

**Item 1: Cover Page**  
**Part 2A Appendix 1 of Form ADV: Wrap Fee Program Brochure**  
**January 2019**



**Auspicious Financial Planning**  
**Fiduciary Wrap Account Program**

**Sponsored by:**

**Auspicious Financial Planning, LLC**  
**2603 Camino Ramon, Suite 200**  
**San Ramon, CA 94583**  
**[www.AuspiciousFinancial.com](http://www.AuspiciousFinancial.com)**

**Firm Contact:**  
**Louis Dagen**  
**Chief Compliance Officer**

This brochure provides information about the qualifications and business practices of Auspicious Financial Planning, LLC dba Auspicious Financial Planning. If you have any questions about the contents of this brochure, please contact us at (925) 355-1200. 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. You can find additional information about our firm on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching CRD #297962.

Please note that the use of the term "registered investment adviser" and description of our firm and/or our associates as "registered" does not imply a certain level of skill or training. We encourage you to review this Brochure and Supplements for our firm's associates who advise clients, for more information on the qualifications of our firm and our employees.

## Item 2: Material Changes

Auspicious Financial Planning, LLC is required to make you aware of information that has changed since the last annual update to our Fiduciary Wrap Account Program which may be important to you. You can then determine whether to review the brochure in its entirety, or to contact us with questions about any changes.

Since our firm's initial SEC Application on August 14, 2018 the following changes have been made:

- Our custodian, T.D. Ameritrade has offered our firm additional economic benefits that may not be typically offered to other registered investment advisers. For more information please refer to Item 9 of this Brochure.

### Item 3: Table of Contents

Item 1: Cover Page .....	1
Item 2: Material Changes.....	2
Item 3: Table of Contents .....	3
Item 4: Services, Fees & Compensation.....	4
Item 5: Account Requirements & Types of Clients .....	5
Item 6: Portfolio Manager Selection & Evaluation.....	5
Item 7: Client Information Provided to Portfolio Manager(s) .....	7
Item 8: Client Contact with Portfolio Manager(s).....	7
Item 9: Additional Information.....	7

## Item 4: Services, Fees and Compensation

Our firm manages assets for many different types of clients to help meet their financial goals, while remaining sensitive to risk tolerance and time horizons. As fiduciaries, it is our duty to always act in each client's best interest. Our firm has established a service-oriented advisory practice with open lines of communication. We work closely with clients to understand their investment objectives and educate them about financial issues, to create an effective working relationship.

Our firm sponsors and offers a "wrap fee" program, which means you will pay a single fee for investment advisory services, with no commissions or transaction costs. As fiduciaries, we try to eliminate bias whenever possible, but because our firm absorbs these costs, we have a slight incentive to minimize trading.

### **Our Fiduciary Wrap Advisory Services**

---

#### **Comprehensive Portfolio Management:**

As part of our Comprehensive Portfolio Management service, we will offer you asset management and financial planning services. We aim to help clients achieve their financial goals through the use of a financial plan. We hold periodic client meetings to understand your current financial situation, existing resources, financial goals, and tolerance for risk. Based on our discussions, we provide an investment strategy to you, generally using publicly-traded mutual funds and exchange-traded funds (ETFs). Once we mutually agree on an appropriate portfolio and strategy, we purchase the relevant investments, and continuously and regularly monitor them. We will rebalance these investments as needed going forward, based upon your individual needs, stated goals and objectives.

#### **Fee Schedule**

Our maximum annual fee for these services range from 0.25% to 0.95%. We will assess these fees as outlined in our Advisory Agreement. We bill these fees on a pro-rata basis quarterly in advance based on the value of the account(s) on the time-weighted daily average of the previous quarter. As fiduciaries, we will make adjustments for deposits and withdrawals during the quarter, so that you're not over-charged. Here's how the process works:

- a) We have engaged T.D. Ameritrade to be the independent custodian holding your investments. At a minimum, they will send you quarterly statements showing the market values for each of your investments, and all deposits and withdrawals, including the amount of the advisory fees paid to our firm; and
- b) You will provide authorization permitting our firm to be directly paid by these terms. Our firm will send an invoice directly to T.D. Ameritrade.

#### **Other Fees and Expenses:**

Mutual funds and exchange-traded funds charge annual fees, called the expense ratio. As fiduciaries, we always choose inexpensive funds to keep your costs as low as possible. The fund's prospectus discloses this expense ratio, so please read it carefully before you invest.

In rare cases, mutual funds may levy a short-term redemption charge, to discourage short-term trading. These charges usually only apply if you sell the fund within the first thirty or ninety days. We will let you know about any costs like this in advance for any fund we recommend.

As fiduciaries, we receive no compensation of any kind from any investment we recommend. Therefore, we have no bias in recommending one investment over another.

#### **Wrap Fee Program Recommendations:**

Our firm does not recommend or offer the wrap program services of other providers.

#### **Regulatory Assets Under Management**

---

Our firm manages \$170,000,000 on a discretionary basis as of December 31, 2018.

### **Item 5: Account Requirements and Types of Clients**

Our firm does not impose requirements for opening and maintaining accounts, or otherwise engaging us. We will help anyone who needs financial planning and wants a harmonious professional relationship.

Our firm has the following types of clients:

- Individuals and High Net Worth Individuals;
- Trusts, Estates and Charitable Organizations;
- Pension and Profit Sharing Plans; and
- Corporations, Limited Liability Companies and Other Business Types.

### **Item 6: Portfolio Manager Selection and Evaluation**

#### **Selection of Portfolio Managers:**

We act as portfolio managers for this comprehensive wrap program. Other investment advisory firms may charge lower fees than our firm for similar services. We are subject to individual licensing requirements as imposed by state securities boards. We are required to confirm or update each of our U-4 Forms on an annual basis. We are supervised by our Chief Compliance Officer or other management personnel.

#### **Advisory Business:**

You can find information about our fiduciary wrap fee services in Item 4 of this brochure. We offer customized investment advice to our clients.

If you wish, we can place reasonable restrictions on the types of investments to be held in the portfolio. (The most common example is Socially Responsible Investing.) While we will try to follow your directions, sometimes it's impossible to impose certain esoteric restrictions.

**Participation in Fiduciary Wrap Fee Programs:**

We only offer fiduciary wrap fee accounts to our clients, which are managed on a customized basis according to your investment objectives, financial goals, risk tolerance, and other considerations.

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

As fiduciaries, we do not charge any performance-based fees.

**Methods of Analysis, Investment Strategies and Risk of Loss:**

Once we have developed a customized investment strategy for you, we select mutual funds and exchange-traded funds (ETFs) that best fit that strategy. We use Morningstar, a Chicago-based provider of investment research, to choose funds that are inexpensive, well-managed, and well-respected in the industry. I've used their five-factor criteria (examining a fund's process, performance, people, parent, and price) successfully for many years. While they are not fiduciaries, they are free from most biases, and have a good historical track record of reviewing funds.

But as with most investments, these are not guarantees. Please remember that investing in funds is not FDIC-insured, so you can lose money. In our conversations together, we will make sure that you understand the risks associated with investing and are appropriately diversified.

How will we diversify your portfolio? By using a process called "asset allocation." This is an investment strategy that attempts to balance risk versus return when choosing investments that match your goals, risk tolerance, and time frame. Asset allocation is based on the principle that different investments perform at different rates depending on market and economic conditions. Since these returns are not perfectly correlated to each other, your overall risk and volatility drops. But the downside is that your potential maximum return drops as well.

To best diversify, we recommend that most clients invest in checking and savings accounts (for FDIC insurance coverage up to \$250,000 per depositor); real estate (personal residence and/or other property); different types of bonds (which generally pay interest income on a regular basis); and stocks from companies around the world (for historical long-term growth above the rate of inflation).

We will recommend changes to this allocation over time, depending on your goals and needs. We will sometimes also suggest different allocations based on changing market or economic conditions.

We are usually buy-and-hold investors. You may own the same funds with us for many years, and may only make changes as discussed above. But we monitor the economy, markets, and individual funds on a daily basis, and will suggest modifications to your asset allocation and/or investments as required.

**Voting Client Securities:**

Our firm does not accept the proxy authority to vote on your behalf. You will receive proxies or other solicitations directly from T.D. Ameritrade. In the event that proxies are sent to us, we will forward them to you, and ask the party who sent them to directly contact you in the future. You may call, write or email us to discuss questions about particular proxy votes or other solicitations.

## Item 7: Client Information Privacy

We manage our clients' investments in-house. Since we have access to your financial data, we take privacy concerns very seriously. Please see our Privacy Policy for more information on how we use and protect client information.

## Item 8: Client Contact with Us

You can always contact us if you have any questions or concerns about your investments or any other financial matters.

## Item 9: Additional Information

### Disciplinary Information

---

There are no legal or disciplinary events that are material to the evaluation of our advisory business or the integrity of our management. On an individual level, in twenty-eight years of practice, Louis Dagen has never been subject to any legal or disciplinary events that affect his advisory business, or the integrity of his financial management.

### Financial Industry Activities and Affiliations

---

Our firm has no other financial industry activities and affiliations to disclose.

### Code of Ethics, Participation or Interest in Client Transactions & Personal Trading

---

As fiduciaries, it is our responsibility to provide fair and full disclosure of all material facts, and to act solely in your best interest at all times. Our fiduciary duty is the underlying principle for our firm's Code of Ethics, which includes procedures for personal securities transactions and insider trading. Our firm requires all of us to conduct business with the highest level of ethical standards, and to comply with all federal and state securities laws at all times. Upon employment with our firm, and at least annually thereafter, all personnel will acknowledge receipt, understanding and compliance with our firm's Code of Ethics. Our firm and personnel conduct business in an honest, ethical, and fair manner, and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients.

This disclosure is provided to give you a summary of our Code of Ethics. If you wish to review our Code of Ethics in its entirety, we will promptly provide a copy.

We recognize that our personal investment transactions demand the application of a Code of Ethics with high standards, 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, our firm also believes that if investment goals are similar for clients and for our representatives, it is logical, and even desirable, that there be common ownership of some investments.

So, in order to prevent conflicts of interest, we have established procedures for transactions carried out in our personal accounts<sup>1</sup>. In order to monitor compliance with our personal trading policy, we have pre-clearance requirements and a quarterly securities transaction reporting system.

We will never recommend, purchase, or sell in client accounts, any investments in which our firm or a related person has a material financial interest, without prior disclosure to you.

Occasionally, related persons of our firm may buy or sell securities and other investments that are also recommended to you. In order to minimize this conflict of interest, our related persons will place client interests ahead of their own interests. Our related persons will refrain from buying or selling the same securities prior to buying or selling for our clients in the same day. If related persons' accounts are included in a block trade, our related persons will always trade personal accounts last.

### **Review of Accounts**

---

We review client accounts on at least a quarterly basis. We carry out this review to learn whether your accounts are in line with your investment objectives, appropriately positioned based on market conditions, and investment policies, if applicable. We may review your accounts more frequently than described above. Among the factors which may trigger an off-cycle review are major market or economic events, changes in your life, your requests, etc. We do not provide written reports to clients, unless asked to do so. Verbal reports to clients take place on at least a quarterly basis.

### **Custodial Information**

---

As fiduciaries, clients have tasked us to recommend a custodian/broker who will hold their assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others, the following:

- Timeliness of execution
- Timeliness and accuracy of trade confirmations
- Research services provided
- Ability to provide investment ideas
- Execution facilitation services provided
- Record keeping services provided
- Custody services provided
- Frequency and correction of trading errors
- Ability to access a variety of market venues
- Expertise as it relates to specific securities
- Financial condition
- Business reputation
- Quality of services

After much due diligence, we recommend T.D. Ameritrade Institutional, a division of T.D. Ameritrade, Inc., member FINRA/SIPC. They are an independent and unaffiliated SEC-registered broker-dealer.

---

<sup>1</sup> For purposes of the policy, our associate's personal account generally includes any account (a) in the name of our associate, his/her spouse, his/her minor children or other dependents residing in the same household, (b) for which our associate is a trustee or executor, or (c) which our associate controls, including our client accounts which our associate controls and/or a member of his/her household has a direct or indirect beneficial interest in.



T.D. Ameritrade offers services to independent investment Advisors, including custody of securities, trade execution, clearance and settlement of transactions.

As part of our contract with T.D. Ameritrade, they provide certain research and brokerage services available at no additional cost to our firm. These services include certain research and brokerage services, including research services obtained by T.D. Ameritrade directly from independent research companies, as selected by our firm (within specific parameters). Research products and services provided by T.D. Ameritrade to our firm may include research reports on recommendations or other information about, particular companies or industries; economic surveys, data and analyses; financial publications; portfolio evaluation services; financial database software and services; computerized news and pricing services; quotation equipment for use in running software used in investment decision-making; and other products or services that provide lawful and appropriate assistance by T.D. Ameritrade to our firm in the performance of our investment decision-making responsibilities. The aforementioned research and brokerage services are used by our firm to manage accounts for which we have investment discretion. Without this arrangement, our firm might be compelled to purchase the same or similar services at our own expense.

As a result of receiving the services discussed for no additional cost, we may have an incentive to continue to use or expand the use of T.D. Ameritrade services. Our firm examined this potential conflict of interest when we chose to enter into this relationship with T.D. Ameritrade and we have determined that the relationship is in the best interest of our firm's clients and satisfies our client obligations, including our duty to seek best execution.

T.D. Ameritrade may charge brokerage commissions for effecting certain securities transactions. T.D. Ameritrade enables us to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. T.D. Ameritrade's commission rates are generally discounted from customary retail commission rates. However, the commission fees charged by T.D. Ameritrade may be higher or lower than those charged by other custodians and broker-dealers.

Clients may pay a commission to T.D. Ameritrade that is higher than another qualified broker dealer might charge to execute the same transaction where we determine in good faith that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although we will seek competitive rates, to the benefit of all clients, we may not necessarily obtain the lowest possible commission rates for specific client account transactions.

### **Other Compensation**

---

Our firm participates in T.D. Ameritrade's institutional customer program ("the program") and we may recommend T.D. Ameritrade to 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 our participation in the program that are typically not available to T.D. Ameritrade retail investors. These benefits include the following products and services (provided 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 participants; access to block trading (which provides the ability to aggregate securities

transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to our firm by third party vendors. T.D. Ameritrade may also have paid for business consulting and professional services received by our firm's related persons. Some of the products and services made available by T.D. Ameritrade through the program may benefit our firm but may not benefit our Client accounts. These products or services may assist us in managing and administering Client accounts, including accounts not maintained at T.D. Ameritrade. Other services made available by T.D. Ameritrade are intended to help us manage and further develop our business enterprise. The benefits received by our firm or our personnel through participation in the program do not depend on the amount of brokerage transactions directed to T.D. Ameritrade. As part of our fiduciary duty to clients, we endeavor at all times to put the interests of our clients first. Clients should be aware, however, that the receipt of economic benefits by our firm or our related persons in and of itself creates a potential conflict of interest and may indirectly influence our choice of T.D. Ameritrade for custody and brokerage services.

Our firm also receives from TD Ameritrade certain additional economic benefits ("Additional Services") that may or may not be offered to any other independent investment Advisors participating in the program. Specifically, the Additional Services include an entitlement of \$27,000 to cover expenses associated with Morningstar Office's Portfolio Monitoring Service. TD Ameritrade provides the Additional Services to Advisor in its sole discretion and at its own expense, and Advisor does not pay any fees to TD Ameritrade for the Additional Services. Advisor and TD Ameritrade have entered into a separate agreement ("Additional Services Addendum") to govern the terms of the provision of the Additional Services.

Advisor's receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to Advisor, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, Advisor's Client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with Advisor, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, Advisor may have an incentive to recommend to its Clients that the assets under management by Advisor be held in custody with TD Ameritrade and to place transactions for Client accounts with TD Ameritrade. Advisor's receipt of Additional Services does not diminish its duty to act in the best interests of its Clients, including to seek best execution of trades for Client accounts.

### **Client Referrals**

---

We do not pay referral fees to anyone, in accordance with Rule 206 (4)-3 of the Investment Advisers Act of 1940.

### **Investment Discretion**

---

Clients have the option of providing our firm with investment discretion on their behalf, pursuant to an executed investment advisory client agreement. By granting investment discretion, our firm is authorized to execute securities transactions, determine which securities are bought and sold, and the total amount to be bought and sold. Should clients grant our firm non-discretionary authority, our firm would be required to obtain the client's permission prior to effecting securities transactions.

Limitations may be imposed by the client in the form of specific constraints on any of these areas of discretion with our firm's written acknowledgement.

### **Financial Information**

---

Our firm is not required to provide financial information in this Brochure because:

- We do not require the prepayment of more than \$1,200 in fees when services cannot be rendered within 6 months.
- We do not take custody of client funds or securities.
- We have no financial condition or commitment that impairs our ability to meet contractual and fiduciary obligations to clients.

Neither Louis Dagen, nor Auspicious Financial Planning, LLC has ever been the subject of a bankruptcy proceeding.