

Part 2A of Form ADV: Firm Brochure

Item 1 Cover Page

Part 2A of Form ADV: Firm Brochure
(Page 1 through Page 20)

Sequoyah Planning II, LLC, Registered Investment Advisor

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01-01-2011

This brochure provides information about the qualifications and business practices of Sequoyah Planning II, LLC ("Sequoyah Planning" or "Advisor"). If you have any questions about the contents of this brochure, you are encouraged to phone us, 678-454-2818, or email us, don@sequoyahplanning.com. All of the information in this brochure plus much more is available for your review on the Sequoyah Planning website www.sequoyahplanning.com.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (the "SEC") or by any state securities authority. Registration as a Registered Investment Advisor does not imply a certain level of skill or training.

Additional information about Sequoyah Planning also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The Sequoyah Planning CRD number is 145654.

(NOTE: "Part 2B of Form ADV: Brochure Supplement" is attached to this brochure and is displayed on Page 29 through Page 32.)

Item 2 Material Changes

The SEC adopted "Amendments to Form ADV" in July, 2010. This Firm Brochure, dated 01-01-2011, is Sequoyah Planning's new disclosure document prepared according to the SEC's new requirements and rules. As a state-registered investment advisor, Sequoyah Planning is required to comply with the new reporting and filing requirements. As you will see, this document is a narrative that is substantially different in form and content, and includes some new information that Sequoyah Planning was not previously required to disclose.

After Sequoyah Planning's initial filing of this Brochure, this section entitled "Item 2 Material Changes" will be used to provide clients with a summary of new and/or updated information. Sequoyah Planning will inform you of the revision(s) based on the nature of the updated information.

Consistent with the new rules, Sequoyah Planning will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of Sequoyah Planning's business' fiscal year. Furthermore, the Sequoyah Planning will provide you with other interim disclosures about material changes as necessary.

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Investment Advisory Services

Sequoyah Planning II, LLC (“Sequoyah Planning” or “Advisor”) is a registered investment adviser with the State of Georgia offering investment advisory products and services to a variety of clients. Sequoyah Planning II, LLC began conducting business as a corporation in 2007. Prior to 2007, Donald A. Holyfield, CLU, ChFC solely conducted business as Sequoyah Planning Corporation, having incorporated under the laws of the State of Georgia in 2004. Prior to 2004, Donald A. Holyfield, CLU, ChFC practiced as a sole proprietor, having initially commenced business operations in 1972. Sequoyah Planning II, LLC offers comprehensive financial planning services and manages clients' assets either directly or via programs offered by other third party providers.

The following list discloses Sequoyah Planning's principal shareholders. (“Principal shareholders” are any individuals and/or entities controlling 25% or more of the ownership of Sequoyah Planning).

- Donald Alfred Holyfield, CLU, ChFC, Managing Partner(100% shareholder)

Sequoyah Planning offers the following advisory services to our clients:

Financial Planning and Consulting Services

Comprehensive Wealth Management LifeDesign Services

Sequoyah Planning believes that an essential step for any client setting personal financial goals is a written document with client goals quantified, client resources outlined and an initial plan of action specified. Sequoyah Planning provides this advice in the form of a financial plan or a less comprehensive financial review. The client is given a financial planning contract, disclosure information and an in-depth consultation to determine the need and/or advantage to having a plan prepared.

Prior to a client engaging Sequoyah Planning to conduct comprehensive Wealth Management LifeDesign Services, Advisor will assist the client in a self-discovery of the following: 1) What's important about life to you? 2) Prioritize what's important about life to you 3) How is it most important to you? 4) What is the vision of your life five years from now? 5) What values make you who you are? 6) What are your goals that will give you the life that you want? 7) Assign timelines to these goals. 8) Create a Family Vision Statement. These discovery sessions are generally not financial related but pertain to the client's overall personal development. The fee for this service is negotiated with the client upon engagement and is based upon the time anticipated to develop the aforementioned. Advisor spends approximately 25% of its time in connection with this service

Clients choosing a financial plan will receive a written report, providing the client with a detailed financial plan designed to help achieve their stated financial goals and objectives.

Advisor will work with the client to provide Comprehensive Wealth Management Planning, and may address any or all of the following areas of concern as contracted for between Sequoyah Planning and the client:

Comprehensive Financial Discovery Process

- 1) Determine personal, financial, and business goals with desired achievement time period. This can include education funding, special expense funding, retirement income.
- 2) Determine investment risk tolerance and investor profile.
- 3) Determine current cash flow, expenses, assets and liabilities, and employer benefits.
- 4) An understanding of family dynamics, current or planned family situation, and special needs of family members.
- 5) An understanding of current and future family responsibilities and potential dependent family members.
- 6) An understanding of Charitable Giving objectives and existing plans.

Comprehensive Risk Management Analysis

- 1) Review of all current life insurance coverage, disability income coverage, property and casualty coverage, health insurance coverage, and long-term care coverage.
- 2) Analysis of the financial impact of premature death.
- 3) Analysis of current situation if disability occurs.
- 4) Recommended Risk Management Plan to achieve financial objectives.

Comprehensive Retirement Planning Analysis

- 1) Retirement Planning Analysis based on existing plans and saving patterns.
- 2) Recommended Retirement Plan to achieve financial objectives during wealth-building phase and during distribution phase.

Comprehensive Income Tax Planning Analysis

- 1) Review of most recent tax year income tax return(s).
- 2) Income Tax Analysis to estimate current year tax liability based on existing income, business, and financial situation.
- 3) Recommended income tax reduction plan to include recommended action steps with respect to existing income, business, and financial situation.
- 4) Evaluation of taxable effect of implementing entire recommended financial plan.

Sequoyah Planning works with the client's tax adviser; however, Sequoyah Planning does not provide tax advice.

Comprehensive Asset Accumulation Analysis

- 1) Portfolio analysis of existing investments to examine current asset allocation, risk assessment, investment operating costs, and suitability of existing securities in light of goals and risk tolerance.
- 2) Monte Carlo simulation to determine probability of existing investment plan achieving desired financial objectives.
- 3) Recommended Asset Allocation Strategy.
- 4) Recommended Asset Accumulation Plan to achieve financial objectives considering risk profile, to include employer sponsored retirement plan if appropriate.

Comprehensive Estate Planning Analysis

- 1) Review of current wills and trust documents.
- 2) Estate Transfer Analysis to include estimate of taxes and expenses based on existing estate plan under different scenarios.
- 3) Estate Liquidity Analysis based on existing estate plan under different scenarios.
- 4) Recommended Estate Plan to achieve estate objectives.

Comprehensive Business Planning Analysis

- 1) Analysis of existing succession planning.
- 2) Analysis of existing benefit program.
- 3) Analysis of existing executive compensation program.
- 4) Recommended business succession plan to achieve financial objectives.
- 5) Recommended benefit program to achieve financial objectives.
- 6) Recommended executive compensation program to achieve financial objectives.

eMoney

- 1) Provide personal, secure, website with 24 hour access to your financial information.
- 2) Set up account aggregation of all client financial accounts and assets.
- 3) Set up alerts of important changes in your accounts.
- 4) Provide online vault capability for storing important documents.
- 5) Provide Frequent Flyer Account Mileage Tracking System.

Sequoyah Planning gathers required information through personal interviews. Information gathered includes a client's current financial status, future goals and attitudes towards risk. As part of the information gathering process, the client will provide Sequoyah Planning with personal data such as family records, budgeting, personal liability and estate information. Related documents supplied by the client are carefully reviewed and a written report is prepared.

Should a client choose to implement the recommendations contained in the plan, Sequoyah Planning suggests the client work closely with his/her attorney, accountant, insurance agent, and/or stockbroker. Implementation of financial plan recommendations is entirely at the client's discretion. Associated persons of Sequoyah Planning may be registered representatives of Resource Horizons Group, LLC ("RHG"), a registered broker/dealer. They may also be licensed to sell life, health and group insurance. Donald A. Holyfield, CLU, ChFC, is licensed to sell life, health and group insurance.

Clients are under no obligation to utilize services of associated persons in the purchase or sales of securities or insurance products. However, if transactions are conducted through RHG, then commissions may be earned by those persons in addition to any advisory fees charged by Sequoyah Planning. No one associated with Sequoyah Planning has a broker dealer dual registration. The only registration permitted is with Resource Horizons Group, LLC.

Other implementation services are available through Sequoyah Planning or companies with which Advisor has a strategic relationship. Clients, however, are under no obligation to utilize any of the parties for implementation of financial planning recommendations. All such decisions are at the client's discretion.

Clients can also receive planning advice on a more limited basis. This may include advice on only an isolated area(s) of concern such as estate planning, retirement planning, or any other specific topic. Sequoyah Planning also provides specific consultation and administrative services regarding investment and financial concerns of the client.

Amount of Managed Assets

As of 01-01-2011, Sequoyah Planning was actively managing on a discretionary basis total assets under management in the amount of \$11,878,792.

Wealth Management Fees

The standard fee for a comprehensive LifeDesign ranges between \$10,000 and \$15,000 and is negotiable based upon the complexity of the project and an estimate of time involved completing the planning process. The plan preparation fee is payable upon signature of the advisory contract. If the agreement is terminated during the planning process, the client is billed an hourly rate of \$500 per hour for the time spent up until termination by Advisor on the planning project. The client can terminate within 5 days with no penalty or cost. All notifications of termination must be in writing.

Fees for limited planning services are billed at an hourly rate of \$500 per hour. These fees are billed monthly as the services are rendered. All fees are negotiable between the planner and client with consideration of the anticipated work hours needed and the extent of evaluation involved.

Similar financial planning services may be available elsewhere for a lower cost to the client. The financial plan will be presented to the client within 90 days of the contract date, provided that the client has promptly provided all information needed to prepare the financial plan.

Investment Management

Sequoia Planning may directly manage client's assets, including but not limited to variable annuity sub-accounts, 401K plans or other retirement accounts. All assets are managed on a discretionary basis. Within these accounts, Advisor will review available investment options to help the client determine a suitable investment mix designed to achieve stated goals and investment objectives. These accounts are generally maintained at a custodian selected by the client. In addition, Advisor may hire a sub-advisor to manage the client's assets. Fees are collected in advance and are deducted directly from the client account per written agreement. In the event of termination, any unearned fees will be returned to the client. All fees are negotiable subject to the discretion of management. Upon request, fees may be billed directly to the client.

The annual fee schedule is:

- 2.00% on the first \$500,000 of assets managed;
- 1.50% on the next \$500,000 of assets managed; and
- 1.00% on all assets over \$1,000,000 of assets managed.

Certain types of assets, such as 529 plans, are subject to a 1% fee regardless of the total amount of assets under management by Advisor. These accounts will be specifically noted in the client's Advisory Agreement.

Third Party Investment Advisory Services (TPIA)

Sequoyah Planning has entered into agreements with other third party investment advisers (“TPIA”) for the provision of certain investment advisory services. These include professional money management, research, and trading. Sequoyah Planning's Investment Adviser Representatives (“IAR”) will provide individualized advisory services to their clients through the selection of a suitable TPIA. Factors considered in the selection of a TPIA include but may not be limited to: i) each IAR's preference for a particular TPIA; ii) the client's risk tolerance, goals and objectives, as well as investment experience; and iii) the amount of client assets available for investment. In order to assist clients in the selection of a TPIA, the IAR will typically gather information from the client about the client's financial situation, investment objectives, and reasonable restrictions the client wants imposed on the management of the account.

Depending on the TPIA selected, securities transactions may be decided upon and executed by the TPIA. For certain transactions, Advisor may have the discretionary authority to enter the transaction. In addition, clients may grant the IAR the discretionary authority to hire and fire third party managers.

Sequoyah Planning's IARs will on a quarterly basis review reports provided to the client and prepare a consolidated report of all of the client's holdings. Through client progress reviews, generally held on a quarterly basis, an IAR will meet with the client to review the client's financial situation and objectives, communicate information to the TPIA managing the account as warranted, and to assist the client in understanding and evaluating the services provided by the TPIA. Clients will be expected to notify their IAR of any changes in their financial situation, investment objectives, or account restrictions.

Please Note: When investing in mutual funds and variable annuities, clients are strongly encouraged to review the applicable prospectus. Mutual funds and variable annuities may impose certain restrictions on the frequency, timing and dollar amount of transactions and may impose penalty fees based upon short-term trading patterns. Such restrictions may impact the services provided by a TPIA.

Compensation generally, consists of four elements: i) management and advisory fees shared by the TPIA, Sequoyah, and its IARs; ii) transaction costs - if applicable - which may be paid to purchase and sell such securities; iii) custody fees; and iv) an additional administrative fee paid to RHG for its supervisory services. Transaction costs may also be charged for the execution and clearance of advisory transactions directed by such TPIA.

A complete description of the programs and services provided, the amount of total fees, the payment structure, termination provisions and other aspects of each program are detailed and disclosed in: i) the TPIA Form ADV Part II; ii) the program wrap brochure (if applicable) or other applicable disclosure documents; iii) the disclosure documents of the portfolio manager or managers selected; or, iv) the TPIA account opening documents. A copy of all relevant disclosure documents of the TPIA and of the individual portfolio manager(s) will be provided to anyone interested in these programs/managers.

Internal Mutual Fund and Variable Annuity Expenses

Generally, mutual fund and variable annuity companies impose internal fees and expenses on clients. Such fees are in addition to any program costs associated with the investment advisory services described above. Complete details of such internal expenses are specified and disclosed in each mutual fund and variable annuity company's prospectus. Clients are strongly advised to review the prospectus (es) prior to investing in such securities. In addition, variable annuity companies generally impose mortality charges on such accounts, of approximately 1.25% annually.

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

Additional Compensation

Associated persons of Sequoyah Planning may also be registered representatives of RHG and licensed insurance agents. In this capacity, they may facilitate the purchase and/or sale of insurance products, mutual funds, securities, and other investment products for their clients, who may or may not have an advisory fee agreement with Advisor. Sequoyah Planning representatives may receive compensation for these non-advisory services that they may provide. Such compensation would be in addition to the advisory and other fees that Sequoyah Planning may receive.

In addition, IARs, as registered representatives of RHG, may receive compensation (such as 12b_1 fees which represents expenses used for advertising and promotion of the fund. 12b-1 fees are paid by the fund out of mutual fund assets and are generally limited to a maximum of 1.00% per year (.75% distribution and .25% shareholder servicing) under FINRA Rules.) from the sale of mutual fund products to clients of Advisor. This compensation is consideration for various services that Sequoyah Planning provides such as presenting information to Sequoyah Planning clients regarding the funds and recommending shares of the funds for investment. Payment of these fees is included in the expense ratios of the mutual funds.

IARs may have a greater incentive to recommend certain funds or fund families with 12b-1 fees or funds with higher 12b-1 fees over other funds or fund families with no or lower 12b-1 fees.

Sequoyah Planning is also party to written agreements with certain third-party money managers under which Advisor acts as a solicitor for the money manager. The IAR will: qualify the clients for a particular TPIA as well as determine the client's goals and objectives (determining risk tolerance and investment styles). Sequoyah Planning and its IARs receive compensation pursuant to these agreements for introducing clients to the TPIA and for providing the aforementioned personal advisory services. This compensation is typically equal to a percentage of the investment advisory fee charged by the TPIA. Because such compensation may differ depending on the individual agreement with each TPIA, the IARs may have an incentive to recommend a particular TPIA over another manager with which Sequoyah Planning has less favorable compensation arrangements or alternative advisory programs. Any solicitation or referral arrangements will comply with applicable laws that govern the nature of the service, fees to be paid, disclosures to clients and any necessary client consents.

Other Services

Advisor may have arrangements with unrelated third parties (included but not limited to other registered investment advisors) to provide certain services in regards to client accounts. These services may include, but are not limited to the following: research, due diligence, reporting, portfolio analysis, portfolio management, and back office administration. The unrelated third parties will not have any direct contact with Advisor clients, nor will the unrelated third parties enter into any advisory contracts directly with Advisor clients. The unrelated third parties will provide services to Advisor, who in turn, is ultimately responsible for client account.

By entering into the advisory agreement with Sequoyah Planning, client implicitly and explicitly authorizes Advisor to use the aforementioned third party arrangements in servicing client's account. Furthermore, client authorizes Advisor to share non-public, personal information with the third party service provider during administration and management of the client's account.

Advisor has reasonable procedures in place to protect client non-public, personal information from dissemination to any unauthorized third party. Additionally, Sequoyah Planning executes a "Confidentiality Agreement" binding a third party service provider from sharing this information with any unauthorized person or entity.

The use of a third party service provider will not cause client to pay any additional fees. Advisor will compensate a third party service provider for services rendered out of the total wealth management fee charged to client as outlined in advisory agreement and previously in this section.

Sequoyah Planning does not charge performance-based fees and does not participate in side-by-side management.

Sequoyah Planning provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals);
- High net worth individuals;
- Pension and profit sharing plans;
Plan participants of pension and profit sharing plans;
- Charitable organizations and/or foundations;
- Corporations, partnerships, LLC's, or other businesses, not listed above;
- Trusts for children and/or special-needs adults.

Sequoyah Planning does not perform or use any of the following methods of analysis in formulating investment advice and/or for managing client assets:

Charting: In this type of technical analysis, the Advisor reviews charts of market and security activity in an admittedly futile attempt to identify when the market is moving up or down and to attempt to predict how long the trend may last and when that trend might reverse. The Advisor greatly discounts the usefulness of any results produced by "charting" and performs this type of analysis primarily to gain insight into the motivations of competing advisors who do rely on "charting" when formulating their investment strategies.

Fundamental Analysis: The Advisor attempts to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell). Fundamental analysis is the primary foundation of the Advisor's research efforts.

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Technical Analysis: The Advisor analyzes past market movements and applies that analysis to the present in an admittedly futile attempt to recognize recurring patterns of investor behavior and potentially predict future price movement.

Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly-managed or financially unsound company may underperform regardless of market movement. The Advisor greatly discounts the usefulness of any results produced by "technical analysis" and performs this type of analysis primarily to gain insight into the motivations of competing advisors who rely on "technical analysis" when formulating their investment strategies.

Cyclical Analysis: In this type of technical analysis, the Advisor measures the movements of a particular stock against the overall market in an admittedly futile attempt to predict the price movement of the security. The Advisor greatly discounts the usefulness of any results produced by "cyclical analysis" and performs this type of analysis primarily to gain insight into the motivations of competing advisors who rely on "cyclical analysis" when formulating their investment strategies.

Quantitative Analysis: The Advisor uses mathematical models in an attempt to obtain more accurate measurements of a company's quantifiable data, such as the value of a share price or earnings per share, and predict changes to that data. Quantitative analysis is important to the formulation of the Advisor's investment strategies. A risk in using quantitative analysis is that the models used may be based on assumptions that prove to be incorrect.

Qualitative Analysis: The Advisor subjectively evaluates non-quantifiable factors such as quality of management, labor relations, and strength of research and development factors not readily subject to measurement, in an attempt to predict changes to share price based on that data. Qualitative analysis is somewhat important to the formulation of the Advisor's investment strategies.

A risk of using qualitative analysis is that our subjective judgment may prove incorrect.

Asset Allocation: Rather than focusing primarily on securities selection, the Advisor attempts to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

Mutual Fund and/or ETF Analysis: The Advisor examines the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. The Advisor also examines the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in another fund(s) in the client's portfolio. They are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as the Advisor does not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the client's portfolio.

Sequoyah Planning does use the following method of analysis in formulating our investment advice and/or for managing client assets. We make every effort to explain to clients that investing in securities involves the risk of loss and that the client should be prepared to bear that loss.

Third-Party Investment Adviser (TPIA) Analysis: Sequoyah Planning examines the experience, expertise, investment philosophies, and past performance of independent third-party investment managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. Sequoyah Planning monitors the manager's underlying holdings, strategies, concentrations and leverage as part of the Sequoyah Planning's overall periodic risk assessment.

Additionally, as part of Sequoyah Planning's due-diligence process, Sequoyah Planning surveys the manager's compliance and business enterprise risks.

Sequoyah Planning examines other areas:

- Is the TPIA approved and does it manage on selected Variable Annuity and Variable Universal Life company platforms?
- Does the TPIA manage for secular bear market and secular bull market periods/trends? How?
- Does TPIA believe in “Buy and Hold” or asset allocation as an investment strategy?
- Which no-load mutual fund companies does TPIA use?
- How often does TPIA trade/adjust/allocate account?

A risk of investing with a third-party manager who has been successful in the past is that he/she may not be able to replicate that success in the future. In addition, as Sequoyah Planning does not control the underlying investments in a third-party manager's portfolio, there is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for Sequoyah Planning clients. Moreover, as Sequoyah Planning does not control the manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

Sequoyah Planning's third-party money manager analysis methods rely on the assumption that publicly-available sources of information about these companies are providing accurate and unbiased data. While Sequoyah Planning is alert to indications that data may be incorrect, there is always a risk that Sequoyah Planning's analysis may be compromised by inaccurate or misleading information.

When a TPIA is selected to recommend for client accounts, Sequoyah Planning will vigilantly monitor the performance of the TPIA in managing each client account.

Item 9 Disciplinary Information

Sequoyah Planning is required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of Sequoyah Planning's advisory business or the integrity of Sequoyah Planning's management.

Sequoyah Planning and Sequoyah Planning's management personnel have no reportable disciplinary events to disclose.

Item 10 Other Financial Industry Activities and Affiliations

Sequoyah Planning and Sequoyah Planning`s related persons are not engaged in other financial industry activities and have no other industry affiliations.

Sequoyah Planning has adopted a Code of Ethics which sets forth high ethical standards of business conduct that Sequoyah Planning requires of all employees, including compliance with applicable federal securities laws.

Sequoyah Planning and Sequoyah Planning personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Sequoyah Planning's Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by Sequoyah Planning access persons. Among other things, Sequoyah Planning's code also provides for oversight, enforcement and recordkeeping provisions.

Sequoyah Planning's Code of Ethics further includes Sequoyah Planning policy prohibiting the use of material non-public information. While Sequoyah Planning does not believe that Sequoyah Planning has any particular access to non-public information, all employees of Sequoyah Planning are reminded that such information may not be used in a personal or professional capacity.

A copy of the Sequoyah Planning Code of Ethics is available to Sequoyah Planning's advisory clients and prospective clients. Clients may request a copy by email, don@sequoyahplanning.com or by calling Sequoyah Planning at 678-454-2818.

The Sequoyah Planning or individuals associated with Sequoyah Planning may not buy securities for Sequoyah Planning or for themselves from our advisory clients. Sequoyah Planning or individuals associated with Sequoyah Planning may not sell securities owned by the firm or the individual(s) to Sequoyah Planning's advisory clients. However, if Sequoyah Planning were to do so, Sequoyah Planning will ensure that such transactions would be conducted in compliance with all of the provisions under Section 206(3) of the Advisers Act governing principal transactions to advisory clients.

Sequoyah Planning and individuals associated with Sequoyah Planning are prohibited from engaging in agency cross transactions.

The Sequoyah Planning Code of Ethics is designed to assure that the personal securities transactions, activities and interests of Sequoyah Planning employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Sequoyah Planning and/or individuals associated with Sequoyah Planning may buy or sell for their personal accounts securities identical to or different from those recommended to Sequoyah Planning clients. In addition, any related person(s) may have an interest or position in a certain security which may also be recommended to a client.

It is the expressed policy of Sequoyah Planning that no person employed by the Sequoyah Planning may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts.

Sequoyah Planning may aggregate employee trades with client transactions where possible and when compliant with our duty to seek best execution for Sequoyah Planning clients. In these instances, participating clients will receive an average share price and transaction costs will be shared equally and on a pro-rata basis. In the instances where there is a partial fill of a particular batched order; Sequoyah Planning will allocate all purchases pro-rata, with each account paying the average price. Sequoyah Planning employee's accounts will be included in the pro-rata allocation.

As these situations represent actual or potential conflicts of interest to our clients, Sequoyah Planning has established the following policies and procedures for implementing the Sequoyah Planning Code of Ethics, to ensure that Sequoyah planning complies with all regulatory obligations and provides Sequoyah Planning clients and potential clients with full and fair disclosure of such conflicts of interest:

1. No principal or employee of Sequoyah Planning may put his or her own interest above the interest of an advisory client.
2. No principal or employee of Sequoyah Planning may buy or sell securities for their personal portfolio(s) where their decision is a result of information received as a result of his or her employment unless the information is also available to the investing public.
3. It is the expressed policy of the Advisor that no person employed by the Advisor may purchase or sell any security prior to a transaction(s) being implemented for an advisory account. This prevents such employees from benefiting from transactions placed on behalf of advisory accounts.
4. The Advisor requires prior approval for any IPQ or private placement investments by related persons of the firm.
5. The Advisor maintains a list of all reportable securities holdings for the Advisor and anyone associated with this advisory practice that has access to advisory recommendations ("access person"). These holdings are reviewed on a regular basis by the Advisor's Chief Compliance Officer or his/her designee.
6. The Advisor has established procedures for the maintenance of all required books and records.
7. Clients can decline to implement any advice rendered, except in situations where the Advisor is granted discretionary authority.
8. All of Sequoyah Planning principals and employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
9. Sequoyah Planning requires delivery and acknowledgement of the Code of Ethics by each supervised person of Sequoyah Planning.
10. Sequoyah Planning has established policies requiring the reporting of Code of Ethics violations to Sequoyah Planning senior management.
11. Any individual who violates any of the above restrictions may be subject to termination.

Sequoyah Planning does not have any soft-dollar arrangements and does not receive any soft dollar benefits.

Sequoyah Planning does not receive any client referrals from Resource Horizons Group or any financial institution third party. Sequoyah Planning receives no incentive from anyone in making client investment recommendations.

As part of Sequoyah Planning's IARs' other business activities, they may affect securities transactions for or sell insurance products to clients. Sequoyah Planning may be receiving a fee for investment advice in advisory accounts and representatives may be receiving a commission for any transactions effected in RHG brokerage accounts. Registered representatives of RHG will use industry standard commissions and RHG will keep evidence of such. Clients are under no obligation to purchase or sell securities through IARs of Sequoyah Planning in the role as registered representatives of RHG.

Sequoyah Planning and its representatives may engage in personal securities transactions. The personal securities transactions of Sequoyah Planning and its representatives may raise potential conflicts of interest when such persons trade in a security that is 1) owned by a client or 2) considered for purchase or sale for a client. Sequoyah Planning has adopted policies and procedures that are intended to ensure that transactions are effected for clients in a manner that is consistent with the fiduciary duty and in accordance with applicable law. Persons who wish to purchase or sell securities of the types purchased or sold for clients may do so only in a manner consistent with Sequoyah Planning policies and procedures

Conditions for Managing Accounts

Advisor requires a minimum of investable assets of \$200,000. This minimum is negotiable subject to various factors including but not limited to related accounts, existing client relationship and family relationship with existing clients.

Review of Fee-Based Discretionary Individual Portfolio Management Accounts

REVIEWS:

All reviews are performed by Donald A. Holyfield, CLU, ChFC. Client accounts are reviewed at least monthly and in person client progress reviews are recommended on a quarterly basis. Accounts are reviewed to ensure that third party managers continue to perform as desired. Account reviews may be triggered by changes in general economic and market conditions, analyst reports, company news and interest rate movement. There is no specific number of accounts assigned to an individual.

REPORTS:

Sequoyah Planning will provide quarterly reports which aggregate holdings including assets held with various third party managers as well as other financial assets. These reports are called Client Progress Reviews: Investment Performance Review. The report provides a quarterly investment performance rate of return, YTD investment performance rate of return, plus, if applicable, previous year's results for comparison. Each account has a performance report with appropriate benchmarks for comparison.

Clients will be provided with account statements by their custodian reflecting their holdings and the transactions occurring in the client's account at least on a quarterly basis. Clients will be provided with confirmations for each securities transaction executed in the client's account.

The timing and frequency of reports from the third party money managers will be disclosed in the applicable managers Form ADV.

It is Sequoyah Planning's policy not to engage solicitors or to pay related or non-related persons for referring potential clients to our firm.

It is Sequoyah Planning's policy not to accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

Sequoyah Planning does not have actual or constructive custody of client accounts.

The qualified custodian, which would be a bank, or other qualified custodian, sends quarterly, or more frequent, account statements directly to the client. Clients should carefully review these statements.

Depending on the TPIA selected, securities transactions may be decided upon and executed by the TPIA. For certain transactions, Sequoyah Planning may have the discretionary authority to enter the transaction and for others the client will be required to implement the recommendations of the TPIA. In addition, clients may grant IARs the discretionary authority to hire and fire third party managers.

Usually, TPIA utilize the services of a particular broker/dealer. Thus, by assisting the client in selecting such a program, IARs may also be deemed to be assisting the client in selecting a broker/dealer. In certain programs, the client is asked to select a particular broker/dealer to execute trades for the client's account and/or to act as custodian for the account. In those programs, IARs will assist the client in making such selection. Because Sequoyah Planning's and/or the IARs' compensation in connection with a program may vary depending on the broker/dealer or custodian selected, Sequoyah Planning and/or the IARs may have a conflict of interest in assisting the client in such selection.

Sequoyah Planning may recommend RHG to execute client account transactions as part of the plan implementation process. This may create a conflict of interest, as associated persons of Advisor may be registered representatives with RHG, and therefore, receives compensation from RHG

Sequoyah Planning does not take any action or render any advice with respect to voting of proxies solicited by or with respect to the issuers of securities in which client assets may be invested. In addition, Sequoyah Planning will not take any action or render any advice with respect to any securities held in any accounts that are named in or subject to class action lawsuits. Advisor will, however, forward to clients any information it receives regarding class action legal matters involving any security held in client accounts.

Sequoyah Planning has no negative financial circumstances to report.
Under no circumstances do we require or solicit payment of fees in excess of \$500 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.
Sequoyah Planning has not been the subject of a bankruptcy petition at any time.

The following individuals are the principal executive officers and management persons of Sequoyah Planning:

- Donald A. Holyfield, CLU, ChFC

Information regarding the formal education and business background for this individual is provided in the subsequent section entitled "Part 2B of Form ADV: *Brochure Supplement.*"