

# Defined Financial Planning LLC Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of Defined Financial Planning LLC. If you have any questions about the contents of this brochure, please contact us at (510) 200-8655 or by email at [support@definedplanning.com](mailto:support@definedplanning.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 Defined Financial Planning LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Defined Financial Planning LLC's CRD number is: 310137.*



2413 Webb Avenue, Suite B  
Alameda, CA 94501  
(510) 200-8655

[support@definedplanning.com](mailto:support@definedplanning.com)  
[www.definedplanning.com](http://www.definedplanning.com)

*Registration as an investment adviser does not imply a certain level of skill or training.*

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## Item 2: Material Changes

Defined Financial Planning LLC has not yet filed an annual updating amendment using the Form ADV Part 2A. There are the following material changes to report.

- Defined Financial Planning LLC has updated ownership (Item 4).

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## Item 4: Advisory Business

### A. Description of the Advisory Firm

Defined Financial Planning LLC (hereinafter "DFP") is a Limited Liability Company organized in the State of California. The firm was formed in February 2020, and the principal owners are Keith Merwin Oslie and Samuel Vasquez Gaeta.

### B. Types of Advisory Services

#### Portfolio Management Services

DFP offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. DFP creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

DFP evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. DFP will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

DFP seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of DFP's economic, investment or other financial interests. To meet its fiduciary obligations, DFP attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, DFP's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is DFP's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent, including initial public offerings ("IPOs") and other investment opportunities that might have a limited supply, among its clients on a fair and equitable basis over time.

#### Selection of Other Adviser Services

DFP may direct that certain clients authorize the active discretionary management of a portion of their assets through the use of third-party independent investment advisers to manage all or a portion of the client's assets based upon the stated investment objectives

of the client Before selecting other advisers for clients, DFP will always ensure those other advisers are properly licensed or registered as an investment adviser. DFP conducts due diligence on any third-party investment adviser, which may involve one or more of the following: phone calls, meetings and review of the third-party adviser's performance and investment strategy. DFP then makes investments with a third-party investment adviser by referring the client to the third-party adviser. DFP will review the ongoing performance of the third-party adviser as a portion of the client's portfolio for which it will receive an annual advisory fee. The firm has engaged AssetMark, a registered investment advisory firm, to act as a sub advisor.

### **Pension Consulting Services**

DFP offers consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans). Pension consulting may include, but is not limited to:

- identifying investment objectives and restrictions
- providing guidance on various assets classes and investment options
- recommending money managers to manage plan assets in ways designed to achieve objectives
- monitoring performance of money managers and investment options and making recommendations for changes
- recommending other service providers, such as custodians, administrators
- and broker-dealers
- creating a written pension consulting plan

These services are based on the goals, objectives, demographics, time horizon, and/ or risk tolerance of the plan and its participants.

### **Financial Planning**

Financial plans and financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

In offering financial planning, a conflict exists between the interests of the investment adviser and the interests of the client. The client is under no obligation to act upon the investment adviser's recommendation, and, if the client elects to act on any of the recommendations, the client is under no obligation to affect the transaction through the investment adviser. This statement is required by California Code of Regulations, 10 CCR Section 260.235.2.

### **Services Limited to Specific Types of Investments**

DFP generally limits its investment advice to mutual funds, fixed income securities, real estate funds (including REITs), insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, commodities, non-U.S. securities, venture capital funds

and private placements. DFP may use other securities as well to help diversify a portfolio when applicable.

### **C. Client Tailored Services and Client Imposed Restrictions**

DFP will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by DFP on behalf of the client. DFP may use model allocations together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent DFP from properly servicing the client account, or if the restrictions would require DFP to deviate from its standard suite of services, DFP reserves the right to end the relationship.

### **D. Wrap Fee Programs**

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. DFP does not participate in any wrap fee programs.

### **E. Assets Under Management**

DFP has the following assets under management:

<b>Discretionary Amounts:</b>	<b>Non-discretionary Amounts:</b>	<b>Date Calculated:</b>
\$16,213,994	\$4,215,817	December 2020

## Item 5: Fees and Compensation

### A. Fee Schedule

Lower fees for comparable services may be available from other sources.

#### Portfolio Management Fees

Total Assets Under Management	Annual Fees
\$0 - \$500,000	1.00%
\$500,001 - \$1,000,000	0.85%
\$1,000,001 – And Up	0.60%

DFP uses the value of the account as of the last business day of the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

These fees are generally negotiable, and the final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of DFP's fees within five business days of signing the Investment Advisory Agreement. Thereafter, clients may terminate the Investment Advisory Agreement immediately upon written notice.

#### Selection of Other Advisers Fees

DFP will be compensated via a fee share from the advisers to which it directs those clients. This relationship will be memorialized in each contract between DFP and each third-party adviser. The fees shared will not exceed any limit imposed by any regulatory agency.

DFP will recommend AssetMark to clients. The annual fee schedule is as follows:

Total Assets Under Management	DFP's Fee	Third Party's Fee	Total Fee
All Assets	1.00%	1.00%	2.00%

DFP uses an average of the daily balance in the client's account throughout the billing period for purposes of determining the market value of the assets upon which the advisory fee is based. The total fees charged by both parties will not exceed 3% of assets under management per year.

On the first business day of every month, AssetMark calculate fees for any account that had one of the following billable events occur in the previous month:

- New money to the platform deposited into new and/or existing account(s)
- Account termination

Advisory Fees are deducted from client accounts within ten business days following month end. Fee payments are facilitated to financial advisory firms by the tenth business day following month end.

When a client closes account(s) on the platform, the pro-rata refund of Advisory Fees are applied to the account at the beginning of the following month. Any Advisory Fees paid in advanced during the current calendar quarter are eligible for a pro-rata refund that can include deposits on new money, investment solution changes, journals between existing platform account(s), and the quarterly advanced billing. Refunds are posted to the client's account by the fifth business day of the following month and deducted from the advisor's payout processed that month.

## **Pension Consulting Services Fees**

### **Asset-Based Fees for Pension Consulting**

<b>Total Assets Under Management</b>	<b>Annual Fee</b>
All Assets	0.35%

DFP uses the value of the account as of the last business day of the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

These fees are generally negotiable, and the final fee schedule will be memorialized in the client's advisory agreement.

Clients may terminate the agreement without penalty for a full refund of DFP's fees within five business days of signing the Investment Advisory Agreement. Thereafter, clients may terminate the Pension Consulting Agreement immediately upon written notice. DFP uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

### **Fixed Fees**

The rate for creating client pension consulting plans is between \$0 and \$3,000. The final fee schedule will be memorialized in the client's advisory agreement. This service may be canceled immediately upon written notice.

### **Financial Planning Fees**

#### **Fixed Fees**

The negotiated fixed rate for creating clients' financial plans is between \$500 and \$10,000.



Clients may terminate the agreement without penalty for full refund of DFP's fees within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

## **B. Payment of Fees**

### **Payment of Portfolio Management Fees**

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis or may be invoiced and billed directly to the client on a quarterly basis. Clients may select the method in which they are billed. Fees are paid in advance.

### **Payment of Pension Consulting Fees**

Asset-based pension consulting fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis. Fees are paid in advance.

Fixed pension consulting fees are paid via check. These fees are paid 50% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

### **Payment of Selection of Other Advisers Fees**

Fees for selection of AssetMark as third-party adviser are withdrawn directly by AssetMark from the client's accounts with client's written authorization. AssetMark will then pay DFP the portion of the fee earned. DFP will never withdraw fees from client accounts. Fees are paid quarterly in advance.

### **Payment of Financial Planning Fees**

Financial planning fees are paid directly from the client's accounts or via check, wire or credit card.

Fixed financial planning fees are paid up to 50% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

## **C. Client Responsibility For Third Party Fees**

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by DFP. Please see Item 12 of this brochure regarding broker-dealer/custodian.

## **D. Prepayment of Fees**

DFP collects certain fees in advance and certain fees in arrears, as indicated above. Refunds for fees paid in advance but not yet earned will be refunded on a prorated basis and returned within fourteen days to the client via check or return deposit back into the client's account.

Fixed fees that are collected in advance will be refunded, based on the prorated amount of work completed at the point of termination.

## **E. Outside Compensation For the Sale of Securities to Clients**

Neither DFP nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

## **Item 6: Performance-Based Fees and Side-By-Side Management**

DFP does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## **Item 7: Types of Clients**

DFP generally provides advisory services to the following types of clients:

- Individuals
- High-Net-Worth Individuals
- Pension and Profit Sharing Plans
- Trusts
- Businesses and Corporations

There is no account minimum for any of DFP's services.

## **Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss**

### **A. Methods of Analysis and Investment Strategies**

#### **Methods of Analysis**

DFP's methods of analysis include Fundamental analysis, Modern portfolio theory and Quantitative analysis.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/ or the analysis of management or competitive advantages.

**Modern portfolio theory** is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

**Quantitative analysis** deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

### **Investment Strategies**

DFP uses long term trading and short term trading.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **B. Material Risks Involved**

### **Methods of Analysis**

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**Modern portfolio theory** assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

**Quantitative analysis** Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

### **Investment Strategies**

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Selection of Other Advisers:** DFP's selection process cannot ensure that money managers will perform as desired and DFP will have no control over the day-to-day operations of any of its selected money managers. DFP would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulatory breaches or fraud.

**Short term trading** risks include liquidity, economic stability, and inflation, in addition to the long term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/ or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting

(extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (invar), or price fluctuation and disassociation from the index being tracked. With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that are one of the typical benefits of ETFs. Additionally, regular trading to beneficially “time the market” is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed income investments (as applicable). Foreign securities in particular are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another and losses may be magnified if no liquid market exists for the ETF’s shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

**Real estate** funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt

and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

**Annuities** are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

**Private placements** carry a substantial risk as they are subject to less regulation than are publicly offered securities, the market to resell these assets under applicable securities laws may be illiquid, due to restrictions, and the liquidation may be taken at a substantial discount to the underlying value or result in the entire loss of the value of such assets.

**Venture capital funds** invest in start-up companies at an early stage of development in the interest of generating a return through an eventual realization event; the risk is high as a result of the uncertainty involved at that stage of development.

**Commodities** are tangible assets used to manufacture and produce goods or services. Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain.

**Non-U.S.** securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

**Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## Item 9: Disciplinary Information

### A. Criminal or Civil Actions

There are no criminal or civil actions to report.

### B. Administrative Proceedings

There are no administrative proceedings to report.

### **C. Self-regulatory Organization (SRO) Proceedings**

There are no self-regulatory organization proceedings to report.

## **Item 10: Other Financial Industry Activities and Affiliations**

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Neither DFP nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

### **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither DFP nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Samuel Vasquez Gaeta is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. DFP always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of DFP in connection with such individual's activities outside of DFP.

Keith Merwin Oslie is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. DFP always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of DFP in connection with such individual's activities outside of DFP.

All material conflicts of interest under Section 260.238 (k) of the California Corporations Code are disclosed regarding the investment adviser, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

## **D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections**

DFP may direct clients to third-party investment advisers to manage all or a portion of the client's assets. Clients will pay DFP its standard fee in addition to the standard fee for the advisers to which it directs those clients. This relationship will be memorialized in each contract between DFP and each third-party advisor. The fees will not exceed any limit imposed by any regulatory agency. DFP will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. DFP will ensure that all recommended advisers are licensed or notice filed in the states in which DFP is recommending them to clients.

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

### **A. Code of Ethics**

DFP has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. DFP's Code of Ethics is available free upon request to any client or prospective client.

### **B. Recommendations Involving Material Financial Interests**

DFP does not recommend that clients buy or sell any security in which a related person to DFP or DFP has a material financial interest.

### **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of DFP may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of DFP to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. DFP will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.



## **D. Trading Securities At/Around the Same Time as Clients' Securities**

From time to time, representatives of DFP may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of DFP to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, DFP will never engage in trading that operates to the client's disadvantage if representatives of DFP buy or sell securities at or around the same time as clients.

## **Item 12: Brokerage Practices**

### **A. Factors Used to Select Custodians and/or Broker/Dealers**

Custodians/broker-dealers will be recommended based on DFP's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and DFP may also consider the market expertise and research access provided by the broker- dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in DFP's research efforts. DFP will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker- dealer/custodian.

DFP will require clients to use Fidelity Brokerage Services LLC, AssetMark Brokerage LLC, or Charles Schwab and Co., Inc.

#### **1. Research and Other Soft-Dollar Benefits**

While DFP has no formal soft-dollars program in which soft dollars are used to pay for third party services, DFP may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). DFP may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft-dollar research, whether or not the client's transactions paid for it, and DFP does not seek to allocate benefits to client accounts proportionate to any soft-dollar credits generated by the accounts. DFP benefits by not having to produce or pay for the research, products or services, and DFP will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that DFP's acceptance of soft-dollar benefits may result in higher commissions charged to the client.

## **2. Brokerage for Client Referrals**

DFP receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third-party.

## **3. Clients Directing Which Broker/Dealer/Custodian to Use**

DFP will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

### **B. Aggregating (Block) Trading for Multiple Client Accounts**

DFP does not aggregate or bunch the securities to be purchased or sold for multiple clients. This may result in less favorable prices, particularly for illiquid securities or during volatile market conditions.

## **Item 13: Review of Accounts**

### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

All client accounts for DFP's advisory services provided on an ongoing basis are reviewed at least Quarterly by Samuel Vasquez Gaeta, Chief Executive Officer, with regard to clients' respective investment policies and risk tolerance levels. All accounts at DFP are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Samuel Vasquez Gaeta, Chief Executive Officer. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

### **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, DFP's services will generally conclude upon delivery of the financial plan.

### **C. Content and Frequency of Regular Reports Provided to Clients**

Each client of DFP's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

Each financial planning client will receive the financial plan upon completion.

## **Item 14: Client Referrals and Other Compensation**

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

DFP receives compensation from third-party advisers to which it directs clients.

### **B. Compensation to Non – Advisory Personnel for Client Referrals**

DFP does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

## **Item 15: Custody**

When advisory fees are deducted directly from client accounts at client's custodian, DFP will be deemed to have limited custody of client's assets. Because client fees will be withdrawn directly from client accounts, in states that require it, DFP will:

- (A) Possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian.
- (B) Send the qualified custodian written notice of the amount of the fee to be deducted from the client's account and verify that the qualified custodian sends invoices to the client.
- (C) Send the client a written invoice itemizing the fee upon or prior to fee deduction, including the formula used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based.

Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy. Clients are urged to compare the account statements they received from custodian with those they received from DFP.

## **Item 16: Investment Discretion**

DFP provides discretionary and non-discretionary investment advisory services to clients. The advisory agreement established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, DFP generally manages the client's account and

makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some instances, DFP's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to DFP. Clients with discretionary accounts will execute a limited power of attorney to evidence discretionary authority.

## **Item 17: Voting Client Securities (Proxy Voting)**

DFP will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

## **Item 18: Financial Information**

### **A. Balance Sheet**

DFP neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither DFP nor its management has any financial condition that is likely to reasonably impair DFP's ability to meet contractual commitments to clients.

### **C. Bankruptcy Petitions in Previous Ten Years**

DFP has not been the subject of a bankruptcy petition in the last ten years.

## **Item 19: Requirements For State Registered Advisers**

### **A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background**

The education and business backgrounds of DFP's current management persons, Samuel Vasquez Gaeta and Keith Merwin Oslie, can be found on the Form ADV Part 2B brochure supplements for those individuals.

**B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)**

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

**C. Calculation of Performance-Based Fees and Degree of Risk to Clients**

DFP does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

**D. Material Disciplinary Disclosures for Management Persons of this Firm**

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

**E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)**

Neither DFP, nor its management persons, has any relationship or arrangement with issuers of securities. See Item 10.C and 11.B.

**This brochure supplement provides information about Samuel Vasquez Gaeta that supplements the Defined Financial Planning LLC brochure. You should have received a copy of that brochure. Please contact Samuel Vasquez Gaeta if you did not receive Defined Financial Planning LLC's brochure or if you have any questions about the contents of this supplement.**

Additional information about Samuel Vasquez Gaeta is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



## **Defined Financial Planning LLC**

Form ADV Part 2B – Individual Disclosure Brochure

for

**Samuel Vasquez Gaeta, CFP®**

Personal CRD Number: 6616279

Investment Adviser Representative

Defined Financial Planning LLC  
2413 Webb Avenue, Suite B  
Alameda, CA 94501  
(510) 200-8655  
[sam@definedplanning.com](mailto:sam@definedplanning.com)

UPDATED: 10/19/2020

## Item 2: Educational Background and Business Experience

**Name:** Samuel Vasquez Gaeta

**Born:** 1991

### **Educational Background and Professional Designations:**

#### **Education:**

Graduate Certificate in Financial Planning, The American College - 2019  
Bachelor of Science Accounting, University of Phoenix- 2018

#### **Designations:**

##### **CFP® - Certified Financial Planner**

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally-registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- i. Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- ii. Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

**Business Background:**

09/2020 - Present	Chief Executive Officer & Investment Advisor Representative Defined Financial Planning LLC
03/2016 - Present	Owner Wealth Beta, LLC
04/2019 - 09/2020	Registered Representative JW Cole Financial Inc.
04/2019 - 09/2020	Investment Advisor Representative JW Cole Advisors Inc.
08/2016 - 04/2019	Investment Advisor Representative Global Financial Private Capital, LLC
10/2015 - 12/2018	Wealth Planner Integrated Wealth Consultants
01/2017 - 09/2018	Wealth Planner Integrated Wealth Consultants, Inc.
10/2011 - 10/2015	General Manager Reno Running Company, LLC
03/2012 - 10/2012	Fire Technician United States Forest Service



### **Item 3: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

### **Item 4: Other Business Activities**

Samuel Vasquez Gaeta is a licensed insurance agent. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Defined Financial Planning LLC always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Defined Financial Planning LLC in their capacity as a licensed insurance agent.

Samuel Vasquez Gaeta is owner of Wealth Beta, LLC. This entity is a holding company.

### **Item 5: Additional Compensation**

Samuel Vasquez Gaeta does not receive any economic benefit from any person, company, or organization, other than Defined Financial Planning LLC in exchange for providing clients advisory services through Defined Financial Planning LLC.

### **Item 6: Supervision**

As a representative of Defined Financial Planning LLC, Samuel Vasquez Gaeta works closely with the supervisor, Keith Merwin Oslie, and all advice provided to clients is reviewed by the supervisor prior to implementation. Samuel Vasquez Gaeta adheres to applicable regulations regarding the activities of an Investment Adviser Representative, together with all policies and procedures outlined in the firm's code of ethics and compliance manual. Keith Merwin Oslie's phone number is (510)200-8599.

### **Item 7: Requirements For State Registered Advisers**

*This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.*

A. Samuel Vasquez Gaeta has NOT been involved in any of the events listed below.

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
  - An investment or an investment-related business or activity;
  - Fraud, false statement(s), or omissions;
  - Theft, embezzlement, or other wrongful taking of property;
  - Bribery, forgery, counterfeiting, or extortion; or
  - Dishonest, unfair, or unethical practices.
  
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
  - An investment or an investment-related business or activity;
  - Fraud, false statement(s), or omissions;
  - Theft, embezzlement, or other wrongful taking of property;
  - Bribery, forgery, counterfeiting, or extortion; or
  - Dishonest, unfair, or unethical practices.

B. Samuel Vasquez Gaeta has NOT been the subject of a bankruptcy.

**This brochure supplement provides information about Keith Merwin Osie that supplements the Defined Financial Planning LLC brochure. You should have received a copy of that brochure. Please contact Keith Merwin Osie if you did not receive Defined Financial Planning LLC's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Keith Merwin Osie is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**



## **Defined Financial Planning LLC**

**Form ADV Part 2B – Individual Disclosure Brochure**

for

### **Keith Merwin Osie**

Personal CRD Number: 6683569

Investment Adviser Representative

Defined Financial Planning LLC  
2413 Webb Avenue, Suite B  
Alameda, CA 94501  
(510) 200-8655  
[keith@definedplanning.com](mailto:keith@definedplanning.com)

UPDATED: 10/12/2020

## Item 2: Educational Background and Business Experience

**Name:** Keith Merwin Oslie                      **Born:** 1978

### **Educational Background and Professional Designations:**

#### **Education:**

Keith Merwin Oslie has not received any higher education degrees after high school.

#### **Business Background:**

07/2020 - Present	Managing Member & Chief Compliance Officer Defined Financial Planning LLC
04/2019 - 09/2020	Investment Adviser Representative J.W. Cole Advisors, Inc.
08/2016 - 04/2019	Investment Adviser Representative Global Financial Private Capital, LLC
07/2015 - 02/2017	Operations Manager Pacific Excel Wealth Advisors
08/1999 - 11/2015	Operations Manager FedEx Express Corp.

## Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

## Item 4: Other Business Activities

Keith Merwin Oslie is a licensed insurance agent. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Defined Financial Planning LLC always acts

in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Defined Financial Planning LLC in their capacity as a licensed insurance agent.

### **Item 5: Additional Compensation**

Keith Merwin Oslie does not receive any economic benefit from any person, company, or organization, other than Defined Financial Planning LLC in exchange for providing clients advisory services through Defined Financial Planning LLC.

### **Item 6: Supervision**

As the Chief Compliance Officer of Defined Financial Planning LLC, Keith Merwin Oslie supervises all activities of the firm. Keith Merwin Oslie's contact information is on the cover page of this disclosure document. Keith Merwin Oslie adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual.

## Item 7: Requirements For State Registered Advisers

*This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.*

- A. Keith Merwin Oslie has NOT been involved in any of the events listed below.
1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
    - An investment or an investment-related business or activity;
    - Fraud, false statement(s), or omissions;
    - Theft, embezzlement, or other wrongful taking of property;
    - Bribery, forgery, counterfeiting, or extortion; or
    - Dishonest, unfair, or unethical practices.
  2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - An investment or an investment-related business or activity;
    - Fraud, false statement(s), or omissions;
    - Theft, embezzlement, or other wrongful taking of property;
    - Bribery, forgery, counterfeiting, or extortion; or
    - Dishonest, unfair, or unethical practices.
- B. Keith Merwin Oslie has NOT been the subject of a bankruptcy.