



**AGILE FINANCIAL PLANNING**  
Firm Brochure - Form ADV Part 2A

Prepared: March 2018

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## **Agile Financial Planning, LLC**

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This document, also referred to as the brochure, provides information about the qualifications and business practices of Agile Financial Planning, LLC, a registered investment adviser (RIA). Throughout this document, Agile Financial Planning, LLC may also be referred to as: Agile Financial Planning, AFP, the firm, or the company.

If you have any questions about the contents of this brochure, please contact AFP by telephone: 415-355-4237 or email: [info@agilefp.com](mailto:info@agilefp.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. In addition, registration of an investment adviser does not imply any level of skill or training.

Additional information about Agile Financial Planning, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

<b>Item 2</b>	<b>Material Changes – pg 1 of 1</b>	<b>Form ADV Part 2A</b>
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This item discusses only specific material changes that were made to the brochure since the last annual update in June 2017.

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## **OVERVIEW**

Agile Financial Planning was founded in 2008. The firm is dedicated to helping individuals, families, and small business owners make informed financial decisions to achieve their goals. The firm's mission is to provide astute, unbiased, and affordable financial planning and asset management services. Partnering closely with clients, Agile Financial Planning strives to deliver its advice in a way that is easily understood and successfully executed.

Clients are advised that other sources may offer lower fees than AFP for comparable financial planning services. AFP does not assign agreements to other service providers without written consent from clients.

## **MANAGEMENT PROFILE**

Michael Pablo, born 1970, is the founder and principal of Agile Financial Planning.

Professional Designations:

- CFP<sup>®</sup> Professional

Education:

- CFP<sup>®</sup> Certification Program, 2006  
The American College
- MBA, 2000  
California State University, Long Beach
- BS Aerospace Engineering, 1994  
California State Polytechnic University, Pomona

Work Experience:

- Agile Financial Planning, LLC - 2008 to Present

## **FINANCIAL PLANNING**

AFP provides goal based comprehensive and modular financial planning for individuals and small businesses. Advice and recommendations are provided in the areas of:

- Investments
- Risk management
- Retirement planning
- Education planning
- Tax matters
- Estate planning

Agile Financial Planning provides clients the precise help they require – from addressing one specific issue (modular planning) to developing strategies to optimize all the interrelated aspects of their financial life (comprehensive planning). Common issues addressed include:

- Controlling spending and increasing savings
- Determining the appropriate types and amounts of insurance to maintain
- Saving for college
- Saving for retirement
- Reducing income tax burden

## **FINANCIAL PLANNING – continued**

Whether clients decide to take a modular or comprehensive approach to resolving their financial issues, the AFP's planning process includes:

- Defining and clarifying goals
- Examining current financial position
- Making financial recommendations to achieve goals
- Assisting in the implementation of financial strategies
- Monitoring plan execution and performance

Financial planning is a process, not a one-time event. The initial financial plan is designed to serve as a starting point to get clients on the right path. As "life happens," financial situations change and new questions or challenges arise. Agile Financial Planning strives to build long term relationships with clients and is available to assist them beyond the initial planning engagement.

## **ASSET MANAGEMENT**

A sound investment plan is pivotal to achieving financial goals. To help clients execute their investment plan, AFP provides asset management services that include:

- Reviewing basic investment principles with clients
- Assessing client circumstances (goals, income stability, investable assets, investment horizon, risk tolerance)
- Developing and clarifying client's investment philosophy
- Designing an appropriate asset allocation
- Determining and overseeing the purchase or sale of specific securities
- Monitoring investment performance and making adjustments as necessary  
See **Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss** for additional details

<b>Item 4</b>	<b>Advisory Business – pg 4 of 4</b>	<b>Form ADV Part 2A</b>
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**ASSET MANAGEMENT – continued**

Agile Financial Planning provides discretionary management of client assets. As of March 15, 2017, AFP manages assets of \$4,250,000. AFP only manages assets on a discretionary basis.

**FINANCIAL PLANNING**

Financial planning fees are determined on a project basis and depend on the complexity of the client's personal and financial situation. Some key considerations include; client goals, family situation, income, assets, and debt. AFP provides clients a comprehensive estimate of the financial planning fee at the conclusion of the initial free consultation.

- Fees for comprehensive financial planning (multiple/interrelated planning topics) typically range from \$750 – \$3,000.
- Fees for modular financial planning (one planning topic) typically range from \$500 – \$1,500.

The term of client financial planning engagements is 12 months from the date the advisory agreement is signed. An initial payment of 50% of the project fee estimate is payable upon acceptance and signing of the agreement. A client-requested increase in the scope of work or additional unforeseen complexity in completing the plan may require an adjustment to the original fee estimate. Work on the plan is suspended and notice of such adjustments is given to clients in writing. Clients must confirm and approve the added scope and fees in writing before work proceeds. The final balance of fees is due upon completion of the financial plan document. The document is considered complete once it has been delivered to clients. After the final balance is paid, AFP may continue to work with clients in making minor revisions to the plan document until the end of the engagement term. The magnitude and scope of the revisions are solely at the discretion of AFP. Financial planning services beyond the initial engagement are offered on a project basis. The cost for additional services are assessed and provided to clients at the time of the request.

Clients may terminate the financial planning agreement with AFP in writing within the first five days after entering the agreement and are entitled to a full refund, 100%, of any fees already paid. AFP reserves the right to terminate the agreement and discontinue services if payments are not paid when due and retains all, 100%, of fees already paid.

## **ASSET MANAGEMENT**

AFP's fees for asset management are paid in arrears and based upon the total of client level assets under management according to the following tapered (retroactive breakpoint) pricing schedule:

- 0.2000% quarterly (approximately 0.80% annually) on accounts with assets up to \$250,000
- 0.1875% quarterly (approximately 0.75% annually) on accounts with assets above \$250,000 up to \$500,000
- 0.1750% quarterly (approximately 0.70% annually) on accounts with assets above \$500,000 up to \$1,000,000
- 0.1625% quarterly (approximately 0.65% annually) on accounts with assets above \$1,000,000

AFP's asset management clients must custody their assets with Folio Institutional. Folio Institutional assesses brokerage fees on client accounts in addition to the AFP asset management service fees above. All fees paid to AFP for investment advisory services are also separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds used in client portfolios. These fees and expenses are described in each fund's prospectus and generally include a management fee, other fund expenses, and a possible distribution fee.

Clients are invoiced at the beginning of each calendar quarter based on the average daily balance of their account(s) during the previous quarter. Invoices are provided to clients and fees are deducted from client accounts within two weeks of the beginning of each quarter.

Clients may terminate AFP asset management services in writing at any time. Prorated asset management fees are assessed and invoiced to the client at the time services are terminated. The fees are deducted/retrieved from the client's account/s or paid directly by the client via check or PayPal.

<b>Item 6</b>	<b><i>Performance-Based Fees and Side-By-Side Management – pg 1 of 1</i></b>	<b><i>Form ADV Part 2A</i></b>
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Agile Financial Planning does not charge performance-based fees.

<b>Item 7</b>	<b>Types of Clients – pg 1 of 1</b>	<b>Form ADV Part 2A</b>
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Agile Financial Planning is dedicated to helping individuals, families, and small business owners make informed financial decisions to achieve their goals.

Clients are not required to meet any sort of asset minimum to engage the services of AFP.

**Item 8****Methods of Analysis, Investment Strategies and Risk of Loss – pg 1 of 1****Form ADV Part 2A**

The following core principles guide Agile Financial Planning’s approach in helping clients make investment decisions.

AFP believes investments must correspond to a client’s’ time horizon and level of risk they are able to take on. AFP emphasizes the importance of understanding client goals including the amount and timing of funds needed to achieve those goals. The firm also educates clients on the risks associated with investing in securities and helps them gauge their tolerance for investment risk.

AFP believes investment portfolios must have the appropriate depth and breadth of diversification to reduce return volatility. Diversification depth is achieved by holding a number of individual securities within the same asset class and diversification breadth is achieved by holding securities across different asset classes. Stocks and Bonds are the core holdings of AFP portfolios and typically comprise the lion’s share of portfolios. Investments may also be made in other asset classes such as real estate and commodities. The percentage of each asset class included in portfolios is based on the client’s time horizon, return requirement, and risk tolerance. AFP portfolios have exposure to both US and non-US bonds and equities. They also include large cap and small cap equities. AFP primarily utilizes collective investments such as ETFs to achieve the depth and breadth client portfolios require.

AFP believes transaction costs and service fees must be minimized to achieve higher overall returns. The firm takes much care in selecting ETFs that maintain low expense ratios and brokers with low commissions.

Investing in securities involves risk and has the potential for loss including the loss of invested capital. Clients are encouraged to keep these risks in mind and be prepared to bear the consequences.

<b>Item 9</b>	<b>Disciplinary Information – pg 1 of 1</b>	<b>Form ADV Part 2A</b>
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Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of the adviser. Agile Financial Planning has no legal or disciplinary information to disclose.

<b>Item 10</b>	<b><i>Other Financial Industry Activities and Affiliations – pg 1 of 1</i></b>	<b><i>Form ADV Part 2A</i></b>
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Agile Financial Planning has no material arrangements or relationships with any individuals and institutions.

## **CODE OF ETHICS**

The Advisers Act imposes a fiduciary duty on investment advisers. As a fiduciary, AFP has a duty of utmost good faith to act solely in the best interests of each of its clients. Clients entrust AFP with their funds, which in turn places a high standard on AFP's conduct and integrity. This fiduciary duty compels the firm to act with the utmost integrity in all dealings. Furthermore, this fiduciary duty is the core principle underlying this brochure and represents the expected basis of all dealings with AFP's clients. This Code of Ethics consists of the following core principles:

- The interests of clients are placed ahead of the investment interests of the firm or any of its personnel.
- Personnel are expected to conduct personal securities transactions in accordance with AFP's Trading Policy and strive to avoid any actual or perceived conflict of interest.
- Personnel are prohibited from taking inappropriate advantage of their position with the firm and act in the best interest of each client.

Personnel are expected to comply with local, state, and federal securities laws. Strict adherence to this manual assists personnel in complying with this requirement.

## **PERSONAL TRADING POLICY**

Agile Financial Planning personnel may follow similar investment strategies that are recommended to clients. As a result, they may own, buy, and sell identical securities. To avoid conflicts of interest, AFP personnel are required to consider the following when placing trades:

- Amount or nature of a transaction that may affect the price or market for a security if it is also traded within client accounts around the same time
- Personal benefit from purchases or sales on behalf of any client
- Client is likely to be harmed by a transaction
- Appearance or suggestion of impropriety

**PERSONAL TRADING POLICY – continued**

Generally, AFP personnel are expected to purchase or sell a security for their personal accounts only after trading of that same security has been completed in client accounts. Personal accounts include all accounts for family members living within their household and accounts over which they have authority even though the account owner does not live within the same household. It is the responsibility of AFP personnel to know which securities are being traded by the firm.

**CODE OF ETHICS AND PERSONAL TRADING POLICY VIOLATIONS**

Consistent with the requirements described above, AFP personnel must promptly consider if any violation of this policy has occurred. Examples of items that should be considered include, but are not limited to:

- Noncompliance with applicable laws, rules, and regulations
- Fraud or illegal acts involving any aspect of the firm's business
- Material misstatements in regulatory filings, internal books and records, client records or reports
- Deviations from required controls and procedures that safeguard clients and the firm
- Any firm activity that is harmful to clients

Any violations discovered by or reported to AFP shall be reviewed and investigated promptly. AFP shall determine the most appropriate action to mitigate the violation, depending on the facts and circumstances of the violation. AFP can provide clients a complete copy of the Code of Ethics and Personal Trading Policy upon request.

Consistent with its fiduciary obligations, AFP seeks best execution in all transactions on behalf of its clients. The firm defines best execution as the most favorable execution for clients in light of all relevant circumstances.

### **BROKER SELECTION CONSIDERATIONS**

AFP is responsible for identifying and approving brokers that custody and execute trades for client accounts. The factors used in selecting a broker may include, but are not limited to:

- Commission structure
- Quality of execution
- Technology for client account access, reporting, and record keeping
- Research services
- Quality and breadth of customer support and other brokerage services

### **SOFT DOLLAR BENEFITS**

AFP maintains no “soft dollar” arrangements of any kind. The firm may not maintain formal or informal arrangements in which it receives products or services from any broker, other than execution of securities transactions, in exchange for directing client brokerage transactions to the broker.

## **DIRECTED BROKERAGE**

Clients entering into an asset management arrangement with Agile Financial Planning are required to use the following broker to custody assets:

### **Folio Institutional**

8180 Greensboro Drive, 8th Floor  
McLean, VA 22102

T: 888-485-3456

F: 703-880-7313

Email (non-clients): [info@folioinstitutional.com](mailto:info@folioinstitutional.com)

Email (clients): [support@folioinstitutional.com](mailto:support@folioinstitutional.com)

Using a designated broker allows AFP to execute transactions on clients' behalf. It is important to note that other brokers not used by AFP may provide clients more favorable:

- Commission rates and other brokerage fees
- Quality of execution
- Technology for client account access, reporting, and record keeping
- Research services
- Quality and breadth of customer support and other brokerage services

**TRADE AGGREGATION AND ALLOCATION**

AFP strives to treat all clients in a fair and equitable manner. Client trades in the same security are bunched in a single order (a “block”) and executed twice a day during specific windows of time.

When employing a block trade:

- AFP will attempt to fill client orders by day-end
- If a block order is filled at several prices through multiple trades, an average price will be determined for all trades executed
- All participating accounts in a block trade will receive the average price for the security being sold or purchased
- Only trades executed within the block on the single day may be combined for purposes of calculating the average price

AFP conducts reviews to determine if client portfolios are in line with the client's investment policy statement. AFP reviews client investment accounts:

- Regularly, no less often than quarterly, as part of the monitoring process
- In the event of a significant change in financial markets
- Significant assets are added to the portfolio
- Some portion of the portfolio is to be liquidated and disbursed

AFP assesses the following when conducting reviews:

- Portfolio performance on a nominal and relative basis
- How well the current portfolio asset allocation aligns with the target allocation set forth in the investment policy statement and if the allocation requires rebalancing
- If the current target portfolio asset allocation is aligned to the client's personal circumstances and if the target portfolio asset allocation requires adjusting
- How well securities in the portfolio (primarily Exchange Traded Funds) meet AFP's selection criteria, which include but are not limited to:
  - Expenses
  - Liquidity
  - Amount of assets held
  - Turn ratio

AFP offers to review investment portfolios with clients annually. The discussion may include, but is not limited to:

- Changes in client situation or outlook
- Prevailing economic environment
- Portfolio performance
- Changes and/or updates to client's investment policy

**Item 13**

**Review of Accounts – pg 2 of 2**

**Form ADV Part 2A**

Clients are able to independently monitor and assess their investment portfolios online. Information available includes, but is not limited to:

- Target and current asset allocation
- Securities held in each asset class
- Performance

<b>Item 14</b>	<b>Client Referrals and Other Compensation – pg 1 of 1</b>	<b>Form ADV Part 2A</b>
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Agile Financial Planning does not provide any form of compensation to solicitors for client referrals. This policy applies to AFP personnel and third party solicitors such as brokers.

It is AFP's intention to only have custody over client assets to the extent it requests the client's custodian to deduct advisory fees directly from the client's account. The following procedures are designed to help ensure AFP does not inadvertently obtain further custody over client assets:

- AFP will obtain prior written authorization from the client before deducting fees directly from the client's account
- AFP will not hold client securities in AFP's name or in bearer form
- AFP will not require clients to prepay fees greater than \$500 six or more months in advance
- Proceeds from the redemption of client securities may not be directed to AFP
- AFP will not have signatory power over a client's checking or custodial account
- AFP personnel may not serve as trustee over a client's account, unless the client is an immediate family member
- All wires or transfers from client custodial accounts to outside (i.e., non-client) accounts must be accompanied by written client authorization

AFP adheres to the following guidelines with respect to custodians:

- All client assets will be held by a qualified custodian, which is typically a brokerage.
- AFP generally opens custodial accounts on behalf of clients, under the client's name. Clients are informed of any new custodial accounts opened on their behalf.
- AFP will not route original custodial statements to clients on behalf of a custodian. Custodians are required to deliver client account statements directly to the client.
- AFP is responsible, within reason, to ensure clients receive or have online access to custodial statements from the custodian at least quarterly. To meet this responsibility, AFP will receive or have online access to copies of its client custodial statements.

<b>Item 15</b>	<b>Custody – pg 2 of 2</b>	<b>Form ADV Part 2A</b>
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AFP adheres to the following guidelines with respect to receipt of funds or certificates:

- AFP may handle or forward checks clearly made payable to a third party, such as the client's custodian. AFP may not handle or forward any other client check or security certificate received by the firm. All such instruments must be returned to the client within three business days, and may not be forwarded to any other party.
- AFP may handle or forward to the client, within five business days, the following checks when they are inadvertently received by AFP:
  - Settlement checks from class action lawsuits
  - Tax refund checks from the IRS, state or other governmental taxing authorities
  - Dividend payments
- AFP may not physically handle security certificates. AFP may, however, provide direction to a client in completing transfer and shipping paperwork to help ensure a security certificate is properly deposited with the client's custodian. Personnel shall never physically handle the security certificate.
- AFP shall maintain a record of actions taken with respect to client assets inadvertently received.

Agile Financial Planning maintains discretionary authority over asset management client accounts. Clients grant AFP discretionary authority by signing an asset management agreement. The signed agreement authorizes Agile Financial Planning to do the following:

- Open accounts at designated new brokerage firms and request asset transfers into them from accounts held at other financial institutions.
- Buy, sell, exchange, convert, tender, trade, or otherwise acquire or dispose of stocks, bonds, mutual funds and any other securities, financial contracts or financial instruments.
- Receive various types of information on or about client accounts, including account statements, trade confirmations, and tax information.
- With the exception of collecting asset management fees based on the agreement, Agile Financial Planning, LLC is not permitted to request the disbursement of funds or securities from client accounts, without written consent.

<b>Item 17</b>	<b>Voting Client Securities – pg 1 of 1</b>	<b>Form ADV Part 2A</b>
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Without exception, AFP does not vote proxies on behalf of clients. Custodians are directed to send or provide access to all proxy materials directly to the client.

<b>Item 18</b>	<b>Financial Information – pg 1 of 1</b>	<b>Form ADV Part 2A</b>
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Registered investment advisers are required to disclose any financial conditions that may likely impair their ability to meet contractual commitments to clients. Agile Financial Planning has no financial issues that would impair its ability to meet contractual or fiduciary obligations to clients. In addition, AFP has never been the subject of a bankruptcy petition.

<b>Item 19</b>	<b>Requirements for State Registered Advisers – pg 1 of 1</b>	<b>Form ADV Part 2A</b>
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See **Item 4 - Advisory Business**.