

# Item 1: Cover Page

Anandi Krishnamurthy d/b/a AKrish Financial Advisory

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**Form ADV Part 2A – Firm Brochure**

(408) 785-7875

Dated February, 2020

<https://www.akrishfa.com/>

This Brochure provides information about the qualifications and business practices of Anandi Krishnamurthy d/b/a AKrish Financial Advisory, “AKFA”. If you have any questions about the contents of this Brochure, please contact us at (408) 785-7875. 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.

Anandi Krishnamurthy d/b/a AKrish Financial Advisory is registered as an Investment Adviser with the State of CA. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about AKFA is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the firm’s identification number 288700.

# Item 2: Material Changes

## Changes

The following changes have been made to this version of the Disclosure Brochure:

- January 2020: No material changes have been made to this document since the last filing and distribution to clients.
- January 2019 - Item 5: The Advisor has changed the compensation structure. The range for the hourly fee has been raised and is now \$200 to \$225. The lower end of the range for the annual fees has been lowered and is now \$1,200. Please see Item 5 for additional information.
- February 2018 - AKrish Financial Advisory was named On Track Financial Advisory prior to 2/2018.

## Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of AKFA.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at <http://www.adviserinfo.sec.gov> by searching for our firm name or by our CRD number 288700.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (408) 785-7875.

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# Item 4: Advisory Business

## Description of Advisory Firm

Anandi Krishnamurthy d/b/a AKrish Financial Advisory (AKFA) is registered as an Investment Adviser with the State of CA. We were founded in June 2017. Anandi Krishnamurthy is the principal owner of AKFA. AKFA does not provide asset management services and reports no discretionary or non-discretionary Assets Under Management.

## Types of Advisory Services

We provide a range of financial advisory solutions to our clients such as assessment of financial goals and objectives, cash flow and budgeting, education funding, employee benefits review, retirement planning, risk management (insurance needs), estate planning, tax planning and investment consultation.

Depending on our clients' needs and wishes, we provide either broad-based, comprehensive financial planning and investment consultation or more targeted, narrowly focused advice. Our clients may engage us on a one-time project basis or on an ongoing basis with periodic reviews of progress towards financial goals as well as investments.

### *Initial Meeting*

We conduct an introductory meeting with each prospective client to discuss the details of your need for financial advice, preliminary information on your financial situation related to the advice you seek and our background and services. At the end of this meeting or soon after, we will provide you a timeline with deliverables and also the cost of the engagement.

During or prior to the introductory meeting, we will provide you with our current ADV Part 2 advisory brochure and our privacy policy statement. The firm will also ensure any material conflicts of interest are disclosed regarding our firm and its associates that could be reasonably expected to impair the rendering of unbiased and objective advice.

### *Agreement*

Should you wish to engage our firm for its services, we must first enter into a written agreement; thereafter, discussion and analysis will be conducted to determine your financial needs, goals, holdings, etc. Depending on the scope of the engagement, we may require current copies of documents such as the ones listed below, early in the process:

- Tax returns,
- Insurance policies,
- Mortgage information,
- Current financial specifics including W-2s or 1099s and outstanding debts/loans,
- Information on current retirement plans and benefits provided by your employer,
- Wills, codicils and trusts,
- Statements reflecting current investments in retirement and non-retirement accounts, and
- Completed risk profile questionnaires or other forms provided by our firm.

It is important that the information and financial statements you provide are accurate. We may, but are not obligated to, verify the information you have provided, which will then be used in the financial planning or investment consultation process.

## **Financial Planning and Investment Consultation Services**

Our services may be broad-based, comprehensive planning or more narrowly focused, targeted advice based on your needs and wishes. If several or all of the services described are provided together through a comprehensive plan, the total time needed to complete these services may be less than the time it would take to complete each service separately because of the efficiency gained by combining more than one service.

### *Cash Flow and Debt Management*

We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if that is one of your concerns. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.

### *Risk Management*

Our services include an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long term care. Advice is provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential costs of not purchasing insurance ("self-insuring").

### *Employee Benefits*

We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible in your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.

### *Retirement Planning*

Our retirement planning services typically include projections of your likelihood of achieving your financial goals, with financial independence usually the primary objective. For situations where projections show less than the desired results, we may make recommendations that include showing you the impact on those projections by making changes in certain variables (i.e., working longer, saving more, spending less, taking more risk with investments). If you are near retirement or already retired, advice may be given on appropriate distribution strategies, including Social Security strategies, to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

### *Tax Planning Strategies*

Our advice includes ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their "tax efficiency," with consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

### *Education Planning*

Our college funding advisory services may include projecting the amount that will be needed to achieve postsecondary education funding goals, along with advice on ways to save the desired amount. Recommendations as to savings strategies are included, and advice might also include the “pros-and-cons” of various college savings vehicles that are available.

### *Estate Planning*

Our services usually include an analysis of your current estate plan and your exposure to estate taxes, which may include whether you have a will, powers of attorney, trusts and other related documents. We always require that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. You are under no obligation to engage an attorney from our list. From time-to-time, we may participate in meetings or phone calls between you and your attorney with your approval.

### *Investment Consultation*

Our investment consultation services may involve one or more of the following:

- Risk tolerance review based on questionnaire and other factors,
- Investment strategy discussion and formulation,
- Information on investment vehicles,
- Investment policy statement,
- Asset allocation and portfolio design including asset location,
- Asset selection recommendations,
- Periodic review and rebalancing recommendations.

We typically begin an engagement by considering factors such as your financial goals, risk tolerance, stage in life and formulate an investment strategy in consultation with you. We then review your existing investments and provide you an assessment of the positions that are, in our opinion, aligned with the formulated investment strategy as well as areas that may need additional review and potential repositioning. We pay special attention to concentrated stock positions, employee stock plans as well as the tax impact of all sell recommendations we propose.

We do not have a relationship with any custodians and do not execute trades on your behalf, either with your approval or on a discretionary basis. We will, however, assist you in establishing your own investment account at a selected broker/dealer or custodian (collectively, we term as “service providers”). We will also assist you in executing the trades. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.

### *Periodic Review for Project Based Clients*

Unless otherwise stated in your agreement with the firm, upon completion of our presentation or delivery of advice, our engagement is typically concluded. We strongly urge all our clients to notify us of any change in their circumstances, and to schedule a review any time there is such a change. We recommend an annual review for all clients even if there is not a substantial change, because tax laws, estate laws, and insurance and investment products are rapidly evolving.

### *Periodic Review for Clients with Ongoing Engagement*

We will contact you periodically to schedule a meeting to review changes to your financial circumstances, your

financial plan and/or investments. We strongly urge all our clients to notify us of any change in their circumstances, and to schedule a review any time there is such a change.

## **Educational Workshops**

We may provide educational workshops at no cost to attendees on an “as announced” basis for groups desiring general advice on investments and personal finance. Topics may include issues related to financial planning, college and estate planning, retirement strategies, or various other economic and investment topics.

Our workshops are educational in nature and do not involve the sale of insurance or investment products. Information presented will not be based on any one person’s need nor do we provide individualized investment advice to attendees during our general sessions.

## **General Information**

AKrish Financial Advisory does not provide legal or accounting services. With your consent, we may work with your other advisers (attorneys, accountants, etc.) to assist with coordination and implementation of accepted strategies. You should be aware that these other advisers will charge you separately for their services and these fees will be in addition to our advisory fees.

Our firm will use its best judgment and good faith effort in rendering its services. AKrish Financial Advisory cannot warrant or guarantee any particular level of investment performance or that your investments will be profitable over time. Past performance is not necessarily indicative of future results.

Except as may otherwise be provided by law, our firm will not be liable to the client, heirs, or assignees for any loss an account may suffer by reason of an investment decision made or other action taken or omitted in good faith by our firm with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; any loss arising from our adherence to your direction or that of your legal agent; any act or failure to act by a service provider maintaining an account.

Federal and state securities laws impose liabilities under certain circumstances on persons who act in good faith and, therefore, nothing contained in this document shall constitute a waiver of any rights that a client may have under federal and state securities laws.

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

We offer the same suite of services to all of our clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client’s current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches their restrictions, needs, and targets.

## **Wrap Fee Programs**

We do not participate in wrap fee programs.

## **CCR Section 260.235.2 Disclosure**

For clients who receive our financial planning or investment consultation services, we must state when a conflict exists between the interests of our firm and the interests of our client. The client is under no obligation to act upon our recommendation. If the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through our firm.

## Item 5: Fees and Compensation

Please note, unless a client has received the firm's disclosure brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below.

### Compensation and Fee Schedule

AKrish Financial Advisory charges on a fee-only basis for financial planning and investment consultation services. Fees may be hourly or fixed as detailed below. Our only source of compensation is the fees paid by our clients. We do not accept commissions, referral fees or revenue sharing arrangements.

#### *Hourly Fees*

We may be engaged for our financial planning and investment consultation services under an hourly fee arrangement. The hourly rate is based upon the scope and complexity of the engagement. Fees for these services range from \$200 to \$225 per hour; billed in 15-minute increments (four increments per hour), and a partial increment (i.e., eight minutes, etc.) will be treated as a whole increment. The hourly fee is negotiable and will be agreed upon before the start of any work, generally after the initial meeting.

A one-time, upfront payment equal to two hours at the hourly rate is due at the time of signing the client agreement. The remainder of the hourly fee is due upon completion of the engagement. In the event of early termination by client, any fees for the hours already worked will be due.

#### *One-time Project Fees*

Our financial planning services and investment consultation may be provided on a project basis for a fixed fee, typically ranging from \$2,000 to \$8,000 as determined by the complexity of the project and the time estimated. The fixed fee is negotiable and will be agreed upon before the start of any work, generally after the initial meeting.

A one-time, upfront payment of 25% of the total project cost is due at the time of signing the client agreement. The remainder of the project fee is due upon completion of the engagement. In the event of early termination by client, up to 100% of the fees will be due, based on the level of completion of the project.

#### *Ongoing Engagement Fees*

We also offer an ongoing engagement model, for clients desiring ongoing financial planning and investment consultation services. Fees are typically between \$1,200 and \$6,000 per year depending on the complexity of a client's financial situation and will be billed quarterly, in arrears. In addition, we typically charge a fixed, one-time, fee between \$2,000 and \$6,000 for the additional time and effort involved in completing the initial financial plan and helping the client implement the resulting recommendations. 25% of the one-time fee is due at the time of signing the client agreement. The one-time and annual fees are negotiable and will be agreed



upon before the start of any work, generally after the initial meeting.

In the event of termination by client, fees will be pro-rated to the end of the current month.

All fees may be paid by check.

## **Other Types of Fees and Expenses**

When implementing an investment recommendation, the client may incur additional fees such as brokerage commissions, transaction fees, and other related costs and expenses. Clients may incur certain charges imposed by broker-dealers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in recommending broker-dealers for client's transactions and determining the reasonableness of their compensation (e.g., commissions).

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

## **CCR Section 260.238(j) Disclosure**

Please note, lower fees for comparable services may be available from other sources.

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

We do not offer performance-based fees.

# **Item 7: Types of Clients**

We provide financial planning and investment consultation to individuals, high net worth individuals, trusts, estates, retirement plans, as well as small businesses.

AKFA does not require minimum income levels, minimum level of assets or other similar conditions for its advisory services. The firm reserves the right to waive or reduce certain fees based on unique individual circumstances, special arrangements or pre-existing relationships. We also reserve the right to decline services to any prospective client for any non-discriminatory reason.

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

## Methods of Analysis

When clients have us complete an Investment Consultation (described in Item 4 of this brochure) as part of their financial plan, we first gather and consider several factors, including:

- Current financial situation
- Current and long-term needs
- Investment goals and objectives
- Level of investment knowledge
- Tolerance for risk and
- Restrictions, if any, on the investment choices.

We may employ fundamental analyses; evaluating economic factors including interest rates, the current state of the economy, or the future growth of an industry sector. In addition to our own research, the firm's recommendations may also be drawn from research sources that include materials from economists and other industry professionals, corporate rating services, company press releases, annual reports, prospectuses and regulatory filings.

We make asset allocation and investment policy decisions based on these and other factors. We will discuss with you how, in our best judgment, to meet your objectives while at the same time seeking a prudent level of risk exposure.

### *Investment Strategies*

We recognize that each client's needs and goals are different; subsequently portfolio strategies and underlying investment vehicles may vary. Generally, we ascribe to a Core + Satellite investment strategy which blends passive (or index) and active investing, where passive investments are used as the basis or "core" of a portfolio and actively-managed investments are added as "satellite" positions. We expect most portfolios to include passive investments while not all portfolios will include satellite positions.

Employing this strategy, the portfolio core holdings are indexed to potentially more efficient asset classes, while outlying selections are often limited to active holdings that are attempting to outperform a particular sector, or a selection of particular positions to increase core diversification, or to improve portfolio performance, or reduce risk during downward trends in the market and during times of uncertainty.

For example, the core of a portfolio may be built with low-cost index funds or ETFs; satellite holdings would include active holdings with unique strategies that are believed capable of adding value beyond a stated benchmark over a full market cycle. Satellite holdings may employ actively managed mutual funds, unique

sector or strategy ETFs/ETNs, individual securities such as stocks or bonds, etc., to assist in the over-or-under allocation to specific sectors, regions, assets classes, etc.

## **Risk of Loss**

We believe our strategies and investment recommendations are designed to produce the appropriate potential return for the given level of risk; however, we cannot guarantee that an investment objective or planning goal will be achieved. As an investor you must be able to bear the risk of loss that is associated with your account, which may include the loss of some or your entire principal. In general, risks regarding markets may be at the investment strategy level or at the level of the individual positions selected to implement a strategy.

### ***Investment Strategy Risks***

Examples of strategy risk include:

#### ***Core + Satellite Strategies Risk***

Strategies involving Core + Satellite investing may have the potential to be affected by “tracking error risk,” which might be defined as a deviation from the stated benchmark. If the core portfolio attempts to closely replicate a stated benchmark, the source of the deviation may come from “active risk” from an active satellite portfolio or position, or from a “sample” or “optimized” index fund or ETF that may not as closely align with the stated benchmark.

#### ***Management Risk***

The performance of an investment with a firm varies with the success and failure of its investment strategies, research, analysis and determination of its portfolio. If an investment strategy were not to produce expected returns, the value of the investment would decrease.

#### ***Market Risk***

When the stock market as a whole or an industry as a whole falls, it can cause the prices of individual stocks to fall indiscriminately. This is also called systemic or systematic risk.

#### ***Passive Market Strategies Risk***

Should a portfolio employ a passive, efficient markets approach, an investor will need to consider the potential risk that the broader allocation may at times generate lower-than-expected returns than a specific asset. Also that the return, over a specific time period, for an asset class is a deviation from the average return for the asset class.

#### ***Research Data Risk***

When research and analyses are based on commercially available software, rating services, general market and financial information, or due diligence reviews, a firm is relying on the accuracy and validity of the information or capabilities provided by selected vendors, rating services, market data, and the issuers themselves. Therefore, while our firm makes every effort to determine the accuracy of the information received, we cannot predict the outcome of events or actions taken or not taken, or the validity of all information researched or provided which may or may not affect the advice on or investment management of an account.

### *Socially Conscious Investing Risk*

If you require your portfolio to be invested according to socially conscious principles, you should note that returns on investments of this type may be limited and because of this limitation you may not be able to be as well diversified among various asset classes. The number of publicly traded companies that meet socially conscious investment parameters is also limited, and due to this limitation, there is a probability of similarity or overlap of holdings, especially among socially conscious mutual funds or ETFs. Therefore, there could be a more pronounced positive or negative impact on a socially conscious portfolio, which could be more volatile than a fully diversified portfolio.

### ***Security-Specific Material Risks***

Examples of risk associated with specific positions:

#### *Company Risk*

When investing in securities, there is always a certain level of company or industry-specific risk that is inherent in each company or issuer. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry.

#### *ETF/ETN and Mutual Fund Risk*

ETFs/ETNs and mutual funds may carry additional expenses based on their share of operating expenses and certain brokerage fees, which may result in the potential duplication of certain fees. The risk of owning these types of holdings also reflects the risks of their underlying securities. ETF/ETNs also may face periods of significant market fluctuations that reduce their liquidity and/or increase their discount to their underlying securities. ETF/ETN liquidity can be complicated to assess, because it is affected by multiple factors, including the liquidity of the underlying securities, as well as the fact that new shares can be created, and existing shares can be repurchased in response to market demand; this ability to manipulate supply and demand can make liquidity difficult to predict.

#### *Fixed Income Risks*

Various forms of fixed income instruments, such as bonds, money market funds, bond funds, and certificates of deposit, may be affected by various forms of risk, including:

**Credit Risk** - Credit risk is a potential risk that an issuer would be unable to pay scheduled interest or repay principal at maturity, sometimes referred to as “default risk.” Credit risk may also occur when an issuer’s ability to make payments of principal and interest when due is interrupted. This may result in a negative impact on all forms of debt instruments, as well as funds or ETF share values that hold these issues. Bondholders are creditors of an issuer and have priority to assets before equity holders (i.e., stockholders) when receiving a payout from liquidation or restructuring. When defaults occur due to bankruptcy, the type of bond held will determine seniority of payment.

**Duration Risk** - Duration is a measure of a bond’s volatility, expressed in years to be repaid by its internal cash flow (interest payments). Bonds with longer durations carry more risk and have higher price volatility than bonds with shorter durations.

**Interest Rate Risk** - Risk that the value of the fixed income holding will decrease because of an increase in interest rates.

**Liquidity Risk** - The inability to readily buy or sell an investment for a price close to the true underlying value of the asset due to a lack of buyers or sellers. While certain types of fixed income are generally liquid (i.e., treasury notes), there are risks which may occur such as when an issue trading on any given period does not readily

support buys and sells at an efficient price. Conversely, when trading volume is high, there is also a risk of not being able to purchase a particular issue at the desired price.

*Reinvestment Risk* – With declining interest rates, investors may have to reinvest interest income or principal at a lower rate.

#### *Index Investing*

ETFs and indexed funds have the potential to be affected by “active risk” or “tracking error risk;” similar to that described in the paragraph above with respect to Core + Satellite investment strategies.

#### *Inflation Risk*

When any type of inflation is present, a dollar today will not buy as much as a dollar next year because purchasing power is eroding at the rate of inflation.

#### *QDI Ratios*

While many ETFs, ETNs, and index mutual funds are known for their potential tax-efficiency and higher “qualified dividend income” (QDI) percentages, there are asset classes within these investment vehicles or holding periods within that may not benefit. Shorter holding periods, as well as commodities and currencies (that may be part of an ETF/ETN or mutual fund portfolio), may be considered “non-qualified” under certain tax code provisions. We consider a holding’s QDI when tax-efficiency is an important aspect of the client’s portfolio.

## Item 9: Disciplinary Information

### **Criminal or Civil Actions**

AKFA and its management have not been involved in any criminal or civil action.

### **Administrative Enforcement Proceedings**

AKFA and its management have not been involved in administrative enforcement proceedings.

### **Self-Regulatory Organization Enforcement Proceedings**

AKFA and its management have not been involved in legal or disciplinary events that are material to a client’s or prospective client’s evaluation of AKFA or the integrity of its management.

## Item 10: Other Financial Industry Activities and Affiliations

No AKFA employee is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No AKFA employee is registered, or has an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

AKFA does not have any related parties. As a result, we do not have a relationship with any related parties.

AKFA only receives compensation directly from clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

### **Disclosure of Material Conflicts**

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

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

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. AKrish Financial Advisory maintains a Code of Ethics that sets forth the standards of conduct expected of advisory personnel. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

### **Code of Ethics Description**

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to clients.
- Competence - Associated persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.

- Confidentiality - Associated persons shall not disclose confidential client information without the specific consent of the client unless in response to proper legal process, or as required by law.
- Professionalism - Associated persons' conduct in all matter shall reflect credit of the profession.
- Diligence - Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any client or prospective client upon request.

## **Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest**

Neither our firm, its associates or any related person is authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.

## **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

Our firm and its "related persons" may buy or sell securities similar to, or different from, those we recommend to clients for their accounts. A recommendation made to a client may be different in nature or timing from a recommendation made to a different client. In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates' transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

## **Trading Securities At/Around the Same Time as Client's Securities**

From time to time, our firm or its "related persons" may buy or sell securities for themselves at or around the same time as clients. In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates' transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

# **Item 12: Brokerage Practices**

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

Anandi Krishnamurthy d/b/a AKrish Financial Advisory does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to clients based on their need for such services. We recommend custodians based on the reputation, the services provided by the firm and the aggregate costs for maintaining

accounts and executing transactions. We also take into account client convenience such as proximity to a branch office when recommending a custodian.

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

We currently do not receive soft dollar benefits.

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

We receive 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**

As a fee-only financial planner who does not offer investment management services, we do not have a concern over which broker-dealers a client may choose in order to implement our investment recommendations.

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

Some Registered Investment Advisers execute client accounts on an aggregated basis as a way to lower expenses. As a fee-only financial planner who does not offer investment management services, we do not execute trades on behalf of clients. As a result, it is up to the client to negotiate their own trading costs with their broker-dealer.

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

Anandi Krishnamurthy, Principal and CCO of AKFA, will contact clients with ongoing engagement agreements to obtain current information regarding their assets and investment holdings and will review this information as part of our financial planning and investment consultation services. AKFA does not provide specific reports to clients, other than financial plans.

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

We do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our clients. Nor do we, directly or indirectly, compensate any person who is not advisory personnel for client referrals.

## **Item 15: Custody**

AKFA does not accept custody of client funds.



## Item 16: Investment Discretion

We do not provide investment management services, and therefore do not exercise discretion.

## Item 17: Voting Client Securities

AKFA does not provide investment management services and does not vote client securities. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

## Item 18: Financial Information

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of client funds or securities or require or solicit prepayment of more than \$500 in fees per client six months in advance.

# Item 19: Requirements for State-Registered Advisers

## Anandi Krishnamurthy

Born: 1956

### Educational Background

- 2012, Certificate Program in Personal Financial Planning, University of California Santa Cruz Extension
- 1987, Masters in Computer Science, Rochester Institute of Technology
- 1978, Bachelors in Electrical Engineering, Birla Institute of Science and Technology

### Business Experience

- 6/2017 - Present, Anandi Krishnamurthy d/b/a AKrish Financial Advisory\*, Principal and CCO
- 12/2016 – 4/2017, self-employed, hourly paraplanning work for Wade Financial Advisory.
- 01/2014 - 12/2016, Wade Financial Advisory, Financial Planning Specialist
- 05/2012 - 01/2014, self-employed
- 03/2003 - 05/2012, IBM, Senior Software Developer

\*On Track Financial Advisory changed its business name to AKrish Financial Advisory in 02/2018.

### Professional Designations, Licensing & Exams

**CFP (Certified Financial Planner)®:** CFP® certificants must have a minimum of three years of workplace experience in financial planning and develop their theoretical and practical financial planning knowledge by completing a comprehensive course of study approved by CFP® Board. Anandi passed a comprehensive 2-day, 10-hour CFP® Certification Examination that tested her ability to apply financial planning knowledge in an integrated format. Anandi must also 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. As a final step to certification, CFP® practitioners agree to abide by a strict code of professional conduct.

### Other Business Activities

Anandi Krishnamurthy serves as a technology consultant who is compensated on an hourly basis. The activity may occur during normal business hours and involves up to 10% of her time. This is not an investment related activity, nor is it believed to create a conflict of interest between the firm and its clients.

Anandi Krishnamurthy serves as an independent contractor for other advisory firms, where she provides back office support and does not have any client contact. The activity may occur during normal business hours and involves up to 10% of her time. This is not an investment related activity, nor is it believed to create a conflict of interest between the firm and its clients.

## **Performance Based Fees**

AKFA is not compensated by performance-based fees.

## **Material Disciplinary Disclosures**

No management person at Anandi Krishnamurthy d/b/a AKrish Financial Advisory has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

## **Material Relationships That Management Persons Have With Issuers of Securities**

Anandi Krishnamurthy d/b/a AKrish Financial Advisory, nor Anandi Krishnamurthy, have any relationship or arrangement with issuers of securities.

## **Additional Compensation**

Anandi Krishnamurthy does not receive any additional compensation from any person, company, or organization, in exchange for providing clients advisory services through AKFA.

## **Supervision**

Anandi Krishnamurthy, as Principal and Chief Compliance Officer of AKFA, is responsible for supervision. She may be contacted at the phone number on this brochure supplement.

## **Requirements for State Registered Advisers**

Anandi Krishnamurthy has NOT been involved in any arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or bankruptcy petition.

## **Conflicts of Interest**

Pursuant to California Code of Regulations Section 260.238 (k) any material conflicts of interest regarding the investment adviser, its representatives or any of its employees are disclosed to the client prior to entering into any Advisory or Financial Planning Agreement.

## **Business Continuity Plan**

AKFA Financial maintains a written Business Continuity Plan that identifies procedures related to an emergency or significant business disruption, including death of the investment adviser or any of its representatives.

## Anandi Krishnamurthy d/b/a AKrish Financial Advisory

19925 Stevens Creek Blvd #100

Cupertino, CA 95014

(408) 785-7875

Dated February, 2018

### Form ADV Part 2B – Brochure Supplement

*For*

#### **Anandi Krishnamurthy - Individual CRD#6807787**

Principal, and Chief Compliance Officer

This brochure supplement provides information about Anandi Krishnamurthy that supplements the Anandi Krishnamurthy d/b/a AKrish Financial Advisory (“AKFA”) brochure. A copy of that brochure precedes this supplement. Please contact Anandi Krishnamurthy if the AKFA brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Anandi Krishnamurthy is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number 6807787.

## Item 2: Educational Background and Business Experience

### Anandi Krishnamurthy

Born: 1956

#### Educational Background

- 2012, Certificate Program in Personal Financial Planning, University of California Santa Cruz Extension
- 1987, Masters in Computer Science, Rochester Institute of Technology
- 1978, Bachelors in Electrical Engineering, Birla Institute of Science and Technology

#### Business Experience

- 06/2017 - Present, Anandi Krishnamurthy d/b/a AKrish Financial Advisory\*, Principal and CCO
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## Item 3: Disciplinary Information

No management person at Anandi Krishnamurthy d/b/a AKrish Financial Advisory has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

## Item 4: Other Business Activities

Anandi Krishnamurthy serves as a technology consultant who is compensated on an hourly basis. The activity may occur during normal business hours and involves up to 10% of her time. This is not an investment related activity, nor is it believed to create a conflict of interest between the firm and its clients.

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## Item 5: Additional Compensation

Anandi Krishnamurthy does not receive any additional compensation from any person, company, or organization, in exchange for providing clients advisory services through AKFA.

## Item 6: Supervision

Anandi Krishnamurthy, as Principal and Chief Compliance Officer of AKFA, is responsible for supervision. She may be contacted at the phone number on this brochure supplement.

## Item 7: Requirements for State Registered Advisers

Anandi Krishnamurthy has NOT been involved in any arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or bankruptcy petition.