

# Amaral Financial Planning, LLC

This brochure provides information about Amaral Financial Planning, LLC's ("Amaral Financial Planning, LLC", the "Firm", or the "AFP") qualifications and business practices. If you have any questions about the contents of this brochure, please contact us at (408) 797-0029 or by email at [brandon@amaralfp.com](mailto:brandon@amaralfp.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any State Securities Authority.

Additional information about Amaral Financial Planning, LLC is also available at the SEC's website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) (select "investment adviser firm" and type in our firm name). Results will provide you both Part 1 and 2 of our Form ADV.

We are a Registered Investment Advisor Firm. Our registration does not imply any level of skill or training. The oral and written communications we provide to you, including this brochure, are for you to evaluate us. Please use this information as factors in your decision to hire us or to continue our business relationship.

## **ITEM 1 – COVER PAGE ADV PART 2A**

March 6, 2024

CRD #: 316681

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# Amaral Financial Planning, LLC

## ITEM 2 – MATERIAL CHANGES

This brochure, dated March 6, 2024, has been prepared by Amaral Financial Planning, LLC to meet California requirements. Since the last filing of our Form ADV Part 2A/2B dated March 18, 2023, we have made the following material changes:

- Update to the firm’s phone number.
- Update to Item 4: Advisory Business.
- Update to Item 5: Fees and Compensation.
- Update to Item 8: Methods of Analysis, Investment Strategies and Risk of Loss.

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## **ITEM 4 – ADVISORY BUSINESS**

Amaral Financial Planning, LLC is registered as an investment Adviser with the state of California and Texas. The firm was founded in September 2021. Brandon R. Amaral, CFP®, EA is the firm’s Founder, Managing Member and Chief Compliance Officer (supervisor), as well as the majority unitholder (shareholder). Additional information about Mr. Amaral may be found in the accompanying Form ADV Part 2B brochure supplement. As of December 31, 2023, AFP had approximately \$4,750,000 in Discretionary Assets Under Management with Betterment and Charles Schwab.

### ***Financial Planning Services***

We provide fee-only financial planning services on an annual basis. These services focus on topics including debt management, cash flow management, risk management, college savings, tax planning, retirement planning, employee benefits, estate planning, and equity compensation. Depending on your project, your financial profile and services to be rendered, you will choose from one of the following Packages:

- Wealth Builder – Designed for tech professionals with equity compensation
- Wealth Management – Designed for business owners & real estate investors

California requires Investment Advisory Firms to disclose to prospective clients that potential conflicts of interest exist between themselves and their client’s best interest if they provide financial planning services and receive fees and/ or commissions from the sale of securities, insurance, real estate or any other product or services recommended in a financial plan (CCR Section 260.235.2).

In the course of a financial planning engagement, the AFP will make recommendations for investment advisory services through the services of AFP and Betterment, LLC and/ or Charles Schwab & Co., Inc. AFP will receive fees for such investment advisory based on a percentage of the assets, generally around 0.50% and such fees will be fully disclosed prior to engagement of AFP. At no time is the client obligated to act on our recommendations and the client can choose to transact our recommendations through any other party.

We are committed to the highest level of ethical professional duty and we continually strive for integrity, objectivity, competence, fairness and diligence. We will always put the client’s best interest first and above our own interests and act with care and in good faith.

### ***Investment Advisory Services***

We provide continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation target, on a discretionary basis. During our data-gathering process, we determine the client’s individual objectives, time horizons, risk tolerance, and liquidity needs. We may also review and discuss a client’s prior investment history, as well as family composition and background.

We offer investment advisory services through use of Betterment, LLC, (MTG LLC d/b/a Betterment Securities, CRD #47788, “Betterment”) and/ or Charles Schwab & Co., Inc. (CRD#: 5393, “Schwab”) for portfolio management services. We assist clients in selecting an appropriate allocation model, completing Betterment’s and/ or Schwab’s investor profile questionnaire, interacting with Betterment and/ or Schwab and reviewing Betterment and/ or Schwab. Additionally, we will meet with the client on a periodic basis to discuss changes in their personal or financial situation, suitability, 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.

We will serve as the communication conduit between the client and Betterment and/ or Schwab. We shall be available to answer questions that the clients may have regarding their account. Prior to the introduction of a prospective client to Betterment and/ or Schwab, we collect financial and demographic information, and will assist the client in identifying their financial objectives. We will also keep the client’s financial plan current to meet the ongoing needs of the client.

Should you choose not to place your assets with Betterment or Schwab, AFP and its advisors will be unable to manage your portfolio account. Additionally, please note, Client may go directly to Betterment and Schwab for investment management services, outside of the Investment Advisory services provided by AFP.

Client should obtain and read Betterment’s and Schwab’s Disclosure Brochure (ADV Part 2) for a complete description of their service, fee schedules and account minimums. A Disclosure Brochure will be provided to clients at the time an agreement for services is executed and account is established.

### ***Tax Preparation and Representation Services***

We offer tax preparation and filing services for clients Federal and State returns. We may also assist clients in reviewing and responding to IRS letters and notices.

### ***Notarization Services***

We offer notarization services for certain documents, including wills, trusts, deeds, contracts, and affidavits.

## **ITEM 5 – FEES AND COMPENSATION**

Payment is made through a third-party payment processor such as AdvicePay.

### **Financial Planning Services**

Our services include an annual fee. Depending on your project, your financial profile and services to be rendered, this will be paid on an annual, quarterly, or monthly basis. The fee is paid in advance each quarter/ month:

Package	Annual Fee
Wealth Builder	<b>\$7,500+</b>
Wealth Management	<b>\$12,000+</b>

Clients will receive:

- An initial financial plan
- Quarterly check-ins
- Unlimited email & phone support
- Tax preparation

This service may be terminated with written notice. Upon termination, the fee will be prorated and any unearned fee will be refunded to the client. AFP will not bill an amount above \$500.00 more than 6 months in advance. However, unpaid fees will be due at time of termination.

The Client will be provided written notice of any fee increase at least 30-days in advance. Fees will be reviewed on an annual basis and adjusted to meet the complexity of the Client's situation. Any fee increases greater than 3% will require the Client and the Adviser to sign a new Client Agreement. The fee may be negotiable in certain cases.

If the client chooses to pay for the fee using an investment account, Betterment and/ or Schwab will debit the client's account for both Betterment's and/ or Schwab's fee and Amaral Financial Planning's advisory fee and will remit Amaral Financial Planning's fee to Amaral Financial Planning.

Clients bear certain charges that may be imposed by other third-party service providers such as custodians, broker dealers, trust companies, banks and other financial institutions (collectively "Financial Institutions"). These additional charges may include platform fees, securities brokerage commissions, transaction fees, custodial fees, charges imposed directly by a mutual fund or ETF in a client's account, as disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), 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.

## **Financial Planning Hourly Fee**

On a limited basis, we may be engaged for our financial planning services on an hourly fee basis. This is typically for those clients requiring a narrowly focused plan, incidental advice or abbreviated review session. The hourly rate is \$500 per hour. A partial increment will be treated as a whole increment. Prior to engagement you will receive an estimate of the overall cost based on your requirements and the time involved. 50% of the fee is due at the start of the engagement and the remainder of the fee is due at the completion of the engagement.

This service may be terminated with written notice. Upon termination, the fee will be prorated and any unearned fee will be refunded to the client. AFP will not bill an amount above \$500.00 more than 6 months in advance. However, unpaid fees will be due at time of termination.

## **Investment Advisory Services**

If the Client hires AFP for Investment Advisory services, accounts are assessed an annualized asset-based fee that is based on the average daily balance during the calendar month. Using an average daily balance allows AFP to readily adjust for additions and withdrawals, as well as mid-cycle account openings or closures. AFP bills on a monthly basis, in arrears, at 0.50% (50 basis points). The annualized Investment Advisory fee excludes the investment advisory fee charged by Betterment for access to their asset allocation platform, which is a maximum of 0.15% per annum. Additional information regarding Betterment's asset allocation services is available on the Form ADV Part 2A for Betterment, which will be provided to you prior to your engaging Betterment.

Your billing will commence upon your election to utilize our Investment Advisory services and execute the Agreement. Investment Advisory fees for partial billing periods will be calculated based upon the number of days the Account was open during that billing period. The Investment Advisory fee will generally be assessed within the first 10 days of the following month.

All Investment Advisory fees deducted by Betterment and/ or Schwab will be clearly noted on account statements that you will receive directly from Betterment and/ or Schwab on a monthly basis. Clients are urged to carefully review and compare account statements that they have received directly from Betterment and/ or Schwab with any document they may receive from AFP which contains portfolio performance information.

Upon the engagement of Betterment and/ or Schwab, you will execute Betterment's and/ or Schwab's custodial and advisory documentation, which will authorize the withdrawal of both their advisory and transactional fees from your Account, in addition to our Investment Advisory fee. To this end, Betterment and/ or Schwab will remit our Investment Advisory fees directly to AFP.

## **Tax Preparation and Representation Services**

If AFP is separately engaged to prepare and file a client's federal and/ or state tax returns, AFP charges a flat fee starting at \$500, depending on the nature and complexity of a client's tax situation. If it becomes necessary that your fee to increase, AFP will request approval before continuing work. You will be responsible to pay your final invoice once returns are sent for review and electronic signature. If you have not selected to e-file your returns with AFP, you will be solely responsible to file the returns with the appropriate taxing authorities. Review all tax-return documents carefully before signing them. The fee may be negotiable in certain cases.

On a limited basis, we may also assist clients in reviewing and responding to IRS letters and notices. The hourly rate is \$500 per hour. Prior to engagement you will receive an estimate of the overall cost based on your requirements and the time involved. 50% of the fee is due at the start of the engagement and the remainder of the fee is due at the completion of the engagement. In the event of early termination by client, any fees for the hours already worked will be due.

## **Notarization Services**

AFP also offers notarization services. The State of California standard fee per notarized signature is \$15. A travel fee will also be assessed and will be based on distance and time of day (if outside business hours).

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

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

## **ITEM 6 – PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

Amaral Financial Planning does not charge fees based on a share of capital appreciation of the funds of an advisory contract, also known as performance-based fees.

## **ITEM 7 – TYPES OF CLIENTS**

Amaral Financial Planning provides its services primarily to individuals and their families, and trusts. We do not require minimums as to income, assets, net worth, and length of engagement, revenues generated or other conditions for engaging our services.

We do not have a minimum account size requirement.

## **ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

We use an investment strategy whereby diversification, asset allocation, and rebalancing are specific to each client. We provide discretionary investment management. We act in a discretionary capacity when accounts are held at Charles Schwab and Betterment.

We provide advice based on long-term investment strategies that incorporate the principles of Modern Portfolio Theory (MPT). Using several different asset classes in a diversified portfolio is emphasized, as this has been shown to typically effect a reduction in portfolio volatility over long periods of time. MPT describes the relationship between risk and return and how by combining uncorrelated asset classes in a portfolio helps the investor achieve a higher risk-adjusted rate of return.

Our investment analysis involves the use of commercially available software, securities ratings services, general financial and economic information and securities ratings services. Our primary sources of information include financial newspapers and journals, commercially available investment information and evaluation services, and academic white papers, in addition to prospectuses and data aggregation services such as Morningstar.

We take into account the cost of an investment, tax consequences, internal costs, portfolio turnover and whether an investment is no load (no 12-b1 fees or commissions).



Our primary method of investment analysis aligns with the principles of passive investing. However, we also consider fundamental, technical, cyclical, and charting analysis.

## **Investment Strategies**

We practice passive investment management. Passive investing involves building portfolios that are comprised of various distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange traded funds.

Passive investment management is characterized by low portfolio expenses (i.e., the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Academic research indicates most active managers underperform the market. Our analysis of outside managers involves the examination of the experience, expertise, investment philosophies, and past performance of the outside 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. We monitor the manager's underlying holdings, strategies, concentrations and leverage as part of our overall periodic risk assessment. Additionally, as part of our due diligence process, we survey the manager's compliance and business enterprise risks. A risk of investing with an outside 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 we do not control the underlying investments in an outside 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 our clients. Moreover, as we do 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.

**Fundamental analysis** involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

**Technical analysis** involves using chart patterns, momentum, volume, and relative strength in an effort to pick sectors that may outperform market indices. However, there is no assurance of accurate forecasts or that trends will develop in the markets we follow. In the past, there have been periods without discernible trends and similar periods will presumably occur in the future. Even where major trends develop, outside factors like government intervention could potentially shorten them. Furthermore, one limitation of technical analysis is that it requires price movement data, which can translate into price trends sufficient to dictate a market entry or exit decision. In a trendless or erratic market, a technical method may fail to identify trends requiring action. In addition, technical methods may overreact to minor price movements, establishing positions contrary to overall price trends, which may result in losses. Finally, a technical

trading method may underperform other trading methods when fundamental factors dominate price moves within a given market.

**Cyclical analysis** is a type of technical analysis that involves evaluating recurring price patterns and trends based upon business cycles. Economic/business cycles may not be predictable and may have many fluctuations between long term expansions and contractions. The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

**Charting analysis** involves the gathering and processing of price and volume information for a particular security. This price and volume information is analyzed using mathematical equations. The resulting data is then applied to graphing charts, which is used to predict future price movements based on price patterns and trends. Charts may not accurately predict future price movements. Current prices of securities may not reflect all information about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

## **Material Risks Involved**

AFP does not provide portfolio management; however, investment recommendations may be made as part of the investment advisory service. All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities and any other investment or security. Material risks associated with our investment strategies are listed below.

**Market Risk:** Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

**Strategy Risk:** The Advisor's investment strategies and/or investment techniques may not work as intended.

**Small and Medium Cap Company Risk:** Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

**Turnover Risk:** At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

**Limited markets:** Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions we may be unable to sell or liquidate investments at prices we consider reasonable or favorable, or find buyers at any price.

**Concentration Risk:** Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

**Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall.

In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

**Legal or Legislative Risk:** Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

**Inflation:** Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

## Security-Specific Material Risks

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

**Commercial Paper** is, in most cases, 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** 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** 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 over time to face value at maturity. The market prices of debt securities fluctuate depending on such factors 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** 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** 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, and liquidity and valuation risk.

**Options and other derivatives** carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

**Exchange Traded Funds** prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected.

**Investment Companies Risk:** When a client invests in open end mutual funds or 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 clients invest.

## ITEM 9 – DISCIPLINARY INFORMATION

Neither Amaral Financial Planning nor any of its personnel have been the subject of a reportable legal or disciplinary event.

## ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Neither Amaral Financial Planning nor any of its management persons are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Neither Amaral Financial Planning nor any of its management persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities, disclose this fact.

As referenced in Item 4 of this brochure, AFP recommends clients to Betterment and/ or Schwab to manage their accounts. In the event that we recommend Betterment, Schwab or other third-party investment advisors, please note that we do not share in their advisory fee. Our fee is separate and in addition to their compensation (as noted in Item 5) and will be described to you prior to engagement. You are not obligated, contractually or otherwise, to use the services of Betterment, Schwab or any third-party investment advisors we recommend. Additionally, AFP will only recommend a third-party investment advisor who is properly licensed or registered as an investment advisor.

Amaral Financial Planning also provides Tax Preparation and Representation services and Notarization services. In the course of a financial planning engagement, the AFP may make recommendations for tax and notarization services. This creates a conflict of interest since AFP is engaged in providing tax and notarization services for a fee. If you choose to utilize AFP for these services, AFP will receive fees for such services (as noted in Item 5), and will be fully disclosed prior to engagement of AFP. At no time is the client obligated to act on our recommendations and the client can choose to transact our recommendations through any other party.

All material conflicts of interest under CCR Section 260.238(k) are disclosed regarding AFP Planning, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

## **ITEM 11 – CODE OF ETHICS, PARTICIPATIONS OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

Amaral 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.

### **Code of Ethics Description**

The firm owes the client a fiduciary duty to put the client's interest first which includes, but is not limited to, a duty of care, loyalty, obedience, and utmost good faith. We have adopted a Code of Ethics that establishes policies for ethical conduct for our personnel. Our firm accepts the obligation not only to comply with all applicable laws and regulations but also 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. AFP Planning 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 the firm's Code of Ethics is made available to any client or prospective client upon request.

CERTIFIED FINANCIAL PLANNER™ Professionals, such as Mr. Amaral, adhere to the Certified Financial Planner Board of Standards, Inc. principles, which state:

### **Principle 1 – Integrity**

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

### **Principle 2 – Objectivity**

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

### **Principle 3 – Competence**

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

## **Principle 4 – Fairness**

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

## **Principle 5 – Confidentiality**

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

## **Principle 6 – Professionalism**

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

## **Principle 7 – Diligence**

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

## **Statement Involving Our Privacy Policy**

We respect the privacy of all clients and prospective clients (collectively termed “customers”), both past and present. It is recognized that you have entrusted our firm with non-public personal information, and it is important that both access persons and customers are aware of firm policy concerning what may be done with that information. The firm collects personal information about customers from the following sources:

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

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

- When required to provide services, our customers have requested.

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

Within the firm, access to customer 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 customer information with someone else that may request information about an account unless they are specifically authorized in writing by the customer to do so. This includes providing information about a spouse's IRA or a parent's account.

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

The firm will provide our customers 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 the firm nor an associate is authorized to recommend to a client, or effect a transaction for a client, involving any security in which the firm or a "related person" (e.g., associate, an immediate family member, etc.) has a material financial interest, such as in the capacity as a board member, underwriter or advisor to an issuer of securities, 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**

Our firm and its "related persons" may buy or sell the same or similar securities we recommend to clients for their accounts. In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates' transactions in specific reportable securities transactions. For securities like mutual funds, index funds, and ETFs, pre-clearance is not required. Given the volume of those types of funds, associates' trades will not have a material impact on the fund. If an associate wants to purchase an individual stock, pre-clearance is required. As a firm, AFP does not normally transact in individual stocks or bonds, however, we may advise clients on their outside assets, and thus, it is important to get pre-clearance for transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

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

From time to time, our firm or its “related persons” may buy or sell securities for themselves at or about the same time that we recommend our clients buy or sell the same securities. In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict when associates’ transactions in specific reportable securities may take place. For securities like mutual funds, index funds, and ETFs, pre-clearance is not required. Given the volume of those types of funds, associates’ trades will not have a material impact on the fund. If an associate wants to purchase an individual stock, pre-clearance is required. As a firm, AFP does not normally transact in individual stocks or bonds, however, we may advise clients on their outside assets, and thus, it is important to get pre-clearance for transactions. AFP and its “related persons” will not trade individual stocks or bonds on the same day that we recommend a client trade that same security.

## **ITEM 12 – BROKERAGE PRACTICES**

### **Factors Used to Select Custodians and/or Broker-Dealers**

We recommend that our clients use MTG, LLC dba Betterment Securities (“Betterment Securities”) and/ or Charles Schwab & Co., Inc. (“Schwab”), 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 or Schwab. While we recommend that you use Betterment Securities and/ or Schwab 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 assist you in doing so. If you do not wish to place your assets with Betterment Securities and/ or Schwab as the custodian of record, we are unable to manage your account under our Investment Advisory Service.

### **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 12). 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 payments to and from accounts.
- Availability of investment research and tools that assist us in making investment decisions.
- Quality of services.
- 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.

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 broker-dealer to Betterment for Advisors, an investment and advice platform serving independent investment 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:

- 1. 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.
- 2. 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.
- 3. Services That Generally Benefit Only Us.** By using Betterment for Advisors, we may be offered other services intended to help us manage and further develop our business enterprise.
  - 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 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 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 markets 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. Furthermore, Betterment may delay or manage trading in response to market instability. For further information, please consult Betterment LLC's Form ADV Part 2A. 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 benefits 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 owe the client a fiduciary duty to put the client's interest first which includes, but is not limited to, a duty of care, loyalty, obedience, and utmost good faith.

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.

Our firm has determined having portfolio management services account trades completed through Betterment Securities is consistent with our duty to seek best execution. We also 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.

## **Aggregating Securities Transactions**

Betterment may block client trades at their discretion. Their specific practices are further discussed in their ADV Part 2A, Item 12. Betterment places aggregated orders involving multiple Betterment accounts trading in the same securities. In conducting these transactions no client is favored over any other client and each client that participates in an aggregated transaction will participate at the average share price for transactions in the aggregated order.

## **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**

Client accounts with the investment advisory service have assets managed by Betterment and/ or Schwab. They will be reviewed regularly on a quarterly basis by Brandon R. Amaral, Founder and CCO. The account is reviewed with regards to the client's investment policies and risk tolerance levels. Events that may trigger a special review would be unusual performance, addition or deletions of client-imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per client's needs.

Clients engaged in the financial planning service will have their plans reviewed as frequently as contracted for at the inception of the relationship, but not less than once annually. The review will include gathering and updating any information in the client's financial profile that may affect their financial plan. In addition, a review will cover changes in

the client's goals and objectives, changes in market/economic conditions, and any specific client requests. The review will be conducted by Brandon R. Amaral, Founder and CCO.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

AFP will not provide written reports to Investment Advisory clients.

## **ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION**

Amaral Financial Planning does provide to or accept compensation from any person for client referrals. Referrals to other professionals may be undertaken where appropriate to meet the client's needs. These situations are discussed below:

- Referrals to a certified public accountant or enrolled agent may be undertaken for preparation of the client's taxes. The client's CPA/ tax preparer will provide these services directly to the client, and the client is charged directly by the CPA/ tax preparer in accordance with the client's agreement with that person or firm.
- Referrals to a mortgage broker or lender may be undertaken for financing of the client's mortgage. The client's mortgage broker or lender will provide these services directly to the client, and the client is charged directly by the mortgage broker or lender in accordance with the client's agreement with that person or firm.
- Referrals to attorneys for legal advice and document preparation may be undertaken for preparation of any recommended estate planning documents, the implementation of various strategies relating to asset protection planning, legal document preparation relating to transactions involving closely held businesses and/or professional firms, and/ or other similar services. Amaral Financial Planning is not a law firm and does not provide legal services.

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 9— 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 for our clients.

## **ITEM 15 – CUSTODY**

Amaral Financial Planning does not take custody of client cash, bank accounts or securities. Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

For client account in which AFP directly debits their Investment Advisory fee: AFP will send a copy of its invoice to the custodian at the same time that it sends the client a copy.

The custodian will send at least quarterly statements to the client showing all disbursements for the account, including the amount of the advisory fee. The client will provide written authorization to AFP, permitting them to be paid directly for their accounts held by the custodian.

We will not ask for, nor accept, any of the client's account access information, such as username and/ or password, even for the accommodation of the client or the client's legal agent. Firm personnel will not act as trustee for, or have full power of attorney over, a client account.

## **ITEM 16 – INVESTMENT DISCRETION**

Investment Advisory Services at Betterment are provided by a third-party RIA, which maintains discretionary authority. Investment discretion is explained to clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the client will execute a Limited Power of Attorney, which will grant the third-party RIA firm discretion over the account.

With regard to Betterment accounts, AFP's discretionary services are limited to the selection of Betterment Institutional as a platform for the client's investment management services. Betterment operates as a portfolio manager, and stipulates that to select their services is a discretionary action. Individual securities to be purchased and sold are not included in AFP's discretionary authority. However, once Betterment is selected as an outside manager, discretionary authority is transferred entirely to Betterment's portfolio managers. AFP will help the client select the model portfolio (ex: Vanguard only funds, an SRI fund, the Betterment model, or a custom blend). AFP will also help the client select the portion of the account invested in stocks vs. bonds.

With regard to Charles Schwab, the client elects to have AFP act in a discretionary manner. Whenever possible, AFP will get authorization from the client before placing trades. When this isn't feasible, AFP does have authority to trade on the client's behalf. It is a best practice for AFP to follow up with the client to confirm when trades have been placed and how this fits within their overall financial plan.

## **ITEM 17 – VOTING PROXIES**

Amaral Financial Planning does not vote client securities. The client will maintain responsibility for directing the manner in which proxies are voted, as well as all other elections relative to mergers, acquisitions, tender offers or other events pertaining to the client's investments. The client will receive their proxies and other solicitations directly from the custodian or transfer agent for their investments.

## **ITEM 18 – FINANCIAL INFORMATION**

Registered Investment Advisors are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding. We do not have custody of client funds or securities or require or solicit prepayment of more than \$500 in fees per client six months in advance.

## **ITEM 19 – REQUIREMENTS FOR STATE-REGISTERED ADVISORS**

AFP is wholly owned by Brandon R. Amaral. Education and business background, including any outside business activities and disclosable events for Brandon and all supervised persons of AFP can be found in the Brochure Supplements below (Form ADV Part 2B).

Other than as disclosed in Item 10 above, AFP does not engage in any other business activities.

Neither AFP nor any of its supervised persons receives any performance-based fees.

Neither AFP nor any of its supervised persons have any relationship or arrangement with any issuer of securities.

### **Conflicts of Interest**

Pursuant to California Code of Regulations Section 260.238(k) any material conflicts of interest regarding the investment advisor, its representatives or any of its employees are disclosed to the client prior to entering into any Advisory or Financial Planning Agreement.

### **Business Continuity Plan**

AFP maintains a written Business Continuity Plan that identifies procedures related to an emergency or significant business disruptions, including death of the investment advisor or any of its representatives.

Other than as disclosed in Item 9 above, AFP and its supervised persons have not been involved in (a) any award or otherwise being found liable in any arbitration claim alleging damages in excess of \$2,500, or (b) any award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding, involving an investment or investment related business or activity; fraud, false statements or omissions; theft, embezzlement, or other wrongful taking of property; bribery forgery, counterfeiting, or extortion; or dishonest, unfair, or unethical practices.



# Amaral Financial Planning, LLC

## **Part 2A APPENDIX 1 – WRAP FEE PROGRAM BROCHURE (NOT APPLICABLE)**

Amaral Financial Planning does not sponsor a wrap fee program, so issues related to a wrap fee program are not applicable.



Amaral Financial Planning, LLC

# Brandon R. Amaral,

## CFP<sup>®</sup>, EA

This brochure provides supplemental information about Brandon R. Amaral (CRD# 6707736). This supplements the Amaral Financial Planning ADV Part 2 A brochure, which should have also been provided to you. Please contact us at 408-797-0029 or by email [brandon@amaralfp.com](mailto:brandon@amaralfp.com) if you need the brochure or if you have any questions. Additional information about Amaral Financial Planning is also available at the SEC's website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) (select "investment adviser firm" and type in our firm name). Results will provide you both Part 1 and 2 of our Form ADV.

### ITEM 1 – COVER PAGE BROCHURE ADV PART 2B

March 6, 2024

707 LOS HUECOS DR, SAN JOSE, CALIFORNIA 95123

[BRANDON@AMARALFP.COM](mailto:BRANDON@AMARALFP.COM)

(408) 797-0029

[WWW.AMARALFP.COM](http://WWW.AMARALFP.COM)



**ITEM 2 - EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

Brandon R. Amaral, Founder, Chief Compliance Officer, Investment Advisor Representative, CFP®, EA

Year Born: 1994

**Educational Background**

Bachelor of Science, Financial Planning, (Business Management Minor), San Diego State (2016)

**Business Background**

09/2021 – Present: Founder, Chief Compliance Officer, Investment Advisor Representative, Amaral Financial Planning, LLC

08/2021 – 02/2022: Tax Prep Consultant, Intuit Inc.

08/2020 – 09/2021: Associate Financial Planner, Ballast Point Financial Planning, LLC

07/2018 – 07/2020: Associate Advisor, Wade Financial Advisory, Inc.

09/2016 – 07/2018: Paraplanner, Ameriprise Financial

02/2015 – 07/2016: Audit Analyst, Preferred Employers

06/2014 – 06/2016: Event Logistics, Vineyard Hacienda

11/2013 – 06/2014: Real Estate Intern, Berkshire Hathaway

**Professional Designations**

Certified Financial Planner (CFP®)

Enrolled Agent (EA)

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 88,000 individuals have obtained 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, administered in 10 hours over a two-day period, 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 Code of Ethics and Standards of Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and Standards of Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Code of Ethics and Standards of Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

**Enrolled Agents** are enrolled by the Internal Revenue Service and authorized to use the EA designation. EA enrollment requirements:

- Successful completion of the three-part IRS Special Enrollment Examination (SEE), or completion of five years of employment by the IRS in a position which regularly interpreted and applied the tax code and its regulations.
- Successfully pass the background check conducted by the IRS.

Individuals who become enrolled must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the EA designation:

- Obtain 72 hours every three years
- Obtain a minimum of 16 hours per year (2 of which must be on ethics)

Enrolled agents are required to renew their license every three years. The IRS will notify one when their renewal cycle is approaching.

## **ITEM 3 - DISCIPLINARY INFORMATION**

Brandon R. Amaral has no legal or disciplinary events that are material to you or a prospective client's evaluation of this advisory business.

## **ITEM 4 – OTHER BUSINESS ACTIVITIES**

The principal business of Brandon R. Amaral is that of an investment advisor representative and provider of financial planning services. Brandon R. Amaral is also a tax preparer and Notary Public, and provides tax and notarization services under Amara Financial Planning. Employees who are tax preparers and Notary Publics may be paid for these services. In cases where we receive payment, there may be a conflict of interest. At all times, you are free to choose an outside tax preparer or Notary Public to avoid the possibility of there being a conflict of interest.

## **ITEM 5 - ADDITIONAL COMPENSATION**

Brandon R. Amaral receives no compensation from outside activities.

## **ITEM 6 – SUPERVISION**

Brandon R. Amaral is the Founder and Chief Compliance Officer of Amara Financial Planning and is a supervising authority at Amara Financial Planning, LLC. The firm has adopted policies and procedures to mitigate the conflict of supervising one's self, and follows a code of ethics. He may be contacted at [brandon@amaralfp.com](mailto:brandon@amaralfp.com) or 408-797-0029.

## **ITEM 7: REQUIREMENTS FOR STATE-REGISTERED ADVISERS**

Brandon R. Amaral has not been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.