

Item 1: Cover Page

Brooke A. Salvini
d/b/a Salvini Financial Planning
Form ADV Part 2A
Investment Advisor Brochure

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March 2021

This Brochure provides information about the qualifications and business practices of Salvini Financial Planning (“we”, “us”, “our”). If you have any questions about the contents of this Brochure, please contact Brooke A. Salvini, Principal and Chief Compliance Officer at (805) 543-6622 or brooke@SalviniFinancial.com.

Additional information about our Firm is also available on the SEC’s website at <http://adviserinfo.sec.gov/Firm/138087>. 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.

We are a registered investment adviser. Please note that use of the term “registered investment advisor” and a description of the Firm and/or our employees as “registered” does not imply a certain level of skill or training. For more information on the qualifications of the Firm and our employees who advise you, we encourage you to review this Brochure and the Brochure Supplement(s).

Item 2: Summary of Material Changes

In this Item of Salvini Financial Planning's (SFP or "the Firm", "we", "us", "ours") Form ADV 2, the Firm is required to discuss any material changes that have been made to Form ADV since the last Annual Amendment, dated March 3, 2020.

Material Changes since the Last Update

Since the last Annual Amendment filing, the Firm has the following material changes to report:

- Effective July 2020, Salvini Financial Planning now maintains a home office with a mailing address of 3940 Broad Street, Suite 7-310, San Luis Obispo, CA 93401.

Full Brochure Available

Our Form ADV may be requested at any time, by contacting Brooke A. Salvini, Principal and Chief Compliance Officer at (805) 543-6622 or brooke@SalviniFinancial.com.

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Item 4: Advisory Business

Information about the Firm

Salvini Financial Planning (the “Firm,” “we,” “us,” or “our,”) is an investment advisor registered with the State of California, formed in the State of California in 2006. Our Firm is owned by Brooke A. Salvini.

As explained more fully in this Brochure, we provide asset management, financial planning and consulting, selection of other investment advisers and retirement plan consulting. We are dedicated to providing individuals, including high net worth individuals, families, and business enterprises with a wide array of investment advisory services.

We provide our services through Brooke A. Salvini, an Investment Advisor Representative, or “IAR.” More information about Brooke A. Salvini may be obtained in the Brochure Supplement (Form ADV Part 2B).

The Firm and Brooke A. Salvini act as fiduciaries who take into consideration the best interests of clients. When dealing with our clients, we act with competence, dignity, integrity and in an ethical manner. We use reasonable care and exercise independent professional judgement when conducting investment analysis, making investment recommendations, trading, promoting our services, and engaging in other professional activities. As a fiduciary, we have an obligation to deal fairly with our clients, including the following responsibilities:

- To render impartial advice;
- To make appropriate recommendations based on a client’s needs, financial circumstances and investment objectives;
- To exercise a high degree of care and diligence to ensure that information is presented in an accurate manner and not in a way to mislead;
- To have reasonable basis, information, and understanding of the facts in order to provide appropriate recommendations and representations;
- To disclose any material conflict of interest in writing; and
- To treat clients fairly and equitably.

Advisory Services

We provide asset management services, financial planning and consulting and retirement plan consulting. Our services may be provided on a discretionary basis, meaning that we have the discretion to buy and sell individual stocks, bonds, and other investments. Each of our asset management services is briefly described below.

Asset Management

As part of our asset management service, we create individual investment portfolios, which may consist of individual stocks or bonds, exchange traded funds (“ETFs”), options, mutual funds and other public and private securities or investments. Each client’s portfolio is

tailored to an individual investment strategy and to specific goals and objectives and may include some or all of the previously mentioned securities. Once the appropriate portfolio has been determined, we review the portfolio at least annually and, as necessary, we rebalance the portfolio based upon the client's needs and stated goals and objectives.

Financial Planning and Consulting

We provide a variety of financial planning and consulting services to individuals, families and other clients based upon an analysis of the client's current situation, goals, and objectives. Generally, our financial planning services involve the preparation of a financial plan or a less formal financial consultation. Our plan or consultation may encompass one or more of the following: investment planning; retirement planning; estate planning; charitable planning; education planning; corporate and personal tax planning; corporate structure; real estate analysis; mortgage/debt analysis; insurance analysis; lines of credit evaluation; and business and personal financial planning. Our written financial plans or consultations usually include general recommendations for a course of activity and may include specific actions to be taken by the clients. For example, we may advise clients to begin or revise investment programs, create or revise wills or trusts, obtain or revise insurance coverage, commence or alter retirement savings rates, or establish education or charitable giving programs.

- For financial planning engagements, we provide our clients with a written summary of their financial situation, including our observations and recommendations. We may also refer clients to an accountant, attorney or other specialist, as necessary, for non-advisory related services.
- For consulting engagements, which are less formal than our planning services, we may provide our clients with a written summary of our observations and recommendations, including financial advice about assets or accounts that are not in our custody (or in the custody of a custodian we have selected). For financial consulting engagements, we have no obligation to instruct any broker or custodian to take any action in furtherance of any advice we provide.

Retirement Plan Consulting

We offer various levels of advisory and consulting services to employee benefit plans and to the participants of such plans ("Participants"). These services are designed to assist plan sponsors ("Plan Sponsors") in meeting their management and fiduciary obligations to the Participants under the Employee Retirement Income Securities Act ("ERISA") and the Pension Protection Act of 2006 ("PPA"). We will provide services to Plan Sponsors and their Participants as described below. Generally, investment advice provided to Plan Sponsors and Participants is regulated under ERISA and the PPA. Plan Sponsors must make the ultimate decision to retain us for advisory services including, but not limited to, services at the Plan and participant level. The Plan Sponsor is free to seek independent advice about the appropriateness of any recommended services for the plan.

In this role, we will develop an Investment Policy Statement for each plan, which may include some or all of the following areas: overview, investor circumstances, reviews, diversification and investment constraints, selection/retention criteria for investments, investment monitoring and control procedures and duties and responsibilities. Services include: Management of vendor relationships; Request for Proposals (“RFPs”); Assistance on plan design strategies; Fiduciary consulting and oversight; Investment Management; and Employee Education and Communication Services.

Advisory services provided to retirement plans may be solely provided by IARs, or in combination with third parties and their retirement plan services.

Tax Services

In addition to asset management and financial planning, we also provide tax preparation and compliance services.

Individual Advice; Restrictions on Investing

All of our advice is based on an assessment of each client’s individual needs, which we identify at the onset of each relationship using, as appropriate, client questionnaires and profiles, a review of existing investments and financial status, and other means. We periodically review each client’s individual investments and investment profile. When a client’s investment profile or needs change and we have notice or receive additional information, we modify our advice, as appropriate.

If we manage a client’s portfolio, we permit a client to impose restrictions on the types of investments that are acquired or held. These restrictions must be reasonable and practicable and permit us to manage the account without undue difficulty. If we do not directly manage a client’s portfolio, such as when a third-party manager is designated, individually imposed restrictions on investments are generally not permitted.

Wrap Fee Program

We do not participate in any Wrap Fee programs.

Assets Under Management

As of February 15, 2021, Salvini Financial Planning managed \$40,623,586 in client assets on a discretionary basis.

Item 5: Fees and Compensation

This item describes the fees we charge for our services and how our fees are calculated and paid.

Investment Advisory Services

Asset Management Fees

For the investment advisory services, we provide, we invoice our clients a flat quarterly fee based upon complexity upon client financial needs and objectives, to be paid quarterly in advance.

Fees for accounts that are maintained for less than a full billing period will be prorated. Fees that are collected in advance will be prorated and returned, without interest, if an account is terminated before the billing period ends.

Our flat fee is negotiable under appropriate circumstances. When we negotiate fees, we may consider factors such as the fees that our client has paid to a competitor for similar services, the totality of our relationship with the client, the potential for future business and the complexity of the client's investment strategy.

Financial Planning and Consulting Fees

For financial planning and consulting services, we charge an hourly, or flat project-based fee. Services may be provided both on an ongoing or a one-time basis based on the client's goals, needs and objectives. The total estimated fee, as well as the actual fee, is based upon the scope and complexity of the engagement. Our hourly fee is \$325. Our flat project-based fees range between \$3,250 to \$15,000 annually based on complexity of services.

For flat-fee engagements we generally require a retainer of 50% of the estimated financial planning or consulting fee, with the remainder of the fee due 90 days after the financial plan or consultation is completed. In no instance do we collect more than \$500 more than 6 months in advance.

Retirement Plan Consulting

For retirement plan consulting, we charge an annual fixed fee ranging from \$3,250 to \$15,000. We generally require a retainer of 50% of the estimated fee, with the remainder of the fee due 90 days after consultation is completed. In no instance do we collect more than \$500 more than 6 months in advance.

Fees are paid by the Plan Sponsor. The type and amount of the fees charged to the client are negotiable and are generally based on the size and complexity of the plan, the number of plan participants, the location of the participants, the estimated number of meetings

required, and other factors that may be deemed relevant by us when negotiating with the client. An estimate of the total cost and fees will be determined at the start of the advisory relationship.

Tax Services

For tax preparation and compliance services we charge a fixed fee ranging from of \$450 to \$5,000, charged in arrears at the completion of the engagement.

General Information on Compensation

In certain circumstances, all fees and account minimums may be negotiable. Our fees may be negotiable based on various criteria, including, but not limited to the size of the aggregate related party portfolio size and pre-existing relationships with clients. Compensation will ultimately be based on the time involved, the degree of responsibility assumed, complexity of the engagement, special skills needed to solve problems, the application of experience and knowledge of the client's situation.

Related accounts may be linked for purposes of fee calculation if all parties agree; meaning certain accounts, approved by us, may be grouped for fee calculations.

Clients are free to use any broker to implement advice provided by us.

In addition to our portfolio management fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transaction for the client's account(s).

The advisory fees we charge are separate and distinct from advisory fees and expenses charged by mutual funds in which client assets are invested. A complete description of these fees and expenses are disclosed in each mutual fund prospectus.

In addition to our advisory fees, clients may also incur certain charges imposed by third-parties (where we have no interest, except as described below) which may include the following: mutual fund or money market, 12b-1 and sub transfer fees; fund or money market management fees and administrative expenses; mutual fund transaction fees; certain deferred sales charges on previously purchased mutual funds transferred into the account; IRA and qualified retirement plan fees and other charges required by law; and trade transaction fees or ticket fees.

We do not earn, charge, or collect any commissions relative to any transactions implemented or retain any 12-b1 fees.

Fees are not charged based on the capital gains or the capital appreciation of any funds or any part of any funds of any client.

All fees paid to us for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and variable annuity sub-accounts to their shareholders. These fees and expenses are described in each fund's or sub account's prospectus. These fees will generally include a management fee, other expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge.

A client could invest in a mutual fund or sub-account directly, without our services. 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 sub-accounts are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds/sub-accounts 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.

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

Fees and Expenses (Mutual Funds Share Class)

Funds generally offer multiple share classes available for investment based upon certain eligibility and/or purchase requirements. For instance, in addition to retail share classes (typically referred to as class A, class B and class C shares), funds may also offer institutional share classes or other share classes that are specifically designed for purchase by investors who meet certain specified eligibility criteria, including, for example, whether an account meets certain minimum dollar amount thresholds or is enrolled in an eligible fee-based investment advisory program. Institutional share classes usually have a lower expense ratio than other share classes.

The appropriateness of a particular fund share class selection is dependent upon a range of different considerations, including but not limited to: the asset-based advisory fee that is charged, whether transaction charges are applied to the purchase or sale of funds, operational considerations associated with accessing or offering particular share classes (including the presence of selling agreements with the fund sponsors and the Firm's ability to access particular share classes through the custodian), share class eligibility requirements; and the availability of revenue sharing, distribution fees, shareholder servicing fees or other compensation associated with offering a particular class of shares.

Item 6: Performance-Based Fees and Side-by-Side Management

“Performance-based fees” are fees based on the capital gains or capital appreciation in an account. We do not charge performance-based fees. “Side-by-side management” refers to the practice of managing both accounts that are charged a performance-based fee and accounts that are charged other types of fees, such as asset-based fees and hourly fees. Because we do not charge performance-based fees, we do not engage in side-by-side management.

Item 7: Types of Clients

We generally provide investment advice to the following types of clients:

- Individuals, including high net worth individuals, families, trusts and estates;
- Pension and Profit-Sharing Plans;
- Small businesses and corporations; and
- Charitable organizations.

We do not have minimum requirements for opening and maintaining accounts or otherwise engaging us.

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

Methods of Analysis

We use the following methods of analysis and investment strategies to develop client portfolios.

Fundamental Analysis: Fundamental analysis is used to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the security is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell). Fundamental analysis does not attempt to anticipate market movements, which may present a potential risk since the price of a security may move up or down with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Investment Strategies

The primary investment strategy recommended for client accounts is strategic asset allocation. We primarily recommend no-load mutual and exchange-traded funds. These funds may be passively or actively managed. Client's existing stock and bond holdings may be used in the strategy. Diversification in both domestic and global markets is the key strategy employed to manage portfolio volatility. Discount brokers or direct ownership are recommended for the custody of assets.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. The strategy is expressed in an Investment Policy Statement, Target Asset Allocation Section Report, Client Relationship software, or in a separate document.

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

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

Initial public offerings (IPOs) are not available through us.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear.

All investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends and other distributions), and the loss of future earnings. Although we manage the assets in a manner consistent with risk tolerances, there can be no guarantee that our efforts will be successful. The investor should be prepared to bear the following investment risks of loss:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar next year will not buy as much as a dollar today, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties (i.e. Non-traded REITs and other alternative investments) are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- **Cybersecurity Risk:** A breach in cyber security refers to both intentional and unintentional events that may cause an account to lose proprietary information, suffer data corruption, or lose operational capacity. This in turn could cause an account to incur regulatory penalties, reputational damage, and additional compliance costs associated with corrective measures, and/or financial loss.

- **Pandemic Risk:** Large-scale outbreaks of infectious disease can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption.

It is not possible to list all risks associated with each class of securities or assets or each market sector. Clients should consult Brooke A. Salvini for more information about specific risks that may be associated with the advisor's investment strategy.

Item 9: Disciplinary Information

We are required to disclose legal or disciplinary events that would be material to a client's evaluation of our ability to provide investment advisory services. Neither the Firm nor Brooke A. Salvini have been involved in any legal or disciplinary events related to past or present matters.

Item 10: Other Financial Industry Activities and Affiliations

Broker/Dealer and Registered Representatives

We are not registered as a broker-dealer, and none of our management persons are registered representatives of a broker-dealer.

We are not registered and do not have an application pending as a securities broker-dealer, futures commission merchant, commodity pool operator or commodity trading advisor.

Other Affiliations

The Firm is a member of the Garrett Planning Network (“GPN”), an international network of fee-only financial planners, which provides continuing education, coaching, webinars and other services for a fixed annual fee. The Firm is listed on the GPN website at www.garrettplanningnetwork.com, where consumers may search for a member to suit their particular financial planning needs.

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

Code of Ethics

We have a duty to exercise our authority and responsibility for the benefit of our clients, to place the interests of our clients first, and to refrain from having outside interests that conflict with the interests of our clients. We and our employees avoid any circumstances that might adversely affect, or appear to affect, our duty of loyalty. We adhere to the American Institute of Certified Accountants and Certified Financial Planner Board Standards Code of Ethics and we have adopted a Code of Ethics (the Code); the Code's key provisions include:

- Statement of general principles;
- Policy on and reporting of personal securities transactions;
- A prohibition on insider trading;
- Restrictions on the acceptance of significant gifts;
- Procedures to detect and deter misconduct and violations; and
- Requirement to maintain confidentiality of client information.

Our employees must acknowledge the terms of the Code at least annually. Any individual not in compliance with the Code may be subject to termination. We will provide a copy of our Code upon request.

Participation or Interest in Client Transactions and Principal/Agency Cross Trades

We do not recommend any securities to our clients in which we have a material financial interest. We do not affect any principal or agency cross securities transactions for client accounts. We also do not cross trades between client accounts.

Personal Trading Practices

Both the Firm and our employees may invest in the same securities at the same time as the securities we recommend to our clients. Brooke A. Salvini maintains the required personal securities transaction records. At no time will employees receive preferential treatment over clients. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets. Moreover, since we are not a market maker for any security, we do not consider this practice to conflict with the interests of our clients.

Item 12: Brokerage Practices

Research and Other Soft Dollar Benefits

We do not receive soft dollars, products or services acquired with client brokerage commissions.

Brokerage for Client Referrals

We do not receive client referrals from broker/dealers.

Selecting Brokerage Firms

We will recommend brokers when appropriate for the needs of the client. All specific custodian recommendations are made to client based on their need for such services. We recommend brokers based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates. We do not receive fees or commissions from any of these arrangements.

Directed Brokerage

While not routine, the client may direct us to use a particular broker-dealer to execute some or all transactions for the client. This brokerage direction must be requested by the client in writing. In that case, the client will negotiate terms and arrangements for the account with that broker-dealer, and we will not seek better execution services or prices from other broker-dealers or be able to “batch” client transactions for execution through other broker-dealers with orders for other accounts managed by us. By directing brokerage, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. Not all advisers require or allow their clients to direct brokerage. Subject to its duty of best execution, we may decline a client’s request to direct brokerage if, in our sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

If the client requests us to arrange for the execution of securities brokerage transactions for the client’s account, we shall direct such transactions through broker-dealers that we reasonably believe will provide best execution. We shall periodically and systematically review its policies and procedures regarding recommending broker-dealers to its client in light of its duty to obtain best execution.

Brokerage – Other Economic Benefits

We may have the opportunity to receive traditional “non-cash benefits” from brokers or custodians (TD Ameritrade, Vanguard or Fidelity), such as customized statements; receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk servicing advisors exclusively; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client portfolios; ability to have investment advisory fees deducted directly from client portfolios; access to an electronic communication network for client order entry and portfolio information; access to mutual

funds which generally require significantly high minimum initial investments or those that are otherwise only generally available to institutional investors; reporting features; receipt of industry communications; and perhaps discounts on business-related products.

We may also receive general access to research and perhaps discounts on research products. Any research received is used for the benefit of all clients. As noted above, we have no written or verbal arrangements whereby we receive soft dollars. While we endeavor at all times to put the interest of the clients first as part of our fiduciary duty, clients should be aware that the receipt of any additional compensation itself creates a conflict of interest and may affect the judgment of these individuals when making recommendations.

Trade Aggregation

Salvini Financial Planning does not aggregate client orders.

Item 13: Review of Accounts and Plans

Generally, we review accounts at least annually, and more frequently if requested by a client. The nature of our review is to determine whether each client's accounts remain invested in a manner consistent with their investment objectives and are appropriately positioned based on our analysis of market conditions. Only our investment advisor representatives and portfolio managers conduct reviews.

Financial planning clients do not receive reviews of their written plans unless they take action to schedule a financial consultation with us or they have contracted with us for periodic review. We may also meet as requested to update financial plans and discuss changes in circumstances and similar factors.

We may review client accounts more frequently than described above. Among the factors which may trigger an off-cycle review are major market or economic events, a client's life events or at a client's specific request.

Our advisory clients receive periodic reports in the form of quarterly statements from their custodian; we may separately provide written periodic reports. Financial planning clients who have contracted with us for a post-financial plan meeting or an update to their initial written financial plan will receive a written plan or update.

Item 14: Client Referrals and Other Compensation

Other Compensation for Advisory Services

We do not receive any formal economic benefits (other than normal compensation) from any firm or individual for providing investment advice.

See disclosure in Item 12 regarding compensation, including economic benefits received in connection with giving advice to clients.

Referral Fees

We may provide referrals to other investment advisory firms and various professionals as a service to clients. We do not receive a fee for these referrals.

Other Compensation

The Firm of Brooke A. Salvini may receive compensation for occasional speaking engagements, and expert witness services.

Item 15: Custody

Custody – Fee Debiting

The client agreement authorizes us to deduct advisory fees directly from the client's account at the custodian. We send the amount of the quarterly fee to the custodian. With the exception of the ability to debit client accounts for advisory fees, we do not and will not have custody of clients' funds or securities. Client assets shall be held in the custody of a bank, trust company or brokerage firm agreed upon by the client and us.

The custodian is advised in writing of the limitation of our access to the account. The custodian sends a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to us.

Custody – Account Statements

As described above and in Item 13, clients receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. Clients are urged to carefully review such statements and compare such official custodial records to the reports that we provide. Our reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16: Investment Discretion

For advisory accounts, we accept discretionary authority to manage securities accounts on behalf of clients. This permits us to exercise full discretion as to the nature, type, and amount of securities to be purchased without preapproval by the client. In some instances, a client may request us to speak directly to one of their financial service providers or would like to give us “view only” ability on an account. A limited power of attorney is an authorization for this purpose. A client signs a limited power of attorney so that we may speak with a provider or view account information. No authority is given to make changes. Our exercise of discretion may be limited by any investment guidelines and objections that are furnished by a client or that we develop with the client and by any restrictions on investment that we have accepted and agreed to administer.

If we have not been given discretionary authority, we will consult with the client prior to each trade.

Item 17: Voting Client Securities

We do not and will not accept the proxy authority to vote securities, although third party money managers selected or recommended by us may vote proxies for their clients. Unless a third-party money manager has been designated and votes proxies, our clients maintain exclusive responsibility for directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted and making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Clients will receive proxies or other solicitations directly from their custodian or a transfer agent. In the event that proxies are sent to us, we forward them to our clients and request that further solicitations be sent directly to the client.

When proxy voting assistance is requested, we will provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client.

Item 18: Financial Information

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients and have not been the subject of a bankruptcy proceeding.

We do not require prepayment of fees of both more than \$500 per client, and more than six months in advance; and therefore, is not required to provide a balance sheet to clients.

Item 19: Requirements for State Registered Advisors

Management Background

See response to Form ADV Part 2B - Investment Adviser Brochure Supplement.

Other Business

See response to Item 10 – Other Financial Industry Activities and Affiliations.

Performance-Based Fees

See response to Item 6 – Performance-based Fees and Side-by-Side Management.

Disciplinary Disclosures

Neither the Firm nor its investment advisor representatives have been involved in any legal or disciplinary events related to past or present matters.

Issuer of Securities

Neither the Firm nor any management persons have any relationships or arrangements with any issuer of securities.

Form ADV Part 2B – Investment Adviser Brochure Supplement

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Investment Adviser Brochure Supplement

3940 Broad Street, Suite 7-310
San Luis Obispo, CA 93401
www.SalviniFinancial.com

Supervisor's Name and Supervised Person: Brooke A. Salvini

March 2021

This Brochure Supplement provides information about the Firm's ("we", "us", "our") employees that supplements our Brochure. You should have received a copy of that Brochure. Please contact Brooke A. Salvini, Principal and Chief Compliance Officer at (805) 543-6622 or brooke@SalviniFinancial.com if you did not receive our Brochure or if you have any questions about the contents of this Supplement.

Additional information about our employee(s) referenced above is also available on the SEC's website at www.adviserinfo.sec.gov. You may search this site using a unique identifying number, known as a CRD number for each employee.

Item 2: Education Background & Business Experience

Education and Business Background

We require that advisors in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning. Examples of acceptable coursework include: an MBA, a CFP®, a CFA, a ChFC, JD, CTFA, EA or CPA/PFS.

Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

Supervised Person

Brooke A. Salvini, CPA/PFS, CFP®
CRD#: 138087

Born 1960

Business Background:

Salvini Financial Planning 2006 to Present

Salvini Financial Consulting 1999 to 2006

Nissan Motor Corporation in USA 1984 to 1992

Rogers, Cullen, Couch & Weibe, CPA's 1983 to 1984

Deloitte, Haskins and Sells (now Deloitte) 1981 to 1983

Formal Education after High School:

Pepperdine University 1981
Bachelor of Science in Business and Accounting

Professional Designations:

Certified Public Accountant (CPA)
Certified Financial Planner (CFP)
AICPA Personal Financial Specialist (PFS)

Professional Certifications

Our Supervised Persons maintain professional designations, which required the following minimum requirements:

Certified Public Accountant (CPA)

Issued by: State Boards of Accountancy

Prerequisites/Experience Required: Candidate must meet the following requirements:

- Minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA);
- Successful passing of the Uniform CPA Examination

Educational Requirements:

- At minimum, a college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting)

Examination Type: Uniform CPA Examination

Continuing Education/Experience Requirements: Completion of 40 hours of continuing professional education each year (or 80 hours over a two-year period) in order to maintain a CPA license

Certified Financial Planner (CFP)

Issued by: Certified Financial Planner Board of Standards, Inc.

Prerequisites/Experience Required: Candidate must meet the following requirements:

- A bachelor’s degree (or higher) from an accredited college or university, and
- 3 years of full-time personal financial planning experience

Educational Requirements: Candidate must complete a CFP-board registered program, or hold one of the following:

- CPA
- ChFC
- Chartered Life Underwriter (CLU)
- CFA
- Ph.D. in Business or Economics
- Doctor of Business Administration
- Attorney's License

Examination Type: CFP Certification Examination

Continuing Education/Experience Requirements: 30 hours every 2 years

Item 3: Disciplinary Information

Neither the Firm or any employees have been involved in any activities resulting in a disciplinary disclosure.

Item 4: Other Business Activities

Neither the Firm nor any Supervised Persons have any outside business activities.

Item 5: Additional Compensation

No employee receives any economic benefit outside of regular salaries or bonuses related to amount of sales, client referrals or new accounts.

Item 6: Supervision

Brooke A. Salvini, Principal and Chief Compliance Officer, is the sole employee named in this Form ADV Part 2B Investment Adviser Brochure Supplement and may be reached at (805) 543-6622.