



Part 2A of Form ADV: *Firm Brochure*

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This brochure provides information about the qualifications and business practices of Symphony Financial Planning, LLC (hereinafter “SFP” or “firm” or “we”). If you have any questions about the contents of this brochure, please contact us at (530)-758-2885 or at info@symphonyfinancialplanning.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 SFP is available on the SEC’s website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for SFP is 137885. Registration with a state regulatory body does not imply any level of skill or training.

Item 2. Summary of Material Changes

Since our last annual updating amendment to this Brochure, dated March 23, 2022, there are material changes in this version: (a) Regulatory assets under management were updated in Item 4; (b) Under Item 12 we have added Charles Schwab, Inc. as a recommended custodian and broker and provided additional information regarding our criteria for recommending custodians/brokers as well; (c) Under Item 12 we have indicated that we generally do aggregate trades for securities traded on an intra-day basis; and (d) We have updated Items 14 (Client Referrals and Other Compensation) and 15 (Custody) to reflect disclosures applicable to Charles Schwab, Inc.

In October of 2020, Schwab completed an acquisition of TDA, but the two firms have continued to operate separate broker-dealers since then. The broker-dealer operations are expected to combine over Labor Day weekend in 2023 under the Schwab name. For the purposes of this ADV Part 2A, we will refer to the broker-dealers we recommend as “TDA/Schwab,” as our firm participates in both programs. See Item 12.

Our current (updated) Form ADV, Part 2 will be available to our existing and prospective clients 24 hours a day through the Investment Adviser Public Disclosure website. Additionally, if you are a current client, we will annually and within 120 days of the end of our fiscal year, provide you either: (i) a copy of our Form ADV, Part 2 that includes or is accompanied by a summary of material changes; or (ii) a summary of material changes that includes an offer to provide a copy of the current Form ADV, Part 2. We urge you to carefully review all subsequent summaries of material changes, as they will contain important information about any significant changes to our advisory services, fee structure, business practices, conflicts of interest, and disciplinary history.

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Item 4. Advisory Business

Symphony Financial Planning, LLC (hereinafter “SFP” or “firm” or “we”) is a fee-only registered investment advisor with its principal place of business located in Davis, California. We have been in business since 2006, with Paul A. Meyerhoff as the sole owner, President and Chief Compliance Officer.

As of December 31, 2022, discretionary assets under our firm’s management were \$186,163,265, and non-discretionary assets were \$2,385,991.

SFP provides portfolio management and financial planning services to its clients. Included in this disclosure document are descriptions of these services, related fees, potential conflicts of interest, and other relevant information for clients and prospective clients.

Symphony Financial Planning’s “Orchestra Service”: Portfolio Management and Financial Planning Combined

SFP provides portfolio management services to its clients through its Orchestra Service. It typically does so by investing client assets in model portfolios developed by SFP, tailored to different investment objectives, time horizons, and risk tolerance. In some cases, these portfolios may be further customized depending on account size and client objectives. Our firm provides continuous advice to Orchestra Service clients regarding the investment of client funds managed by SFP based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client’s particular circumstances are established, we develop a client’s personal target asset allocation designating the approximate portfolio percentages to be allocated towards equities, fixed income, and cash, and create and manage a portfolio based on that target allocation. During our data-gathering process, we assess the client’s individual objectives, time horizons, risk tolerance and income and liquidity needs. We may also review and discuss a client’s prior investment history and current investment holdings, as well as family composition and background.

We will manage advisory accounts on a discretionary or non-discretionary basis, depending on the specific agreement with the client. For discretionary accounts, we will implement transactions without seeking prior client consent. For non-discretionary accounts, we will seek prior client consent for every contemplated transaction. Therefore, clients with non-discretionary accounts should understand that any delay in obtaining consent may result in less favorable transaction terms, including higher security price, higher commissions, and/or limited availability of the securities sought.

Account supervision is guided by the stated objectives of the client as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

SFP will provide financial planning advice as part of its Orchestra Service. The topic

areas to be addressed will be those discussed under the Duet (hourly planning) Services section below. The specific topic areas to be addressed will be those most relevant to each client's circumstances and stage in life as determined by SFP in consultation with the Client. The financial planning advice will be delivered using a modular approach, wherein one or more modules addressing specific topic areas will be delivered each year as part of the Orchestra Service. As a result, each of the six topic areas of personal finance will be reviewed over a period of time, typically three to five years. The most relevant and time-sensitive issues will be addressed within the first year.

Discussion of financial planning topics and recommendations will take place during periodic client review meetings, but at least annually. Financial planning recommendations and analysis may be provided verbally, in writing, or electronically, depending on the complexity and amount of detail required. At a minimum, a written list of action items will be provided at least annually pertaining to the personal finance topic area(s) covered in that year, assuming the client has met with us in that year. Clients need to be available for consultations in person or by phone in order to receive financial planning advice. Actual implementation of the recommendations is the responsibility of Client and is not included in the Orchestra Services fee unless it relates to an investment account specifically managed by SFP for the Client.

SFP's offering of financial planning services to Orchestra Service clients is contingent upon those clients providing the necessary financial documents and information to SFP in a timely and convenient manner. SFP makes available to Orchestra Service clients electronic online data aggregation services to automate collection of this information. Clients are not required to use these systems, but Clients should understand that lack of ready access to accurate financial information may prevent SFP from providing financial planning advice.

Cash Management Accounts

In instances where clients wish to maintain a significant cash balance in their accounts on an ongoing basis, or they have non-cash securities which they plan to hold indefinitely for tax or other reasons, a separate cash management account may be established as part of the Orchestra Service we provide. The primary purpose of these accounts is to hold cash and CDs, and in some circumstances fixed income securities of short duration, for administration of client cash flow needs at a cost that is less than what would be charged to the client for a more fully invested account. We will assist clients in determining the amount of cash and short-duration fixed income securities to hold in these accounts, and in transferring cash to or from other accounts as needed to meet client objectives. We will also monitor these accounts as we do with other managed accounts and place trades in non-cash securities as needed to maintain desired cash balances. Clients should understand that the advisory fees on Cash Management Accounts may exceed the returns provided by these accounts, especially in low interest rate environments.

Symphony Financial Planning's "Duet Service": Financial Planning on an Hourly Basis without Portfolio Management

SFP offers financial planning advice on a more limited, hourly basis known as its "Duet Service." This may include advice on one or more of the following topics:

- Cash, debt, and budget planning: Analyzing income, expenses, and debt to determine the most efficient use of income to meet one's goals.
- Investment planning: Analyzing a client's current portfolio and opportunities to consolidate accounts where appropriate, and recommending changes as needed to align the portfolio with a client's objectives.
- Retirement planning: Understanding how goals for retirement lifestyle translate into financial needs. Estimating how much income can be expected from pensions and government programs, and how much one needs to save to augment those sources. In retirement, estimating how much one can withdraw from investments on a sustainable basis.
- Tax planning: Analyzing a client's current taxes and looking for ways to minimize short and long-term tax expenses in ways that are consistent with their overall financial goals.
- Risk management and insurance planning: Identifying financial risks that a client is exposed to such as premature death, disability, longevity, personal liability, property loss, and long-term care expense, and developing recommendations to address each, such as insurance or risk avoidance.
- Estate and gift planning: Analyzing a client's estate with respect to how assets may be transferred at death or by gifting, along with potential tax liabilities, and providing general information on strategies to address these issues that can then be discussed with and implemented by the client's attorney.

The scope of the engagement is limited to the areas identified at the start of the engagement in the Financial Planning Agreement. Analysis and advice may be provided verbally and/or in writing, depending on the complexity of the topic and the client's request. The engagement and client-advisor relationship is completed once the advice designated in the agreement has been provided and a final invoice has been issued.

Should a client choose to implement the recommendations contained in an Hourly "Duet" Consultation, we suggest the client work closely with his/her attorney, accountant, insurance agent, and/or stockbroker. A client can implement securities-related recommendations of the plan by utilizing our firm's Orchestra Service, through another investment manager, or by self-managing their portfolio. Implementation of the recommendations is entirely at the client's discretion.

Pension Consulting Services

We also provide several pension 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"):

We will meet with the client (in person or by video or teleconference) 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. The number of investments to be recommended will be determined by the client, based on the IPS.

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 may also provide quarterly educational support and investment workshops designed for the plan participants. The nature of the topics to be covered will be determined by us and the client under the guidelines established in ERISA Section 404(c). The educational support and investment workshops will NOT provide plan participants with individualized, tailored investment advice or individualized, tailored asset allocation recommendations.

Services in General

We tailor all of our advisory recommendations to the individual needs of each client. All advisory recommendations are based on information gathered through client statements, questionnaires, electronic communications, correspondence, and video, telephone, and in-person discussions.

Our investment advice is not limited to any specific product or service offered by a broker dealer or insurance company and will primarily include advice regarding the following instruments:

- No-load or load waived mutual funds
- Exchange Traded Funds (ETFs)

Occasionally, we may also advise clients on the following instruments:

- Load mutual funds
- Domestic and foreign equity securities
- Fixed income securities
- Warrants
- Commercial paper
- Certificates of Deposit
- Variable life insurance
- Variable annuities
- Option contracts
- Interests in private placement securities

We may also provide advice on separate account investments with investment managers as part of our Duet financial planning service. However, Symphony Financial Planning does not select third-party managers or monitor separate accounts as part of our Orchestra portfolio management service.

For California Residents: California clients will only be referred to third-party money managers licensed as investment advisors in the State of California, notice filed with the California Department of Corporations, or otherwise exempt from California filing requirements.

Item 5. Fees and Compensation

Orchestra Portfolio Management Service

In general, our minimum household portfolio size for our Orchestra Service is \$500,000. Existing clients are not subject to this minimum. Our fees for our Orchestra Service are based upon a percentage of assets under management, according to the following fee schedule:

<u>Assets Under Management (\$)</u>	<u>Annual Fee (%)</u>
Under \$100,000	1.50% or minimum of \$3000/year
\$100,000 to \$249,999	1.25% or minimum of \$3000/year
\$250,000 to \$499,999	1.15%
\$500,000 to \$999,999	1.00%
\$1,000,000 to \$1,499,999	0.95%
\$1,500,000 to \$1,999,999	0.90%
\$2,000,000 to \$2,999,999	0.80%
\$3,000,000 to \$3,999,999	0.70%
\$4,000,000 to \$4,999,999	0.60%
\$5,000,000 and above	0.50%

Existing Orchestra portfolio management clients are not subject to the \$3000 per year minimum fee.

Cash Management Accounts are charged an annual fee of 0.50% of assets held and/or advised on.

For the purpose of determining fee breakpoints, Assets Under Management include all accounts managed by SFP for the household under an Investment Advisory Agreement (IAA). This includes Cash Management Accounts. Assets Under Management do not include accounts that are not supervised by SFP on an on-going basis, such as self-directed accounts in an employer's retirement plan or at a retail brokerage firm, accounts managed by another firm, 529 college savings plan accounts that are not managed by SFP, bank accounts, and other accounts where SFP does not provide performance reporting and periodic rebalancing and reviews.

The fee percentage is a "drop down" fee, which means that the percentage is applied in aggregate to all Assets Under Management. For example, if the average daily balance at the end of the quarter for Assets Under Management is \$550,000, the Client receives the benefit of having the fee percentage for \$550,000, 1.00%, applied to the entire \$550,000 balance, not just to the \$50,000 amount above \$500,000. We may group certain related household portfolios for the purposes of determining the account size and/or annualized fee for our Orchestra Service. Grouping of households for determining fee breakpoints is at the discretion of SFP.

Orchestra portfolio management service fees are invoiced in arrears at the end of each calendar quarter, based upon the average daily balance during that quarter. Each quarterly fee will be based on the actual number of days in the quarter as a percentage of days in the year.

Depending on the particular arrangement with each client, we will either invoice clients or directly debit their custodial accounts for Orchestra Service fees. If the fee is directly debited, we will adhere to the following procedure:

1. We will obtain a written authorization from the client, permitting our fees to be paid directly from the client's account held by an independent custodian;
2. We will send a fee statement to the client in advance of debiting the account. The custodian will receive a fee statement at the time we request them to debit the account. The client's fee statement will show the amount of the advisory fee and how it was calculated, while the custodian's fee statement will only show the amount of the advisory fee;
3. We will inform the client that it is the client's responsibility to verify the accuracy of the fee calculation and that the custodian will not determine whether the fee is properly calculated; and
4. The custodian will agree to send to the client a statement, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to us.

Duet Hourly Consultation Service

We charge Duet clients an hourly fee ranging from \$75 to \$400 per hour. The rate depends on the type of work involved and the qualifications of the person(s) in our firm who conduct(s) the work. A fee schedule will be provided to clients that provides the hourly rates for different personnel. For new clients, a minimum engagement fee of \$500 will be charged. Duet clients who later become Orchestra Service portfolio management clients will receive financial planning advice as described under that service.

Pension Consulting Services

We charge Pension Consulting clients a project fee, hourly fee, and/or asset management fee depending on the nature of the engagement. Services that are limited to preparation of an Investment Policy Statement or selection of investment options will be charged an hourly fee as discussed above under Duet (Hourly) Consultation Services. Services that include monitoring of investment performance on an ongoing basis will be charged an asset management fee according to the following fee schedule:

<u>Pension Plan Assets Being Monitored (\$)</u>	<u>Annual Fee (%)</u>
Under \$250,000	0.75% or minimum of \$1500/year
\$250,000 to \$500,000	0.70%
\$500,000 to \$999,999	0.65%
\$1,000,000 to \$1,499,999	0.60%
\$1,500,000 to \$1,999,999	0.50%
\$2,000,000 to \$2,999,999	0.45%
\$3,000,000 to \$4,999,999	0.40%
\$5,000,000 and above	0.35%

The fee percentage is a “drop down” fee, which means that the percentage is applied in aggregate to all pension assets monitored for a particular client. Fees will be paid by the plan sponsor or out of plan assets, as directed by the plan documents.

Fees in General

For California Residents: Subsection (j) of Rule 260.238, California Code of Regulations requires that all investment advisors disclose to their advisory clients that lower fees for comparable services may be available from other sources.

For All Clients:

For clients who initially engage us for Duet hourly consultation services and who then become Orchestra portfolio management clients within 60 days, we take measures so that the client does not pay duplicate fees for financial planning advice that would typically be provided under the Orchestra service in the first year. This includes investment education, risk tolerance assessment, developing a preliminary cash flow plan, determining investment objectives and time horizon, developing an account consolidation plan, and developing target asset allocations. Clients in these circumstances will receive a credit in one of two ways:

1. If the client becomes an Orchestra Service client prior to the end of the Duet hourly consultation service engagement, we will credit the planning fee for the financial planning advice as described in the previous paragraph.
2. If Orchestra Services are started after, but within 60 days, of the end of the Duet hourly consultation services engagement, a credit will be applied to Orchestra Service fees that are due at the end of the first, and if necessary, second quarter of Orchestra Services.

Fees and account minimums for all services are negotiable based upon certain criteria (i.e., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, number of plan participants within a pension plan, etc.). Discounts, not generally available to our advisory clients, may be offered to family members and employees of SFP. Certain legacy client agreements may be governed by fee schedules and account minimums different from those listed above.

Under no circumstances will we earn fees in excess of \$1,200 more than six months in advance of services rendered.

Termination of Services

Clients will have a period of five (5) business days from the date of signing of an Orchestra Service or Duet Service agreement to unconditionally rescind the agreement and receive a full refund of all fees. Thereafter, the client may terminate the agreement by

providing us with a written notice at our principal place of business. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, after deduction of any termination costs incurred by our firm. Any earned, unpaid fees will be due and payable.

Mutual Fund and ETF Fees and Expenses: All fees paid to our firm for Orchestra or Duet services are separate and distinct from the fees and expenses charged by mutual funds and ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution or marketing fee, known as a 12b-1 fee. These 12b-1 fees are considered an operational expense and, as such, are included in a fund's expense ratio. Our firm does not receive any portion of these fees.

A client could invest in a mutual fund or an ETF directly, without the services of our firm. In that case, the client would not receive the services provided by us which are designed, among other things, to assist the client in determining which mutual funds or ETFs are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and ETFs and the fees charged by us to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Although we generally recommend no-load or load-waived mutual funds, clients should be aware that certain mutual funds charge “front-end loads” or “back-end loads” which are paid to investment intermediaries as sales commissions. Front-end and back-end loads are not part of a mutual fund's operating expenses and are deducted from the investment amount, thus lowering the size of the investment. For advice on accounts not managed by SFP, we may recommend mutual funds that do impose a front-end or back-end load in limited cases, for example, when clients ask us for advice on accounts they have with another firm that charges commissions.

Mutual fund shares purchased in accounts managed under our Orchestra Service will not be assessed a front-end or back-end load. In limited cases, SFP Orchestra clients may incur an early redemption fee imposed by the fund company or custodian on certain mutual funds if shares are sold before the end of a required holding period. SFP typically does not sell shares that will be subject to such fees. However, there are circumstances where the client may incur such fees, including, but not limited to: when a client requests an unanticipated liquidation, when market conditions are so severe that SFP in its judgment believes that it is in the client's best interest to sell shares subject to an early redemption fee, or if SFP believes the tax benefits of selling a position outweigh the costs of early redemption fees.

Brokerage and Custodial Fees

In addition to advisory fees paid to our firm, clients will also be responsible for all transaction, brokerage, trade-away and custodial fees incurred as part of their account

management. Please see Item 12 of this Brochure for important disclosures regarding our brokerage practices.

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

We do not charge any fees based on a share of capital gains on or capital appreciation of the assets of a client. We do not engage in side-by-side management.

Item 7. Types of Clients

Our firm generally provides advisory services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, and other business entities.

For Orchestra portfolio management clients we normally require a minimum managed portfolio size of \$500,000 of assets under management to initiate an engagement, and a minimum annual fee of \$3000. Existing Orchestra clients are not subject to these minimums.

For new Duet consultation clients we impose a minimum initial engagement fee of \$500. We do not impose any minimum net worth requirements for Duet clients.

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

Methods of Analysis and Associated Risks

Our firm employs the following types of analysis to formulate client recommendations:

Mutual fund and/or ETF analysis: We evaluate the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We evaluate the cost of the mutual fund or ETF relative to similar investments. 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 other funds 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 fund or ETF less suitable for the client's portfolio.

Fundamental Analysis: Fundamental analysis of a business involves analyzing its income statement, financial statements and health, its management and competitive advantages, and its competitors and markets. Fundamental analysis school of thought maintains that markets may mis-price a security in the short run but that the "correct" price will eventually be reached. Profits can be made by trading the mis-priced security and then waiting for the market to recognize its "mistake" and re-price the security. However, fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock. Therefore, unforeseen market conditions and/or company developments may result in significant price fluctuations that can lead to investor losses.

Third-Party Manager Analysis: We do not select or monitor third-party money managers. However, as part of our financial planning services we may provide advice on third-party managers for accounts that are not under our management. We examine the experience, expertise, investment philosophies, and past performance of independent third-party investment managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We review the manager's cost, underlying holdings, strategies, concentrations and leverage as part of our overall risk assessment.

A risk of investing with third-party managers who have been successful in the past is that they may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a third-party manager's portfolio, there is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager's daily business and compliance operations, it is possible for us to miss the absence of internal controls necessary to prevent business, regulatory or reputational deficiencies.

Risks for all forms of analysis: Our securities analysis method relies on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

Investment Strategies and Associated Risks

Our firm employs the following investment strategies to implement investment advice given to Orchestra portfolio management clients:

Long-term purchases: We generally purchase securities with the idea of holding them in the client's account for a year or longer. We do this primarily because we want exposure to a particular asset class over time. We may also do this because we believe the securities to be currently undervalued.

A risk in a long-term purchase strategy is that, by holding the security for this length of time, we may not take advantages of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

Short-term purchases: On rare occasions, we may also purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase.

A risk in a short-term purchase strategy is that, should the anticipated price swing not materialize, we are left with the option of having a long-term investment in a security that was designed to be a short-term purchase, or potentially taking a loss. In addition, this strategy involves more frequent trading than does a longer-term strategy, and will result in increased brokerage and other transaction-related costs, as well as less favorable tax treatment of short-term capital gains.

Clients should understand that investing in any securities, including mutual funds and ETFs, involves a risk of loss of both income and principal that clients should be prepared to bear.

Item 9. Disciplinary Information

Our firm has no reportable disciplinary events to disclose.

Item 10. Other Financial Industry Activities and Affiliations

Our firm and our related persons are not engaged in other financial industry activities and have no other industry affiliations.

Since we endeavor at all times to put the interests of our clients first as part of our fiduciary duty as a registered investment advisor, we take the following steps to address conflicts that may arise if we or our related persons become engaged in other financial industry activities or affiliations:

1. We disclose to clients the existence of all material conflicts of interest, including the potential for our firm and its employees to earn compensation from advisory clients in addition to our advisory fees;
2. We do not pay or collect referral fees from any related persons or entities;
3. We require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed;
4. We periodically monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by our firm; and
5. We educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

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

Code of Ethics Disclosure

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our principals and employees, including compliance with applicable state and federal securities laws. Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code provides for oversight, enforcement and recordkeeping provisions. A copy of our Code of Ethics is available to our advisory clients and prospective clients upon request to Paul Meyerhoff, President and Chief Compliance Officer, at the firm's principal office address.

Our firm or individuals associated with our firm may buy or sell securities identical to those recommended to or purchased for customers for their personal accounts. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client. This practice results in a potential conflict of interest, as we may have an incentive to manipulate the timing of such purchases, to the extent it is possible, to obtain a better price or more favorable allocation in rare cases of limited availability. Since we mostly transact in mutual funds, such cases of limited availability are not expected to occur.

To mitigate these potential conflicts of interest and ensure the fulfillment of our fiduciary responsibilities, we have established the following restrictions:

1. No principal or employee of our firm may buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No principal or employee of our firm may prefer his or her own interest to that of the advisory client.
2. It is the expressed policy of our firm that no person employed by us may purchase or sell any private placement or initial public offering security prior to a transaction(s) for that security being implemented for an advisory account, and therefore, preventing such employees from benefiting from transactions placed on behalf of advisory accounts
3. We do not aggregate employee trades with client trades.
4. We maintain a list of all securities holdings for our firm and anyone associated with this advisory practice with access to advisory recommendations.
5. We emphasize the unrestricted right of the client to decline to implement any advice rendered, except in situations where our firm is granted discretionary authority.
6. All of our principals and employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
7. Any individual not in observance of the above may be subject to disciplinary action or termination.

Item 12. Brokerage Practices

SFP requires that clients provide us with written authority to determine the broker-dealer to use and the commission costs that will be charged to our clients for these transactions.

Clients must include any limitations on this discretionary authority in this written authority statement. Clients may change/amend these limitations as required. Such amendments must be provided to us in writing.

The Custodians and Brokers We Use

We do not maintain custody of your assets that we manage, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15—Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We recommend that our clients use TD Ameritrade Institutional (“TDA”), a division of TD Ameritrade Inc., a

registered broker-dealer, member SIPC (“TD Ameritrade”), or Charles Schwab & Co., Inc. (“Schwab”), a registered broker-dealer, member SIPC, as the qualified custodian.

In October of 2020, Schwab completed an acquisition of TDA, but the two firms have continued to operate separate broker-dealers since then. The broker-dealer operations are expected to combine over Labor Day weekend in 2023 under the Schwab name. For the purposes of this ADV Part 2A, we will refer to the broker-dealers we recommend as “TDA/Schwab,” as our firm participates in both programs.

We are independently owned and operated and are not affiliated with Schwab or TD Ameritrade. Schwab or TD Ameritrade will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use Schwab or TD Ameritrade as custodian/broker, you will decide whether to do so and will open your account with Schwab or TD Ameritrade by entering into an account agreement directly with them. Conflicts of interest associated with this arrangement are described below as well as in Item 14 (Client referrals and other compensation). You should consider these conflicts of interest when selecting your custodian.

We do not open the account for you, although we may assist you in doing so. Even though your account is maintained at Schwab or TD Ameritrade, and we anticipate that most trades will be executed through Schwab or TD Ameritrade, we can still use other brokers to execute trades for your account as described below (see “Your brokerage and custody costs”).

How We Select Brokers/Custodians

When considering whether the terms that TDA/Schwab provide are, overall, most advantageous to you when compared with other available providers and their services, we take into account a wide range of factors, including:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds [ETFs], etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, security and stability
- Prior service to us and our clients
- Services delivered or paid for by TDA/Schwab
- Availability of other products and services that benefit us, as discussed below (see “Products and services available to us from TDA/Schwab”)

Your Brokerage and Custody Costs

For our clients' accounts that TDA/Schwab maintains, TDA/Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your TDA/Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur TDA/Schwab commissions or transaction fees. TDA/Schwab is also compensated by earning interest on the uninvested cash in your account. In addition to commission, TDA/Schwab charges you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your TDA/Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have TDA/Schwab execute most trades for your account.

We are not required to select the broker or dealer that charges the lowest transaction cost, even if that broker provides execution quality comparable to other brokers or dealers. Although we are not required to execute all trades through TDA/Schwab, we have determined that having TDA/Schwab execute most 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 (see "How we select brokers/custodians"). By using another broker or dealer you may pay lower transaction costs.

Products and Services Available to Us from Schwab and TDA

Schwab and TDA serve independent investment advisory firms like us. They provide us and our clients with access to their institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to Schwab or TDA retail customers. However, certain retail investors may be able to get institutional brokerage services from TDA/Schwab without going through us. TDA/Schwab also make available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. TDA/Schwab 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 TDA/Schwab support services:

Services that benefit you: TDA/Schwab institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through TDA/Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. TDA/Schwab services described in this paragraph generally benefit you and your account.

Services that do not directly benefit you: Schwab also makes available to us other products and services that benefit us but do not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts and operating our firm. They include investment research, both Schwab's and TDA's own and that of third parties. We use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at TDA/Schwab. In addition to investment research, TDA/Schwab also make available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

Services that generally benefit only us: TDA/Schwab also offer other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology and business needs
- Consulting on legal and related compliance needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers
- Marketing consulting and support

TDA/Schwab provide some of these services themselves. In other cases, they will arrange for third-party vendors to provide the services to us. TDA/Schwab also discount or waive their fees for some of these services or pay all or a part of a third party's fees.

TDA/Schwab also provide us with other benefits, such as occasional business entertainment of our personnel. If you did not maintain your account with TDA/Schwab, we would be required to pay for these services from our own resources or forgo them. We maintain a code of ethics that our employees are required to adhere to mitigate these conflicts of interest.

Our Interest in Schwab's and TDA's Services

The availability of these services from TDA/Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's or TDA's services. The fact that we receive these benefits from TDA/Schwab is an incentive for us to recommend the use of TDA/Schwab rather than making such a decision based exclusively on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that taken in the aggregate, our recommendation of TDA/Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's and TDA's services. SFP's receipt of services

does not diminish our duty to act in the best interests of our clients, including seeking best execution of trades for client accounts.

Trade Aggregation

As a matter of policy and practice, SFP generally does aggregate client trades for securities that trade intraday, depending on the number of shares being traded and market trading volume in those securities.

Item 13. Review of Accounts

Orchestra Portfolio Management Services

Paul Meyerhoff and Taylor Rios will monitor the underlying securities in managed client accounts on an ongoing basis and perform at least quarterly reviews of account holdings for all clients. Accounts are reviewed for consistency with client investment strategy, asset allocation, risk tolerance and performance relative to the appropriate benchmark. For discretionary accounts, we will place trades as necessary to bring accounts into alignment with the target asset allocation specified for that account. More frequent reviews may be triggered by changes in an account holder's personal, tax or financial status, or if deposits or withdrawals are contemplated. Significant domestic, geopolitical, and economic events may also trigger reviews.

In addition to the monthly/quarterly statements and confirmations of transactions that clients receive from their broker dealer, our firm will provide quarterly holdings, account valuation and performance reports in electronic format via our web site, unless the client requests that such reports be transmitted by mail.

Duet Hourly Consultation Services

We will review these client accounts as contracted for at the inception of the engagement. If an investment review is specifically included in the scope of a Duet hourly consultation, we will provide a written and/or verbal report on investments. Once a Duet hourly consultation engagement is completed, we will not provide additional investment reviews or advice unless a new engagement is requested by the client.

Item 14. Client Referrals and Other Compensation

We are not compensated by other advisors or professionals for referring clients to them. We do not provide compensation to other advisors or professionals for referring clients to us.

We receive an economic benefit from TDA/Schwab 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 TDA/Schwab. You do not pay more for assets maintained at TDA/Schwab as a result of these arrangements. However, we benefit from the referral arrangement because the cost of these services would otherwise be borne directly by us. You should consider these conflicts of interest when selecting a custodian. The products and services provided by TDA/Schwab, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices).

Item 15. Custody

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct TDA/Schwab to deduct our advisory fees directly from your account or if you grant us authority to move your money to another person's account. TDA/Schwab maintain actual custody of your assets. You will receive account statements directly from TDA/Schwab at least quarterly. They will be sent to the email or postal mailing address you provided to TDA/Schwab. You should carefully review those statements promptly when you receive them. We also urge you to compare TDA/Schwab account statements with the periodic portfolio reports you will receive from us. Should you notice any discrepancies, please notify us and/or your custodian as soon as possible.

Item 16. Investment Discretion

For clients granting us discretionary authority to determine which securities and the amounts of securities that are to be bought or sold for their account(s), we request that such authority be granted in writing, typically in the executed Orchestra Services Agreement.

Should the client wish to impose reasonable limitations on this discretionary authority, such limitations shall be included in this written authority statement. Clients may change/amend these limitations as desired. Such amendments must be submitted to us by the client in writing.

Item 17. Voting Client Securities

As a matter of firm policy, our firm does not vote proxies on behalf of clients. Clients will receive their proxies and other solicitations directly from their custodian or transfer agent and retain sole responsibility for voting. However, we may provide clients with consulting assistance regarding proxy issues if they contact us with questions at our principal place of business.

We will neither advise nor act on behalf of the client in legal proceedings involving companies whose securities are held in the client's account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. If desired, clients may direct us to transmit copies of class action notices to the client or a third party. Upon such

direction, we will make commercially reasonable efforts to forward such notices in a timely manner.

Item 18. Financial Information

Under no circumstances will we earn fees in excess of \$1,200 more than six months in advance of services rendered.

Part 2B of Form ADV: *Brochure Supplement*

Paul A. Meyerhoff
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Symphony Financial Planning, LLC
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3/17/2023

This brochure supplement provides information about Paul Meyerhoff that supplements the Symphony Financial Planning, LLC brochure. You should have received a copy of that brochure. Please contact Mr. Meyerhoff, President and Chief Compliance Officer, if you did not receive our brochure or if you have any questions about the contents of this supplement.

Item 2. Educational Background and Business Experience

Paul A. Meyerhoff

Year of Birth: 1959

Education:

Mr. Meyerhoff graduated from the University of California, Davis with a BS in Plant Science in 1981, an MS in Agronomy in 1984, and a PhD in Plant Physiology in 1993.

Business Background:

Symphony Financial Planning, LLC, President and Chief Compliance Officer from 02/2006 to Present

AIG Financial Advisors, Inc., Registered Representative from 07/2002 to 03/2006

UC Davis Extension, Part Time Instructor from 03/2004 to 06/2005

Lucas Group Financial Planners, Financial Planner from 05/2004 to 02/2006

Gregory Lucas Financial Planning, Financial Planner from 07/2002 to 05/2004

Professional Designations:

Mr. Meyerhoff earned the Certified Financial Planner (CFP®) designation from the Certified Financial Planner Board of Standards, Inc. (CFP Board) in 2001. To receive authorization to use the designation, the candidate must meet education, examination, experience and ethics requirements, pay an ongoing certification fee, and comply with continuing education requirements. To fulfill the education requirement, students are required to complete course training in various topic areas and sit for the ten hour CFP Board Certification Examination. A bachelor's degree (or higher), or its equivalent in any discipline, from an accredited college or university is required to attain CFP® certification.

Item 3. Disciplinary Information

Mr. Meyerhoff does not have any history of disciplinary events.

Item 4. Other Business Activities

Mr. Meyerhoff is a member and manager of 1784 Picasso CDE, LLC, a California LLC with the sole purpose of owning and leasing commercial real estate. Namely, 1784 Picasso CDE, LLC leases office space to Symphony Financial Planning, LLC. Mr. Meyerhoff also volunteers as Treasurer on the Board of Directors for Tree Davis, a non-profit organization in Davis, CA. Mr. Meyerhoff may spend up to 5% of his time on these other business activities.

Item 5. Additional Compensation

Mr. Meyerhoff does not receive any additional compensation in connection with advising our clients.

Item 6. Supervision

As the sole owner of SFP, Paul Meyerhoff is solely responsible for all employee supervision and general business strategy of the firm. Mr. Meyerhoff is also primarily responsible for the formulation and monitoring of investment advice offered to clients to ensure that client objectives are being met. Mr. Meyerhoff is also responsible for monitoring and enforcing compliance with our policies and procedures, employee rules of conduct, and all relevant federal and state laws and regulations. Mr. Meyerhoff can be reached at (530) 758-2885.

Part 2B of Form ADV: Brochure Supplement

Taylor Rios
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3/17/2023

This brochure supplement provides information about Taylor Rios that supplements the Symphony Financial Planning, LLC brochure. You should have received a copy of that brochure. Please contact Mr. Meyerhoff, President and Chief Compliance Officer, if you did not receive our brochure or if you have any questions about the contents of this supplement.

Item 2. Educational Background and Business Experience

Taylor Rios

Year of Birth: 1981

Education:

Mrs. Rios graduated from the University of California, Davis with a BS in Psychology in 2003.

Business Background:

Symphony Financial Planning, LLC, Investment Advisor Representative from 03/2014 to Present

Symphony Financial Planning, LLC, Financial Analyst and Office Manager from 12/2010 to 03/2014

UC Davis MIND Institute, Clinical Research Coordinator from 06/2008 to 12/2010

Symphony Financial Planning, LLC, Financial Planning Intern, from 10/2009 to 05/2010

UC Davis MIND Institute, Staff Research Associate from 06/2003 to 06/2008

Therapeutic Pathways, Inc., Behavioral Technician and Paraprofessional Aid from 04/2001 to 07/2003

Professional Designations:

Mrs. Rios earned the Certified Financial Planner (CFP®) designation from the Certified Financial Planner Board of Standards, Inc. (CFP Board) in 2013. To receive authorization to use the designation, the candidate must meet education, examination, experience and ethics requirements, pay an ongoing certification fee, and comply with continuing education requirements. To fulfill the education requirement, students are required to complete course training in various topic areas and sit for the ten hour CFP Board Certification Examination. A bachelor's degree (or higher), or its equivalent in any discipline, from an accredited college or university is required to attain CFP® certification.

Item 3. Disciplinary Information

Mrs. Rios does not have any history of disciplinary events.

Item 4. Other Business Activities

Mrs. Rios is not engaged in any outside business activities.

Item 5. Additional Compensation

Mrs. Rios does not receive any additional compensation from third parties for providing investment advice to its clients.

Item 6. Supervision

As the sole owner of SFP, Paul Meyerhoff is solely responsible for all employee supervision and general business strategy of the firm, including supervision of Mrs. Rios. Mr. Meyerhoff is also primarily responsible for the formulation and monitoring of investment advice offered to clients. In addition, he is responsible for monitoring and enforcing compliance with our policies and procedures, employee rules of conduct, and all relevant federal and state laws and regulations. Mr. Meyerhoff can be reached at (530) 758-2885.

Part 2B of Form ADV: *Brochure Supplement*

Ann B. Fagan
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3/17/2023

This brochure supplement provides information about Ann B. Fagan that supplements the Symphony Financial Planning, LLC brochure. You should have received a copy of that brochure. Please contact Mr. Meyerhoff, President and Chief Compliance Officer, if you did not receive our brochure or if you have any questions about the contents of this supplement.

Item 2. Educational Background and Business Experience

Ann B. Fagan

Year of Birth: 1948

Education:

Ms. Fagan graduated from California State University, Sacramento with a BA in Social Sciences in 1971 and received her teaching credentials from the same university in 1972. Ms. Fagan successfully completed coursework in 1985 from the College of Financial Planning, Denver, CO towards the Certified Financial Planner (CFP) credential.

Business Background:

Symphony Financial Planning, LLC, Investment Advisor Representative from 12/2018 to Present

Fagan Financial Planners, Investment Advisor Representative from 09/1982 to 12/2019

M Holdings Securities, Inc., Registered Representative from 08/2009 to 12/2018

Cozad Asset Management, Investment Advisor Representative from 08/2009 to 12/2018

FSC Securities Corporation from 12/1990 to 08/2009

Professional Designations:

Ms. Fagan earned the Certified Financial Planner (CFP®) designation from the Certified Financial Planner Board of Standards, Inc. (CFP Board) in 1985. To receive authorization to use the designation, the candidate must meet education, examination, experience and ethics requirements, pay an ongoing certification fee, and comply with continuing education requirements.

Item 3. Disciplinary Information

Ms. Fagan does not have any history of disciplinary events.

Item 4. Other Business Activities

Ms. Fagan is not engaged in any outside business activities.

Item 5. Additional Compensation

Ms. Fagan does not receive any additional compensation from third parties for providing investment advice to clients.

Item 6. Supervision

As the sole owner of SFP, Paul Meyerhoff is solely responsible for all employee supervision and general business strategy of the firm, including supervision of Ms. Fagan. Mr. Meyerhoff is also primarily responsible for the formulation and monitoring of investment advice offered to clients. In addition, he is responsible for monitoring and enforcing compliance with our policies and procedures, employee rules of conduct, and all relevant federal and state laws and regulations. Mr. Meyerhoff can be reached at (530) 758-2885.