

Item 1

Cover Page

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Your Mental Wealth

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March 2, 2020

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 mvalsb@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.

Any reference to or use of the terms “registered investment adviser” or “registered,” does not imply that Occidental Asset Management, LLC or any person associated with Occidental Asset Management, LLC has achieved a certain level of skill or training. 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

This statement refers to the disclosure brochure dated March 2, 2020.

Our previous brochure was dated August 19, 2019. The following material changes have been made in this version of the brochure:

Item 4 (Advisory Business): Updated our assets under management and number of clients as of the end of the previous year.

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Item 4 Advisory Business

A. General Description of Advisory Firm

Occidental Asset Management, LLC (the “**Advisor**”), is an independently owned limited liability company formed under the laws of the State of Delaware, was formed on April 25, 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.

The Advisor may select certain independent managers (“Sub-advisors”) to actively manage a portion of its clients’ assets. The specific terms and conditions under which a client engages a Sub-advisor will be set forth in a separate written agreement with the designated Sub-advisor. In addition to this Brochure, clients will also receive the written disclosure documents of the designated Sub-advisor.

The Advisor evaluates a variety of information about Sub-advisors, including public disclosure documents, materials supplied by the Sub-advisors and other third-party information it believes is reliable. The Advisor continues to provide services relative to the discretionary selection of Sub-advisors. On an on-going basis, the Advisor monitors the performance of those accounts being managed by Sub-advisors. The Advisor seeks to ensure that Sub-advisors’ strategies and allocations remain aligned with clients’ investment objectives and overall best interests.

C. Financial Planning Services

The Advisor may provide certain clients with a financial analysis including non-investment related matters. This service includes gathering of information regarding the client's current and historical status in the areas of net worth, income, expenses, taxes, investments, retirement plans and insurance, as well as future goals and objectives. We then develop a personalized plan, which includes specific recommendations in applicable areas.

Areas of focus may include retirement, education funding, survivor needs, or wealth transfers. Our financial planning services do not include preparation of any kind of income tax, gift, or estate tax returns nor preparation of any legal documents, including wills or trusts.

D. Wrap Fee Programs

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

E. Client Assets Under Management

As of December 31, 2019, the Advisor managed \$336,900,000 on a discretionary basis on behalf of 323 clients.

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.

For client assets managed by Sub-advisors, the Advisor receives no compensation directly from clients with respect to those assets. Instead, the Advisor receives a portion of the fees charged by the Sub-advisor and as disclosed to the client in a separate written agreement with the designated Sub-advisor.

The Advisor also reserves the right to reduce or waive our fees for employee or family accounts and certain client accounts.

B. Payment of Fees

With client authorization, the Advisor will automatically withdraw the Management Fee from the client's account held by an independent custodian. Typically, the custodian withdraws advisory fees from the client's account during the first month of each quarter based on the Advisors' instruction. All clients will receive brokerage statements from the custodian no less frequently than quarterly. The custodian statement will show the deduction of the Management Fee.

C. Other Fees and Expenses

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, please refer to the Brokerage Practices section of this Brochure.

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.

Clients with assets managed by Sub-advisors will incur fees payable directly to the Sub-advisor in addition to fees payable to the Advisor. Fees charged by Sub-advisors will be established in a client's written agreement with the Advisor.

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

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).

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 \$750,000 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 strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon your defined objectives, risk tolerance, time horizon, financial horizon, financial information, liquidity needs, and other various suitability factors. Your restrictions and guidelines may affect the composition of your portfolio.

Charting and Technical Analysis – Charting analysis involves the gathering and processing of price and volume information for a particular security. This price and volume information is analyzed using mathematical equations. The resulting data is then applied to graphing charts, which is used to predict future price movements based on price patterns and trends. Technical Analysis involves studying past price patterns and trends in the financial markets to predict the direction of both the overall market and specific stocks. The risk of market timing based on technical analysis is that charts may not accurately predict future price movements. Current prices of securities may reflect all information known about the security and day to day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

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

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

Long Term Purchases – securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

Short Term Purchases – securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short term price fluctuations.

Margin Transactions – a securities transaction in which an investor borrows money to purchase a security, in which case the security serves as collateral on the loan.

Options Trading/Writing - a securities transaction that involves buying or selling (writing) an option. If you write an option, and the buyer exercises the option, you are obligated to purchase or deliver a specified number of shares at a specified price at the expiration of the option regardless of the market value of the security at expiration of the option. Buying an option gives you the right to purchase or sell a specified number of shares at a specified price until the date of expiration of the option regardless of the market value of the security at expiration of the option.

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

Risk of Loss – Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

Use of Sub-advisors – As described above, the Advisor may select certain Sub-advisors to manage a portion of clients' assets. In these situations, the Advisor continues to conduct ongoing due diligence of such Sub-advisors, but such recommendations rely to a great extent on the Sub-advisors' ability to successfully implement their investment strategies.

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

Equity Securities – There are numerous ways of measuring the risk of equity securities (also known simply as "equities" or "stock"). In very broad terms, the value of a stock depends on the financial health of the company issuing it. However, stock prices can be affected by many other factors including, but not limited to: the class of stock (for example, preferred or common); the health of the market sector of the issuing company; and, the overall health of the economy. In general, larger, more well-established companies ("large cap") tend to be safer than smaller start-up companies ("small cap") but the mere size of an issuer is not, by itself, an indicator of the safety of the investment.

Mutual funds – Are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities or any combination thereof. A mutual fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. The returns on mutual funds can be reduced by the costs to manage the funds. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, the fund, other types of mutual funds do charge such fees which can also reduce returns.

Exchange-Traded Funds (ETFs) – An ETF is a type of investment company (usually, an open-end fund or unit investment trust) containing a basket of stocks. Typically, the objective of an ETF is to achieve returns similar to a particular market index, including sector indexes. An ETF is similar

to an index fund in that it will primarily invest in securities of companies that are included in a selected market. Unlike traditional mutual funds, which can only be redeemed at the end of a trading day, ETFs trade throughout the day on an exchange. Like stock mutual funds, the prices of the underlying securities and the overall market may affect ETF prices. Similarly, factors affecting a particular industry segment may affect ETF prices that track that particular sector.

Options Trading/Writing - A securities transaction that involves buying or selling (writing) an option. If you write an option, and the buyer exercises the option, you are obligated to purchase or deliver a specified number of shares at a specified price at the expiration of the option regardless of the market value of the security at expiration of the option. The seller of an uncovered call or put option assumes the risk of increases or decreases, respectively, in the market price of the underlying option with respect to the exercise price of the option. Buying an option gives you the right to purchase or sell a specified number of shares at a specified price until the date of expiration of the option regardless of the market value of the security at expiration of the option. The buyer of a call or put option assumes the risk of losing the entire investment in the price of the option.

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

Occidental Asset Management, LLC believes that we owe clients the highest level of trust and fair dealing. As part of our fiduciary duty, our goal is to protect your interests and to demonstrate our commitment to our fiduciary duties. Occidental's personnel are required to conduct themselves with integrity at all times and follow the principles and policies detailed in our Code of Ethics.

Occidental's Code of Ethics attempts to address specific conflicts of interest that either we have identified or that could likely arise. Occidental's personnel are required to follow clear guidelines from the Code of Ethics, which require compliance with fiduciary duties, applicable securities laws, maintaining confidentiality of client nonpublic personal information, insider trading policies, and placing client interests first. Additionally, individuals who make securities recommendations to clients, or who have access to nonpublic information regarding any client's purchase or sale of securities, are subject to personal trading policies governed by the Code of Ethics (see below).

Occidental will provide a complete copy of the Code of Ethics to any client or prospective client upon request. 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.

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. The Advisor does not intend to generate “soft dollars” in connection with client securities transactions.

The Advisor participates in the institutional advisor program (the “Program”) offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC (“TD Ameritrade”), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the Program. (Please see the disclosure under Item 14. below.)

The Advisor has an arrangement with Charles Schwab under which Schwab will reimburse client transfer of account exit fees for certain accounts placed at Schwab and the Advisor receives benefits to be used for technology for servicing its accounts. The Advisor’s recommendation to place certain client accounts at Schwab may be based in part on the benefit to the Advisor and the availability of some of the services and benefits provided and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest. The Advisor’s arrangement with Schwab is not dependent on the Advisor maintaining any particular level of client assets at Schwab.

1. Directed Brokerage

The Advisor generally asks its clients to direct the Advisor to appoint TD Ameritrade, E*Trade, 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, E*Trade, 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.

2. Betterment for Advisors Accounts

For certain of our client accounts we use Betterment for Advisors, an investment and advice platform of independent advisory firms like us. For clients for whom we use Betterment for Advisors to manage assets, we require that those accounts use MTG, LLC dba Betterment Securities ("Betterment Securities"), a registered broker-dealer and member of the SIPC, as the qualified custodian. We are not affiliated with Betterment Securities. Betterment Securities will hold those client assets in a brokerage account and buy and sell securities when we and/or you instruct them to. While we recommend that you use Betterment Securities as custodian/broker, you will decide whether to do so and will open your account with Betterment Securities by entering into an account

agreement directly with them. We do not open the account for you, although we may assist you in doing so. If you do not wish to place your assets with Betterment Securities, then we cannot manage your account on Betterment for Advisors.

For our clients' accounts that Betterment Securities maintains, Betterment Securities does not charge you separately for custody/brokerage services, but is compensated as part of the Betterment for Advisors platform fee, which is charged for a suite of platform services, including custody, brokerage, and sub-advisory services provided by Betterment and access to the Betterment for Advisors platform. The platform fee is an asset-based fee charged as a percentage of assets in Betterment accounts. Clients utilizing the Betterment for Advisors platform may pay a higher aggregate fee than if the investment management, brokerage and other platform services are purchased separately. Nonetheless, for those Clients participating in the Betterment for Advisors platform, we have determined that having Betterment Securities execute trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above.

Betterment for Advisors also makes available various support services which may not be available to Betterment's retail customers. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Betterment for Advisors' support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of Betterment for Advisors' support services:

- **Services That Benefit You.** Betterment for Advisors includes access to a globally diversified, low-cost portfolio of ETFs, execution of securities transactions, and custody of client assets through Betterment Securities. In addition, a series of model portfolios created by third-party providers are also available on the platform. Betterment Securities' services described in this paragraph generally benefit you and your account.
- **Services That May Not Directly Benefit You.** Betterment for Advisors also makes available to us other products and services that benefit us, but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts, such as software and technology that may:
 - Assist with back-office functions, recordkeeping, and client reporting of our clients' accounts.
 - Provide access to client account data (such as duplicate trade confirmations and account statements).
 - Provide pricing and other market data.

The availability of these services from Betterment for Advisors benefits us because we do not have to produce or purchase them. In addition, we do not have to pay for Betterment Securities' services. These services may be contingent upon us committing a certain amount of business to Betterment Securities in assets in custody. We may have an incentive to recommend that you maintain your account with Betterment Securities, based on our interest in receiving Betterment for Advisors and Betterment Securities' services that benefit our business rather than based on your interest in

receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Betterment Securities as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Betterment Securities' services and not Betterment for Advisors and Betterment Securities' services that benefit only us or that may not directly benefit you.

When using the Betterment for Advisors platform, we and you are subject to the trading policies and procedures established by Betterment. These policies and procedures limit our ability to control, among other things, the timing of the execution of certain trades (including in response to withdrawals, deposits, or asset allocation changes) within your account. You should not expect that trading on Betterment is instant, and, accordingly, you should be aware that Betterment does not permit you or us to control the specific time during a day that securities are bought or sold in your account (i.e., to "time the market"). Betterment describes its trading policies in Betterment LLC's Form ADV Part 2A. As detailed in that document, Betterment generally trades on the same business day as it receives instructions from you or us. However, transactions will be subject to processing delays in certain circumstances. In particular, orders initiated on non-business days and after markets close generally will not transact until the next business day. Betterment also maintains a general approach of not placing securities orders during approximately the first thirty minutes after the opening of any market session. Betterment also generally stops placing orders arising from allocation changes in existing portfolios approximately thirty minutes before the close of any market session. Betterment continues placing orders associated with deposit and withdrawal requests until market close. Betterment maintains a general approach of not placing orders around the time of scheduled Federal Reserve interest rate announcements. Furthermore, Betterment may delay or manage trading in response to market instability. For further information, please consult Betterment LLC's Form ADV Part 2A.

B. Block Allocation and Order Aggregation

1. Block Allocation

Discretionary Accounts-Generally for discretionary accounts, we combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

Non-discretionary Accounts-We do not combine multiple orders for shares of the same securities purchased for non-discretionary accounts. Accordingly, non-discretionary accounts may pay different costs than discretionary accounts pay. If you enter into non-discretionary arrangements with our firm, we may not be able to buy and sell the same quantities of securities for you and you

may pay higher commissions, fees, and/or transaction costs than clients who enter into discretionary arrangements with our firm.

Item 13 Review of Accounts

A. Frequency and Nature of Review

The investment adviser representative assigned to your managed account and/or a designated portfolio manager will monitor your accounts on a continuous basis and re-balance your portfolio(s) as market conditions and your circumstances change. In addition, we will conduct internal account reviews at least semi-annually to ensure that the advisory services provided to you are consistent with your stated investment needs and objectives. Additional reviews may be conducted based on various circumstances, including, but not limited to:

- changes in your financial circumstances;
- contributions and withdrawals;
- year-end tax planning;
- market moving events;
- security specific events; and/or,
- changes in your risk/return objectives.

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 performance and account statements and trade confirmations from the qualified custodian of the client's account. 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 engages independent solicitors to provide client referrals. If a client is referred to us by a solicitor, this practice is disclosed to the client in writing by the solicitor and the Advisor pays the solicitor out of its own funds—specifically, the Advisor generally pays 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.

Charles Schwab

We receive an economic benefit from Schwab in the form of financial benefits it makes available to us to be used for technology for servicing of accounts and other independent investment advisors that have their clients maintain accounts at Schwab. These arrangements, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). The availability to us of Schwab's benefits, products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

TD Ameritrade

As disclosed under Item 12. above, the Advisor participates in TD Ameritrade's institutional customer program and the Advisor may recommend TD 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 to our clients, although we receive economic benefits through our participation in the program that are typically not available to TD 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 the Advisor 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 the Advisor by third party vendors. TD Ameritrade may also pay for business consulting and professional services received by the Advisor's related persons.

Some of the products and services made available by TD Ameritrade through the program may benefit the Advisor but may not benefit its client accounts. These products or services may assist us in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help us manage and further develop our business enterprise. The benefits received by the Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties 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 the Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

The Advisor may receive client referrals from TD Ameritrade through its participation in TD Ameritrade AdvisorDirect. In addition to meeting the minimum eligibility criteria for participation in AdvisorDirect, the Advisor may have been selected to participate in AdvisorDirect based on the amount and profitability to TD Ameritrade of the assets in, and trades placed for, client accounts maintained with TD Ameritrade. TD Ameritrade is a discount broker-dealer independent of and unaffiliated with the Advisor and there is no employee or agency relationship between them. TD Ameritrade has established AdvisorDirect as a means of referring its brokerage customers and other investors seeking fee-based personal investment management services or financial planning services to independent investment advisors. TD Ameritrade does not supervise the Advisor and has no responsibility for the Advisor's management of client portfolios or the Advisor's other advice or services. The Advisor pays TD Ameritrade an on-going fee for each successful client referral. This fee is usually a percentage (not to exceed 25%) of the advisory fee that the client pays to the Advisor ("Solicitation Fee"). The Advisor will also pay TD Ameritrade the Solicitation Fee on any advisory fees received by the Advisor from any of a referred client's family members, including a spouse, child or any other immediate family member who resides with the referred client and hired the Advisor on the recommendation of such referred client. The Advisor will not charge clients referred through AdvisorDirect any fees or costs higher than its standard fee schedule offered to its clients or otherwise pass Solicitation Fees paid to TD Ameritrade to its clients. For information regarding additional or other fees paid directly or indirectly to TD Ameritrade, please refer to the TD Ameritrade AdvisorDirect Disclosure and Acknowledgement Form.

The Advisor's participation in AdvisorDirect raises potential conflicts of interest. TD Ameritrade will most likely refer clients through AdvisorDirect to investment advisors that encourage their clients to custody their assets at TD Ameritrade and whose client accounts are profitable to TD Ameritrade. Consequently, in order to obtain client referrals from TD Ameritrade, the Advisor may have an incentive to recommend to clients that the assets under management by the Advisor be held in custody with TD Ameritrade and to place transactions for client accounts with TD Ameritrade. In addition, the Advisor has agreed not to solicit clients referred to it through AdvisorDirect to transfer their accounts from TD Ameritrade or to establish brokerage or custody accounts at other custodians, except when its fiduciary duties require doing so. The Advisor's participation in AdvisorDirect does not diminish its duty to seek best execution of trades for client accounts.

Betterment for Advisors

We use Betterment for Advisors' platform to manage certain of our clients' accounts. We receive a non-economic benefit from Betterment for Advisors and Betterment Securities in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Betterment Securities. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices). The availability to us of Betterment for Advisors' and Betterment Securities' products

and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

E*Trade

The Advisor may receive client referrals from E*Trade through its participation in E*Trade's referral program. In addition to meeting eligibility criteria, the Advisor pays fees to E*Trade for participation in the program. The amount and level of fees charged by the Advisor to clients referred to it by E*Trade will not be higher than the fees charged, and the level or quality of services provided will not be inferior to the level or quality of services provided, to comparable clients and accounts for which the Advisor does not have to pay a referral fee.

The Advisor's participation in the program creates potential conflicts of interest. E*Trade will most likely refer clients through its referral program to investment advisors that encourage their clients to custody their assets at E*Trade and whose client accounts are profitable to E*Trade. Consequently, in order to obtain client referrals from E*Trade, the Advisor may have an incentive to recommend to clients that the assets under management by the Advisor be held in custody with E*Trade and to place transactions for client accounts with E*Trade. The Advisor's participation in E*Trade's referral program does not diminish its duty to seek best execution of trades for client accounts. The Advisor and E*Trade are independent entities that are not affiliated with each other.

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 is deemed to have custody of client assets if clients authorize the deduction of advisory fees directly from client accounts. 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.), 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. The Advisor urges clients to compare the custodian’s account statements to the periodic statements clients will receive from the Advisor.

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.

In addition, to the extent a portion of a client’s assets will be managed by a Sub-advisor selected by the Advisor, the client will enter into an agreement with the Sub-advisor that sets forth the scope of the Sub-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

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any nonpublic personal information about you to any nonaffiliated third parties, except as permitted by law. In the course of servicing your account we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to nonpublic personal information about you to employees who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your nonpublic personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Please contact Nathan Hatton Walsh/Chief Compliance Officer at 650-344-1600, if you have any questions regarding this policy.

Item 1

Cover Page

A. Charles Cattano III
Managing Principal

Occidental Asset Management, LLC
also doing business as
OCCAM
Your Mental Wealth

301 California Drive #9
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www.occamllc.net

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

March 2, 2020

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. ("ACCIMP") 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 a principal in Skumu Kawayu LLC, a company organized to create a mitigation/conservation bank. He devotes less than five hours per month to this activity. Mr. Cattano is not involved in any other business activities material to his relationship with advisory clients.

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 Cover Page

Nathan H. Walsh
Chief Compliance Officer, Managing Principal

Occidental Asset Management, LLC
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March 2, 2020

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 not involved in any other business activities material to his relationship with advisory clients.

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.

Item 1

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Dr. Bradley T. Klontz
Managing Principal

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March 2, 2020

This Brochure Supplement provides information about Dr. Bradley T. Klontz 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 Dr. Bradley T. Klontz is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Dr. Bradley T. Klontz was born in 1971. He received a Bachelor of Science in Psychology from Olivet Nazarene University in 1993, a Masters of Science in Counseling and Human Resources Development from South Dakota State University in 1995, a Doctorate in Clinical Psychology from Wright State University in 1999, and a Graduate Certificate in Personal Financial Planning from Kansas State University in 2011. From October 2011 to October 2013, Dr. Klontz was a Planner for Personal Financial Consultants, Inc. Since October 2000, he has been the President of Coastal Clinics, Inc., which provides psychological services in Hawaii. Since 2010 he has been an Associate Professor in Personal Financial Planning at Kansas State University, teaching courses in financial planning, the psychology of financial planning, and behavioral finance. Since 2014, Dr. Klontz has been the co-founder of the Financial Psychology Institute™, which conducts research and trains financial advisors in financial psychology.

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

Since 2000, Dr. Klontz has been the President of Coastal Clinics, Inc., which provides a range of psychological and related services: research, consulting, assessments, supervision, media spokesperson, training, and psychotherapy. Since 2014, Dr. Klontz has been the co-founder of the Financial Psychology Institute™, which conducts research and trains financial advisors in financial psychology. Dr. Klontz is also an Associate Professor of Practice, Department of Economics and Finance at Creighton University, Heider School of Business and an Associate Clinical Professor, Department of Psychiatry at the John A. Burns School of Medicine, University of Hawaii at Manoa.

Dr. Klontz is an owner in Misconduct Prevention, Inc. The company develops sexual prevention misconduct training programs for primary and secondary schools in Hawaii. Dr. Klontz spends less than one-hour a week.

Item 5 Additional Compensation

Dr. Klontz 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 Dr. Klontz. His telephone number is (650) 344-1600.

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**John Wilbourne
Managing Partner**

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March 2, 2020

This Brochure Supplement provides information about John Wilbourne 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 John Wilbourne is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

John Wilbourne was born in 1967. He received a B.A. in Economics from the University of Washington in 1990.

Mr. Wilbourne has been a Managing Partner of Occidental Asset Management, LLC since May 2016. Mr. Wilbourne has previously served as a financial advisor of Private Advisor Group, LLC from January 2014 to May 2016, of Washington Wealth Management from November 2012 to January 2014, and a financial consultant of Wells Fargo Investments, LLC from July 2004 to January 2011. Mr. Wilbourne has also served as a broker-dealer representative of Overlake Partners from January 2016 to May 2016, of LPL Financial LLC from November 2012 to May 2016, and of Wells Fargo Advisors LLC from January 2011 to November 2012.

Mr. Wilbourne'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. Wilbourne is not involved in any other business activities material to his relationship with advisory clients.

Item 5 Additional Compensation

Mr. Wilbourne 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. Wilbourne. His telephone number is (650) 344-1600.

Item 1

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Erin Hadley
Managing Partner

Occidental Asset Management, LLC

also doing business as

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March 2, 2020

This Brochure Supplement provides information about Erin Hadley 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 Erin Hadley is also available on the SEC's website at www.adviserinfo.sec.gov.

Occidental Asset Management, LLC also doing business as OCCAM and Your Mental Wealth

CRD: 168650

March 2, 2020

Item 2 Educational Background and Business Experience

Erin Hadley was born in 1972. She received a B.A. in English from the University of Florida in 1995.

Ms. Hadley has been a Managing Partner of Occidental Asset Management, LLC since October 2015. From January 2004 to October 2015 she was a certified financial planner with Personal Financial Consultants, Inc.

Ms. Hadley'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

Ms. Hadley is not involved in any other business activities material to his relationship with advisory clients.

Item 5 Additional Compensation

Ms. Hadley 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 Ms. Hadley. His telephone number is (650) 344-1600.

Item 1

Cover Page

Nicholas Maratta
Managing Partner

Occidental Asset Management, LLC
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March 2, 2020

This Brochure Supplement provides information about Nicholas Maratta 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 Nicholas Maratta is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Nicholas Maratta was born in 1979. He received a B.A. in Economics from Rollins College in 2001.

Mr. Maratta has been a Managing Partner of Occidental Asset Management, LLC since April 2016. From May 1999 to April 2016, he was a financial advisor and branch manager with Scottrade, Inc.

Mr. Maratta'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. Maratta is not involved in any other business activities material to his relationship with advisory clients.

Item 5 Additional Compensation

Mr. Maratta 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. Maratta. His telephone number is (650) 344-1600.