#### **Item 1: Cover Page**

## Bustamante Financial Planning, LLC.

March 28, 2017

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This brochure provides information about the qualifications and business practices of Bustamante Financial Planning, LLC (Thomas Bustamante, CFP<sup>®</sup>, Sole Member/Manager). If you have any questions about the contents of this brochure, please contact Thomas Bustamante, Chief Compliance Officer, Thomas Bustamante Financial Planning, LLC. at (505) 473-1193. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or any State securities authority.

Additional information about Bustamante Financial Planning, LLC is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for Bustamante Financial Planning, LLC is 165175.

Bustamante Financial Planning, LLC is a registered investment advisor firm in the state of New Mexico. Registration of an Investment Advisor does not imply any particular level of skill or training. The oral and written communications from an advisor provide you with information you should use to decide whether to hire or retain an advisor.

## **Item 2: Summary of Material Changes**

This report dated March 28, 2017 is the sixth report. The fifth report is dated April 12, 2016, the fourth report is dated March 30, 2015. the third report is dated February 22, 2014, the second report is dated June 30, 2013 and the official start of the business did not commence until January 1, 2013. The only material change is in Item 4. The number of clients are 48 with assets under advisement approximately \$34,000,000 as of March 28, 2017. Also, ongoing investment management was removed.

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\*Please note that the format of this Brochure is mandated by regulation. As a result, these item headings are mandatory, even if they are not applicable to BFP.

**Item 4: Advisory Business** 

## About Bustamante Financial Planning, LLC (BFP)

Bustamante Planning, LLC (BFP) is a limited liability company that provides personal financial planning and investment advisory services. Our plans are easy to understand and implement. BFP does not sell products or receive commissions. Clients are charged on an hourly basis for traditional financial planning and investment advisory services. If the client wishes continual monitoring of investment assets, then a fee based on a percentage of invested assets may be established. In addition, BFP can prepare the client to meet other specialists who provide expertise beyond the scope of this firm, such as attorneys and tax advisors.

## **Amount of Assets Under Advisement**

The number of clients under advisement is 36 with investable assets approximately \$29,300,000 as of March 30, 2015.

## **Services Offered**

Advice may be extensive in nature or focused on a particular area of need, depending on each client's unique circumstances. BFP offers advice in many personal financial planning areas, including:

Defining financial goals: identifying, articulating and prioritizing Assembling financial information Constructing financial statements: net worth, cash flow, and ratio analysis Income and estate tax planning Retirement and financial independence planning Information assembly for attorney and CPAs Investment analysis Determining appropriate asset allocation per client situation Investment suggestions, portfolio rebalancing Risk and insurance review Cash flow and budgeting Education funding and planning Employee benefits and compensation plans Philanthropic and Charitable Gifting Estate planning, gifting, and trusts

#### The Financial Planning Process

Although the financial planning process has a basic structure, it must be tailored to the client's unique interests and needs. BFP clarifies the client's financial situation, establishes goals, gathers information, provides financial diagnostics, recommends planning options, and implements the plan. Over time, BFP monitors and adjusts the plan for any changes in the economy, market and personal situations. Specifically, we employ the following steps in the financial planning process.

#### Defining Goals and Assembling Financial Information

Identify, Articulate and Prioritize Goals – During the first meeting, BFP and the client will identify, articulate and prioritize the client's financial goals. This initial meeting will be a free consultation. Software or card

selection will be used to identify and prioritize which financial planning issues are important to the client. The planner can suggest how to facilitate goals and develop an action plan. Some clients will find that they are doing all that is necessary to accomplish their goals and only minor adjustments are necessary, while other clients will find that they need further consultation with BFP to understand their financial situation and address their financial issues. Ultimately, each client will identify personal financial planning issues.

Assemble Financial Information – During the next meeting, the planner and client will gather and assemble profile, asset, liability, income, expense, and tax information. Any information will be provided by the client or, with the client's permission, information will be obtained from their professional advisors.

#### Financial Diagnostics

Next, the planner will assemble a net worth statement, cash flow statement, tax review and other diagnostics to address needs and goals. Other diagnostics might include investment analysis, calculations to estimate insurance needs, and commercial real estate valuation analysis. This is the foundation of the customized financial plan. Occasionally, diagnostics will reveal problems, such as a deficit in the cash flow, that must be resolved before addressing other goals. After assembling and analyzing this information, the planner and client may wish to revisit the initial financial goals to determine whether or not they are realistic.

#### Recommendation

With specific financial information now in hand, BFP and the client can review alternatives. Recommendations will be made to achieve the client's goals based on the client's priorities. Generally each financial situation should be addressed in order of priority. For example, a client who has lost a loved one may decide that an estate plan is a priority. Another client might be concerned about retirement; another may need to address debt. Still another client may need an asset allocation strategy for investments.

#### Execution and Implementation

Next, the client must execute and implement the plan. In all situations we involve, as necessary, professionals such as tax advisors, attorneys, bank lenders, investment brokers and insurance underwriters in the planning process.

#### Monitor and Adjust if Necessary

As the client and attendant professionals execute the plan, BFP monitors progress and revises the plan as circumstances change. For example, we may adjust asset allocation as the client nears retirement. In the event of a financial crisis such as the 2008 financial meltdown, BFP would review the client's financial situation to determine if adjustments need be made to the plan.

#### **Advisory Services**

BFP also provides investment advisory services. A client may engage BFP to review and analyze his/her existing portfolio and make recommendations to design an investment portfolio on an hourly fee-only basis. Investment recommendations made on an hourly fee-only basis will be limited to an asset allocation model of mutual funds and exchange traded funds (ETFs).

## **Trade Error Policy**

Should they occur, BFP will reimburse clients for losses only due to written instruction errors by BFP on the type of trade (buy versus sell), the dollar amount of the trade, and company (ticker or CUSIP symbol). Since BFP does not execute trades, BFP will not be responsible for trade execution errors.

## **Principal Owner**

The owner (Member/Manager) of Bustamante Financial Planning, LLC is Thomas Bustamante, CFP®.

## **Firm's History**

BFP was formed in 2012 by Thomas Bustamante, CFP<sup>®</sup> who guides clients to achieve their financial goals through independent, non-biased, objective advice. BFP's financial planning advisory services are fee based only and not based on commissions, referral fees or revenue sharing. BFP does not participate in wrap fee programs. BFP does not sell or trade securities or other products such as insurance. As of July 2012, BFP does not have any assets under advisement.

# **Item 5: Fees and Compensation**

## **Advisory Services and Fees**

BFP provides fee-only advisory services from the client for financial planning consultation and investment advisory services. This is BFP's only source of compensation. BFP does not accept commissions, sales charges, revenue sharing, service fees or referral fees from financial product providers or to other financial professionals. This eliminates the inherent conflict of interest that exists when compensation is directly tied to a product. The fees are generally based on an hourly fee schedule of \$160 per hour. However, on a case-by-case basis there may be a percentage of asset investment management fee for ongoing investment management.

#### Hourly Fees

Fees are generally based on an hourly fee schedule of \$160 per hour. There is no minimum fee. The number of hours billed depends on the extent and complexity of the client's situation. This fee is billed at the end of a session or at month end. Unless otherwise agreed upon, invoices will be sent via email. Payment is due upon receipt of the invoice.

All fees are subject to New Mexico Gross Receipt Tax.

## **Fee Negotiation**

All fees are subject to negotiation for certain client relationships and can be less for the following reasons:

- 1) If the client or client's broker assumes the fixed income or equity securities selection based on the investment policy guidelines, the fees will revert to the hourly fee basis.
- 2) If the planning request specifies a component of the financial plan that does not require the skills or aptitude of the planner.

3) Family or friends, on occasion, may be offered a discount.

BFP is willing to engage in consultation with the client at any time to discuss setting a cap and/or providing a good faith estimate of the amount of hours we devote to your situation. If, during the course of providing services, the higher estimate is likely to be exceeded, BFP will contact the client for authorization to proceed with the additional work.

The client or BFP may terminate the financial agreement without penalty at any time upon written notice. The client will be responsible for work performed by BFP up to termination.

## **Fees on Services Provided by Others**

BFP fees are exclusive of brokerage commissions, transaction costs, professional fees (such as accountant/attorney fees) and other fees from outside providers needed to prepare or implement the financial plan.

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

BFP does not charge any performance-based fees or participate in any side-by-side management.

# **Item 7: Types of Clients**

BFP offers personalized investment services to individuals, couples, families, high net worth individuals, trusts and business owners. Client relationships vary in scope and length of service. BFP works with individuals from their 20s through the late stages of their lives, depending on their needs and goals. There are no minimum account sizes for advisement and/or financial planning services.

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

#### **Method of Analysis and Investment Strategies**

BFP will go through a step-by-step process to develop an investment policy statement to provide guidelines on the investment. This process is described below.

The first step is to develop a deep understanding of the individual and his/her stage in life in order to establish an appropriate investment objective. An investment objective establishes the percentage of investment in cash, fixed income, equities and other investments in their asset allocation. Below are the areas that are considered:

• Profile – This includes the individual's age, marital status, dependents, family, health and general financial goals.

- Time Horizon Using IRS Actuarial Tables, we determine the client's average life expectancy and establish an investment time horizon. This tool is useful in discussing inflation risk.
- Assets A net worth statement describes the resources available for emergencies, living support and other life goals such as education and gifting.
- Income/Expenses Documenting sources of income and expenses provides an understanding of cash flow and attendant asset allocation risks.
- Tax Consideration BFP helps the client select investments that are the most tax efficient.
- Investment Philosophy and/or Other Considerations If an individual is an experienced investor, he/she is likely to have an investment philosophy to be considered. A client might also have a concentrated position with a low tax basis that needs to be addressed.
- Risk Tolerance BFP works with the client to determine his/her risk tolerance, which greatly influences the financial plan.

1. Preservation of Principal	Preservation of principal is primary. Income is secondary. No appreciation expected. This model is for persons with very low risk tolerance. Not considered a hedge against inflation.
2. Stability	A balance of liquid, non-fluctuating assets and intermediate fixed income investments. Return should be higher than #1, with minor fluctuation, but still offering safety for persons with low risk tolerance.
3. Income	Income is primary. Appreciation is secondary. There is potential for small capital growth but emphasis is on income. Equity exposure is not dramatic. This category is for persons who want income with a partial inflation hedge.
4. Income & Growth	A balance of growth and income. Biased toward income rather than appreciation. It has a moderate amount of risk, moderate volatility and a moderate inflation hedge.
5. Balanced	Capital appreciation with a reasonable level of current income is the goal. Above average volatility. Goal is a total return in excess of inflation over the long term.
6. Growth	Capital appreciation over the long term is primary. Potential for significant growth, but also subject to substantial market volatility that is partially cushioned. Must be willing and able to accept risk and market fluctuation.
7. All Equity	Most aggressive. Goal is total return well in excess of inflation. Must be willing and able to assume significant market risk and fluctuation.

This next step is to identify an appropriate investment objective based on the information gathered above. There are seven investment objective categories from conservative to aggressive.

In each of the above investment objective categories there will be guidelines for the asset allocation percentages in cash, fixed income, equities, real estate and, if applicable, alternative investments. Such percentages can be changed and adjusted as a result of market conditions, economy and interest rates.

The third step is to analyze the client's existing investments based on the general overall asset allocation and details such as cash, fixed income, equities and other positions. The primary purpose is to identify the strengths and weaknesses in the portfolio. Below are the areas reviewed and analyzed.

Asset Allocation – BFP takes a general overview of the existing investment portfolio's asset allocation to identify variances between the investment objective and the existing portfolio. Variances are noted, allowing the client to see the gaps between the existing portfolio and the asset allocation guidelines for the established investment objective.

*Cash* – We analyze cash amounts exceeding those needed to cover emergency expenses or planned expenditures in the next few years. Such cash reserves will be considered for deployment into other investments as appropriate.

*Fixed Income* – Fixed income investments include government, state and corporate bonds. They can also include preferred stocks or certificate of deposits. BFP will analyze the quality of the fixed income allocation by using S&P and Moodys' rating services. We will develop a bond maturity schedule. Finally, we analyze bond composition allocations such as government bonds, municipal bonds, preferred stock, high yield debt funds, foreign developed debt funds and emerging market debt funds. Overall, quality and diversification are the important factors considered in this review. In addition, the client's tax bracket will determine the appropriate types of bonds to maximize after tax yield.

*Equity* – Equity generally includes stock positions. This review is an involved process. Individual securities are categorized by industry sectors and financial ratios are reviewed to determine valuation and past volatility. Of particular interest are concentrated positions and heavily weighted industry sectors. In terms of mutual funds, the following categories are reviewed:

- passive/active investment management
- large, mid and small cap,
- growth, value and blended positions
- international developed and emerging markets
- specialty mutual funds

Together they are analyzed to determine how well the equity position is balanced.

*Real Estate* – Real estate usually includes rental property and real estate investment trusts (REITs). Rental property includes actual ownership of apartment/residential property and commercial property. REITS can be categorized by office, storage, retail, medical, timber property, international and indexed. Rental property is reviewed for net income, depreciation, leverage cost and vacancy assumptions. REITs are reviewed by yield, diversification and leverage.

*Alternatives* – This includes commodity funds and hedge funds. The important consideration is the purpose that this investment serves within a portfolio. For example, a commodity fund may be used to complement fixed income in the event of rising inflation. Certain long/short hedge funds may be used to protect the

downside of the stock market. However, some hedge funds that are used to place a bet on a position are beyond the scope of BFP.

The final step is to make recommendations that position the portfolio toward the investment objective, bridge gaps in the portfolio, provide diversification, and provide tax efficiency. These detailed recommendations suggest position changes to meet the client's goals.

#### **Risk of Loss**

Any type of investment bears risk. Loss of principal or purchasing power (inflation risk) can occur. There are no guarantees that the investment strategies suggested by BFP will prevent losses or profits from occurring. The client must be able to bear known risks such as:

Purchasing Power Risk – This is the risk that an investment does not stay ahead of inflation.

Business Risk – This is the risk that an individual company held by the client declines in value or fails because of management, economy or an event.

Market Risk – This is the general downturn of the overall market that might be caused by an overall weak economy, political factors or a correction due to market overvaluation.

Interest Rate Risk – This is due to rising interest rates causing bond values to decline

Liquidity Risk – This is due to an investment that either cannot be readily sold or will be sold at a significant loss.

Currency Risk – Devaluation in currency will affect the value of investments made in a particular country.

Reinvestment Risk – This can occur when a matured bond is reinvested at a lower interest rate.

Any one of the above risks as well as other risk factors can occur at any time. In order to mitigate such risks, BFP will use broad diversification. Still, even in good markets there are components in a portfolio that can lose value. For example, a decline in energy prices might lift the market, but positions in the energy sector will likely decline. In this example it is important to maintain representation in the energy sector because at any given time the reverse can occur. BFP does not use market timing for position changes because sudden shifts can occur.

# **Item 9: Disciplinary Information**

BFP has no reportable legal or disciplinary events. Thomas Bustamante, managing member, has been a Certified Financial Planner<sup>™</sup> since 1986 and has no reportable events through the CFP Board of Standards.

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

No one at BFP is a securities broker/dealer or a securities registered representative. BFP is not a futures commission merchant, a commodity pool operator or a commodity trading advisor, or an associated person of such activities. BFP does not have any fee sharing arrangement with any firm.

BFP will make recommendations to other financial advisors from time to time. However, there are no referral fees, commissions or any other compensation received.

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

## **Code of Ethics**

BFP is committed to put the interests of its clients first. Maintaining trust in a client relationship is predicated by adopting a Code of Ethics. In addition, Thomas Bustamante, managing member of Bustamante Financial Planning, LLC, must comply with ethical standards within the profession. For example, CERTIFIED FINANCIAL PLANNER™ Practitioners, including Thomas Bustamante, must adhere to the Certified Financial Planner Board of Standards Code of Ethics. These principles include:

**Principle 1 – Integrity:** Provide professional services with integrity.

Integrity demands honesty and candor which must not be subordinated to personal gain and advantage. Certificants are placed in positions of trust by clients, and the ultimate source of that trust is the certificant's personal integrity. Allowance can be made for innocent error and legitimate differences of opinion, but integrity cannot co-exist with deceit or subordination of one's principles.

Principle 2 – Objectivity: Provide professional services objectively.

Objectivity requires intellectual honesty and impartiality. Regardless of the particular service rendered or the capacity in which a certificant functions, certificants should protect the integrity of their work, maintain objectivity and avoid subordination of their judgment.

**Principle 3 – Competence:** Maintain the knowledge and skill necessary to provide professional services competently.

Competence means attaining and maintaining an adequate level of knowledge and skill, and application of that knowledge and skill in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation with other professionals is appropriate or referral to other professionals necessary. Certificants make a continuing commitment to learning and professional improvement.

**Principle 4 – Fairness:** Be fair and reasonable in all professional relationships. Disclose conflicts of interest.

*Fairness requires impartiality, intellectual honesty and disclosure of material conflicts of interest. It involves a subordination of one's own feelings, prejudices and desires so as to achieve a proper balance of conflicting interests. Fairness is treating others in the same fashion that you would want to be treated.* 

#### **Principle 5 – Confidentiality:** Protect the confidentiality of all client information.

Confidentiality means ensuring that information is accessible only to those authorized to have access. A relationship of trust and confidence with the client can only be built upon the understanding that the client's information will remain confidential.

Principle 6 – Professionalism: Act in a manner that demonstrates exemplary professional conduct.

Professionalism requires behaving with dignity and courtesy to clients, fellow professionals, and others in businessrelated activities. Certificants cooperate with fellow certificants to enhance and maintain the profession's public image and improve the quality of services.

Principle 7 – Diligence: Provide professional services diligently.

Diligence is the provision of services in a reasonably prompt and thorough manner, including the proper planning for, and supervision of, the rendering of professional services.

#### Participation or Interest in Client Transactions and Personal Trading

BFP or its staff does not have trading authority or the ability to initiate any transactional activity on client's accounts; therefore BFP cannot directly buy or sell securities to a client. Such transactions can only be executed by the client or the client may direct his/her broker to execute such transactions. BFP often will recommend the same securities that are held by BFP staff. Such securities can be investment-grade rated bonds, large-cap stocks, mutual funds, ETFs, REITs and other marketable securities. BFP's positions in these securities will not have an impact on the market or the client's purchase or sale. It is BFP's belief that its staff should hold positions similar to what they recommend. This may appear to be a conflict. However, since the securities recommended are widely held and publicly traded, BFP staff's securities positions are too small to affect the market.

When a security is recommended for a purchase or sale, clients are notified in advance before the BFP staff can execute like trades. BFP intention is to provide consistent recommendations to all clients including BFP staff. Occasionally, securities that are recommended to buy are often sold because of a particular reason. This could be for portfolio rebalancing, concentrated stock reduction, liquidity needs or investment objective changes.

BFP will maintain its staff's personal security transactions records as required by industry regulations.

BFP or its staff will not borrow money from a client or lend money to a client. Exceptions to this rule include:

- a. The client is a member of the BFP staff's immediate family, or
- b. The client is not an individual but rather an institution in the business of lending money and the borrowing is unrelated to the professional services performed by the BFP staff.

# Item 12: Brokerage Practices

## **Recommendations and Selection of Brokerage Firms**

BFP will work with the client's existing brokerage firm. There are circumstances when BFP will suggest changes because of high commission fees, inability to download information for analysis, lack of bond inventory, inadequate reports, weak transaction execution, poor service, unfriendly internet access and other reasons. In most cases BFP will recommend discount brokerage services. However, there are many circumstances where it is appropriate to recommend a full service broker or a bank trust department. Often this is the case when more complex transactions are required, such as option trading to protect a position's value, oil and gas leases, real estate management, or trust services.

BFP does not receive any commission, referral fees, soft dollar benefits or other compensation for suggesting a particular firm. There are occasions when BFP staff may attend seminars or educational training at brokerage firms. However, BFP will not accept travel or lodging reimbursement.

Since BFP works with individual client's brokerage accounts, transactions are also individual. Various client accounts cannot be aggregated for the purchase and sale of securities. That is the rationale for suggesting discount brokerage services.

# Item 13: Review of Account

BFP will provide a review of an account depending on the terms and expiration of the financial planning engagement agreement. The client may re-engage BFP for periodic follow-ups and portfolio reviews. This is usually beneficial for rebalancing portfolio investments or monitoring investment strategy implementation. If BFP is providing ongoing investment management, the account review will be scheduled at least quarterly until the engagement agreement between BFP and the client is terminated. Upon expiration or termination of the financial planning engagement agreement, BFP will no longer be responsible for account review.

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

BFP will often refer clients to professionals such as attorneys, CPAs, insurance agents, and investment brokers to assist in the planning process. BFP will not provide direct or indirect monetary or non-monetary compensation to any person or entity that may refer a client to BFP. As mentioned previously, BFP does not have an agreement with or receive referral fees from any other advisors for referrals.

## **Item 15: Custody**

BFP does not take custody of client funds and/or securities. All of our clients receive account statements directly from qualified custodians, such as a bank, broker-dealer or brokerage firm that maintains those

assets. BFP is not responsible for the custodian's transaction activity, trade reporting, holding reports and tax reporting.

## **Item 16: Investment Discretion**

BFP does not exercise discretion in the client's investment. All recommendations are suggested to the client for implementation. It is the client's sole responsibility to effect the transaction since BFP does not have trading authority. Only the client can act on BFP's investment recommendation.

# **Item 17: Voting Client Securities**

BFP does not vote proxies on behalf of a client. It is the responsibility of the client to vote on the proxies sent by the custodian or broker-dealer. BFP may on occasion offer advice regarding corporation actions.

## **Item 18: Financial Information**

BFP does not have custody of client assets and does not directly withdraw our fees from a client bank or investment account. BFP also does not collect advanced fees of \$500 or more for services performed six months or more. Neither Thomas Bustamante nor BFP has ever filed for bankruptcy. Therefore an audited balance sheet is not required.

# Item 19: Requirements for State Registered Advisors

The advisor, Thomas Bustamante, is registered by the NM State Securities Division, and no extra disclosures that are not detailed above are required in this section.

## **Item 20: Privacy Policy**

## **Information Which May be Collected**

The financial planning process involves gathering and assembling information to provide a comprehensive and thorough financial plan. BFP requires information regarding the client's profile, assets, liabilities, income, expenses, investments, tax information, wills, and other documents. Some of the information is documented in client questionnaire/surveys and from outside sources such as bank/brokerage statements, retirement plans, insurance binders, notes/mortgages documents, tax filings and other reports. Information is also received from professionals that serve the client such as the CPA and attorney. The information assembled is used to provide client diagnostics.

#### **Limited Information Disclosure**

In order to further analyze or implement the plan, professionals, such as tax advisors, attorneys, insurance brokers, and investment advisors, will need information for certain products and services. BFP will disclose information about the client only with his/her authorization and on a need-to-know basis.

## **Disclosures Permitted by Law**

We may also disclose all the information we collect as permitted or required by law. For example, we may be required to disclose information to law enforcement agencies or securities regulatory agencies who routinely audit investment advisory firms such as ours.

## How Your Personal Information is Protected

BFP restricts access to client documents. System access is password protected. Communication of client data by fax machine is preferred. Client information sent via unsecured email requires the client's permission. Otherwise such documents are sent via US Postal Service, UPS, FedEx or hand delivered. It should also be noted that BFP does not maintain Social Security information in its client questionnaire. Information provided by prospective clients who do not engage BFP for its services, will be returned or destroyed.

# **Brochure Supplement**

This Brochure Supplement provides information about Thomas Bustamante that supplements the Advisor Firm Brochure. The Firm Brochure always precedes the Brochure Supplement in the same document. Please contact Thomas Bustamante at (505) 231-4607 if you have any questions about the contents of this Supplement.

Additional information about Thomas Bustamante is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>.



Thomas Bustamante, CFP<sup>®</sup> Managing Member, Chief Compliance Officer Bustamante Financial Planning, LLC 2700 Via Venado Santa Fe, NM 87505 Phone: 505 473-1193

#### **Educational Background**

Thomas Bustamante has earned the following degrees and designations:

- 1979 Bachelors of Business Administration degree with a concentration in finance at the Robert O. Anderson School of Business, University of New Mexico.
- 1986 CERTIFIED FINANCIAL PLANNER™ Educational Program at the College for Financial Planning in Denver, Colorado.

#### **Business Experience**

Thomas has over 32 years of experience in the banking, trust and investment industry. He served as Senior Vice President and Trust Manager for the Bank of Santa Fe from 1988 through 2002. He has also served as Investment Manager and Wealth Advisor for Wells Fargo from 2002 through 2011. Thomas has managed over \$200 million in assets and advised up to 200 account relationships. In addition, he has managed bank bond portfolios, instituted extensive IRA training programs, implemented and upgraded systems, wrote policy and procedures, and enhanced investment programs.

Thomas was also the past-chair and current board member of the Santa Fe Community Foundation and the past-president of the Estate Planning Council of Santa Fe. He has also been the past-president of the Santa Fe Civitan Club.

## **Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to the client's evaluation of each supervised person providing investment advice. No information is applicable to this Item.

#### **Additional Compensation**

None

#### **Supervision**

As the Chief Compliance Officer, Thomas Bustamante supervises his own work.