

Firm Brochure

(Part 2A of Form ADV)

DOUBLE BAY MANAGEMENT & PLANNING

50 CALIFORNIA STREET, SUITE 1500

SAN FRANCISCO, CA 94111

800-494-3267

415-276-2373

WWW.DBMP.COM

KEIR@DBMP.COM

This brochure provides information about the qualifications and business practices of Double Bay Management & Planning. If you have any questions about the contents of this brochure, please contact us at: 800-494-3267, by email at keir@dbmp.com or by visiting the firm website at www.dbmp.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.

Additional information about Double Bay Management & Planning is available on the SEC's website at www.adviserinfo.sec.gov.

March 27, 2020

Item 2 Material Changes

Annual Update

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

Material Changes since the Last Update

Our Firm has no material change since the last update.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 800-494-3267 or by email at: keir@dbmp.com.

Item 3 Table of Contents

Item 2 Material Changes	ii
Annual Update	ii
Material Changes since the Last Update	ii
Full Brochure Available	ii
Item 4 Advisory Business.....	1
Firm Description.....	1
Principal Owners.....	1
Types of Advisory Services.....	1
Financial Planning.....	2
Portfolio Management.....	2
Pension consulting services.....	3
Selection of other advisers.....	4
Tailored Relationships	5
Retainer Agreement.....	5
Investment Management Agreement.....	5
Assets Under Management	5
Item 5 Fees and Compensation.....	6
Description	6
Individual Portfolio Management.....	6
Financial Planning.....	6
Pension Consulting Fees	7
Selection And Monitoring Of Third-Party Money Managers Fees	7
Other Fees	7
Limited Prepayment of Fees	8
ERISA Accounts	8
Expense Ratios.....	8
Past Due Accounts and Termination of Agreement	8
Item 6 Performance-Based Fees	9
Sharing of Capital Gains	9
Item 7 Types of Clients	9
Description	9
Account Minimums.....	9

Item 8 Methods of Analysis, Investment Strategies and Risk of Loss	10
Methods of Analysis.....	10
Investment Strategies	10
Risk of Loss	12
Item 9 Disciplinary Information	13
Legal and Disciplinary.....	13
Item 10 Other Financial Industry Activities and Affiliations	13
Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	13
Code of Ethics.....	13
Participation or Interest in Client Transactions.....	14
Personal Trading.....	14
Item 12 Brokerage Practices	14
Selecting Brokerage Firms.....	14
Best Execution	14
Soft Dollars	14
Order Aggregation	15
Item 13 Review of Accounts.....	15
Periodic Reviews	15
Regular Reports.....	15
Item 14 Client Referrals and Other Compensation.....	16
Incoming Referrals.....	16
Referrals Out	16
Item 15 Custody.....	17
Account Statements.....	17
Performance Reports.....	17
Item 16 Investment Discretion	17
Discretionary Authority for Trading.....	17
Limited Power of Attorney.....	18
Item 17 Voting Client Securities.....	18
Proxy Votes	18
Item 18 Financial Information.....	18
Financial Condition	18

Business Continuity Plan	19
General	19
Disasters	19
Alternate Offices	19
Loss of Key Personnel	19
Information Security Program.....	19
Information Security	19
Privacy Notice	19
Brochure Supplement (Part 2B of Form ADV)	21
Item 2 Educational Background and Business Experience	22
Item 3 Disciplinary History	23
Item 4 Other Business Activities	23
Item 5 Additional Compensation	23
Item 6 Supervision	23

Item 4 Advisory Business

Firm Description

Double Bay Management & Planning was founded in 1998.

Double Bay Management & Planning provides personalized confidential financial planning and investment management to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, insurance review, investment management, education funding, retirement planning, and estate planning.

Double Bay Management & Planning is strictly a fee-only financial planning and investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products.

Investment advice is an integral part of financial planning. In addition, Double Bay Management & Planning advises clients regarding cash flow, college planning, retirement planning, and estate planning.

Double Bay Management & Planning may place trades for clients under a limited power of attorney. While we may have authorization to place trades under a limited power of attorney, certain critical account functions are still only available to the account holder, such as cash withdrawals, a change of beneficiary or other major account actions.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) 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 should occur.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

Principal Owners

Keir Oxley, Sole Proprietor, is the firm's principal owner.

Types of Advisory Services

Double Bay Management & Planning provides

- Financial planning services
- Portfolio management for individuals
- Pension consulting services
- Selection of other advisers (including private fund managers)

On more than an occasional basis, Double Bay Management & Planning furnishes advice to clients on matters not involving securities, such as

financial planning matters, and trust services that often include estate planning.

Financial Planning

A financial plan is designed to help the client with all aspects of financial planning without ongoing investment management after the financial plan is completed.

Financial Planning recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

Detailed investment advice and specific recommendations are provided as part of a financial plan. Implementation of the recommendations is at the discretion of the client. Typically the financial plan is presented to the client within six months of the contract date, provided that all information needed to prepare the financial plan has been promptly provided.

We gather required information through in-depth personal interviews. Information gathered includes the client's current financial status, tax status, future goals, returns objectives and attitudes towards risk. We carefully review documents supplied by the client, including a questionnaire completed by the client, and prepare a written report. Should the client choose to implement the recommendations contained in the plan, we suggest the client work closely with his/her attorney, accountant, insurance agent, and/or stockbroker. Implementation of financial plan recommendations is entirely at the client's discretion.

Portfolio Management

Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. All aspects of the client's financial affairs are reviewed, including those of their children. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

We manage these advisory accounts on both a discretionary and non-discretionary basis. Account supervision is guided by the client's stated

objectives (i.e., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations.

Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. Most clients choose to have Double Bay Management & Planning manage their assets in order to obtain ongoing in-depth advice and life planning.

The scope of work and fee for an Advisory Service Agreement is provided to the client in writing prior to the start of the relationship. An Advisory Service Agreement includes: cash flow management; insurance review; investment management (including performance reporting); education planning; retirement planning; estate planning, as well as the implementation of recommendations within each area.

Assets are invested primarily in no-load or low-load mutual funds and exchange-traded funds, usually through discount brokers or fund companies. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Discount brokerages may charge a transaction fee for the purchase of some funds.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades. Double Bay Management & Planning does not receive any compensation, in any form, from fund companies.

Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts, futures contracts, and interests in partnerships.

Initial public offerings (IPOs) are not available through Double Bay Management & Planning.

Pension consulting services

We also provide several advisory services separately or in combination. While the primary clients for these services will be pension, profit sharing and 401(k) plans, we offer these services, where appropriate, to individuals and trusts, estates and charitable organizations. Pension Consulting Services are comprised of four distinct services. Clients may choose to use any or all of these services.

Investment Policy Statement Preparation (hereinafter referred to as "IPS"):

If an IPS is contracted for, we will meet with the client (in person or over the telephone) to determine an appropriate investment strategy that reflects the

plan sponsor's stated investment objectives for management of the overall plan. Our firm then prepares a written IPS detailing those needs and goals, including an encompassing policy under which these goals are to be achieved. The IPS also lists the criteria for selection of investment vehicles as well as the procedures and timing interval for monitoring of investment performance.

Selection of Investment Vehicles:

We assist plan sponsors in constructing appropriate asset allocation models. We will then review various mutual funds (both index and managed) to determine which investments are appropriate to implement the client's IPS, if one is contracted for. The number of investments to be recommended will be determined by the client.

Monitoring of Investment Performance:

We monitor client investments continually, based on the procedures and timing intervals delineated in the Investment Policy Statement. Although our firm is not involved in any way in the purchase or sale of these investments, we supervise the client's portfolio and will make recommendations to the client as market factors and the client's needs dictate.

Employee Communications:

For pension, profit sharing and 401(k) plan clients with individual plan participants exercising control over assets in their own account ("self-directed plans"), we also provide quarterly educational support and investment workshops designed for the plan participants when the plan sponsor engages our firm to provide these services. The nature of the topics to be covered will be determined by us and the client. Double Bay Management & Planning may provide individualized advice for plan participants.

Selection of other advisers

We also offer advisory management services to our clients through our Selection and Monitoring of Third-Party Money Managers programs (hereinafter, "Programs").

Our firm provides the client with an asset allocation strategy developed through personal discussions in which goals and objectives based on the client's particular circumstances are established.

Based on the client's individual circumstances and needs we will then perform management searches of various unaffiliated registered investment advisers to identify which registered investment adviser's portfolio management style is appropriate for that client. Factors considered in making this determination include account size, risk tolerance, the opinion of each client and the investment philosophy of the selected registered investment adviser. Clients should refer to the selected registered investment adviser's Firm Brochure or other disclosure document for a full description of the services offered. We

are available to meet with clients on a regular basis, or as determined by the client, to review the account.

Once we determine the most suitable investment adviser(s) for the client, we provide the selected adviser(s) with the client's guidelines. The adviser(s) then creates and manages the client's portfolio based on the client's individual needs.

We monitor the performance of the selected registered investment adviser(s). If we determine that a particular selected registered investment adviser(s) is not providing sufficient management services to the client, or is not managing the client's portfolio in a manner consistent with the client's guidelines, we may suggest that the client contract with a different registered investment adviser and/or program sponsor. Under this scenario, our firm assists the client in selecting a new registered investment adviser and/or program. However, any move to a new registered investment adviser and/or program is solely at the discretion of the client.

Tailored Relationships

The goals and objectives for each client are documented in our client relationship management system. Investment policy statements may be created if the client wants one. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

Retainer Agreement

In some circumstances, a *Retainer Agreement* is executed in lieu of an *Advisory Service Agreement* when it is more appropriate to work on a fixed-fee basis. The annual fee for a *Retainer Agreement* will vary and is not negotiable.

Investment Management Agreement

An *Investment Management Agreement* may be executed when financial planning is not provided as part of the relationship. The annual fee for an *Investment Management Agreement* will vary and is not negotiable.

Assets Under Management

As of December 31, 2019, Double Bay Management & Planning manages approximately \$103,431,146 in assets on a discretionary basis. Double Bay Management & Planning has roughly \$374,751,544 retirement plan assets under advisement.

Item 5 Fees and Compensation

Description

Double Bay Management & Planning bases its fees on a percentage of assets under management, hourly charges or fixed fees

Some *Retainer Agreements* may be priced based on the complexity of work, especially when asset management is not the most significant part of the relationship.

Financial plans are priced according to the degree of complexity associated with the client's situation.

Fees are not negotiable.

Individual Portfolio Management

The annual Advisory Service Agreement fee is based on a percentage of the investable assets according to the following schedule:

1.00% on the first \$500,000;

0.80% on the next \$500,000 (from 500,001 to 1,000,000); and

0.60% on the assets above \$1,000,000.

Our firm charges this fee on a quarterly basis in arrears. Our firm may charge our fees directly through the account or otherwise bill the client directly. The client must consent in advance to direct debiting of their investment account. The minimum annual fee is \$9,000 and is not negotiable. Both current and future client relationships may exist where the fees are higher or lower than the fee schedule above.

Financial Planning

The fee for a financial plan is predicated upon the facts known at the start of the engagement. The fee range is \$500 to \$10,000 and is not negotiable. Since financial planning is a discovery process, situations occur wherein the client is unaware of certain financial exposures or predicaments.

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 a financial plan, future face-to-face meetings may be scheduled as necessary. Follow-on implementation work is billed separately at the rate of \$200 per hour.

Hourly Planning Engagements

Double Bay Management & Planning provides hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements is \$200.

Fees for financial plans are billed upon delivery of the financial plan.

Pension Consulting Fees

This service may be charged as either a percentage or a flat fee as determined in each client's agreement.

When we charge an annual fee for Pension Consulting Services, the fee will range from .01% to 1% of plan assets depending on the services requested and the size of the plan.

Alternatively, a flat fee may be charged and will range from \$4,000 to \$50,000. This fee is not negotiable. Both current and future client relationships may exist where the fees are higher or lower than the fee schedule above.

Plan sponsors are invoiced in arrears at the end of each calendar quarter.

We do not require any minimum fee.

Selection And Monitoring Of Third-Party Money Managers Fees

We are paid by the independent adviser selected by the client for portfolio management services. Our fee is based on a percentage of the client's managed assets (typically ranging up to 1% of the fee charged by the independent investment adviser, depending on the size of the account), which is included in the independent investment adviser's annual management fee. The portion of the advisory fee paid to us does not increase the client's ultimate advisory fee paid to the selected independent investment adviser.

Clients are provided with a separate disclosure document describing the fee paid to us by such independent registered investment advisers. The total asset management fee, including the referral fee paid to our firm, is disclosed in the independent investment adviser's disclosure document.

Double Bay Management & Planning's fee for this service does not include the independent investment adviser's fee for that entity's advisory/management services. The independent investment adviser's management fee is disclosed in the independent investment adviser's Firm Brochure or other disclosure document.

Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The

selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

Double Bay Management & Planning, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

New Advisory Service Agreement fees are calculated on a formula basis and adjusted for complexity of individual situations. *The formula is based on gross income, gross assets and other financial considerations.*

Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

Limited Prepayment of Fees

Under no circumstances do we require or solicit payment of fees in excess of \$1,200 more than six months in advance of services rendered.

ERISA Accounts

Double Bay Management & Planning is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, Double Bay Management & Planning may only charge fees for investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b-1 fees.

Expense Ratios

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to Double Bay Management & Planning.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

Past Due Accounts and Termination of Agreement

Double Bay Management & Planning reserves the right to stop work on any account that is more than 30 days overdue. In addition, Double Bay Management & Planning reserves 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 Double Bay Management & Planning's judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 30 days.

The client or the investment manager may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The portfolio value at the completion of the prior full billing quarter is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

Item 6 Performance-Based Fees

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Double Bay Management & Planning does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Item 7 Types of Clients

Description

Double Bay Management & Planning generally provides investment advice to individuals, high net worth individuals, banks or thrift institutions, investment companies, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

Account Minimums

The minimum account size is \$1,000,000 of assets under management, which equates to an annual fee of \$9,000.

When an account falls below \$1,000,000 in value, the minimum annual fee of \$9,000 will still be charged.

Double Bay Management & Planning has the discretion to waive the account minimum and minimum fees.

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

Methods of Analysis

Asset Allocation.

Rather than focusing primarily on securities selection, we attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

Mutual Fund and/or ETF Analysis.

We look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in another fund(s) in the client's portfolio. We also monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the client's portfolio.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Other sources of information that Double Bay Management & Planning may use include Morningstar Principia mutual fund and stock information, Charles Schwab & Company's "SchwabLink" service, Advisor Intelligence, among other industry resources which we believe to be reliable.

Investment Strategies

The primary investment strategy used on client accounts is asset allocation. We use primarily passively-managed funds.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client typically executes an Investment Policy Statement that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, short sales, margin transactions, and option writing (including covered options, uncovered options or spreading strategies).

Short sales. We borrow shares of a stock for your portfolio from someone who owns the stock on a promise to replace the shares on a future date at a certain price. Those borrowed shares are then sold. On the agreed-upon future date, we buy the same stock and return the shares to the original owner. We engage in short selling based on our determination that the stock will go down in price after we have borrowed the shares. If we are correct and the stock price has gone down since the shares were purchased from the original owner, the client account realizes the profit.

Margin transactions. We will purchase stocks for your portfolio with money borrowed from your brokerage account. This allows you to purchase more stock than you would be able to with your available cash, and allows us to purchase stock without selling other holdings.

Option writing. We may use options as an investment strategy. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option, just like a stock or bond, is a security. An option is also a derivative, because it derives its value from an underlying asset.

The two types of options are calls and puts:

- A call gives us the right to buy an asset at a certain price within a specific period of time. We will buy a call if we have determined that the stock will increase substantially before the option expires.
- A put gives us the holder the right to sell an asset at a certain price within a specific period of time. We will buy a put if we have determined that the price of the stock will fall before the option expires.

We will use options to speculate on the possibility of a sharp price swing. We will also use options to "hedge" a purchase of the underlying security; in other words, we will use an option purchase to limit the potential upside and downside of a security we have purchased for your portfolio.

We use "covered calls", in which we sell an option on security you own. In this strategy, you receive a fee for making the option available, and the person purchasing the option has the right to buy the security from you at an agreed-upon price.

We use a "spreading strategy", in which we purchase two or more option contracts (for example, a call option that you buy and a call option that you

sell) for the same underlying security. This effectively puts you on both sides of the market, but with the ability to vary price, time and other factors.

Risk of Loss

All investment programs have certain risks that are borne by the investor. Securities investments are not guaranteed and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk. Our investment approach constantly 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.

Item 9 Disciplinary Information

Legal and Disciplinary

The firm and 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

Double Bay Management & Planning and our related persons are not engaged in other financial industry activities and have no other industry affiliations.

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

Code of Ethics

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws. The employees of Double Bay Management & Planning have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. Our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports of the firm's access persons. Any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering will be documented. Our code also provides for oversight, enforcement and recordkeeping provisions.

Double Bay Management & Planning's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

The firm will provide a copy of the Code of Ethics to any client or prospective client upon request by contacting us at 800-494-3267.

Participation or Interest in Client Transactions

Double Bay Management & Planning and its employees may buy or sell mutual funds or ETF's that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the Double Bay Management & Planning *Compliance Manual*. Individuals associated with our firm are prohibited from engaging in principal and agency cross transactions.

Personal Trading

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Item 12 Brokerage Practices

Selecting Brokerage Firms

Double Bay Management & Planning does not have any affiliation with product sales firms. Specific custodian recommendations are made to Clients based on their need for such services. Double Bay Management & Planning recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

Double Bay Management & Planning recommends discount brokerage firms and trust companies (qualified custodians), such as Charles Schwab & Co.

Double Bay Management & Planning does not receive fees or commissions from any of these arrangements.

Best Execution

Double Bay Management & Planning reviews the execution of trades on at least an annual basis. Trading fees charged by the custodians is also reviewed on a regular basis. Double Bay Management & Planning does not receive any portion of the trading fees.

Soft Dollars

Double Bay Management & Planning does not have any formal or informal soft dollar arrangement. If an advisor custodies assets with Schwab and the advisor only has a small amount of assets, Schwab may charge the advisor an annual fee. Based on the assets Double Bay Management & Planning custodies with Schwab no fees are due.

Order Aggregation

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

Item 13 Review of Accounts

Periodic Reviews

Portfolio Management

Account reviews are performed when appropriate which may be annually, semi-annually, quarterly, or other time period by Keir Oxley. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. Account reviews may be performed more frequently and may be triggered by material changes in variables such as the market, political or economic environment. Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

Financial Planning

While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for Financial Planning clients unless otherwise contracted for.

Pension Consulting

Double Bay Management & Planning will review the client's Investment Policy Statement (IPS), if one has been contracted for, whenever the client advises us of a change in circumstances regarding the needs of the plan. Double Bay Management & Planning will also review the investment options of the plan according to the agreed upon time intervals established in the IPS. Such reviews will generally occur quarterly. These accounts are reviewed by Keir Oxley, Sole Proprietor.

Selection of Other Advisers

These client accounts should refer to the independent registered investment adviser's Firm Brochure for information regarding the nature and frequency of reviews provided by that independent registered investment adviser. Double Bay Management & Planning will provide as contracted for at the inception of the advisory relationship. These accounts are reviewed by Keir Oxley, Sole Proprietor.

Regular Reports

Portfolio Management

Account reviewers are members of the firm's Investment Committee. They are instructed to consider the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client.

Clients receive communications on a periodic basis. *Advisory Service Agreement* clients, *Investment Management* clients, and *Retainer Agreement* clients may receive written quarterly updates. The written updates may include a net worth statement, portfolio statement, and a summary of objectives and progress towards meeting those objectives.

Financial Planning

Reports will not typically be provided to Financial Planning clients unless otherwise contracted for.

Pension Consulting

These client accounts will receive reports as contracted for at the inception of the advisory relationship.

Selection of Other Advisers

These clients should refer to the independent registered investment adviser's Firm Brochure for information regarding the nature and frequency of reports provided by that independent registered investment adviser. Double Bay Management & Planning will provide these client accounts with performance reports as contracted for at the inception of the advisory relationship.

Item 14 Client Referrals and Other Compensation

Incoming Referrals

Double Bay Management & Planning has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

Referrals Out

Double Bay Management & Planning does not accept referral fees or any form of remuneration including cash, sales awards or other prizes, from other professionals when a prospect or client is referred to them.

Item 15 Custody

Account Statements

We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm directly debits advisory fees from client accounts.

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account.

Our firm does not have actual custody of client accounts. However, we may have custody of certain clients' assets based on standing letters of authorization from clients to transfer funds to third-parties as instructed by clients. All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly showing all transactions within the account during the reporting period.

Performance Reports

Because the custodian does not calculate the amount of the fee to be deducted, Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by Double Bay Management & Planning to ensure that all account transactions, holdings and values are correct and current. Clients should contact us directly if they believe that there may be an error in their statement.

Item 16 Investment Discretion

Discretionary Authority for Trading

Double Bay Management & Planning accepts clients under both discretionary and non-discretionary management.

For clients which the firm has discretionary authority to manage securities accounts on behalf of clients, Double Bay Management & Planning has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

For clients which Double Bay Management & Planning does not have discretion, we will consult with the client prior to each trade to obtain consent.

Clients may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

The client approves the custodian to be used and the commission rates paid to the custodian. Double Bay Management & Planning does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy if one was approved in writing.

Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute the trades that you have approved.

Item 17 Voting Client Securities

Proxy Votes

Double Bay Management & Planning does not vote proxies on securities. Clients are expected to vote their own proxies.

When assistance on voting proxies is requested, Double Bay Management & Planning will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

Item 18 Financial Information

Financial Condition

Double Bay Management & Planning does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because Double Bay Management & Planning does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.

Double Bay Management & Planning has not been the subject of a bankruptcy petition at any time during the past ten years.

Business Continuity Plan

General

Double Bay Management & Planning has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, 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, T-1 communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

Alternate Offices

Alternate offices 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.

Loss of Key Personnel

Double Bay Management & Planning has a Business Continuation Agreement with another financial advisory firm to support Double Bay Management & Planning in the event of Keir Oxley's serious disability or death.

Information Security Program

Information Security

Double Bay Management & Planning maintains an information security program to reduce the risk that your personal and confidential information may be breached.

Privacy Notice

Double Bay Management & Planning is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer

reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

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

Personally identifiable information about you will be maintained while you are 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 you in advance if our privacy policy is expected to change. We are required by law to deliver this *Privacy Notice* to you annually, in writing.

Brochure Supplement (Part 2B of Form ADV)

Harry Keir Oxley

DOUBLE BAY MANAGEMENT & PLANNING

50 CALIFORNIA STREET, SUITE 1500

SAN FRANCISCO, CA 94111

800-494-3267

415-276-2373

WWW.DBMP.COM

KEIR@DBMP.COM

This Brochure Supplement provides information about Keir Oxley that supplements the Double Bay Management & Planning's Brochure. You should have received a copy of that Brochure. Please contact at: 800-494-3267, by email at keir@dbmp.com or by visiting the firm website at www.dbmp.com if you did not receive Double Bay Management & Planning's Brochure or if you have any questions about the contents of this supplement.

Additional information about Keir Oxley is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Name: Keir Oxley

Year of Birth: 1961

Education

Double Bay Management & Planning requires that advisors in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning. Examples of acceptable coursework include: an MBA, a CFP®, a CFA, a ChFC, JD, CTFA, EA or CPA. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

- Bachelor of Science, double major in Pure and Applied Mathematics, Sydney University Graduated 1985.

Professional Designations

- 1998 - Chartered Financial Analyst (CFA): Chartered Financial Analysts are licensed by the CFA Institute to use the CFA mark. CFA certification requirements:
 - Hold a bachelor's degree from an accredited institution or have equivalent education or work experience.
 - Successful completion of all three exam levels of the CFA Program.
 - Have 48 months of acceptable professional work experience in the investment decision-making process.
 - Fulfill society requirements, which vary by society. Unless you are upgrading from affiliate membership, all societies require two sponsor statements as part of each application; these are submitted online by your sponsors.
 - Agree to adhere to and sign the Member's Agreement, a Professional Conduct Statement, and any additional documentation requested by CFA Institute.
- 2002 - Certified Financial Planner (CFP):
 - The program is administered by the Certified Financial Planner Board of Standards Inc. Those with the CFP® designation have demonstrated competency in all areas of finance related to financial planning. Candidates complete studies on over 100 topics, including stocks, bonds, taxes, insurance, retirement planning and estate planning. In addition to passing the CFP certification exam, candidates must also complete qualifying work experience and agree to adhere to the CFP Board's code of ethics and professional responsibility and financial planning standards.

Business Background

- 1998 – Present, Sole Proprietor, Double Bay Management & Planning.
- February 2003 – June 2014, Registered Principal, Financial Telesis, Inc.
- September 1998 – February 2003, Registered Principal, SunAmerica Securities, Inc.

Item 3 Disciplinary History

Keir Oxley does not have any history of disciplinary events.

Item 4 Other Business Activities

Keir Oxley does not engage in another investment-related business or occupation.

Item 5 Additional Compensation

Keir Oxley does receive additional compensation in connection to the advisory services provided .

Item 6 Supervision

The activities of Double Bay Management & Planning are supervised by Keir Oxley and can be reached at 800-494-3267. All clients receive confirmation, from the brokerage holding their account(s), of any and all trades made by Double Bay Management & Planning, on their behalf. In addition to trade confirmations, each client receives quarterly account statements from the brokerage that holds their account(s). Keir Oxley reviews the holdings in each client account for appropriateness (client goals and holdings) on a regular basis.