

Part 2A of Form ADV: Firm Brochure

Item 1 Cover Page

VARIPLAN, LLC

Phone: 800-923-7616

Fax: 703-991-8777

Email: MMILES@VARIPLAN.COM

Website: WWW.VARIPLAN.COM

January 1, 2026

This brochure provides information about the qualifications and business practices of Variplan, LLC. If you have any questions about the contents of this brochure, please contact us through any of the channels listed above. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or any state securities authority.

Additional information about Variplan, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Material Changes

None

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Item 4 Advisory Business

Variplan, LLC is the investment advisory practice of Michael S. Miles, who acts as the firm's principal advisor. Mr. Miles has been providing investment advice professionally since 1996. Mr. Miles is the sole owner of the firm.

All of our advisory services are provided under written agreements that clearly define the scope of the engagement, and the terms and cost of the services to be provided.

Variplan provides its investment advisory services primarily through its proprietary **Vantage™** engagement agreement. Vantage is an annual engagement package that provides integrated financial planning and non-discretionary investment advisory services for a fixed fee. Under a Vantage agreement, we consider our client's goals, resources, constraints and preferences in formulating our advice. Our advice through Vantage is primarily based upon quantitative analysis, including Monte Carlo simulation, mean-variance optimization, and other widely accepted advanced statistical methods. The objective of Vantage is to assist clients in managing their investment resources in a way that will maximize the probability of funding their lifetime financial goals. This is accomplished by conducting semi-annual reviews of the client's plan and adjusting the investment portfolio in response to changes in the client's circumstances and the investment environment.

Additionally, Variplan may occasionally offer certain clients customized engagements to perform specific analytic and advisory work for fixed or hourly fees.

In all cases, Variplan will recommend the securities we judge to be best suited, from those available to the client, to meet the client's needs.

Ultimately, the client retains control of all of their investment assets and is free to implement or ignore our investment advice covering those assets.

Vantage includes an option, called the Vantage Account Management Assistance Program (VAMAP), which, at no additional cost, provides our Vantage clients with assistance in directing recommending trading activity on their behalf. This service is offered as a convenience to our clients and is only available for accounts held in custody at Charles Schwab over which Variplan is granted the necessary limited power of attorney.

Item 5 Fees and Compensation

Fees for **Vantage™** engagements are fixed by written agreement in advance. Vantage fees are based on a 1-year service commitment and are payable, in advance, monthly or quarterly, as elected by the client at the time of engagement. Fees are payable by check, debit card or major credit card. The exact fee for each engagement is based upon the frequency of portfolio review and the number of investment accounts for which we will be providing advice.

Our recurring fees for new clients currently begin at \$1,260 for a client with 1 investment account engaging us for 1 review per year. A new client with 5 investment accounts engaging us for 2 reviews per year, can expect to pay \$3,080 per year. In addition, we charge a one-time initiation fee, based on the complexity of the work to be performed, of between \$570 and \$1,500, for each new engagement. Our current schedule of fees is available on request.

Our fees for Vantage clients are re-calculated at each annual renewal and the client is notified of any change prior to renewal. Vantage clients are entitled to a system of progressive fee discounts based on their longevity as Vantage clients.

In addition to Variplan's fees, clients are directly responsible all investment expenses related to their investment accounts. In the event that a client chooses to terminate a Vantage agreement before its maturity date, Variplan will calculate the fees due for work completed, in good faith, up to the date of termination, according to its published rates at the time, and either bill the client for any balance due, or promptly refund to the client any overpayment.

Our hourly billing rate for consulting services is \$265. Our rates and fees are not generally negotiable.

Variplan calculates all client fees based on our estimates of the cost of the service(s) to be provided under an engagement agreement. We do not charge fees based on a percentage of wealth or investment assets. All of our fees are quoted in advance, and we charge only for work that has been authorized by the client.

We do not deduct fees from our clients' investment accounts, nor do we accept prepayment of fees of more than \$500 or more than 6 months in advance.

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

Variplan does not charge performance-based fees for its services.

We do not engage in side-by-side management of accounts in a way that would create a conflict, or the potential for conflict, between our interests and those of our clients, or between the interests of our clients.

Item 7 Types of *Clients*

Variplan provides investment advisory services, exclusively, to individuals and trusts.

Variplan employs the following methods of analysis and investment strategies in providing its investment advice and management:

Our **Vantage™** and other planning engagements rely on the following analytic methods:

- a. Two-variable Monte Carlo simulation
- b. Mean-variance optimization
- c. Linear regression analysis
- d. Statistical data reduction
- e. Expected value calculations
- f. Historical distribution analysis

And recommend the following investment strategies and tactics:

- g. Asset allocation
- h. Portfolio optimization
- i. Cost minimization
- j. Tax-efficient investing
- k. Index fund investing
- l. Exchange-traded fund selection
- m. Periodic rebalancing

All of our investment advisory services are intended to assist clients in achieving the financial goals with a minimum of risk. Our bias toward diversified, low-cost, unmanaged index securities is evidence of this intent. In addition, we seek to identify the lowest risk asset allocation that is likely to fully fund our clients' financial objectives.

In spite of this effort, the investment strategies that we recommend are subject to the risk of loss, and our clients should be prepared to bear this risk. Since all of our recommended investment strategies are broadly diversified across the three major asset classes (cash, bonds and stocks) and highly diversified within each of these classes, the primary investment risk that our Vantage clients face is general market risk.

Item 9 Disciplinary Information

There is no disciplinary information to disclose.

Item 10 Other Financial Industry Activities and Affiliations

There are no other financial industry activities and affiliations to report.

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

Variplan's Code of Ethics sets forth standards of conduct that govern our business activities and which recognize and promote our fiduciary obligations to our clients. Our Code of Conduct is available to our clients and prospective clients upon request.

Item 12 Brokerage Practices

Our **Vantage™** clients may elect, at no additional charge under the Vantage Account Management Assistance Program (VAMAP), to request our assistance in directing securities transactions that they approve in their brokerage account(s), as long as those brokerage accounts are held in the custody of Charles Schwab, and we have been granted the necessary limited power of attorney over the account(s).

VAMAP is purely optional and voluntary, and we do not recommend, request, or require that our clients direct their investment activity through a particular broker-dealer.

We selected Charles Schwab for their ability to facilitate such a 3-party arrangement, their cost effectiveness, and their high level of client service. While we have access to a standard package of research and other support services as a result of our relationship with Charles Schwab, we receive no service or compensation that is related to the volume of activity or revenue that our clients' accounts produce, and we would receive similar services and support benefits from competitive broker-dealers. We, therefore, do not believe that this relationship creates any conflict between our interests and those of our Vantage clients.

Not all advisors recommend, request or require their clients to direct brokerage. When clients direct brokerage, we may be unable to achieve the most favorable execution of client transactions, and this practice may cost clients more money.

We do not aggregate client transactions and generally do not have the opportunity to do so. We do not believe that this practice results in additional costs to our clients.

Item 13 Review of Accounts

Our **Vantage™** clients' plans and accounts are reviewed according to the frequency selected by the client at the time of engagement, or as modified subsequently by mutual agreement – usually 1 or 2 times per year. We initiate each review by providing the client with a copy of the last plan of record and requesting updated information on the client's investment accounts and other relevant planning factors. We then compare the client's account values, in aggregate, with the expected value of those accounts at the time of the review and report any difference and its effect on the viability of the plan.

During the planning process, we employ the analytic methods described in Item 8, Paragraph 1, above, to formulate our investment advice and deliver this advice to the client in writing.

Item 14 *Client Referrals and Other Compensation*

There is no client referral or other compensation information to report.

Item 15 *Custody*

Variplan does offer to, nor willingly, accept custody of client funds.

Item 16 Investment Discretion

Variplan does not exercise discretion over our clients' investment decisions or transactions.

Item 17 Voting *Client* Securities

Variplan does not vote securities proxies on behalf of its clients.

Item 18 Financial Information

Variplan is not required to report financial information.

Item 19 Requirements for State-Registered Advisers

Michael Scott Miles is Variplan's Managing Member and Principal Advisor

Education:

- Bachelor of Science, 1985, Virginia Polytechnic Institute and State University
- Master of Business Administration, Finance, 1993, George Mason University
- Registered Employee Benefits Consultant, 1998, American College
- Certified Financial Planner, 1999, CFP Board of Standards

Mr. Miles has been in the business of providing professional financial advice to individuals and businesses since 1995:

1995 – 1999; John Hancock Financial Service, Registered Representative

1999 – Present; Self Employed, Principal Financial Advisor

In addition to, and as the basis for, providing investment advice, Variplan provides comprehensive financial planning services and other advisory services as described elsewhere in this document.

Although most of Variplan's business activity is related to providing its clients with investment advice, we devote approximately 40% of our time to business activity other than directly providing investment advice.

Part 2B of Form ADV: Firm Brochure Supplement

Item 1 Cover Page

MICHAEL S. MILES

Variplan, LLC

Phone: 800-923-7616

Fax: 703-991-8777

Email: MMILES@VARIPLAN.COM

Website: WWW.VARIPLAN.COM

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This brochure supplement provides information about Michael S. Miles that supplements the Variplan, LLC brochure. You should have received a copy of that brochure. Please contact Variplan, LLC if you did not receive Variplan, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Michael S. Miles is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Full Name: Michael Scott Miles

Year of Birth: 1961

Education

Virginia Polytechnic Institute and State University
Blacksburg, VA
Bachelor of Science, Geology, 1985

George Mason University
Fairfax, VA
Master of Business Administration, Finance, 1993

Employment

1995 – 1999; John Hancock Financial Service, Registered Representative

1999 – Present; Self Employed, Principal Financial Advisor

Professional designations

Certified Financial Planner® licensee, Certified Financial Board of Standards, Inc. (www.cfp.net)

To become and remain certified, a CFP licensee is required to meet the following requirements:

- Must have a bachelor's degree from an accredited college or university
- Must demonstrate mastery a list of nearly 1,000 topics on integrated financial planning
- Must pass a 10-hour examination
- Must have at least 3 years of relevant work experience
- Must pass an ethics, character, and criminal background check
- Must adhere to the CFP Board Code of Ethics and Professional Responsibility
- Must meet and maintain the CFP Financial Planning Practice Standards
- Must meet continuing education requirements including 30 hours of relevant professional and ethics education every 2 years

Registered Employee Benefits Consultant, The American College (www.theamericancollege.edu)

To become and remain certified, a Registered Employee Benefits Consultant is required to meet the following requirements:

- Must complete college-level coursework in six areas of knowledge including group benefits, retirement planning, personnel management, executive compensation, managed care.
- Must have at least 3 years of relevant business experience
- Must adhere to the Huebner School code of ethics
- Must meet continuing education requirements including 30 hours of relevant professional education every 2 years

Item 3 Disciplinary Information

There is no disciplinary history to report for Michael S. Miles.

Item 4 Other Business Activities

Michael S. Miles is not substantially engaged in any other business activity.

Item 5 Additional Compensation

Michael S. Miles receives no additional compensation, beyond that provided by clients, for his advisory services.

Item 6 Supervision

Not Applicable

Item 7 Requirements for State-Registered Advisers

No Disclosures