

Part 2A of Form ADV: Firm Brochure

Item 1

Cover Page

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This Brochure provides information about the qualifications and business practices of Occidental Asset Management, LLC (“**Occidental**”, the “**Advisor**” or “**we**”). If you have any questions about the contents of this Brochure, please contact us at by telephone at (650) 344-1600 or by email at nwalsh@occamlc.net. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (the “**SEC**”) or by any state securities authority.

Additional information about Occidental also is available on the SEC’s website at www.adviserinfo.sec.gov.

Registration of an investment Advisor with the SEC or with any state securities authority does not imply any level of skill or training.

Item 2 Material Changes

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which changes the form of the disclosure document that registered advisers are required to provide to clients. This Brochure dated August 15, 2013 has been prepared according to the SEC’s requirements and rules.

In the future, this Item 2 will discuss only specific material changes that are made to this Brochure and provide you with a summary of the changes. We will also reference the date of our last annual update of our Brochure.

Pursuant to the SEC’s rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days after the close of our fiscal year.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Nathan Hatton Walsh, Chief Compliance Officer at any of the telephone numbers on the cover page or nwalsh@occamlc.net.

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Item 4 Advisory Business**A. General Description of Advisory Firm**

Occidental Asset Management, LLC (the “**Advisor**”), a limited liability company formed under the laws of the State of Delaware, was formed on April 25th 2013. The Advisor is currently wholly-owned by Occidental Capital, LLC, a Delaware limited liability company, which in turn is controlled by A. Charles Cattano and Nathan H. Walsh.

B. Description of Advisory Services (including any specializations)

The Advisor will provide investment supervisory services on a discretionary and non-discretionary basis to its clients who will include individuals and institutions with separately managed accounts. The investment advisory services that the Advisor provides include wealth management and financial planning services designed to provide each client with an investment plan tailored to achieve their retirement and other financial planning goals.

The Advisor will have discretionary authority to make the following determinations without obtaining the consent of the client before the transactions are effected:

- the securities that are to be bought or sold;
- the total amount of the securities to be bought or sold;
- the brokers through which securities are to be bought or sold; and
- the commission rates at which securities transactions for client accounts.

The Advisor’s authority may be subject to conditions imposed by the client, examples of which may include where: 1) the client restricts or prohibits transactions in securities of a specific industry, and/or 2) the client directs that transactions be effected through specific brokers and dealers. The latter restriction may be conditioned by the client on the broker or dealer being competitive as to price and execution for each transaction, or offering a specified level of commission discount or may be subject to varying degrees of restrictions such as an instruction to utilize the broker or dealer: a) whether or not competitive, and b) where the specified levels of commission discounts are less favorable than might otherwise be obtained by the Advisor.

C. Availability of Tailored Services for Individual Clients

The Advisor will provide advice to client accounts based on each client’s specific wealth management and financial planning goals, investment objectives and strategies. The Advisor will also tailor its advisory services by adhering to the investment restrictions imposed by clients.

D. Wrap Fee Programs

The Advisor does not currently participate in any wrap fee programs.

E. Client Assets Under Management

The Advisor is a new registrant, and as such, does not yet have client assets under management.

Item 5 Fees and Compensation**A. Advisory Fees and Compensation**

The Advisor will charge each client an investment management fee (the “**Management Fee**”) based on the value of the client’s assets under management, generally in accordance with the following schedule:

Account Value	Annual Management Fee Rate
Up to \$200,000	1.50%
\$200,001 to \$700,000	1.25%
\$700,001 to \$1,200,000	1.15%
\$1,200,001 to \$2,200,000	1.10%
\$2,200,001 to \$3,200,000	1.00%
\$3,200,000 to \$25,000,000	0.75%

The above fee schedule will apply to both discretionary and non-discretionary advisory accounts.

Management Fees will be charged each quarter in advance based on the total market value of the assets in the client account (including net unrealized appreciation or depreciation of investments and cash, cash equivalents and accrued interest) on the first day of the quarter. If a new client account is established during a quarter or a client makes an addition to its account during a quarter, the Management Fee will be charged as of the effective date of the investment management agreement or the date of the additional contribution based on the value of the assets as of the applicable date and will be prorated for the number of days remaining in the quarter. Management Fees will be negotiable in the sole and absolute discretion of the Advisor.

B. Payment of Fees

The Advisor will deduct the Management Fee quarterly from client accounts by instructing the client’s custodian.

C. Other Fees and Expenses

In addition to paying Management Fees, client accounts will also be subject to other investment expenses such as custodial charges, brokerage fees, commissions and related costs; interest expenses; taxes, duties and other governmental charges; transfer and registration fees or similar expenses; costs associated with foreign exchange transactions; other portfolio expenses; and costs, expenses and fees (including, investment advisory and other fees charged by investment advisors with, or funds in, which the client’s account invests) associated with products or services that may be necessary or incidental to such investments or accounts. Client assets may be invested in mutual funds, exchange-traded funds (“**ETF**”) or other registered investment companies. In these cases, the client will bear its *pro rata* share of the investment management fee and other fees of the fund, which are in addition to the investment

Management Fee paid to the Advisor.

All fees paid to the Advisor for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and ETF to their shareholders. These fees and expenses are described in each mutual fund's and ETF's prospectus and may include a management fee, distribution fee (*i.e.*, Rule 12b-1 fee), sales charge and other fund expenses. A client could invest in a mutual fund or an ETF directly, without the services of the Advisor. In that case, the client would not receive the services provided by the Advisor which are intended, among other things, to assist the client in determining which mutual fund(s) or ETF(s) are most appropriate to each client's financial condition and objectives. Accordingly, each client should review both the fees charged by the mutual funds and the ETFs and the fees charged by the Advisor to fully understand the total amount of fees paid by the client and to thereby evaluate the advisory services being provided.

If the Advisor invests its clients' assets in mutual funds, the Advisor would not receive any 12b-1 fees from that mutual fund. Clients should also understand that while the *Advisor* does not receive 12b-1 fees, a 12b-1 fee may still be paid to a mutual fund distributor. These 12b-1 fees could increase overall expenses to the client.

Please refer to Item 12 in this brochure for a discussion of Occidental's brokerage practices, including factors that we consider when selecting brokers and dealers for client transactions.

D. Prepayment of Fees

Clients will be required to pay Management Fees to the Advisor quarterly in advance. Upon the termination of a client account during a calendar quarter, the Management Fee will be prorated for the days remaining in that calendar quarter and any prepaid, unearned fees will be refunded to the relevant client.

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

The Advisor currently does not currently charge performance-based fees (i.e., fees based on a share of capital gains or capital appreciation of the assets of a client).

The Advisor will provide investment management services to multiple portfolios for multiple clients. When the Advisor manages more than one client account, a potential exists for one client account to be favored over another client account. For example, certain client accounts may have higher asset-based fees than other accounts. The Advisor will have an incentive to favor client accounts that pay the Advisor (and indirectly its investment personnel) higher fees. The Advisor's investment personnel may also have conflicts in allocating their time and services among multiple clients. Further, it is possible that the various accounts managed could have different investment strategies that, at times, might conflict with one another to the possible detriment of a client's account. One account may seek to participate in a transaction in which another account may have made (or may seek to make) an investment. The two accounts may have conflicting interests and objectives in connection with the transactions, including how they view the operations or activities of the portfolio or issuer, the targeted returns from the transaction, and the timeframe for, and method of, exiting the transaction. Client accounts also may be invested in different parts of an issuer's capital structure (e.g., private versus public securities), or different classes of securities of the same issuer, which have different preferences and rights.

The Advisor has adopted policies and procedures intended to address conflicts of interest relating to the management of multiple accounts, including accounts with multiple fee arrangements, and the allocation of investment opportunities. The Advisor reviews investment decisions for the purpose of ensuring that all accounts with substantially similar investment objectives are treated equitably. The performance of similarly managed accounts is also regularly compared to determine whether there are any unexplained significant discrepancies. In addition, the Advisor's procedures relating to the allocation of investment opportunities require that similarly managed accounts participate in investment opportunities *pro rata* based on asset size and require that, to the extent orders are aggregated, the client orders are price-averaged. Finally, the Advisor's procedures also require the objective allocation of limited opportunities (such as initial public offerings and private placements) to ensure fair and equitable allocation among accounts. These areas are monitored by the Advisor's Chief Compliance Officer. Further, the Advisor, and its investment personnel, endeavor to devote such time to each client as they deem appropriate under the circumstances to perform each of their duties and obligations to each client in accordance with applicable law and the investment management agreement with each such client.

Item 7**Types of Clients**

The Advisor's clients will consist of individuals and institutions with separately managed accounts. The Advisor will generally require a minimum of \$500,000 of assets under management for a separately managed account but may waive this minimum in its sole and absolute discretion. If the account size falls below the minimum requirement due to market fluctuations only, a client will not be required to invest additional funds with the Advisor to meet the minimum account size.

Item 8**Methods of Analysis, Investment Strategies and Risk of Loss****A. Methods of Analysis and Investment Strategies**

Our investment philosophy is based upon having a three-tiered approach to investing our clients' money while seeking to meet their wealth management and financial planning goals. We will use fundamental research, technical analysis and market sentiment evaluations to determine how we will invest our clients' portfolios. We will combine multiple indicators that historically have been shown to add value in our investment decisions. We can objectively assess the weight of the evidence and make strategic decisions about our investment mix.

We will employ the following methods of analysis and investment strategies with respect to our clients:

Fundamental Research. Also known as basic or pure research, this analysis is conducted to understand the health or valuations of a company, index, or country. Researching different valuations of the S&P 500 (price-to-earnings, dividend yield, earnings growth, etc.), or looking at the economic growth of the United States are two examples of macro fundamental research. Analyzing a company's financial statements or sales growth is an example of micro fundamental research.

Technical Analysis. This can be used to identify nonrandom price patterns and trends in financial markets. We will use moving averages, support and resistance lines, stochastic statistics, relative strength, and other factors to better understand the momentum (positive or negative) of a particular market, segment of a market (sector or industry), or of a specific stock.

Sentiment Evaluations. This can be used to understand the basic investor psychology. Typically, we find that it is best to follow investor sentiment until it reaches an extreme and reverses, at which point we would typically take a contrary position. When the bullish sentiment reading has risen to high levels, it has frequently coincided with an intermediate-term peak in stock prices. Conversely, when most investors have been bearish, stock prices have been typically near a bottom.

Buy and Hold. The Advisor can engage in a buy and hold investment strategy wherein the Advisor would buy securities and holds them for a relatively longer period of time, regardless of short-term factors such as fluctuations in the market or volatility of the stock price.

Equity. The Advisor's equity strategy will focus on a broad range of equity investment styles, including growth, core, and value, as well as portfolios designed to be "style-neutral." We expect that some client accounts will focus on specific ranges on the capitalization scale, from micro-cap, through small-cap, mid-cap and large-cap, to mega-cap, while other client accounts will focus on investment opportunities in more than one capitalization category or across all capitalization levels.

Hedging. The Advisor may utilize a variety of financial instruments such as derivatives and options for risk management purposes.

Option Trading. The Advisor may engage in various option trading investment strategies. Options are investments whose ultimate value is determined from the value of the underlying investment. We may engage in the following types of option trading strategies: securities, covered options, uncovered options and spreading strategies.

These methods, strategies and investments involve risk of loss to clients and clients must be prepared to bear the loss of their entire contribution/investment.

B. Material Risks (Including Significant, or Unusual Risks) Relating to Investment Strategies

Issuer-Specific Changes. Changes in the financial condition of an issuer or counterparty, changes in specific economic or political conditions that affect a particular type of security or issuer, and changes in general economic or political conditions can increase the risk of default by an issuer or counterparty, which can affect a security's or instrument's value. The value of securities of smaller, less well-known issuers can be more volatile than that of larger issuers. Smaller issuers can have more limited product lines, markets, or financial resources.

Relative Value Risk. In the event that the perceived mispricing's underlying the Advisor's relative value trading positions were to fail to converge toward, or were to diverge further from, relationships expected by the Advisor, client accounts may incur a loss.

Hedging. There can be no assurances that a particular hedge is appropriate, or that certain risk is measured properly. Further, while the Advisor may enter into hedging transactions to seek to reduce risk, such transactions may result in poorer overall performance and increased (rather than reduced) risk for the Advisor's investment portfolios than if the Advisor did not engage in any such hedging transactions.

Frequent Trading. The Advisor's strategy may involve frequent trading which will result in significantly higher commissions and charges to client accounts due to increased brokerage, which will offset client profits.

C. Risks Associated with Types of Securities that are Primarily Recommended

Equity Securities. The value of equity securities fluctuates in response to issuer, political, market, and economic developments. Fluctuations can be dramatic over the short as well as long term, and different parts of the market and different types of equity securities can react differently to these developments. For example, large cap stocks can react differently from small cap stocks, and "growth" stocks can react differently from "value" stocks. Issuer, political, or economic developments can affect a single issuer, issuers within an industry or economic sector or geographic region, or the market as a whole. Changes in the financial condition of a single issuer can impact the market as a whole. Terrorism and related geopolitical risks have led, and may in the future lead, to increased short-term market volatility and may have adverse long-term effects on world economies and markets generally.

Fixed-Income and Debt Securities. Investment in fixed-income and debt securities such as bonds, notes and asset-backed securities, subject a client's portfolios to risks in connection with both rising or declining interest rates. Where interest rate are rising, these value of these securities overall may decline. In the case of falling interest rates, there is the risk that the portfolio's income will decline. Investments in these types of securities will also be subject to the credit risk created when a debt issuer fails to pay interest and principal in a timely manner, or that negative perceptions of the issuer's ability to make such payments will cause the price of that debt to decline. Lastly, investments in debt securities will also subject the investments to the risk that the securities may fluctuate more in price, and are less liquid than higher-rated securities because issuers of such lower-rated debt securities are not as strong financially, and are more likely to encounter financial difficulties and be more vulnerable to adverse changes in the economy.

Exchange Traded Funds. Because ETFs are, by definition, portfolios of securities, the Advisor believes that the unsystematic risk associated with investments in ETFs is generally very low relative to investments in ordinary securities of individual issuers. However, there are events that can trigger sharp

and sometimes adverse price movements in ETFs that are not related to movements of the market in general. Not limited to, but among these, are surprise dividends, changes to regular dividend amounts, announcements of rights offerings and possible surprise revisions to net asset values of the ETF. The Advisor may invest in small and/or unseasoned ETFs with small market capitalization. While smaller ETFs generally have potential for rapid growth, they often involve higher risks because they may lack the management experience, financial resources, product diversification, and competitive strength of larger ETFs. In addition, in many instances, the frequency and volume of their trading may be substantially less than is typical of larger ETFs. As a result, the securities of smaller ETFs may be subject to wider price fluctuations.

Options. In connection with the use of options, there may be an imperfect correlation between the change in market value of a security and the prices of the options in the client's account.

Item 9 Disciplinary Information

Investment advisors are required to disclose any legal or disciplinary events that are material to your evaluation of us. We have no information of this type to report.

Item 10 Other Financial Industry Activities and Affiliations

The Advisor has no affiliation with other financial industry firms with common ownership.

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

A. Code of Ethics

The Advisor has adopted a Code of Ethics (the “**Code**”) that obligates the Advisor and its related persons to put the interests of the Advisor’s clients before their own interests and to act honestly and fairly in all respects in their dealings with clients. All of the Advisor’s personnel will be required to comply with applicable federal securities laws. Clients or prospective clients may obtain a copy of the Code by contacting Nathan H. Walsh (Chief Compliance Officer) by telephone at (650) 344-1600 or by email at nwalsh@occamlc.net. See below for further provisions of the Code as they relate to the pre-clearing and reporting of securities transactions by related persons.

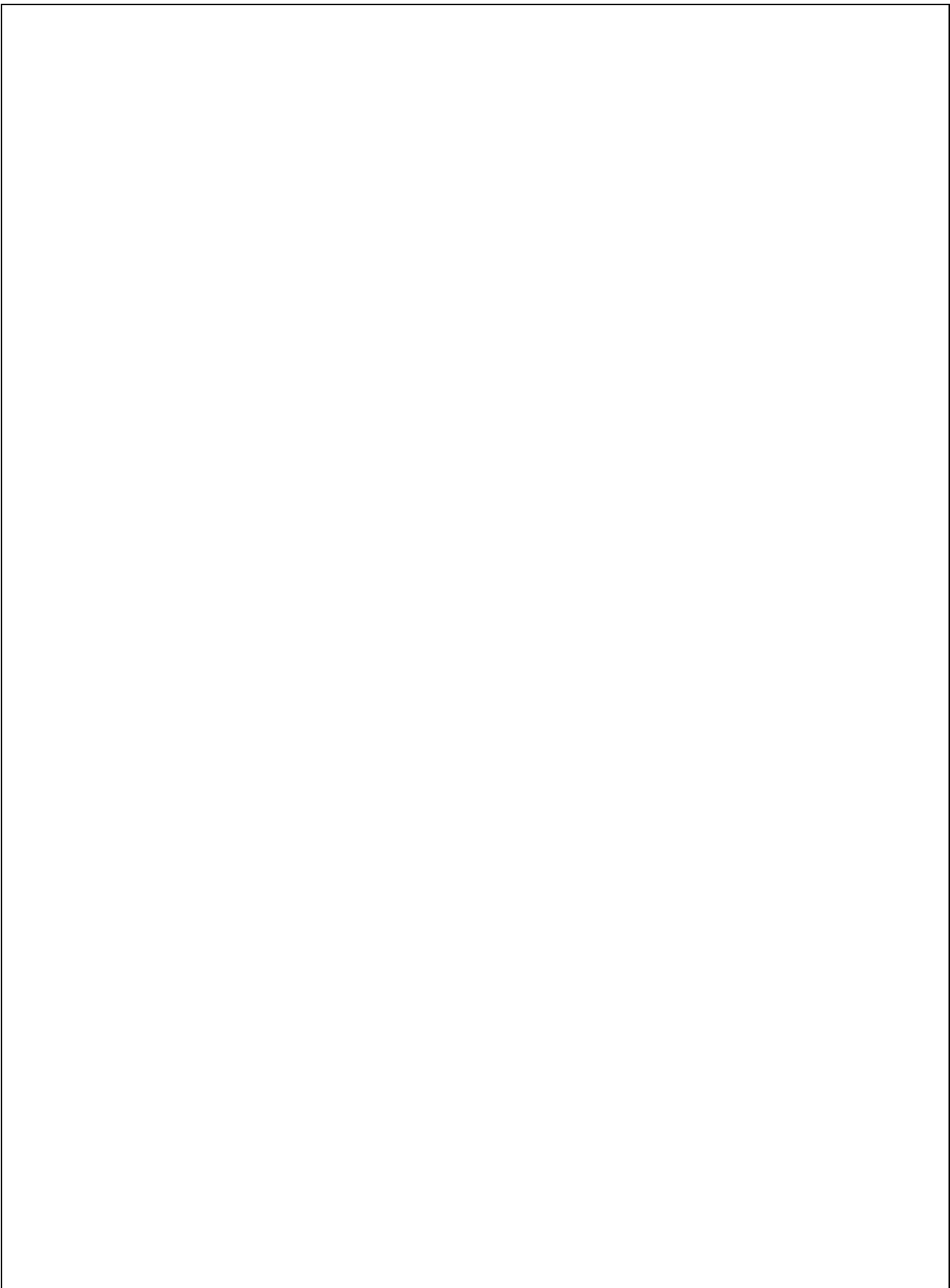
The Advisor, in the course of its investment management and other activities (*e.g.*, board or creditor committee service), may come into possession of confidential or material nonpublic information about issuers, including issuers in which the Advisor or its related persons have invested or seek to invest on behalf of clients. The Advisor is prohibited from improperly disclosing or using such information for its own benefit or for the benefit of any other person, regardless of whether such other person is a client. The Advisor maintains and will enforce written policies and procedures that prohibit the communication of such information to persons who do not have a legitimate need to know such information and to assure that the Advisor is meeting its obligations to clients and remains in compliance with applicable law. In certain circumstances, the Advisor may possess certain confidential or material, nonpublic information that, if disclosed, might be material to a decision to buy, sell or hold a security, but the Advisor will be prohibited from communicating such information to the client or using such information for the client’s benefit. In such circumstances, the Advisor will have no responsibility or liability to the client for not disclosing such information to the client (or the fact that the Advisor possesses such information), or not using such information for the client’s benefit, as a result of following the Advisor’s policies and procedures designed to provide reasonable assurances that it is complying with applicable law.

B. Personal Trading Policies

The Advisor, or its associated persons may invest in the same securities that the Advisor recommends to clients. This could be viewed as presenting a potential conflict of interest.

The Advisor recognizes that the personal investment transactions of its associated persons demand the application of a high code of ethics and require that all such transactions be carried out in a way that does not endanger the interest of any client. At the same time, the Advisor believes that if investment goals are similar for clients and for the Advisor’s associated persons, it is logical that there be a common ownership of some securities. However, it is the express policy of the Advisor that no associated person may purchase or sell any security prior to a transaction being implemented for a client account, thereby preventing that associated person from benefiting from transactions placed on behalf of the Advisor’s advisory clients. In order to address conflicts of interest, the Advisor has adopted procedures with respect to transactions effected by its associated persons for their personal accounts.

From time to time, trading by the Advisor, its associated persons (and certain of their relatives) in particular securities may be restricted in recognition of impending investment decisions on behalf of clients. If transaction orders for a client and the Advisor (and/or its associated persons and certain of their relatives) are not aggregated, the transaction orders for the Advisor (and/or its associated persons and certain of their relatives) will be the last orders filled.



Item 12**Brokerage Practices****A. Factors Considered in Selecting or Recommending Broker-Dealers for Client Transactions**

The Advisor will generally seek “best execution” on an overall basis in light of the circumstances involved in transactions. The Advisor considers a number of factors in selecting a broker-dealer to execute transactions (or series of transactions) and determining the reasonableness of the broker-dealer’s compensation. Such factors include net price, reputation, financial strength and stability, efficiency of execution and error resolution, and offering to the Advisor on-line access to computerized data regarding a client’s accounts. In selecting a broker-dealer to execute transactions (or series of transactions) and determining the reasonableness of the broker-dealer’s compensation, the Advisor need not solicit competitive bids and does not have an obligation to seek the lowest available commission cost. It is not the Advisor’s practice to negotiate “execution only” commission rates, thus a client may be deemed to be paying for research, brokerage or other services provided by a broker-dealer which are included in the commission rate.

1. Research and Other Soft Dollar Benefits

The Advisor may receive research or other products or services other than execution from a broker-dealer and/or a third party in connection with client securities transactions. This is known as a “soft dollar” relationship. The Advisor will limit the use of “soft dollars” to obtain research and brokerage services to services that constitute research and brokerage within the meaning of Section 28(e) of the Securities Exchange Act of 1934, as amended (“**Section 28(e)**”). Research services within Section 28(e) may include, but are not limited to, research reports (including market research); certain financial newsletters and trade journals; software providing analysis of securities portfolios; corporate governance research and rating services; attendance at certain seminars and conferences; discussions with research analysts; meetings with corporate executives; consultants’ advice on portfolio strategy; data services (including services providing market data, company financial data and economic data); advice from broker-dealers on order execution; and certain proxy services. Brokerage services within Section 28(e) may include, but not limited to, services related to the execution, clearing and settlement of securities transactions and functions incidental thereto (*i.e.*, connectivity services between an Advisor and a broker-dealer and other relevant parties such as custodians); trading software operated by a broker-dealer to route orders; software that provides trade analytics and trading strategies; software used to transmit orders; clearance and settlement in connection with a trade; electronic communication of allocation instructions; routing settlement instructions; post trade matching of trade information; and services required by the SEC or a self regulatory organization such as comparison services, electronic confirms or trade affirmations.

When the Advisor uses client commissions to obtain Section 28(e) eligible research and brokerage products and services, the Chief Compliance Officer will periodically review and evaluate the Advisor’s soft dollar practices and to determine in good faith whether, with respect to any research or other products or services received from a broker-dealer, the commissions used to obtain those products and services were reasonable in relation to the value of the brokerage, research or other products or services provided by the broker-dealer. This determination will be viewed in terms of either the specific transaction or the Advisor’s overall responsibilities to the accounts or portfolios over which the Advisor exercises investment discretion.

Where a particular service or product that a broker or dealer is willing to provide for soft dollars has not only a “research” application, but it is also useful to the Advisor for non-“research” purposes, the Advisor may allocate the cost of the product or service between its “research and non-“research” uses and pay

only the “research” portion with soft dollars. The Advisor’s interest in making such an allocation may differ from clients’ interests in that the Advisor has an incentive to designate as great a portion of the cost as “research” as possible in order to permit payment with soft dollars. Where a particular service or product provides benefits to the Advisor’s clients and/or the Advisor itself, the Advisor may allocate the cost among the various persons who receive benefits.

The use of client commissions (or markups or markdowns) to obtain research and brokerage products and services raises conflicts of interest. For example, the Advisor will not have to pay for the products and services itself. This creates an incentive for the Advisor to select or recommend a broker-dealer based on its interest in receiving those products and services.

The Advisor may cause clients to pay commissions (or markups or markdowns) higher than those charged by other broker-dealers in return for soft dollar benefits (known as paying-up), resulting in higher transaction costs for clients.

Research and brokerage services obtained by the use of commissions arising from a client’s portfolio transactions may be used by the Advisor in its other investment activities, including, for the benefit of other client accounts. The Advisor does not seek to allocate soft dollar benefits to client accounts proportionately to the soft dollar credits the accounts generate.

The Advisor may participate in “client commission arrangements” pursuant to which the Advisor may execute transactions through a broker-dealer and request that the broker-dealer allocate a portion of the commissions or commission credits to another firm that provides research and other products to the Advisor. The Advisor excludes from use under these arrangements those products and services that are not eligible under Section 28(e) and applicable regulatory interpretations.

2. Directed Brokerage

The Advisor generally asks its clients to direct the Advisor to appoint TD Ameritrade, Scottrade, or Charles Schwab to serve as custodian for the Advisor’s clients’ accounts. With respect to advisory client accounts maintained at a particular custodian, the Advisor, to the extent applicable, will direct all securities transactions effected for such accounts through such custodian.

When a client directs the Advisor to use a specified broker-dealer (such as TD Ameritrade, Scottrade, Charles Schwab or otherwise) to execute all or a portion of the client’s securities transactions, the Advisor treats the client direction as a decision by the client to retain, to the extent of the direction, the discretion the Advisor would otherwise have in selecting broker-dealers to effect transactions and in negotiating commissions for the client’s account. Although the Advisor attempts to effect such transactions in a manner consistent with its policy of seeking best execution, there may be occasions where it is unable to do so, in which case the Advisor will continue to comply with the client’s instructions. Transactions in the same security for accounts that have directed the use of the same broker will be aggregated. When the directed broker-dealer is unable to execute a trade, the Advisor will select broker-dealers other than the directed broker-dealer to effect client securities transactions. A client who directs the Advisor to use a particular broker-dealer to effect transactions should consider whether such direction may result in certain costs or disadvantages to the client. Such costs may include higher brokerage commissions (because the Advisor may not be able to aggregate orders to reduce transaction costs), less favorable execution of transactions, and the potential of exclusion from the client's portfolio of certain foreign ordinary shares and/or small capitalization or illiquid securities due to the inability of the particular broker-dealer in

question to provide adequate price and execution of all types of securities transactions. By permitting a client to direct the Advisor to execute the client's trades through a specified broker-dealer, the Advisor will make no attempt to negotiate commissions on behalf of the client and, as a result, in some transactions such clients may pay materially disparate commissions depending on their commission arrangement with the specified broker-dealer and upon other factors such as number of shares, round and odd lots and the market for the security. The commissions charged to clients that direct the Advisor to execute the client's trades through a specified broker-dealer may in some transactions be materially different than those of clients who do not direct the execution of their trades. Clients that direct the Advisor to execute trades through a specified broker-dealer may also lose the ability to negotiate volume commission discounts on batched transactions that may otherwise be available to other clients of the Advisor, and this may cost such clients more money. Not all investment advisors require clients to direct the advisor to execute client trades with a specific broker-dealer.

If the Advisor believes, in its exclusive discretion, that it cannot satisfy its fiduciary duty of best execution by executing a transaction for a client account with a broker designated by the client, the Advisor may execute that transaction with a different broker-dealer. Any client providing instructions to the Advisor regarding direction of brokerage transactions must notify the Advisor in writing if the client desires the Advisor to cease executing transactions with or through any such broker-dealer.

B. Trade Allocation and Order Aggregation

1. Trade Allocation

In general, all accounts that participate in a block transaction will participate on a *pro rata* or other objective basis, as described below. Adjustments in the number of securities acquired for or sold by a particular account may be made in order to meet certain requirements or (*e.g.*, to maintain round lots, to fill to specific percentages, or to avoid crossing certain ownership thresholds). The standard initial allocation methodologies are as follows:

- *Pro rata* allocation will generally consist of a weighted allocation based on account size whereby each account will receive a portion of the order based on the account's current market value (measured on all assets under the Advisor's management) relative to other accounts participating in the transaction. If no other allocation method is selected, allocation will be effected on a *pro rata* basis.
- Percentage allocation formulas can be used in place of a *pro rata* allocation. In a percentage allocation, each client receives or achieves a specifically sized position – *e.g.*, buying or selling to result in a 1% position (or a 5% industry or sector position) based on the current market value of the client's account or that portion of the account under the particular model.
- Other objective allocation methodologies are permissible provided they are employed with general consistency and operate fairly (*e.g.*, doubling up on the size of positions taken for certain accounts).
- Standard allocation methods may be modified when common sense dictates that strict adherence to the usual allocation is impractical or leads to inefficient or undesirable results.

2. Order Aggregation

The Advisor will frequently purchase or sell the same security for many clients contemporaneously (or near the same time) and using the same executing broker. It will be the Advisor's practice, where

possible, to aggregate client orders for the purchase or sale of the same security submitted contemporaneously (or near the same time) for execution using the same executing broker. The Advisor will also aggregate in the same transaction, the same securities for accounts where the Advisor has brokerage discretion. Such aggregation may enable the Advisor to obtain for clients a more favorable price or a better commission rate based upon the volume of a particular transaction. However, in cases where the client has negotiated the commission rate directly with the broker, the Advisor will not be able to obtain more favorable commission rates based on an aggregated trade. In such cases, the client will be precluded from receiving the benefit of any possible commission discounts that might otherwise be available as a result of the aggregated trade. In cases where trading or investment restrictions are placed on a client's account, the Advisor may be precluded from aggregating that client's transaction with others. In such a case, the client may pay a higher commission rate and/or receive less favorable prices than clients who are able to participate in an aggregated order. When an aggregated order is completely filled, the Advisor allocates the securities purchased or proceeds of sale *pro rata* among the participating accounts, based on the purchase or sale order. Adjustments or changes may be made under certain circumstances, such as to avoid odd lots or excessively small allocations. If the order at a particular broker is filled at several different prices, through multiple trades, generally all such participating accounts will receive the average price and pay the average commission, subject to odd lots, rounding, and market practice. If an aggregated order is only partially filled, the Advisor's procedures provide that the securities or proceeds are to be allocated in a manner deemed fair and equitable to clients. Depending on the investment strategy pursued and the type of security, this may result in a *pro rata* allocation to all participating clients. The Advisor and its associated persons may also participate in an aggregate order.

Item 13**Review of Accounts****A. Frequency and Nature of Review**

A Charles Cattano, III, Managing Principal, and Nathan H. Walsh, Chief Compliance Officer and Managing Principal, will review client accounts on a periodic basis, generally at least quarterly. A review of individual client accounts and a re-evaluation of client wealth management or financial planning goals and objectives will be conducted on an annual basis. More frequent reviews of client accounts may be triggered by changes in variables such as market, political, or economic circumstances, or a change in the client's individual circumstances.

B. Factors Prompting a Non-Periodic Review of Accounts

Significant market events affecting the prices of one or more securities in client accounts, changes in the wealth management or financial planning goals, investment objectives or guidelines of a particular client, or specific arrangements with particular clients may trigger reviews of client accounts on other than a periodic basis.

C. Content and Frequency of Regular Account Report

Each client that is a separate account will receive quarterly statements and trade confirmations from the qualified custodian of the client's account and will receive annual reports from the Advisor. The reports may include a summary of assets, realized and unrealized capital gains and losses, performance measured against an appropriate index, and anticipated and actual income generated by the portfolio. Such reports may be delivered electronically to the client in accordance with the client's agreement with the Advisor.

Item 14**Client Referrals and Other Compensation**

The Advisor may engage independent solicitors to provide client referrals. If a client is referred to us by a solicitor, this practice will be disclosed to the client in writing by the solicitor. In these cases, the Advisor would pay the solicitor out of its own funds—specifically, the Advisor would generally pay the solicitor a portion of the advisory fees earned for managing the capital of the client or investor that was referred.

The use of solicitors is strictly regulated under applicable federal and state law. The Advisor's policy is to fully comply with the requirements of Rule 206(4)-3, under the Investment Advisers Act of 1940, as amended, and similar state rules, as applicable.

Item 15 Custody

Custody means holding, directly or indirectly, client funds or securities or having any authority to obtain possession of them. The SEC has rules and regulations which are designed to safeguard client assets. The Advisor follows the rules of the SEC, which require us to follow the following procedures:

Maintain Accounts with Qualified Custodians: The Adviser has all client funds and securities, except shares of mutual funds, maintained by a “qualified custodian” (i.e., a bank, registered broker-dealer) in separate accounts for each client. Although the Advisor may recommend a custodian, and generally does (see Item 12.A.3), the client may choose its own. Shares of mutual funds are held by the mutual fund’s transfer agent.

Periodic Account Statements: The Advisor requires each custodian to furnish account statements to our clients no less frequently than quarterly. The Advisor also requires that this statement, at a minimum, identifies the amount of funds and of each security in the account at the end of the quarter and all transactions in the account during the quarter.

Item 16 Investment Discretion

The Advisor will provide investment advisory services on a discretionary basis to clients. Please see the description in “Advisory Business” (Item 4) for a description of limitations clients may place on the Advisor’s discretionary authority.

Prior to assuming full discretion in managing a client’s assets, the Advisor will enter into an investment management agreement or other agreement that sets forth the scope of the Advisor’s discretion.

Unless otherwise instructed or directed by a discretionary client, the Advisor will have the authority to determine (i) the securities to be purchased and sold for the client account (subject to restrictions on its activities set forth in the applicable investment management agreement and any written investment guidelines) and (ii) the amount of securities to be purchased or sold for the client account. Because of the differences in client investment objectives and strategies, risk tolerances, tax status and other criteria, there may be differences among clients in invested positions and securities held.

All accounts are managed using the investment strategy described in the “Methods of Analysis, Investment Strategies and Risk of Loss” section (Item 8). We do not allow clients to limit investments we make that fall within the parameters of the investment strategy described above.

Item 17 Voting Client Securities

Presently, the Advisor does not vote proxies for any client accounts. The client retains the right and responsibility to vote proxies. Clients will receive their proxies or other solicitations directly from their custodian.

Item 18 Financial Information

The Advisor is required in this section to provide you with certain financial information or disclosures about our financial condition. Neither the Advisor nor its associated persons has any financial commitment that is reasonably likely to impair the Advisor's ability to meet contractual commitments to its clients, and neither the Advisor nor its associated persons has been the subject of bankruptcy proceedings.

Privacy Policy

Maintaining the confidentiality of client personal financial information is very important to the Advisor. To provide clients with superior service, the Advisor may collect several types of nonpublic personal information about its clients, including:

- Information from forms that clients may fill out and send to the Advisor in connection with a new account application for separately managed accounts (such as name, address, and social security number).
- Information a client may give the Advisor orally.
- Information about the amount clients have invested (such as initial investment and any additions to and withdrawals from a capital account).
- Information about any bank account clients may use for transfers between accounts.

The Advisor does not sell or disclose client personal information to anyone except as permitted or required by law. The Advisor may share this information with the Advisor's legal counsel as it deems appropriate and with regulators. Finally, the Advisor may disclose information about clients at the client's request (for example, by sending duplicate account statements to someone designated by the client), or as otherwise permitted or required by law.

Within the Advisor, access to information about clients is restricted to those employees who need to know the information to service client accounts. The Advisor employees are trained to follow our procedures to protect client privacy and are instructed to access information about clients only when they have a business reason to obtain it.

The Advisor reserves the right to change its privacy policy in the future, but the Advisor will not disclose client nonpublic personal information as required or permitted by law without giving the client an opportunity to instruct the Advisor not to.

Anti-Money Laundering Policy

The Advisor maintains policies designed to detect and report any activities that raise suspicions of money laundering activities, and may modify these policies from time to time. In that regard, the Advisor requires prospective clients to provide such information as the Advisor deems necessary for the Advisor to comply with applicable legal or regulatory requirements, including, without limitation, anti-money laundering requirements, and the Advisor may disclose information respecting clients and investors to governmental and/or regulatory or self-regulatory authorities to the extent that the Advisor deems required by applicable law or regulation and the Advisor may file reports with such authorities as the Advisor deems required by applicable law or regulation. If required by applicable law, regulation or interpretation thereof, the Advisor may suspend all activity with respect to a client's or investor's account, including suspending the client's to withdraw funds or assets from the account pending the Advisor's receipt of instructions regarding the account from the appropriate governmental or regulatory authority.

Item 1

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**A. Charles Cattano III
Managing Principal**

Occidental Asset Management, LLC
301 California Drive #9
Burlingame, CA 94010
www.occamlc.net

Telephone: (650) 344-1600
Facsimile: (650) 745-7347

August 15, 2013

This Brochure Supplement provides information about A. Charles Cattano III that supplements the Occidental Asset Management, LLC Brochure. You should have received a copy of that Brochure. Please contact us at the above telephone number if you did not receive our Brochure or if you have any questions about the content of this supplement.

Additional information about A. Charles Cattano III is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

A. Charles Cattano, III was born in 1967. He received a BA in English from University of California at Berkeley in 1989 and a MBA in Business Administration, Finance Emphasis from St. Mary's College of California in 1999.

Mr. Cattano has been the Managing Principal of Occidental Asset Management, LLC since the firm's inception in July 2013. He was previously the President of ACC Investment Management, Inc. ("ACCIMI") from its founding in January 2001 until August 2013. Mr. Cattano's principal duties include portfolio management and diversification services for high net worth individuals.

Item 3 Disciplinary Information

Registered investment advisors are required to disclose any material facts regarding any legal or disciplinary actions that would be material to your evaluation of each investment advisor representative providing investment advice to you. There is no information of this type to report.

Item 4 Other Business Activities

Mr. Cattano is also the President of ACCIMI, an investment advisor registered with the State of California. ACCIMI is a predecessor entity to Occidental Asset Management, LLC and is currently in the process of withdrawing its investment advisor registration. ACCIMI will not conduct any further business activities following withdrawal of its investment adviser registration.

Item 5 Additional Compensation

Mr. Cattano does not receive any economic benefit from any non-client for providing advisory services.

Item 6 Supervision

Nathan H. Walsh, Chief Compliance Officer and Managing Principal of Occidental Asset Management, LLC, is responsible for the supervision of Mr. Cattano. His telephone number is (650) 344-1600.

Item 1

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Nathan H. Walsh
Chief Compliance Officer, Managing Principal

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Burlingame, CA 94010
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Facsimile: (650) 745-7347

August 15, 2013

This Brochure Supplement provides information about Nathan H. Walsh that supplements the Occidental Asset Management, LLC Brochure. You should have received a copy of that Brochure. Please contact us at the above telephone number if you did not receive our Brochure or if you have any questions about the content of this supplement.

Additional information about Nathan H. Walsh is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Nathan H. Walsh was born in 1974. He received a BA in History from Rhodes College in 1997.

Mr. Walsh has been the Chief Compliance Officer and Managing Principal of Occidental Asset Management, LLC since the firm's inception in July 2013. From January to August 2013, he was Managing Director of ACC Investment Management, Inc. ("ACCIMI"). From August to December 2012 he was Managing Director of Personal Financial Consultants, Inc., an investment advisor. From February 1999 to August 2012 he was a partner with Polaris Equity Management, Inc., an investment advisor. Mr. Walsh has also served as a broker-dealer representative with Round Hill Securities, Inc. from October 2001 to October 2004 and with Merrill Lynch from June 1997 to February 1999.

Mr. Walsh's principal duties include portfolio management and diversification services for high net worth individuals and other clients.

Item 3 Disciplinary Information

Registered investment advisors are required to disclose any material facts regarding any legal or disciplinary actions that would be material to your evaluation of each investment advisor representative providing investment advice to you. There is no information of this type to report.

Item 4 Other Business Activities

Mr. Walsh is also a Managing Director of ACCIMI, an investment advisor registered with the State of California. ACCIMI is a predecessor entity to Occidental Asset Management, LLC and is currently in the process of withdrawing its investment advisor registration. ACCIMI will not conduct any further business activities following withdrawal of its investment adviser registration.

Item 5 Additional Compensation

Mr. Walsh does not receive any economic benefit from any non-client for providing advisory services.

Item 6 Supervision

A. Charles Cattano III, Managing Principal of Occidental Asset Management, LLC, is responsible for the supervision of Mr. Walsh. His telephone number is (650) 344-1600.