broker-dealer and member of the SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Betterment Securities. While we recommend that you use Betterment Securities as your custodian, you will decide whether to do so and will open your account with them by entering into an account agreement directly with them. We do not technically open the account for you, although we may assist you in doing so. If you do not wish to place your assets with Betterment Securities as the custodian of record, we are unable to manage your account under our portfolio management services engagement.

### **How We Select Brokers/Custodians**

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. We consider a wide range of factors, including:

- Capability to execute, clear, and settle trades (buy and sell securities for your account) itself or to facilitate such services (see Item 15). Your account must be maintained by a qualified custodian, such as a broker/dealer, bank, or trust company. Our firm is not a custodian nor is there an affiliate that is a custodian.
- Capability to facilitate timely transfers and payment to and from accounts.
- Availability of investment research and tools that assist us in making investment decisions.
- Quality of service.



- Competitiveness of the price of those services and willingness to negotiate the prices.
- Reputation, financial strength, and stability.
- Prior service to us and our other clients.

### Your Brokerage and Custody Costs

For our clients' accounts that Betterment Securities maintains, Betterment Securities does not charge you separately for custody/brokerage services, but is compensated as part of the Betterment for Advisors (defined below) platform fee, which is charged for a suite of platform services, including custody, brokerage, and sub-advisory services provided by Betterment and access to the Betterment for Advisors platform. The platform fee is an asset-based fee charged as a percentage of assets in your Betterment account. Create does not accept commission, mark-ups, or compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

Clients utilizing the Betterment for Advisors platform may pay a higher aggregate fee than if the investment management, brokerage, and other platform services are purchased separately. Nonetheless, for those clients participating in the Betterment for Advisors platform, we have determined that having Betterment Securities execute trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see "How We Select Brokers/Custodians").

### Services Available to Us Via Betterment for Advisors

Betterment Securities serves as a broker-dealer to Betterment for Advisors, an investment and advice platform serving independent advisory firms like us ("Betterment for Advisors"). Betterment for Advisors also makes available various support services which may not be available to Betterment's retail customers. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Betterment for Advisors' support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of Betterment for Advisors' support services:

**Services That Benefit You** Betterment for Advisors includes access to a globally diversified, low-cost portfolio of ETFs, execution of securities transactions, and custody of client assets through Betterment Securities. In addition, a series of model portfolios created by third-party providers are also available on the platform. Betterment Securities' services described in this paragraph generally benefit you and your account.

**Services That May Not Directly Benefit You** Betterment institutional also makes available to our firm other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts, such as software and technology that may:

- Assist with back-office functions, recordkeeping, and client reporting of our clients' accounts.
- Provide access to client account data (such as duplicate trade confirmations and account statements).
- Provide pricing and other market data.

By using Betterment for Advisors, we may be offered other services intended to help us manage and further develop our business enterprise. These services include:

- Consulting (including through webinars) on technology and business needs.

- Access to publications and conferences on practice management and business succession.

#### **Our Interest in Betterment Securities' Services**

The availability of these services from Betterment for Advisors benefits us because we do not have to produce or purchase them. In addition, we do not have to pay for Betterment Securities' services. We have an incentive to recommend that you maintain your account with Betterment Securities', based on our interest in receiving Betterment for Advisors and Betterment Securities' services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions.

This is a conflict of interest. We believe, however, that our selection of Betterment Securities as a custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Betterment Securities' services (see "How We Select Brokers/Custodians") and not for the Betterment for Advisors and Betterment Securities' services that benefit only us or that may not directly benefit you.

#### **Betterment for Advisors' Trading Policy**

When using the Betterment for Advisors platform, we and you are subject to the trading policies and procedures established by Betterment. These policies and procedures limit our ability to control, among other things, the timing of the execution of certain trades (including in response to withdrawals, deposits, or asset allocation changes) within your account. You should not expect that trading on Betterment is instant, and, accordingly, you should be aware that Betterment does not permit you or us to control the specific time during a day that securities are bought or sold in your account (i.e., "to time the market"). Betterment describes its trading policies in Betterment LLC's Form ADV Part 2A. As detailed in that document, Betterment generally trades on the same business day as it receives instructions from you or us. However, transactions will be subject to processing delays in certain circumstances. In particular, orders initiated on non-business days and after market close generally will not transact until the next business day. Betterment also maintains a general approach of not placing securities orders during approximately the first thirty minutes after the opening of any market session. Betterment also generally stops placing orders arising from allocation changes in existing portfolios approximately thirty minutes before the close of any market session. Betterment continues placing orders associated with deposit and withdrawal requests until market close. Betterment maintains a general approach of not placing orders around the time of scheduled Federal Reserve interest rate announcements. Also, Betterment may delay or manage trading in response to market instability. For more information, please consult Betterment LLC's Form ADV Part 2A.

#### **Betterment Brokerage Services: Betterment for Advisors Platform**

Betterment Securities is responsible for execution of securities transactions and maintains custody of client assets. Betterment Securities exercises no discretion in determining if and when trades are placed; it places trades only at the direction of Betterment. Clients should understand that the appointment of Betterment Securities as the broker for their accounts held at Betterment may result in their receiving less favorable trade executions than may be available through the use of broker-dealers that are not affiliated with Betterment. If Clients do not wish to place assets with or execute trades through Betterment Securities, then Betterment cannot manage Client accounts on the Betterment for Advisors platform.

Additional information regarding Betterment Securities can be found on FINRA's BrokerCheck.

### **Betterment Institutional**

Some of the noted products and services made available by Betterment Securities and/or Betterment Institutional may benefit our firm but may not directly benefit a client account, and certain research and other previously referenced services qualify as “brokerage or research services” under Section 28(e) of the Securities Exchange Act of 1934. The availability of these services from Betterment Securities and/or Betterment Institutional benefit us because we do not have to produce or purchase them. These services may be contingent upon us committing a certain amount of business to Betterment Securities in assets in custody. We have an incentive to recommend that you maintain your account with Betterment Securities, based on our interest in receiving Betterment Institutional and Betterment Securities’ services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that our selection of Betterment Securities as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Betterment Securities’ services (as noted) and not Betterment Institutional and Betterment Securities’ services that benefit only us. Further, we will act in the best interest of our clients regardless of the custodian we may recommend.

We periodically conduct an assessment of any service provider we recommend (including Betterment Securities) which generally involves a review of their range and quality of services, reasonableness of fees, among other items, and in comparison, to their industry peers.

Create has determined; portfolio management services account trades completed through Betterment Securities is consistent with our duty to seek best execution. We periodically review policies regarding our recommending custodians to our clients in light of our duty to seek best execution.

### **Directed Brokerage**

We do not trade away from the client’s custodian, and we do not permit directed brokerage. If we allowed directed brokerage, you may be unable to achieve most favorable execution of your transactions. Directing brokerage may cost you more money. For example, in a directed brokerage account, you may pay higher brokerage commissions because you may not be able to aggregate orders to reduce transaction costs, or you may receive less favorable prices.

### **Aggregating Securities Transactions**

Betterment may block client trades at their discretion. Their specific practices are further discussed in their ADV Part 2A, Item 12.

### **Client Referrals from Custodians**

We do not receive referrals from our custodian; nor are client referrals a factor in our selection of our custodian.

## **Item 13: Review of Accounts**

### **Schedule for Periodic Review and Advisory Persons Involved**

#### **Financial Planning and Portfolio Management Services**

For those clients who have engaged our firm for ongoing planning services, we will schedule reviews with you in advance. It will be your responsibility to initiate a review if your agreement does not involve

continuous financial planning support, and these reviews are recommended on at least an annual basis or whenever practical.

Reviews will be conducted by Ms. Venustus and normally involve analysis and possible revision of your previous financial plan or investment allocation. A copy of revised plans or asset allocation reports will be provided to the client upon request.

Unless provided for in your engagement agreement (e.g., CREATE Process ongoing support), financial planning and portfolio management service reviews are conducted under a new or amended agreement and will be assessed at our current fee rate.

#### **Review of Client Accounts on Non-Periodic Basis Financial Planning and Portfolio Management Services**

We strongly recommend you contact our firm for an additional review when you anticipate or have experienced changes in your financial situation (i.e., employment, marital status, inheritance, the birth of a new child, etc.). Non-periodic reviews are conducted by Ms. Venustus, which may occur under a new or amended agreement unless previously engaged in writing and will be assessed at our published rate. A copy of revised plans or asset allocation reports will be provided upon request.

#### **Content of Client Provided Reports and Frequency**

Whether you have opened and maintained an investment account on your own or with our assistance, you will receive account statements sent directly from mutual fund companies, transfer agents, custodians, or brokerage companies where your investments are held. We urge you to carefully review these account statements for accuracy and clarity and ask questions when something is not clear.

Our firm may provide portfolio “snapshots” if we are engaged to provide periodic asset allocation or investment advice. We do not provide ongoing performance reporting under our investment consultation service engagements. Clients may receive portfolio performance reports from their selected portfolio model manager.

Clients are urged to carefully review and compare account statements that they have received directly from their custodian of record with any document they may receive from our firm or any other party should the report contain performance information.

## **Item 14: Client Referrals and Other Compensation**

#### **Economic Benefit from External Sources and Conflicts of Interest**

We receive a non-economic benefit from Betterment Institutional and Betterment Securities in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Betterment Securities. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 - Brokerage Practices). The availability to us of Betterment Institutional and Betterment Securities’ products and services is not based on us giving particular investment advice, such as buying particular securities.

#### **Advisor Firm Payments for Client Referrals**

We do not pay any third parties for prospective client referrals, nor is there a fee-sharing arrangement reflective of a solicitor engagement.

## Item 15: Custody

Create, LLC does not maintain physical custody of client assets. For clients enrolled in our portfolio management system, Betterment Securities maintains actual custody of your assets. Your statements will be available for you to review on the activity section of your Betterment for Advisors account portal. You will also receive periodic emails from Betterment with information about your accounts as well as links to account statements directly from Betterment Securities. Your account information is also available at [www.bettermentsecurities.com](http://www.bettermentsecurities.com). You should carefully review those statements promptly and compare them to the invoiced you receive from us and notify us of any discrepancies.

Your assets will be maintained by an unaffiliated, qualified custodian, such as a bank, broker/dealer (e.g., Betterment Securities), mutual fund companies, or transfer agent. Your assets are not held by our firm or any associate of the firm. In keeping with this policy involving our client funds or securities, Create:

- Restricts the firm or an associate from serving as trustee or having general power of attorney over a client account.
- Prohibits any associate from having authority to directly withdraw securities or cash assets from a client account. Although we may be deemed to have “constructive custody” of your assets since we may request the withdrawal of advisory fees from an account, we will only do so through the engagement of a qualified custodian maintaining your account assets, via your prior written authorization, and following our written invoice;
- Does not accept or forward client securities (i.e., stock certificates) erroneously delivered to our firm.
- Will not collect advance fees of \$500 or more for services that are to be performed six months or more into the future; and
- Will not authorize an associate to have knowledge of a client’s account access information (i.e., online 401(k), brokerage, or bank accounts) if such access would allow physical control over account assets.

The custodian of record will provide the client with the account transaction confirmations and statements, which will include all debits and credits, as well as reference to our firm’s advisory fee for that period.

Statements are provided on at least a quarterly basis and confirmations are provided as transactions occur within the client account. Create Financial Planning will not create an account statement for a client or serve as the sole recipient of an account statement.

Should a client receive a report from our advisory firm that included investment performance information, they are urged to carefully review and compare their account statements that they have received directly from their custodian of record with any performance report form our firm.

## Item 16: Investment Discretion

### **Portfolio Management Services**

Betterment uses algorithms to advise clients and manage their accounts. These algorithms are developed, overseen, and monitored by Betterment's investment advisory personnel. To use Betterment's investment services, Clients and/or you inform Betterment of a Client's financial goals and personal information through Betterment's online applications, and Betterment's algorithm then recommends and builds a portfolio of exchange traded funds for each of the client's financial goals and account types. Each portfolio is associated with a target allocation of investment types and/or asset classes but you can modify Betterment's initial allocation recommendation as you see fit.

In the absence of a contrary direction, Betterment periodically rebalances client portfolios so that in the face of fluctuating market prices each Client's portfolio remains within a range of the target allocation. Betterment also offers optional tax loss harvesting and automated asset location services.

Create Financial Planning provides portfolio management services on a discretionary basis. Similar to a limited power of attorney, discretionary authority allows our firm to implement investment strategies and trading decisions, such as the purchase or sale of a security on behalf of your account, without requiring your prior authorization for each transaction in order to meet stated investment objectives. This authority will be granted through your execution of our client engagement agreement as well as the custodian of record's limited power of attorney agreement. The custodian/Betterment will specifically limit our authority within your account to the placement of trade orders that match your investment objective and the request for the deduction of advisory fees. Betterment Securities will rebalance your account to keep it in alignment with your investment objective; that will not be at your advisor's discretion.

## Item 17: Voting Client Securities

For assets managed on the Betterment for Advisors platform, Clients delegate to Betterment the authority to receive and vote all proxies and related materials. Betterment will only vote on proxies and respond to corporate actions associated with securities that Betterment recommends be purchased for client accounts. Additional information about proxy matters is contained in Betterment's Form ADV Part 2A.

## Item 18: Financial Information

Our advisory firm will not take physical custody of the client assets. Fee withdrawals must be done through a qualified intermediary (e.g., the custodian of record), per the client's prior written agreement, and following a client's receipt of our firm's written notice (termed "constructive custody").

Engagements with our firm do not require that we collect advance fees from a client of \$500 or more for our advisory services that we have agreed to perform six months or more into the future.

Neither the firm nor its management serve as general partner for a partnership or trustee for a trust in which the firm's advisory clients are either partners of the partnership or beneficiaries of the trust.

The firm and its management do not have a financial condition likely to impair its ability to meet client commitments, nor has the firm or its management been the subject of a bankruptcy petition.

Due to the nature of our firm's advisory services and operational practices, an audited balance sheet is not required nor included in this brochure.

## Item 19: Requirements for State-Registered Advisers

**Lindy Grace Venustus**

Born: 1969

Managing Member/Founder/President/Chief Compliance Officer (Supervisor)/Investment Advisor Representative

### Educational Background

- 2017 - CERTIFIED FINANCIAL PLANNER™, CFP® - Certified Financial Planner Board of Standards, Inc.
- 2014 - Series 66 - Financial Industry Regulatory Authority (FINRA)
- 2013 - Series 7 - Financial Industry Regulatory Authority (FINRA)
- 2002 - Insurance License - MN Department of Commerce
- 1993 - Bachelor of Arts in Psychology and Kinesiology, University of Minnesota, Minneapolis, MN

### Business Experience

- 2020 - Present, Create, LLC, Richfield, MN, Principal/Founder/Chief Compliance Officer (Supervisor)/Investment Advisor Representative
- 2019 - Present, LegalZoom LifePlan, Austin, TX, Financial Planner
- 2019 - 2019, Channel Financial, Triad Advisors, Norcross, GA (Golden Valley, MN office), Financial Planner
- 2018 - 2019, Berger Financial Group, LLC., Cambridge Investment Research, Inc., Fairfield, IA (Medicine Lake, MN office), Financial Planner, Paraplanner
- 2016 - 2018, Wells Fargo Advisors, Wells Fargo Clearing Services, LLC, St Louis, MO (Wayzata, MN office), Investment Advisor Representative/Registered Representative, Financial Advisor, Financial Planner
- 2015 - 2016, Business & Estate Advisors, Inc, Valmark Securities, Akron, OH (Wayzata, MN office), Financial Advisor, Paraplanner
- 2013 - 2015, Foster Klima & Company, Inc, Park Avenue Securities, Bethlehem, PA (Minneapolis, MN office), Investment Advisor Representative/Registered Representative, Financial Advisor
- 2002 - 2012, State Farm Insurance, Bloomington, IL (Mound, Minneapolis, Burnsville, St Louis Park offices, MN), Insurance Specialist, Office Manager

### Professional Designations, Licensing & Exams

#### **CERTIFIED FINANCIAL PLANNER™**

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries

for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained the CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

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

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 each CFP® professional 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.

### Other Business Activities

Ms. Venustus is a Fee Only Advisor, and is not registered, nor has an application pending to register, as a registered representative of a broker/dealer or associated person of a futures commission merchant, commodity pool operator, or commodity trading advisor. She does not receive commissions, bonuses, or other compensation based on the sale of securities, including that as a registered representative of a broker/dealer or the distribution or service (“trail”) fees from the sale of mutual funds.

- Ms. Venustus works on a contract basis giving financial planning advice, but not investment advice nor securities recommendations for LegalZoom LifePlan (Austin, TX), less than 8 hours a week.
- Ms. Venustus is a dog walker/ sitter with Rover.com (Olympia, WA) as needed, care times do not interfere.



- Ms. Venustus is temporarily with BakerTilly tax prep, variable hours ending April, 2021.
- Ms. Venustus is a member of the Financial Planning Association, Golden Valley, MN Chapter, with not more than four hours a month time commitment for continuing education.
- Ms. Venustus is a member of Women in Pensions Network (Minneapolis, MN) with not more than three hours a month commitment for continuing education.
- Ms. Venustus is a member of Toastmasters (Minnetonka, MN) one hour a week for personal development.
- Ms. Venustus is a volunteer on the Death and Dying Committee of the Minneapolis, MN Quaker Friends, available to help as needed, not more than two hours a week.
- Ms. Venustus is an artist and author in her free time.
- Ms. Venustus is a member of the MN Watercolor Society (Edina, MN); two hours a month.

#### **Performance Based Fees**

Create is not compensated by performance-based fees.

#### **Material Disciplinary Disclosures**

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

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

Neither Create, LLC, nor Lindy Venustus, have any relationship or arrangement with issuers of securities.

#### **Supervision**

Lindy Venustus, as Principal and Chief Compliance Officer of Create, is responsible for supervision. She may be contacted at the phone number on this brochure supplement.

#### **Requirements for State Registered Advisers**

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



Create, LLC  
8400 Normandale Lake Blvd, Suite 920  
Bloomington, MN 55437-3843

Form ADV Part 2A - Firm Brochure

(612) 401-9755  
[www.createfp.com](http://www.createfp.com)

Dated December 21, 2020

**Form ADV Part 2B - Brochure Supplement**

This brochure provides information about Ms. Lindy Venustus, CFP®, a fee only fiduciary, the firm's principal executive, and supplements Create, LLC advisory brochure referenced in the preceding pages. If you have any questions about the contents of this supplement, please contact Ms. Venustus by telephone at (612) 401-9755. Additional information about Ms. Venustus, CFP® and Create, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Item 1: Cover Page

## Item 2: Educational Background and Business Experience

Regulatory guidance requires the firm to disclose relevant post-secondary education and professional training for each principal executive and associate of the firm, as well as their business experience for at least the most recent five years.

### Principal Executive Officers and Management Persons

Managing Member/Founder/Chief Compliance Officer (Supervisor)/Investment Advisor Representative

#### **Lindy Grace Venustus**

Year of Birth: 1969

CRD Number: 6192715

### Educational Background

- 2017 - CERTIFIED FINANCIAL PLANNER™, CFP® - Certified Financial Planner Board of Standards, Inc.
- 2014 - Series 66 - Financial Industry Regulatory Authority (FINRA)
- 2013 - Series 7 - Series Industry Regulatory Authority (FINRA)
- 2002 - Insurance License - MN Department of Commerce
- 1993 - Bachelor of Arts in Psychology and Kinesiology, University of Minnesota, Minneapolis, MN

### Business Experience

- 2020 - Present, Create, LLC, Richfield, MN, Principal/Founder/Chief Compliance Officer (Supervisor)/Investment Advisor Representative
- 2019 - Present, LegalZoom LifePlan, Austin, TX, Financial Planner
- 2019 - 2019, Channel Financial, Triad Advisors, Norcross, GA (Golden Valley, MN office), Financial Planner
- 2018 - 2019, Berger Financial Group, LLC., Cambridge Investment Research, Inc., Fairfield, IA (Medicine Lake, MN office), Financial Planner, Paraplanner
- 2016 - 2018, Wells Fargo Advisors, Wells Fargo Clearing Services, LLC, St Louis, MO (Wayzata, MN office), Investment Advisor Representative/Registered Representative, Financial Advisor, Financial Planner
- 2015 - 2016, Business & Estate Advisors, Inc, Valmark Securities, Akron, OH (Wayzata, MN office), Financial Advisor, Paraplanner
- 2013 - 2015, Foster Klima & Company, Inc, Park Avenue Securities, Bethlehem, PA (Minneapolis, MN office), Investment Advisor Representative/Registered Representative, Financial Advisor
- 2002 - 2012, State Farm Insurance, Bloomington, IL (Mound, Minneapolis, Burnsville, St Louis Park offices, MN), Insurance Specialist, Office Manager

### Professional Designations, Licensing & Exams

#### **CERTIFIED FINANCIAL PLANNER™**

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained the CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

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

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 each CFP® professional must provide financial planning services in the best interests of their clients.

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

### Item 3: Disciplinary Information

Registered investment advisors are required to disclose certain material facts about its associated personnel regarding any legal or disciplinary events, including criminal or civil action in a domestic, foreign, or military court, or any proceeding before a state, federal, or foreign regulatory agency, self-regulatory organization, or suspension or sanction by a professional association for violation of its conduct rules, that would be material to the evaluation of each officer or supervised person providing investment advice. No reportable information is applicable to the section for Ms. Venustus or her firm.

## Item 4: Other Business Activities

- Ms. Venustus works on a contract basis giving financial planning advice, but not investment advice nor securities recommendations for the clients of LegalZoom LifePlan.
- Ms. Venustus works on a contract basis as a dog walker and home sitter with Rover.com.
- Ms. Venustus has temporary employment with BakerTilly tax preparers.

## Item 5: Additional Compensation

Ms. Venustus is not compensated for advisory services involving performance-based fees. Firm policy does not allow associated persons to accept or receive additional economic benefit, such as sales awards or other prizes, for providing advisory services to firm clients.

## Item 6: Supervision

Ms. Venustus serves as the firm's Chief Compliance Officer. Because supervising one's self poses a conflict of interest, the firm has adopted policies and procedures to mitigate this conflict, which Ms. Venustus will adhere to, and may use the services of unaffiliated professionals to ensure the firm's oversight obligations are met. Questions relative to the firm, its services, or this Form ADV Part 2 may be made to the attention of Ms. Venustus at (612) 401-9755.

Additional information about the firm, other advisory firms, or an associated investment advisor representative, including Ms. Venustus, is available on the internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). A search of this site for firms may be accomplished by firm name, or a unique firm identifier known as an IARD number. The IARD number for Create, LLC is 309648. You may also search for Ms. Venustus by name or her industry reference number ("CRD #"), which is 6192715.

## Item 7: Requirements for State Registered Advisers

There have been neither awards nor sanctions or other matters where Ms. Venustus or our firm have been found liable in a self-regulatory or administrative proceeding. Ms. Venustus and her firm have not been the subject of a bankruptcy petition.