

# CHAMBERLAIN FINANCIAL PLANNING & WEALTH MANAGEMENT

DBA of Chamberlain Financial Planning LLC

March 3, 2020

## Firm Brochure

(Part 2A of Form ADV)

**Phone 800-347-1340**

**Fax 831-423-1341**

**[www.chamberlainfp.com](http://www.chamberlainfp.com)**

**[info@chamberlainfp.com](mailto:info@chamberlainfp.com)**

**125 Mission Street  
Suite 3  
Santa Cruz, CA 95060**

**333 University Avenue  
Suite 200  
Sacramento, CA 95825**

**231 D Street  
Suite D  
Davis, CA 95616**

**644 N. Santa Cruz Ave.  
Suite 8  
Los Gatos, CA 95030**

This brochure provides information about the qualifications and business practices of Chamberlain Financial Planning and Wealth Management a DBA for Chamberlain Financial Planning LLC. If you have any questions about the contents of this brochure, please contact us at: 800-347-1340, or by email at: [info@chamberlainfp.com](mailto:info@chamberlainfp.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority. Registration does not imply a certain level of skill or training.

Additional information about Chamberlain Financial Planning and Wealth Management is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

## Item 2 Material Changes

---

### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

---

### **Material Changes since the Last Update**

Since the last Annual Brochure update on March 25, 2019, Chamberlain Financial Planning and Wealth Management has had the following material changes:

- Mark Astrinos and Gene Hsu became partners of the firm.
- The office in Davis, CA moved from 231 D Street, Suite B to a new office within the same building. The new address is now 231 D Street, Suite D, Davis, CA 95616.

---

### **Full Brochure Available**

The firm may at any time update this document. Annually we will either send the latest brochure or an offer to send an electronic or hard copy form of the updated brochure, whenever changes are made.

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 800-347-1340 or by email at: info@chamberlainfp.com

***Important Information: Throughout this document Chamberlain Financial Planning & Wealth Management shall also be referred to as the “firm,” “our,” “we” or “us.” These terms are utilized for the reader’s ease of use while reviewing the brochure and are not meant to imply the firm is larger than it actually may be at the time of publication. The client or prospective client may also be referred to as “you,” “your,” etc., and refers to a client engagement involving a single person as well as two or more persons. The term “advisor” and “adviser” are used interchangeably where accuracy in identification is necessary ( i . e., Internet address, etc.).***

Item 3 Table of Contents

<b>Item 1 Cover Page</b> .....	<b>i</b>
<b>Item 2 Material Changes</b> .....	<b>ii</b>
Annual Update.....	ii
Material Changes since the Last Update .....	ii
Full Brochure Available .....	ii
<b>Item 3 Table of Contents</b> .....	<b>1</b>
<b>Item 4 Advisory Business</b> .....	<b>1</b>
Firm Description .....	1
Principal Owner .....	1
Types of Advisory Services.....	1
Tailored Relationships .....	2
Types of Agreements .....	2
Workshop Presentations .....	4
Termination of Agreement.....	4
<b>Item 5 Fees and Compensation</b> .....	<b>5</b>
Description.....	5
Fee Billing.....	6
Other Fees.....	6
Expense Ratios.....	6
Past Due Accounts and Termination of Agreement.....	6
General Information .....	7
<b>Item 6 Performance-Based Fees</b> .....	<b>7</b>
Sharing of Capital Gains.....	7
<b>Item 7 Types of Clients</b> .....	<b>7</b>
Description.....	7
Account Minimums.....	8
<b>Item 8 Methods of Analysis, Investment Strategies and Risk of Loss</b> .....	<b>8</b>
Methods of Analysis .....	8
Investment Strategies .....	8
Risk of Loss.....	8
<b>Item 9 Disciplinary Information</b> .....	<b>10</b>
Legal and Disciplinary.....	10
<b>Item 10 Other Financial Industry Activities and Affiliations</b> .....	<b>11</b>
Financial Industry Activities.....	11
Affiliations .....	11
<b>Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</b> .....	<b>11</b>
Code of Ethics .....	11
Privacy Policy .....	12
Participation or Interest in Client Transactions .....	13
Personal Trading .....	13

<b>Item 12 Brokerage Practices</b> .....	<b>13</b>
<b>Selecting Brokerage Firms</b> .....	<b>13</b>
<b>Best Execution</b> .....	<b>13</b>
<b>Soft Dollars</b> .....	<b>14</b>
<b>Order Aggregation</b> .....	<b>14</b>
<b>Trading Errors</b> .....	<b>14</b>
<b>Item 13 Review of Accounts</b> .....	<b>14</b>
<b>Periodic Reviews</b> .....	<b>14</b>
<b>Regular Reports</b> .....	<b>14</b>
<b>Item 14 Client Referrals and Other Compensation</b> .....	<b>15</b>
<b>Incoming Referrals</b> .....	<b>15</b>
<b>Outgoing Referrals</b> .....	<b>15</b>
<b>Other Compensation</b> .....	<b>15</b>
<b>Item 15 Custody</b> .....	<b>17</b>
<b>Account Statements</b> .....	<b>17</b>
<b>Performance Reports</b> .....	<b>17</b>
<b>Net Worth Statements</b> .....	<b>17</b>
<b>Item 16 Investment Discretion</b> .....	<b>17</b>
<b>Discretionary Authority for Trading</b> .....	<b>17</b>
<b>Limited Power of Attorney</b> .....	<b>18</b>
<b>Item 17 Voting Client Securities</b> .....	<b>18</b>
<b>Proxy Votes</b> .....	<b>18</b>
<b>Item 18 Financial Information</b> .....	<b>18</b>
<b>Financial Condition</b> .....	<b>18</b>
<b>Item 19 Requirements for State Registered Advisors</b> .....	<b>18</b>
<b>See Form ADV Part 2B on page 21</b> .....	<b>18</b>
<b>Business Continuity Plan</b> .....	<b>18</b>
<b>Information Security Program</b> .....	<b>19</b>
<b>Firm Brochure Supplement (Part 2B of Form ADV)</b> .....	<b>20</b>

---

## **Firm Description**

Chamberlain Financial Planning LLC was founded in 2007 by Michael Chamberlain and began using the DBA Chamberlain Financial Planning and Wealth Management (“we” or “the firm”) in September of 2012 to more fully convey the services provided.

Gene Hsu joined the firm in 2017 with over 20 years in the financial planning field. He also taught the Risk Management curriculum for the Personal Financial Planning Program at the University of California, Davis Extension for a number of years.

Mark Astrinos joined the firm at the beginning of 2018 but started his professional carrier as a CPA, working with clients and their taxes. He discovered that it was more helpful working with clients in all financial areas and shifted the scope of services. He worked for several larger firms in the Bay area before starting his own firm in San Francisco and then joining our firm.

The firm is an Investment Advisor, registered with the Securities and Exchange Commission and domiciled in the state of California with offices in Santa Cruz, Silicon Valley, Davis, and Sacramento California. The firm and its associated personnel may register or meet certain exemptions to register and other jurisdictions where advisory business is conducted.

We provide personalized confidential financial planning, investment management and wealth management services to individuals, couples, families, high net worth individuals, trusts, estates, and retirement plans.

Advice is provided through consultations with the client(s) and may include: determination of financial goals and objectives, identification of financial problems, cash flow management, debt management, tax planning, insurance review, investment review, investment allocation, investment selection, investment management, education planning, retirement planning, estate planning, stock options and RSU planning and consultations with the client’s other advisors.

As a fee-only financial firm, we do not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. Michael Chamberlain does hold a Life and Health insurance license issued by the California Department of Insurance as required by the State for providing insurance advice as part of the financial planning service. The firm is not affiliated with entities that sell financial products or securities to the clients of the firm. No commissions, referral fees or finder’s fees are accepted associated with any of our clients.

An initial “get acquainted meeting” is offered and is considered an exploratory or discovery interview to determine the extent to which financial planning, investment management or wealth management may be beneficial to the client. At the conclusion of this meeting the client will be provided a written fee quote for the initial services the client wishes to receive.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) may be introduced to the client but are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they may arise.

Michael Chamberlain CFP® AIF® is the managing member of the LLC, the designated principle (supervisor) and the compliance officer.

---

## **Principal Owner**

Michael Chamberlain is the majority owner of the LLC, while Mark Astrinos and Eugene Hsu are minority owners of the LLC.

---

## **Types of Advisory Services**

The firm furnishes several types of services:

- Financial Planning
- Investment Management
- Wealth Management (On-going Financial Planning and Investment Management)
- Retirement Plan Fiduciary Services
- As needed Hourly Advice

As of 2/15/2020, Chamberlain Financial Planning and Wealth Management managed approximately \$320,994,000 in assets for approximately 169 client households and retirement plans on a discretionary basis and zero on a non-discretionary basis .

Those financial planning clients who personally implement the investment recommendations provided by the firm are not included in the above asset management data.

---

## **Tailored Relationships**

The services and type of relationship are determined by the client and are based on the client's needs and desires. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

---

## **Types of Agreements**

The following types of services define the typical client relationships.

### **1. Financial Planning**

A financial plan is designed based on the needs and services requested by the client to help the client reach their financial and life goals and are agreed to prior to the onset of the agreement.

At the inception of the financial planning process, we will establish the client's goals and objectives, and collect relevant data. We will review and analyze the financial information based on the client's circumstances. Once such information has been reviewed and analyzed, written reports will be produced and presented that are designed to achieve the client's financial goals and objectives. The primary purpose of this process is to assist the client in developing a strategy for the successful management of income, assets and liabilities and meeting the client's short and long-term goals and objectives.

The resulting report may incorporate recommendations on a number of topics such as: cash flow, assets and liabilities, asset allocation, insurance analysis, education planning, retirement planning, estate planning, tax implications, asset protection, charitable giving, annuity review and stock options or RSU strategies.

Financial plans are based on the client's financial situation at the onset of the planning process and on the financial information disclosed to us by the client. Certain assumptions

will be made in the planning process with respect to a number of factors that may include future interest rates, inflation rates, tax rates and the use of past trends and performance of the markets and the economy. Past performance is not an indication of future performance. We cannot guarantee that the client's financial goals and objectives will be met if the financial plan recommendations are implemented.

As the client's financial situation, goals, objectives, or needs change, the client should update their plan if it is to remain effective. On-going financial planning is provided within our Wealth Management services. Clients that engaged our Financial Planning services or Investment Management services may have their financial plans updated only when the client requests additional planning services in the future.

Specific investment recommendations can be provided in the plan, as one-time advice and will be provided on an hourly basis but are included with our Investment Management and Wealth Management services outlined below.

Help implementing the plan recommendations is not typically part of the financial plan but is made available at the discretion of the client. Investment implementation is part of the Investment Management or Wealth Management services.

The fee for a financial plan can be either a fixed fee, strictly by the hour or an estimate within a fee range. With the estimated fee or the by the hour options, the fee is based on the actual time spent and billed in 10-minute increments at \$60 to \$300 an hour, depending on the staff providing the service. The final fee for the estimated fee range will not exceed the upper end of the quote. In the event that the client's situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. The client must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

After delivery of the written and/or electronic financial plan, a follow up meeting and or phone call or emails is provided within one month to address any client questions and then the engagement is complete.

A client who engaged our services (other than Wealth Management) may request additional service in the future at the conclusion of the Financial Planning. Those services and the resulting face-to-face meetings, phone calls or emails will be billed on the hourly rates in effect at that time. Follow-up investment implementation work is available and is billed separately by the hour.

## **2. Investment Management**

Some clients engage us to help manage their investments on an ongoing basis after they have completed their financial plan. The Investment Management service could include some or all of the following depending on the client:

- Opening new accounts
- Transferring assets
- Account aggregation services
- Buying and selling investments
- Monitoring investments and the client's asset allocation
- Rebalance periodically based on the client's Investment Policy Statement and tax considerations
- Recommendations are provided on held away assets (401k, 403b, etc.)

Periodic reporting to the client on the portfolio and the investments utilization of

investments that are not available on a retail platform. We provide investment advice to each client tailored to meet the client's needs and investment objectives as outlined in the written agreement. We will utilize information gathered in the financial planning process at the inception of the relationship such as the client's investment objectives, risk tolerance, risk capacity and other relevant information, as well as providing an investment policy statement for their portfolio.

Based upon the client's Investment Policy Statement, we will recommend an initial portfolio of securities, which will be customized for the client's situation. We may also invest client's assets according one or more model portfolios developed by our firm. Once we construct the client's investment portfolio or select a model portfolio.

For Investment Management clients we will monitor the portfolio's asset allocation on a periodic basis, review the specific investments in the portfolio to be sure they continue to be appropriate for the client and will place trades and rebalance the portfolio as required by changes in market conditions and in the clients' financial circumstances.

For the client to participate in our discretionary Investment Management we require new clients to grant our firm discretionary authority to manage the client's account. Discretionary authorization will allow our firm to determine the specific securities, and the amount of securities, to be purchased or sold for their account without the client's approval prior to each transaction.

### **3. Wealth Management**

Many clients engage our services to have ongoing advice on their financial plan and new financial issues that arise (Financial Planning services) in addition to having ongoing Investment advice as described above in addition to Investment Management (Investment Management services). In addition, this service level provides continuous monitoring of the client's portfolio, quarterly performance reporting and unlimited meetings, phone calls and email regarding any subject that impacts the client's wealth and financial well-being.

For either Investment Management or Wealth Management clients, assets are invested primarily in no-load mutual funds and exchange-traded funds. Fund companies charge each shareholder a fee (fund expense ratio) that is disclosed in the fund prospectus. Discount brokerages may charge a transaction fee for the purchase or sale of some funds and/or have annual account fees and other fees.

We may allocate (and/or recommend that the client allocate) a portion of a client's investment assets among unaffiliated independent investment managers in accordance with the client's designated investment objectives. In such situations, the Independent Manager[s] shall have day-to-day responsibility for the active discretionary management of the allocated assets. We shall continue to render investment advisory services to the client relative to the ongoing monitoring and review of asset allocation and client investment objectives. Factors that we shall consider in recommending Independent Manager[s] include the client's designated investment objectives, management style, performance, reputation, financial strength, reporting, pricing, and research.

We do not offer Initial Public Offerings (IPOs).

We do not receive any compensation, in any form, from fund or investment companies, custodians or broker dealers.

#### **4. Retirement Plan Fiduciary Services**

We provide retirement plan fiduciary services to Defined Benefit and Defined Contribution retirement plans. The services may include an Investment Policy Statement (IPS) for the plan, investment selection and monitoring as well as investment replacement if an investment option no longer meets the provisions of the IPS and other services as agreed to ahead of time.

#### **5. Hourly Planning Engagements**

We may provide hourly financial advice, investment implementation services, investment reporting services, or other services for clients who are better served by an hourly approach for engagements that are limited in scope.

---

#### **Workshop Presentations**

Appropriately trained and registered associated personnel of Chamberlain Financial Planning and Wealth Management may provide educational workshops on a periodic basis for the general public or specific groups on topics related to personal finance, investing, retirement planning, etc. These workshops or presentations are educational in nature and do not involve the sale of an investment or insurance product. Such information presented cannot be based on any one person's needs nor does the personnel of Chamberlain Financial Planning and Wealth Management provide individual advice to attendees during such sessions.

---

#### **Termination of Agreement**

The client may terminate an agreement within 5 days of the signing of the agreement without penalty. Thereafter, a Client may terminate any of the aforementioned agreements at any time by notifying the firm in writing. For Financial Planning agreements the client will pay for the time expended on an advisory engagement prior to notification of termination.

For Investment Management clients a prorated basis of the quarterly retainer fee will be refunded. For Wealth Management clients the quarterly retainer fee will be prorated for the quarter except the first quarter, which is not refunded. If the client made an advance payment, we will refund any unearned portion of the advance payment within 10 business days.

For Investment Management or Wealth Management clients following termination, it is the client or their legal representative's responsibility to ensure an immediate transfer is completed of any portfolio account or residual amount to the receiving service provider, since the firm will no longer be responsible for said accounts. There is no fee for termination of the agreement. A custodian may issue termination and/or account transfer fees.

All refunds will be made within 10 business days.

## Item 5 Fees and Compensation

### Description of Fees

---

The firm's fees can be (1) hourly charges, (2) fixed project fees, or (3) retainer agreement fees or (4) a combination of the above 3 options.

- a. Hourly planning and advising rates are between \$60 and \$300 per hour, in 10-minute increments, depending on which staff is doing the work.
- b. Financial plan fees are impacted by the degree of complexity associated with the client's situation, the services requested and are agreed to at the onset of the engagement. Typically, the financial plan fee is between \$2,000 and \$5,000 but can be more or less depending on the client's situation and is mutually agreed to at the onset of this service.
- c. The Investment Management retainer is mutually agreed to at the onset of this service. The flat fee is typically based on the complexity of the client's situation, number of accounts, amount of assets, allocation complexity, and the expected time required during the year. There is a minimum annual retainer fee of \$1,500 at the discretion of the firm. The annual fee is paid quarterly in advance (25% per quarter). The fee will be adjusted annually due to inflation as described in our fee agreement.

We will deduct the fees directly from the client's investment account through the qualified custodian holding the client's funds and securities only after the client has given our firm written authorization permitting the fees to be paid directly from the accounts or the client may elect to pay the fee directly. Further, the qualified custodian will deliver an account statement to the client at least quarterly. These account statements will show all disbursements from the clients account. Clients should review all statements for accuracy. If mutually agreed upon, we may invoice the client directly for the payment of our fee.

The Wealth Management annual retainer is mutually agreed to at the onset of this service. The flat fee is individually determined for each client's specific circumstances. The dollar amount is based on a number of factors including: the complexity of the client's financial situation, income, net worth, and the particular services we will provide to address the client's unique financial situation. This fee is designed to cover a wide range of current and projected financial needs. The annual fee is paid quarterly in advance (25% per quarter). The fee will be adjusted annually due to inflation as described in our fee agreement. The fee will automatically adjust due to the inflation factor as described in our fee agreement. Throughout the relationship, it is anticipated that the Advisor will periodically review the fixed fee for each Client and update it to remain commensurate with factors such as, the Client's financial situation, level of investable assets, and estimated time involved. The Client will be notified of any fee changes in writing, and if the result is a fee increase it must be acknowledged by the Client in writing before taking effect.

We cannot determine the client's retainer amount until we fully understand the client's situation, which is in the middle of the financial planning process, however as a prediction of our annual retainer fee, it would generally not exceed:

- 1.0% on the first \$1 million of investments
- 0.7% on the next \$1 million of investments

0.5% over \$2 million of investments

There is a minimum annual retainer fee of \$6,000 at the discretion of the firm. Current client relationships may exist where the services and fees are different than the retainer stated above.

We will deduct the fees directly from the client's investment account through the qualified custodian holding the client's funds and securities only after the client has given our firm written authorization permitting the fees to be paid directly from the accounts or the client can elect to pay the fee directly. Further, the qualified custodian will deliver an account statement to the client at least quarterly. These account statements will show all disbursements from the clients account. Clients should review all statements for accuracy. If mutually agreed upon, we may invoice the client directly for the payment of our fee.

- d. Retirement Plan Services are billed on an hourly or flat fee basis depending on the services requested and agreed to by the client prior to the onset of the services.

---

## **Fee Billing**

Hourly fees may be billed at the end of the month or when the planning is completed. Fees for financial plans may be billed \$500 in advance as a deposit, with the balance due upon delivery of the financial plan. There will never be an instance where \$1,200 or more is required or solicited, 6 or more months in advance.

Investment Management and Wealth Management clients' retainer fees are typically billed quarterly, in advance. The client must give written permission in advance to direct debiting of their investment account(s). Fee information is available on the Quarterly statements provided by the custodian (SSG or TD Ameritrade).

In all instances, the client bears responsibility for verifying the accuracy of our fees in their invoice/statement. The custodian cannot determine whether the fee is the calculated since there is no fee calculation.

Our firm strives to offer fees that are fair and reasonable in light of the experience of the firm and the services to be rendered. Similar services may be made available from other providers, and potentially at lower or higher rates.

---

## **Other Fees**

As part of our investment advisory services, we may invest, or recommend that the client invest, in mutual funds and Exchange Traded Funds ("ETFs"). The fees that the client pays to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or ETFs (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses.

A client may also incur transaction charges and/or brokerage fees when purchasing or selling securities. The broker-dealer or custodian through whom the client's account transactions are executed typically imposes these charges and fees. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost the client will incur, the client should review

all the fees charged by mutual funds, ETFs, our firm, and others.

Additional information about the firm's fees in relationship to its brokerage practices is noted in Item 12.

---

### **Expense Ratios**

Mutual funds and ETF's generally charge a management fee for their services as investment managers and is called an "expense ratio". For example, an expense ratio of 0.05 means that the mutual fund company charges 0.5% for their services and other costs. These fees are in addition to the fees paid by the client to the firm.

Performance figures quoted by mutual fund companies in various publications are after the expense ratios have been deducted.

---

### **Past Due Accounts and Termination of Agreement**

We reserve the right to stop work on any account that is more than 10 days overdue. In addition, we reserve the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in Chamberlain Financial Planning and Wealth Management's judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 10 days.

---

### **General Information**

Chamberlain Financial Planning and Wealth Management reserves the right to adjust certain fees from those stated above based on unique individual circumstances, special arrangements, pre-existing relationships or otherwise may be determined by a firm principle. The firm also reserves the right to decline service to any prospective client for any reason.

The firm will use its best judgment and good faith efforts in rendering services to its clients. The firm cannot warrant or guarantee any particular level of account performance or that the accounts will be profitable over time. Past performance is not a good indicator of future results. Services provided by the firm may be obtained from other providers at lower or higher costs. The client is free to decline recommendations made by the firm.

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

### **Individual Retirement Account Considerations**

As part of the advisory services we provide, from time to time we may recommend that a client withdraw the assets from the retirement plan they hold with their employer or past employer and transfer those assets to an IRA, aka an Individual Retirement Account. This transferal process is familiarly called a "rollover." Clients are not obliged, contractually or otherwise, to rollover to an IRA. Furthermore, though unusual, the client is not obliged to have those assets managed by us.

Regardless of the client's decision, to rollover or not, the fee charged by us remains unchanged. We do not charge a different fee simply because the assets are held or managed elsewhere.

Most people generally consider rolling over their IRA when their employment situation changes, either as a result of retirement or perhaps a new job. Sometimes, though less common, an employee may move assets from their company's retirement plan, even if they still work for the employer. Usually, when an employee leaves a company, he or she has four choices:

1. Leave the funds in the former employer's retirement plan.
2. Transfer the funds to a new employer's plan.
3. Rollover the funds into an IRA account (not-taxable event).
4. Close the account and take a cash distribution (taxable).

Our compensation or fee is not dependent upon a client's selection of a particular option over another. Before any changes are made to a client's retirement plan accounts, we first discuss these options. Thereafter, we will make a recommendation that we believe best meets our client's financial objectives and goals and disclose the pros and cons for each of these four options.

Before we make our recommendation, there are some considerations that we must first evaluate:

- The associated fees and expenses of the current retirement plan vs. the proposed IRA. For example, does the employer pay for the plan's administrative expenses, either in whole or part?
- Various services offered under the retirement plan; those services could include investment advice, educational material and/or workshops, planning tools, telephone or online help, etc. We also assess which services might not be offered under the retirement plan, such as distribution planning or asset allocation.
- Investment options available, and whether the client's financial objectives and goals can be achieved within the current employer's retirement plan or within a new employer's retirement plan.
- Differences between the current and proposed retirement plan in terms of protection from creditors and potential legal judgments.
- If still employed, the possibility of postponing the taking of the Required Minimum Distribution or "RMD" from the retirement plan.
- Implications for employer stock held within the current retirement plan, i.e. special tax and investment considerations.

#### Item 6 Performance-Based Fees

---

##### **Performance-Based Fees and Side-By-Side Management**

We do not accept performance-based fees or participate in side-by-side management. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Performance-based fees are fees that are based on a share of

capital gains or capital appreciation of a client's account. Our fees are calculated as described in the Advisory Business section above and are not charged on the basis of a share of capital gains upon or capital appreciation of the funds in the clients advisory account.

#### Item 7 Types of Clients

---

##### **Description**

We generally work with successful working or retired individuals, couples, families, retirement plans, trusts, estates, corporations or business entities. Client ages range from the 20s to the 90s. Clients net worth range from a negative amount to multimillions of dollars. Client income varies to that of a student's to more than a million a year. Client relationships vary in scope.

Clients provide an adequate level of information and documentation to the firm throughout the term of the engagement, including source of funds, income levels, client or legal agent's authority to act on behalf of the account, among others. This will allow the firm to determine the appropriateness of our services for the client's situation.

---

##### **Account Minimums**

There is no account minimum for hourly financial planning clients. There is no minimum account size for Investment Management or Wealth Management clients but there are minimum retainer fees. Due to the retainer amount, in relation to the investment amounts, Investment Management services may not be well suited to those clients with less than \$150,000 of investments. Wealth Management services may not be well suited to those with less than \$500,000 of investments. We have the discretion to waive the fee minimum. Other exceptions to the minimums may apply to employees of the firm and their relatives, or relatives of existing clients.

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

---

##### **Methods of Analysis**

Security analysis methods may include fundamental analysis, technical analysis, or cyclical analysis. The main sources of information include research materials prepared by others, corporate rating services, financial newspapers and periodicals. Other sources of information that we may use include Morningstar, fi360 and the World Wide Web.

---

##### **Investment Strategies**

Rather than trying to analyze and select individual securities for inclusion in client portfolios, we spend the majority of our time analyzing and studying the optimal allocation of a client's investment portfolio among the various asset classes. Assets classes considered include, but are not limited to, US equities, international equities, emerging market equities, real estate, US bonds, Foreign bonds and cash. We include those asset classes in a client's portfolio that we believe, when combined together, will offer the highest probability of a client achieving his or her goals at an appropriate risk level for that client.

We evaluate a wide variety of both current and historical performance, macro-economic trends, and valuation data of the various asset classes to set the portfolio policy as well as to make adjustments to the policy over time. Adjustments to the portfolio policy include overweighting, under weighting or in some circumstances avoiding a particular

asset class based on our analysis of the potential risk reward profile.

In most instances, when executing a strategy for investing in a specific investment class, we employ a passive strategy believing that a client is best served by a low-cost, low income tax impact investment strategy. When we believe a manager can bring either additional return or added risk control to the return of an asset class, we will assess the managers which meet a set of quantitative criteria, including risk-adjusted returns in comparison with peer managers, low-cost structure, sensitivity to income tax impact when executing the strategy, and longevity of the manager executing the strategy, among other factors.

We adhere to the following basic asset management tenets when managing a client's portfolio:

- Diversify extensively across multiple asset classes for optimal risk-adjusted returns.
- Base the majority of recommendations on secular or long-term asset class fundamentals.
- Occasionally take advantage of short-term valuation divergences or unusual opportunities in the markets.
- Execute and follow written investment policy guidelines.
- Seek opportunities to globalize the portfolio holdings across all asset classes.
- Employ low-cost investment products when possible as a strategy for increasing returns.
- Manage the portfolio in a tax efficient manner.
- Rebalance the portfolio methodically within the investment policy asset allocation targets.
- Manage clients' decision-making behaviors for more successful portfolio outcomes.

Our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon the client's predefined objectives, risk tolerance, time horizon, financial horizon, financial information, liquidity needs, and other various suitability factors. The client's restrictions and guidelines may affect the composition of the client's portfolio.

For over 30 years DFA has provided low cost funds based on the efficient market hypothesis of worldwide capital markets and Nobel Prize winning research by Eugene Fama and Kenneth French. Their four-factor model of equity investing drives their equity strategies term structure. The use of DFA funds is only available with our Investment Management and Wealth Management services.

---

### **Risk of Loss**

All investment programs have certain risks that are borne by the investor. Our investment approach keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-Rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing

bonds become less attractive, causing their market values to decline.

- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

While Chamberlain Financial Planning & Wealth Management thinks its strategies and investment selection is designed to potentially produce the highest possible return for a given level of risk, it cannot warrant or guarantee that an investment objective or planning goal will be achieved. Some investment decisions made by either the firm or the client may result in loss, which may include the original principal invested.

The challenge involving fundamental analyses is that information obtained may be incorrect; an analysis may not provide an accurate estimate of earnings, which may be the basis for a security's value. If a security's price adjusts rapidly to new information, a fundamental analysis may result in unfavorable performance. The risk of investing based on technical analysis is that it may not consistently predict a future price movement; the current price of a security may reflect all known information.

When the firm's research and analyses is based upon commercially available software, rating services, general market and financial information, or due diligence reviews, the firm is relying upon the accuracy and validity of the information or capabilities being provided by selected vendors, rating services, market data, and the issuers themselves. The firm makes an effort to determine the accuracy of the information received but it cannot foretell events or actions taken or not taken, or the validity of all information it has

researched or provided which may or may not affect the advice to or investment management of a client account or financial plan.

Portfolios or certain holdings that involve active management strategies may at times outperform or underperform various benchmarks or other strategies. In an effort to meet or surpass these benchmarks, active portfolio management may require more frequent trading or “turnover” within an account. This may result in shorter holder periods, higher transactional costs and/or create taxable events that will be borne by the client, thereby potentially reducing or negating certain benefits that may be derived by shorter term investing.

ETFs and mutual funds may carry additional expenses based on their share of operating expenses and certain brokerage fees, which may result in the potential duplication of certain fees. The risk of owning these types of holdings also reflects the risks of their underlying securities. Further, while many ETFs and certain mutual funds are known for their potential tax-efficiency and higher “qualified dividend income” (QDI) percentages, there are certain asset classes within these investment vehicles or holding periods within that may not benefit. Shorter holding periods as well as certain commodities and currencies (that may be part of an ETF or mutual fund portfolio) may be considered “non-qualified” under certain tax code provisions, therefore, the holding’s QDI will be considered if tax-efficiency is an important aspect of the client’s portfolio.

Investing in limited partnerships involves certain risks related to investing in their underlying assets, as well as the risks associated with pooled investment vehicles (certain pooled investments may be less regulated than others). In addition, limited partnerships that concentrate in a particular industry or a particular geographic region are subject to risks associated with that specific industry or region. A potential benefit derived from a limited partnership is also dependent on the holding being treated as a partnership for federal income tax purposes; if part or all of the limited partnership is not, it may have potential adverse tax consequences on the portfolio.

#### Item 9 Disciplinary Information

---

##### **Legal and Disciplinary**

Neither Chamberlain Financial Planning & Wealth Management nor any of its associated personnel has been involved in a material criminal or civil action in a domestic, foreign or military jurisdiction, or self-regulatory organization proceeding. Its employees have not been involved in legal or disciplinary events related to past or present investment clients.

#### Item 10 Other Financial Industry Activities and Affiliations

---

##### **Financial Industry Activities**

The firm’s policies require it and its personnel to conduct business activities in a manner that avoids actual or potential conflicts of interest between the firm, employees and clients, or that may otherwise be contrary to law. The firm will provide disclosure to its client prior to and throughout the term of an engagement of any conflicts of interest which will or may reasonably compromise its impartiality or independence. Neither our firm nor a member of its management is, or has a material relationship with any of the following types of entities:

- broker/dealer, municipal securities dealer, or government securities dealer or broker
- futures commission merchant, commodity pool operator, or commodity

trading advisor

- banking or thrift institution
- lawyer or law firm
- accountant or accounting firm
- pension consultant
- real estate broker or dealer
- sponsor or syndicator of limited partnerships
- investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund,” and offshore fund).

Upon a client’s request and when appropriate to do so, our firm may provide referrals to various professionals, such as a tax preparer, insurance agent or attorney. We do not have an agreement with or receive fees from these professionals for these informal referrals. Any fees charged by these other entities for their services are completely separate from advisory fees charged by our advisory firm.

---

### **Affiliations**

The firm does not have arrangements that are material to its advisory or its clients with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading advisor or futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships.

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

---

#### **Code of Ethics**

The employees of Chamberlain Financial Planning and Wealth Management are committed to a Code of Ethics that is available for review by clients and prospective clients upon request and is posted on the company website. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

We adhere to the fiduciary oath of the National Association of Personal Financial Advisors (NAPFA) which is as follows:

- The Advisor shall exercise his/her best efforts to act in good faith and in the best interest of the client.
- The Advisor shall provide written disclosure to the client prior to the engagement of the advisor, and thereafter throughout the term of the engagement, of any conflicts of interest, which will reasonably compromise the impartiality or independence of the advisor.
- The Advisor, or any part in which the advisor has a financial interest, does not receive any compensation or other remuneration that is contingent on any client's purchase or sale of a financial product.
- The Advisor does not receive any fee or other compensation from another professional to whom the client was referred.

Associates of the firm who are CERTIFIED FINANCIAL PLANNERS® practitioners who are associated with our firm, adhere to the Certified Financial Planner Board of Standards, Inc.'s Code of Ethics.

---

## **Privacy Policy**

The firm collects non-public personal financial information about its clients from the following sources:

- Information clients or their legal agent provide to complete their financial plan,
- Information clients provide in agreements, account applications, and other documents completed in connection with opening and maintenance of accounts,
- Information clients provide orally, and
- Information received from third parties, such as brokerage firms or custodians, about client transactions.

Chamberlain Financial Planning & Wealth Management does not disclose non-public personal information about clients to anyone, except in the following circumstances:

- When required to provide services clients have requested,
- When clients specifically authorize the Firm to do so in writing, or
- When permitted or required by law.

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

Identifiable information about the client or prospective client will be maintained during the span of the engagement and for the period thereafter as required by both securities industry and state privacy laws. The firm will notify its clients annually of its privacy policy and at any time, in advance, if its policy is expected to change.

---

## **Participation or Interest in Client Transactions**

Neither the firm, employees nor any related person are authorized to recommend to a client or affect a transaction for a client involving any security in which the firm or related person has a material financial interest, such as in the capacity as an underwriter advisor to the issue etc.

Associates are prohibited from taking or providing a loan from a client unless it is an approved financial institution.

The firm recognizes that should it act as an advisor to the sponsor of a ERISA qualified retirement plan and one of its investment advisor representatives serves in an advisory capacity to one or more of the plans participants, potential or implied conflict of interest may occur, which will be disclosed to the plan sponsor and participant.

As noted above, Chamberlain Financial Planning and Wealth Management provides advice in a broad range of investment advisory services to clients on a fee-only basis. Due to the firm offering all of these services to a client a potential conflict of interest may exist therefore the client is under no obligation to act upon the firm's recommendations.

---

## **Personal Trading**

The Chief Compliance Officer of Chamberlain Financial Planning and Wealth Management is Michael Chamberlain. The firm does not trade for its own account however its associates and any of related persons may buy or sell securities similar to those recommended to the client for their accounts. The firm may also make recommendations or take action with respect to investments for the clients that may differ in nature or timing from recommendations made to or actions taken for other clients or employees. At no time will Chamberlain Financial Planning and Wealth Management or any related party receive preferential treatment over its clients.

### **Item 12 Brokerage Practices**

---

## **Selecting Brokerage Firms**

The firm does not have any affiliation with investment product sales firms. Specific custodian recommendations are made to clients based on their need for such services. We recommend custodians based on their integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

We recommend discount brokerage firms and trust companies (qualified custodians), such as TD Ameritrade and Shareholder Service Group. Chamberlain Financial Planning and Wealth is not affiliated with any brokerage firm. These brokers do not supervise the advisor, its agents, or its activities.

The firm does not receive fees or commissions from any of these companies.

---

## **Best Execution**

Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed in the earlier section in and in Item 14.

Our firm recognizes its obligation in seeking best execution for its clients, however, the determinative factor is not always the lowest possible cost but whether the selected service provider's transactions represent the best "qualitative" execution while taking into consideration the full range of services provided. We will seek services involving competitive rates, but it may not necessarily correlate into the lowest possible rate for each transaction. Our firm believes that having its trades executed through SSG/Pershing or TD Ameritrade is consistent with our duty to seek best execution for client trades. The firm periodically reviews its policies regarding recommending service providers to its clients in light of the firm's duty to seek best execution.

Chamberlain Financial Planning & Wealth Management does not require or engage in directed brokerage involving its accounts.

A client may direct the firm (in writing) to use another particular broker/dealer to execute some or all transactions for their account. In these circumstances, the client will be responsible for negotiating, in advance, the terms and/or arrangements for their account with their selected broker/dealer.

---

## **Soft Dollars**

A custodian may make available to us other products and services that benefit us but may not directly benefit the client and their account. These products and services assist us in managing and administering our clients' accounts. They include investment

research. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at a given custodian. In addition to investment research, a custodian may also make available software and other technology that provides access to client account data (such as duplicate trade confirmations and account statements), facilitate trade execution and allocate aggregated trade orders for multiple client accounts, provide pricing and other market data, facilitate payment of our fees from our clients' accounts and assist with back-office functions, recordkeeping, and client reporting services that generally benefit only us.

A custodian may also offer other services intended to help us manage and further develop our business enterprise. These services may include educational conferences and events, consulting on technology, compliance, legal, and business needs, publications and conferences on practice management and business succession, access to employee benefits providers, human capital consultants, and insurance providers. A custodian may provide some of these services itself but in other cases, it will arrange for third-party vendors to provide the services to us. A custodian may also discount or waive its fees for some of these services or pay all or a part of a third party's fees.

---

### **Order Aggregation**

Transactions for each client will typically be independently made unless the firm decides to transact the same security for more than one client at the same time, which is turned "aggregated" or "batched" orders. The firm does not receive any additional compensation as a result of aggregated transactions.

Within aggregated orders, transactions will generally be averaged as to price and allocated among the clients on a pro rata basis on any given day and the firm will attempt to do so in accordance with applicable industry rule.

The firm reviews both its trade aggregation procedure and allegation processes on a periodic basis to ensure it remains within the stated policies and/or regulation.

---

### **Trading Errors**

The firm corrects all the trade errors through a Trade Error Account maintained by the firm's custodian and the firm will be responsible for any losses in accounts. Likewise, the firm may also receive any gains resulting from the correction of any trade errors and, therefore, may potentially receive a benefit from this arrangement.

## **Item 13 Review of Accounts**

---

### **Periodic Reviews**

Periodic financial reviews are recommended for financial planning clients, but it is up to the client to initiate or request those reviews.

Investment management and Wealth Management client investment accounts are reviewed periodically but not less than quarterly by our staff.

---

### **Regular Reports**

Reports for Wealth Management clients are arranged on an individual basis according to client's requests but usually quarterly. The reports may include a review of the overall market performance, the client's specific portfolio performance and a review of each investment within the portfolio. All reports generated by the firm will be prepared in accordance with appropriate jurisdictional guidance. Clients

are urged to carefully review and compare account statements that they have received directly from their service provider with any report received from our firm.

#### Item 14 Client Referrals and Other Compensation

---

##### **Incoming Referrals**

Chamberlain Financial Planning and Wealth Management has been fortunate to receive many client referrals over the years. The referrals may come from current clients, estate planning attorneys, accountants, insurance professionals, personal friends and other similar sources. The firm does not compensate referring parties for referrals.

Investment advisor representatives of the firm may hold individual membership or serve on boards or committees of professional industry associations such as NAPFA, the Financial Planning Association (FPA), or the Certified Financial Planner Board of Standards, Inc. Generally, participation in any of these entities require membership fees to be paid, adherence to ethical guidelines, as well as in meeting experiential and educational requirements. Associates' information may be available on these organizations' websites for public view. These passive websites may provide a means for an interested person to reach an individual planner via listed contact information. Prospective clients locating the firm or an associated investment advisor representative via any of these venues are not actively marketed by these associations; nor do they pay more for their services than another client who may be referred in another fashion, such as a personal referral from another firm client.

Further, firm policy does not allow it or an employee to pay these associations for prospective client referrals, nor are there fee-sharing arrangements reflective of a solicitor engagement.

---

##### **Outgoing Referrals**

Chamberlain Financial Planning and Wealth Management does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

---

##### **Other Compensation**

Fees for public speaking may be paid to Chamberlain Financial Planning and Wealth Management.

From time to time the staff of Chamberlain Financial Planning and Wealth Management may attend educational events provided by financial services company for educational purposes. These venues may include food and beverages. While these educational events are not a direct benefit to the client the services may assist us in providing advice and guidance to our clients.

Chamberlain Financial Planning & Wealth Management may receive an economic benefit from external sources in the form of the support products and services they make available to our firm and other independent investment advisors.

As disclosed under Item 12, our firm participates in SSG and TD Ameritrade's institutional customer programs and we may recommend TD Ameritrade and/or

SSG and its arrangement with Pershing to our clients for custody and brokerage services. There is no direct link between our participation in the program and the investment advice we give our clients, although our firm receives economic benefits through its participation in the program that are typically not available to “retail investors.” These benefits include the following products and services (provided either without cost or at a discount):

- receipt of duplicate client statements and confirmations
- research related products and tools
- consulting services
- access to a trading desk serving our clients
- access to block trading (which provides our ability to aggregate securities transactions for execution and then allocate the appropriate shares to our client’s accounts)
- the ability to have advisory fees deducted directly from our client’s accounts per our written agreement
- access to an electronic communications network for client order entry and account information
- access to mutual funds with no “loads” or transaction fees, and to certain institutional money managers
- discounts on research, technology, and practice management products or services provided to our firm by third party vendor

SSG and TD Ameritrade may also pay for business consulting and professional services received by our firm. Some of the products and services made available by SSG and TD Ameritrade may benefit our firm but may not benefit client accounts. These products or services may assist us in managing and administering our client accounts, including accounts not maintained by SSG or TD Ameritrade. These other services made available by SSG and TD Ameritrade are intended to help our firm manage and further develop our business enterprise. The benefits received by our firm or its associates through participation in a program do not depend on the amount of brokerage transactions directed to SSG/Pershing or TD Ameritrade.

As part of its fiduciary duty, we will endeavor at all times to put the interests of our clients first. Our clients should be aware, however, that the receipt of any economic benefit by our firm or its associates in and of itself creates a potential conflict of interest and may influence our choice of SSG/Pershing or TD Ameritrade for custody and brokerage services.

#### Item 15 Custody

---

##### **Account Statements**

All client assets are held at an unaffiliated qualified custodian such as TD Ameritrade or Shareholder Service Group and not with or by the firm. Chamberlain Financial Planning and Wealth is not affiliated with any custodian. The custodian does not supervise our firm, its agents or its activities. Each custodian provides account statements directly to clients at their address of record or by electronic means at least quarterly at the discretion of the client.

The firm may be given written permission by the client to withdraw advisory fees from the client's account(s), which causes the firm to exercise limited custody. The firm does not have physical custody of client's funds and/or assets, as all assets are held with an independent qualified custodian. The client will receive quarterly statements as to retainer fees due and/or paid.

At no time will a firm employee be authorized to have knowledge of a client's account access information such as a client's 401(k), personal brokerage account or bank account, even for the accommodation of the client or their legal agent.

---

### **Performance Reports**

Clients are urged to review the account statements received directly from their custodians on a regular basis. The firm may provide periodic performance reports to Investment Management and Wealth Management clients or others requesting such service.

---

### **Net Worth Statements**

Clients may be provided net worth statements and net worth graphs. Net worth statements contain approximations of account balances provided by the client, as well as the value of land and hard-to-price real estate. The net worth statements are used for long-term financial planning where the exact values of assets are not material to the financial planning tasks.

---

### **Standing Letters of Authorization**

Some clients may execute limited powers of attorney or other standing letters of authorization that permit the firm to transfer money from their account with the client's independent qualified Custodian to third-parties. This authorization to direct the Custodian may be deemed to cause our firm to exercise limited custody over your funds or securities and for regulatory reporting purposes, we are required to keep track of the number of clients and accounts for which we may have this ability. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian. You will receive account statements from the independent, qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate any transfers that may have taken place within your account(s) each billing period. You should carefully review account statements for accuracy.

#### **Item 16 Investment Discretion**

---

### **Discretionary Authority for Trading**

In the past, we offered new clients the choice of discretionary or non-discretionary account management. For non-discretionary accounts we consult with the client prior to each trade to obtain concurrence authorization by email, written or voice notification.

For discretionary accounts, we have the authority to determine, without obtaining specific client consent, the securities to be bought or sold, the amount of the securities to be bought or sold and the timing of transactions. This approach allows for automatic tax loss harvesting, account rebalance

Going forward all new clients will be managed as discretionary only and current clients will be encouraged to change to discretionary.

The client approves the custodian to be used and the trading costs paid to the custodian. Chamberlain Financial Planning and Wealth Management does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

---

### **Limited Power of Attorney**

A limited power of attorney is a trading authorization for this purpose. The client decides to sign a limited power of attorney so that the firm may execute the trades that the client approved or on behalf of the client.

#### **Item 17 Voting Client Securities**

---

### **Proxy Votes**

Clients are expected to vote their own proxies. When assistance on voting proxies is requested, we will provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client. We do not normally vote proxies on securities but will in some cases as requested.

#### **Item 18 Financial Information**

---

### **Financial Condition**

We do not have any financial impairment that will preclude the firm from meeting contractual commitments to clients, nor has the firm and its management been the subject of a bankruptcy petition during the last 10 years.

The firm will not take physical custody of client's assets. Fee withdrawals must be done through a qualified intermediary, such as the client's custodian with prior written agreement.

Our engagements do not require that we collect fees from clients of more than \$1,200 for advisory services that we will perform 6 months more in advance. Due to the nature of our firm's services and operational practices an audited balance sheet is not required per statute nor included with this brochure.

Neither the firm nor its management serves as general partnership in which the firm's advisory clients are either partners of the partnership or beneficiaries of the trust.

#### **Item 19 Requirements for State Registered Advisors**

---

**This section is not applicable since the firm is registered with the Securities and Exchange Commission.**

## **Business Continuity Plan**

Chamberlain Financial Planning and Wealth Management has a Business Continuity Plan in place to mitigate and recover from the loss of office space, communications, services or key people.

The Business Continuity Plan covers natural disasters such as earthquakes and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

Alternate offices in Davis, Los Gatos and Sacramento are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

The firm has a plan in case of the death or disability of one of the owners so that there would be continued services to all clients should an unfortunate event effect one of the owners.

---

## **Information Security Program**

The firm maintains an information security program to reduce the risk that personal and confidential information may be breached.

The firm is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to the firm. Clients are provided the firm's written privacy policy statement prior to or at the first meeting.

The categories of nonpublic information that we collect from the client may include information about their personal finances, information about their health to the extent that it is needed for the financial planning process, information about transactions between the client and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help the client meet their personal financial goals.

With the client's permission, we disclose limited information to attorneys, accountants, insurance professionals and mortgage lenders with whom the client has established a relationship. They may withhold permission to share their information with these nonaffiliated third parties. With the client's permission, we may share a limited amount of information about the client with the brokerage firm in order to execute securities transactions on the client's behalf.

We maintain secure offices to ensure that the client's information is not placed at unreasonable risk. In our computer environment we employ a firewall barrier, secure data encryption techniques and authentication procedures.

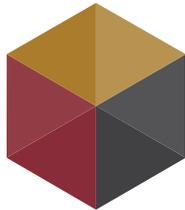
We do not provide client's personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to the client's personal information, including financial service companies, and consultants. Federal and State securities regulators may review our Company records and the client's personal records as permitted by law.

Personally, identifiable information about the client will be maintained while the client is a client, and for the required period thereafter that records are required to be maintained by Federal and State securities laws. After that time, information may be destroyed.

We will notify the client in advance if our privacy policy is expected to change. We are required by law to offer this Privacy Notice to clients annually, in writing.

*Item 1 – Cover page*

Firm Brochure Supplement (Part 2B of Form ADV)



# CHAMBERLAIN FINANCIAL PLANNING & WEALTH MANAGEMENT

DBA of Chamberlain Financial Planning LLC

March 3, 2020

**Firm Information:**

**Primary place of business:**

**125 Mission Street**

**Suite 3**

**Santa Cruz, CA 95060**

**Phone 800-347-1340**

**Fax 831-423-1341**

This brochure supplement provides information about Michael Chamberlain and Gary Cohen that supplements the Chamberlain Financial Planning and Wealth Management brochure. All clients should have received a copy of that brochure. Please contact Michael Chamberlain, Manager if you did not receive Chamberlain Financial Planning and Wealth Management's brochure or if you have any questions about the contents of this supplement.

Additional information about the above listed individuals is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 Educational Background and Business Experience

Chamberlain Financial Planning and Wealth Management requires that financial planners/advisors have a bachelor's degree and further coursework demonstrating knowledge of financial planning. Examples of acceptable coursework include MBA, CFP®, CFA, or ChFC. Additionally, advisors must have experience that demonstrates their aptitude for financial planning and investment management.

### Principal Executive Officers and Management Persons

Managing Member/Designated Principal (Supervisor)/Investment Advisor Representative

Michael David Chamberlain CFP® AIF®

Year of birth: 1952  
CRD # 2611857

#### Educational Background:

- Boston University Certificate Program for Financial Planning, 2007
- University of California, Berkeley, OD 1977
- University of California, Berkeley, BS 1975
- Consumnes River College, Sacramento, AA 1973
- Securities Registration NASAA Series 65
- CERTIFIED FINANCIAL PLANNER™ Professional, CFP®



#### Business Experience:

- Chamberlain Financial Planning and Wealth Management, 2007 to present
- Board of Directors of \$2 billion company 1999-2007
- Insurance sales, 1985-2007
- Estate Planning, 1989-2007
- Mutual fund sales and service, 1996-2006

#### Item 3: Disciplinary Information

No Financial Planning or securities disciplinary events.

#### Item 4: Other Business Activities

None

#### Item 5: Other compensation

Fees for public speaking may be paid to Chamberlain Financial Planning and Wealth Management.

From time to time the staff of Chamberlain Financial Planning and Wealth Management may attend educational events provided by financial services company for educational purposes. These venues may include food and beverages. While these educational events are not a direct benefit to the client the services may assist us in providing advice and guidance to our clients.

#### Item 6: Supervision

Michael Chamberlain serves in multiple capacities with the firm: Principal, Financial Planner, Investment Advisor Representative and Chief Compliance Officer.

The firm recognizes that not having all organizational duties segregated may potentially create a conflict of interest. However, the firm employs policies and procedures to ensure timely and accurate recordkeeping and supervision. Certain functions may be outsourced to assist in these efforts when necessary.

#### Item 7: Requirements for State-Registered Advisors

This section is not applicable since the firm is registered with the Securities and Exchange Commission.

### Investment Advisor Representative

#### Mark Francis Astrinos CPA/PFS<sup>®</sup>, CFP<sup>®</sup>, RLP<sup>®</sup>

Year of birth: 1983  
CRD # 6035365

#### Educational Background:

- Santa Clara University, Bachelor of Science in Accounting, 2005
- Personal Financial Specialist, PFS<sup>®</sup>
- CERTIFIED FINANCIAL PLANNER<sup>™</sup> Professional, CFP<sup>®</sup>
- Certified Public Accountant, CPA



#### Business Experience:

- Chamberlain Financial Planning and Wealth Management, 2018 to present
- Libra Wealth LLC, 2017 to present
- Vista Wealth Management, LLC, 2012 to 2017
- Burr, Pilger, Mayer, 2010 to 2012
- Deloitte & Touche, LLP, 2005 to 2010

### Item 3: Disciplinary Information

No Financial Planning or securities disciplinary events.

### Item 4: Other Business Activities

Mark Astrinos is part owner of this firm and is the owner of another Registered Investment Advisor. He is dually registered as an Investment Advisor Representative with that firm as well as Chamberlain Financial Planning and Wealth Management.

### Item 5: Other compensation

Fees for public speaking may be paid to Chamberlain Financial Planning and Wealth Management.

From time to time the staff of Chamberlain Financial Planning and Wealth Management may attend educational events provided by financial services company for educational purposes. These venues may include food and beverages. While these educational events are not a direct benefit to the client the services may assist us in providing advice and guidance to our clients.

### Item 6: Supervision

Mark Astrinos serves in the following capacities with the firm: Principle, Financial Planner, Investment Advisor Representative and managing Partner for the Santa Cruz and Silicon Valley offices and the associated clients. He is supervised by Michael Chamberlain in his role as Chief Compliance Officer.

Michael Chamberlain contact information: 831-420-1340,  
[mike@chamberlainfp.com](mailto:mike@chamberlainfp.com)

### Item 7: Requirements for State-Registered Advisors

This section is not applicable since the firm is registered with the Securities and Exchange Commission.

## Investment Advisor Representative

Eugene K. Hsu, CFP<sup>®</sup>, CFS<sup>®</sup>, AIF<sup>®</sup>

Year of birth: 1976  
CRD # 3107090

#### Educational Background:

- University of California, Davis, Certificate Program for Financial Planning, 2010
- University of California, Davis, BA 1998
- Securities Registration FINRA Series 6 & 7, and NASAA Series 63 & 66



- fi360, Accredited Investment Fiduciary, AIF®
- Institute of Business and Finance, Certified Fund Specialist, CFS®
- CERTIFIED FINANCIAL PLANNER™ Professional, CFP®

Business Experience:

- Chamberlain Financial Planning & Wealth Management 2017 to present
- Commonwealth Financial Network – Paragon Financial Services, 2011 to 2017
- University of California, Davis Extension Personal Financial Planning Instructor 2013 to 2017
- Securities Service Network – Lucas Group Financial Planners, 2008 to 2011
- AIG Financial Advisors, Inc., - Lucas Group Financial Planners, 2004 to 2008
- Mutual of New York, 1998 to 2008

Item 3: Disciplinary Information

No Financial Planning or securities disciplinary events.

Item 4: Other Business Activities

None

Item 5: Other compensation

Fees for public speaking may be paid to Chamberlain Financial Planning and Wealth Management.

From time to time the staff of Chamberlain Financial Planning and Wealth Management may attend educational events provided by financial services company for educational purposes. These venues may include food and beverages. While these educational events are not a direct benefit to the client the services may assist us in providing advice and guidance to our clients.

Item 6: Supervision

Eugene Hsu serves in the following capacities with the firm: Principle, Financial Planner, Investment Advisor Representative and Managing Partner for the Sacramento and Davis offices and the associated clients. He is supervised by Michael Chamberlain, in his role as Chief Compliance Officer.

Michael Chamberlain contact information: 831-420-1340,  
[mike@chamberlainfp.com](mailto:mike@chamberlainfp.com)

Item 7: Requirements for State-Registered Advisors

This section is not applicable since the firm is registered with the Securities and Exchange Commission.

## Investment Advisor Representative

### Gary Leon Cohen CFP®

Year of birth: 1958  
CRD # 5971589

#### Educational Background:

- University of California, Santa Cruz, Certificate in Financial Planning, 2011
- Stanford University, MS 1986
- MIT, BS 1980
- Securities Registration NASAA Series 65
- CERTIFIED FINANCIAL PLANNER™ Professional, CFP®



#### Business Experience:

- Chamberlain Financial Planning & Wealth Management, 2011 to present
- Systems Engineering & Digital Hardware Design, Cisco Systems, 2004 to 2009
- Digital Hardware Design, Juniper Networks, 2001 to 2004

#### Item 3: Disciplinary Information

No Financial Planning or securities disciplinary events.

#### Item 4: Other Business Activities

None

#### Item 5: Other compensation

Fees for public speaking may be paid to Chamberlain Financial Planning and Wealth Management.

From time to time the staff of Chamberlain Financial Planning and Wealth Management may attend educational events provided by financial services company for educational purposes. These venues may include food and beverages. While these educational events are not a direct benefit to the client the services may assist us in providing advice and guidance to our clients.

#### Item 6: Supervision

Gary Cohen serves in multiple capacities with the firm: Financial planner, Investment Advisor Representative and is the primary trader for the firm. He is supervised by Mark Astrinos (for the clients from the Santa Cruz and Silicon Valley offices and Eugene Hsu for those clients in Sacramento and Davis offices, as well as Michael Chamberlain, in his role as Chief Compliance officer.

Michael Chamberlain contact information: 831-420-1340, [mike@chamberlainfp.com](mailto:mike@chamberlainfp.com)

## Item 7: Requirements for State-Registered Advisors

This section is not applicable since the firm is registered with the Securities and Exchange Commission.

---

### Professional Certifications

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

The CFP<sup>®</sup> certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP<sup>®</sup> 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 62,000 individuals have obtained CFP<sup>®</sup> certification in the US.

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

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas including insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning.
- Examination – Pass the comprehensive 10-hour CFP<sup>®</sup> Certification Examination.
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP<sup>®</sup> 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<sup>®</sup> marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP<sup>®</sup> professionals provide financial planning services at a fiduciary standard of care.

The **CERTIFIED FUND SPECIALIST**<sup>™</sup> (CFS<sup>®</sup>) designation recipients receive training for the exam from the Institute of Business and Finance (IBF). IBF is the creator and issuer of the CFS designation. The CFS exam is designed to provide specialists with current market information on mutual funds, exchange-traded funds (ETFs), real estate investment trusts

(REITs), closed-end funds and other similar retail investment offerings. It also includes material on advanced fund analysis and fund selection, asset allocation, portfolio construction, risk management, taxes and estate planning.

Individuals must have a bachelor's degree or 2,000 hours of financial services work experience. A six-module self-study program provided by IBF is also a pre-requisite for taking the exam. Certified Fund Specialists must also maintain continuing education. Certified Fund Specialists must complete 30 hours of continuing education every two years. The **PERSONAL FINANCIAL SPECIALIST™** (PFS®) is a specialty credential awarded by the American Institute of Certified Public Accountants (AICPA) to CPAs who specialize in helping individuals plan all aspects of their wealth. Successful Personal Financial Specialist (PFS) applicants earn the right to use the PFS designation with their names, which can improve job opportunities, professional reputation and pay. Every three years, PFS professionals must complete 60 hours of continuing professional education. PFS applicants study estate planning, retirement planning, investing, insurance and other areas of personal financial planning. Individuals with the PFS designation may work for accounting firms, consulting firms or run their own firms. To become a PFS, candidates must be active members of the AICPA, have at least three years of financial planning experience, meet all the requirements for being a CPA, receive recommendations and pass a written exam.

The **ACCREDITED INVESTMENT FIDUCIARY®** (AIF®) designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF designation, individuals must complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor and agree to abide by the AIF Code of Ethics. In order to maintain the AIF designation, the individual must annually renew their affirmation of the AIF Code of Ethics and complete six hours of continuing education credits. The certification is administered by the Center for Fiduciary Studies, LLC (a Fiduciary360 (fi360) company).

The **CERTIFIED PUBLIC ACCOUNTANT** (CPA) designation is a license regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous *Code of Professional Conduct* which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy

have adopted the AICPA's *Code of Professional Conduct* within their state accountancy laws or have created their own.

The **REGISTERED LIFE PLANNER®** (RLP®) designation is administered by the Kinder Institute of Life Planning that denotes an advisor with advanced training in client relationship skills and holistic financial advice. RLPs learn a structured client interview process that gives them a greater ability to discover a client's values, purpose, and life goals—even those that may be closely-guarded. This allows RLPs to develop financial recommendations and strategies that better serve the client's long-term interests. RLPs must complete the following three step curriculum for initial certification: 1. Two-day workshop: The Seven Stages of Money Maturity 2. Five-day workshop: Advanced EVOKE™ Training 3. Six-month mentorship that includes further EVOKE™ training through case studies, peer reviews and support, group conference calls led by experienced RLP mentors, and one-on-one guidance from experienced RLP mentors. There are biannual CEU requirements to maintain certification. Planners must also adhere to Kinder Institute's code of ethics standards.