# Item 1: Cover Page



228 Hamilton Ave, Third Floor Palo Alto, CA 94301

## Form ADV Part 2A - Firm Brochure

(650) 431-7799

www.radiantwealthplanning.com

Dated April 9th, 2025

This Brochure provides information about the qualifications and business practices of RADIANT Wealth Planning, LLC, "RWP." If you have any questions about the contents of this Brochure, please contact us at (650) 431-7799. 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.

RADIANT Wealth Planning, LLC is registered as an Investment Adviser with the States of California, Vermont, Texas, Alaska, and Washington. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about RWP is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>, which can be found using the firm's identification number, 310280.

# Item 2: Material Changes

The last annual update of this Brochure was filed on January 13, 2021. The following changes have been made to this version of the Disclosure Brochure:

- The firm's primary place of business and phone number have changed.
- The firm's website has been added.
- RWP became registered in the State of California.
- Project-based financial planning services have been removed. (The firm will continue to offer Ongoing Financial Planning and Hourly Financial Planning services.)
- A separate fee schedule has been added for Clients who reside outside the State of Washington.
- RWP will require using Charles Schwab or Charles Schwab for Investment Management Services and Investment Management Using an Outside Manager.
- Tax Return Preparation services have been added to Items 4 and 5.
- Educational Seminars/ Speaking Engagements/Workshops have been added to Items 4 and 5.
- The maximum annual fee for Investment Management Using an Outside Manager in Item 5 has been changed to 2%.
- RWP became registered in the State of Texas.
- XY Investment Services (XYIS) is no longer being used. Reference to XYIS or Use of Outside Managers has been removed.
- RWP hourly fee has been changed to \$150.
- RWP only directs clients to Charles Schwab. References to Charles Schwab from Item 12 Brokerage Practices have been removed.
- Pricing model updates: The financial planning fee has been removed (the service will remain); hourly financial planning remains as is, and the investment management percentage for AUM has changed.
- Pricing update: no longer offering hourly financial planning services.
- Tax Preparation and Tax Planning: RADIANT Wealth Planning, LLC does not prepare tax returns but utilizes the services of RADIANT Tax Services, LLC and not XY Tax Services "XYTS"
- Adding Charles Schwab as a custodian

- Updated address from Newport Beach, CA, to Palo Alto, CA, and phone number
- Removed TD Ameritrade as a custodian
- Updated pricing model to include independent financial planning for clients with less than \$350,000 in AUM.
- Updated pricing model to include pricing for retirement plans with employees.
- Added Christina Gamache to ADV Part 2B.
- Adding VA and AK to states registered in.
- Changed the way the investment management fee is calculated at the end of the quarter from the account value as of the last day of the previous quarter to daily average.
- Included language for how financial fees are paid, and how they are refunded.
- Added a calculation of a sample portfolio under Item 5

From time to time, we may amend this Brochure to reflect changes in our business practices, changes in regulations, and routine annual updates as required by securities regulators. This complete brochure or summary of material changes shall be provided to each client annually if a material change occurs in the business practices of RADIANT Wealth Planning, LLC.

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# Item 4: Advisory Business

## **Description of Advisory Firm**

RADIANT Wealth Planning, LLC became registered as an Investment Adviser with the States of Washington and California in 2020, Texas in 2021, and Virginia and Alaska in 2024. Randa Hoffman is the principal owner of RWP. RWP currently reports \$10,305,476 discretionary and no non-discretionary Assets Under Management. Assets Under Management were calculated as of December 31, 2024.

### **Types of Advisory Services**

#### **Investment Management Services**

We are in the business of managing individually tailored investment portfolios. Our firm provides continuous advice to a Client regarding the investment of Client funds based on the individual needs of the Client. Through personal discussions in which goals and objectives based on a Client's particular circumstances are established, we develop a Client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation targets. We will also review and discuss a Client's prior investment history, as well as family composition and background.

Account supervision is guided by the stated objectives of the Client (e.g., maximum capital appreciation, growth, income, or growth, and income), as well as tax considerations. RWP will provide this service on a discretionary basis, and will not give advance notice or seek the Client's consent for any changes to the Portfolio. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Fees pertaining to this service are outlined in Item 5 of this brochure.

#### **Ongoing Comprehensive Financial Planning**

This service involves working one-on-one with a planner to develop and implement a financial plan, however the client is not obligated to work with the adviser for financial planning. Clients get to engage with a planner who will work with them to develop and implement their plan. The planner will monitor the plan, recommend any changes and ensure the plan is up to date..

Financial planning involves an evaluation of a Client's current and future financial state by using currently known variables to predict future cash flows, asset values, and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information, and analysis will be considered as they affect and are affected by the entire financial and life situation of the Client. Clients will receive a written or an electronic report, providing the Client with a detailed financial plan designed to achieve his or her stated financial goals and objectives.

In general, the financial plan will address any or all of the following areas of concern. The Client and advisor will work together to select specific areas to cover. These areas may include, but are not limited to, the following:

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 they exceed your income. 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, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.

College Savings: Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren (if appropriate).

**Employee Benefits Optimization**: We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of 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.

**Estate Planning**: This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts, and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. We always recommend 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. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

**Financial Goals**: We will help Clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.

**Insurance**: Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile.

**Investment Analysis**: This may involve developing an asset allocation strategy to meet Clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.

**Retirement Planning**: Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., 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 to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years

**Risk Management:** A risk management review includes 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 planning. Advice may be 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 cost of not purchasing insurance ("self-insuring").

**Tax Planning Strategies:** Advice may include 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 the consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

## Tax Preparation and Tax Planning

We do not offer Tax Preparation services but do utilize the services of RADIANT Tax Services, LLC "RTS", a third-party tax planning firm, to facilitate the preparation and filing of your tax return, and we will work with you and RTS to gather the necessary information as part of this service.

## **Educational Seminars/ Speaking Engagements/Workshops**

We may provide seminars for groups seeking general advice on investments and other areas of personal finance. These seminars are purely educational in nature and do not involve the sale of any investment products. Information presented will not be based on any individual's person's need, nor does RWP provide individualized investment advice to attendees during these seminars.

#### **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 restrictions, needs, and targets.

Clients are able to specify, within reason, any limitations they would like to place on discretionary authority as it pertains to individual securities and/or sectors that will be traded in their account, by notating these items on the executed advisory agreement.

#### CCR Section 260.235.2 Disclosure

For Clients residing in California who receive our Financial Planning 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.

#### **Wrap Fee Programs**

We do not provide a wrap fee program.

# 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 and without penalty. Fees may be negotiable in certain cases and are dependent on the types of services we perform, as outlined below. Please review the fee and compensation information below. Fee(s) may be higher than normally charged in the industry, and another adviser may offer similar services at a lower fee.

### **Investment Management Services**

Our standard advisory fee is based on the market value of the assets under management and is calculated as follows:

Account Value	Annual Advisory Fee
\$0 - \$50,000	1.30%
\$50,001 - \$150,000	1.20%
\$150,001 - \$400,000	1.00%
\$400,001 - \$700,000	0.80%
\$700,001 - \$1,000,000	0.60%
\$1,000,001 and Above	0.40%

The annual fees are negotiable, prorated, and paid in arrears quarterly. The advisory fee is a tiered fee and is calculated by assessing the percentage rates using the predefined levels of assets as shown in the above chart and applying the fee to the daily average account value of the previous quarter. No increase in the annual fee shall be effective without agreement from the Client by signing a new agreement or amendment to their current advisory agreement.

When the household AUM balance is less than \$350,000, RWP charges a fixed minimum fee of \$3,600 annually in addition to the tiered advisor fee. When the household AUM balance is \$350,000 or more, the fixed minimum fee of \$3,600 is waived. Before the planning process, the Client will be provided an estimated plan fee. The fee will be collected upfront, and that is when the work will begin.

Advisory fees are directly debited from Client accounts, or the Client may pay by debit card, credit card or check. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee based upon the days the account was open during the billing period. An account may be terminated with written notice at least 30 calendar days in advance. Since fees are paid in arrears, no refund will be given upon termination of the account.

Example 1  $^{\sim}$  Client's household AUM exceeds minimum of \$350,000; the fixed annual minimum fee of \$3,600 is waived

Investment Management							
Tiers		Percentage	Annual Fee				
\$ -	\$	50,000	1.30%	\$	650.00		
\$ 50,000	\$	150,000	1.20%	\$	1,200.00		
\$ 150,000	\$	400,000	1.00%	\$	2,500.00		
\$ 400,000	\$	700,000	0.80%	\$	-		
\$ 700,000	\$	1,000,000	0.60%	\$	-		
\$ 1,000,000	\$	30,000,000	0.40%	\$	-		

Investable amount \$ 400,000

Annual Investment Management Fee \$ 4,350.00

Annual Minimum Fee \$ - 4,350.00

Example 2  $^{\sim}$  Client's household AUM does not exceed the minimum of \$350,000; the fixed annual minimum fee of \$3,600 is added

Investment Management							
		Tiers		Percentage	An	nual Fee	
\$	-	\$	50,000	1.30%	\$	325.00	
\$	50,000	\$	150,000	1.20%	\$	-	
\$	150,000	\$	400,000	1.00%	\$	-	
\$	400,000	\$	700,000	0.80%	\$	-	
\$	700,000	\$	1,000,000	0.60%	\$	-	
\$	1,000,000	\$	30,000,000	0.40%	\$	-	

\$ 25,000

Annual Investment Management Fee \$ 325.00
Annual Minimum Fee \$ 3,600.00
\$ 3,925.00

## **Financial Planning Services**

Clients can work with RWP solely for financial planning (no investment management services). RWP charges a fixed flat fee of \$3,600 annually. Before the planning process, the Client will be provided an estimated plan fee. The fee will be collected upfront, and that is when the work will begin.

Planning services may include a written financial plan, personal meetings, phone calls, or notes on various issues. Goals and objectives may include projections of retirement savings, education savings, estate planning, tax planning, targeted savings, investment and portfolio analysis, and planning, including specific investment recommendations, risk management, housing affordability calculations, and other financial matters.

We ask the client to provide information, including copies or summaries of various documents (including but not limited to the client's investment and retirement plan account statements, wills, insurance documentation, trust documents, and employer benefit plans.) Together, we will determine goals and objectives, priorities, tolerance for risk, and other parameters specific to the client's situation. We will then prepare analyses, notes, and/or recommendations regarding these issues.

Financial planning fees can either be directly debited from Client investment accounts (if managed by RWP), or the Client may choose to pay by debit card, credit card or check. Services begin upon payment and continue for one full year. At the end of the year, clients may renew for an additional year to continue working with their financial advisor to continue working through their financial plan. If a client chooses to terminate the agreement before the year ends, they will receive a prorated refund for the unused portion of the service period. Termination requires written notice at least 30 calendar days in advance.

#### Delivery of the plan

The plan will be reviewed with the client at least two weeks after completing the final data gathering meeting. If the client prefers, the plan may be delivered at a later date.

#### Renewal of the plan

There will be an annual renewal in order for the client and advisor to continue working on the plan.

### **Businesses Package**

For businesses that have employees and require a retirement plan, RWP assists with the retirement plan set up, investment selections, and annual reviews with every employee with a retirement account.

Setup: \$5,500 (includes established plans coming to RWP) + employee fee for first year (one invoice)

Annual: \$300/ employee/ year

## Tax Preparation and Tax Planning

When RWP utilizes the services of RTS for Tax Preparation and Tax Planning, clients will be billed for the cost of RTS to prepare and file their tax returns following their current pricing. The cost of Tax Preparation & Tax Planning through RTS will be reviewed and agreed to by the client before engaging in the service.

### **Educational Seminars/ Speaking Engagements/Workshops**

Seminars, speaking engagements, and workshops are offered to organizations and the public on various financial topics. Fees range from free to \$4,000 per seminar or free to \$1,000 per participant. The fee range is based on the content, the amount of research conducted, the number of hours of preparation needed, and the number of attendees. Fees will be paid prior to the date of the engagement by electronic funds transfer or credit card.

Should the event organizer decide to cancel or change the date of the event for any reason besides weather or similar unforeseen causes, the event organizer will be responsible for reimbursement of any non-refundable travel expenses already incurred and will provide payment for 50% of the Speaker's fee if the cancellation occurs within 30 days of the event. If the Speaker must cancel due to health or similar unforeseen circumstances, the Speaker will make all attempts to find a reasonable alternative engagement date and will absorb any incremental additional costs for obtaining alternative travel arrangements. If an alternative date cannot be obtained, the event organizer will not be responsible for any travel costs already incurred by the Speaker or any portion of the Speaker's fee.

In the event of inclement weather or flight cancellation, the Speaker shall make all reasonable attempts to make alternative travel arrangements to arrive in time for the presentation. If travel proves impossible, or the event is otherwise canceled, the Speaker's fee is waived, but the event organizer will still be responsible for reimbursement of any non-refundable travel expenses already incurred.

Educational Seminars, Speaking Engagements, and Workshops may be provided pro-bono at RWP's discretion.

### Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the Client. Clients may incur certain charges imposed by custodians, brokers, 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 selecting or 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

For Clients residing in California, 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 and do not engage in side-by-side management.

# Item 7: Types of Clients

We provide financial planning and portfolio management services to individuals, high net-worth individuals corporations, or other businesses.

We do not have a minimum account size requirement.

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

Our primary methods of investment analysis are fundamental, technical, cyclical and charting analysis.

**Fundamental analysis** involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that the information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

**Technical analysis** involves using chart patterns, momentum, volume, and relative strength in an effort to pick sectors that may outperform market indices. However, there is no assurance of accurate forecasts or that trends will develop in the markets we follow. In the past, there have been periods without discernible trends and similar periods will presumably occur in the future. Even where major trends develop, outside factors like government intervention could potentially shorten them.

Furthermore, one limitation of technical analysis is that it requires price movement data, which can translate into price trends sufficient to dictate a market entry or exit decision. In a trendless or erratic market, a technical

method may fail to identify trends requiring action. In addition, technical methods may overreact to minor price movements, establishing positions contrary to overall price trends, which may result in losses. Finally, a technical trading method may underperform other trading methods when fundamental factors dominate price moves within a given market.

**Cyclical analysis** is a type of technical analysis that involves evaluating recurring price patterns and trends based upon business cycles. Economic/business cycles may not be predictable and may have many fluctuations between long-term expansions and contractions. The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

**Charting analysis** involves the gathering and processing of price and volume information for a particular security. This price and volume information is analyzed using mathematical equations. The resulting data is then applied to graphing charts, which is used to predict future price movements based on price patterns and trends. Charts may not accurately predict future price movements. Current prices of securities may not reflect all information about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

#### **Passive and Active Investment Management**

We may choose investment vehicles that are considered passive, active, or a combination of both styles.

Passive investing involves building portfolios that are composed of various distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio.

Active investing involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Actively managed funds are also designed to reduce volatility and risk.

We may engage in both passive and active investing in your portfolio. However, we strive to construct portfolios of funds and individual securities that we believe will have the greatest probability for achieving our clients' personal financial goals with the least amount of volatility and risk rather than attempt to outperform an arbitrary index or benchmark.

Specific investment selections are based on a number of factors that we evaluate in order to select, what we believe to be, the highest quality funds or individual securities for our clients. These factors include but are not limited to underlying holdings of funds, percentage weighting of holdings within funds, liquidity, tax efficiency, bid/ask spreads, and other smart/strategic beta factors. These factors may or may not result in the lowest cost ETFs and mutual funds available when utilizing funds in a client's portfolio, but we strive to keep internal fund expenses as low as possible.

#### **Material Risks Involved**

All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Material risks associated with our investment strategies are listed below.

**Market Risk:** Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

**Strategy Risk:** The Adviser's investment strategies and/or investment techniques may not work as intended.

**Small and Medium Cap Company Risk:** Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the Client's portfolio.

**Turnover Risk:** At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

**Limited markets:** Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions, we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

**Concentration Risk:** Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

**Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

**Legal or Legislative Risk**: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

**Inflation**: Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same

#### **Risks Associated with Securities**

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks. Investing in securities involves risk of loss that clients should be prepared to bear.

**Commercial Paper** is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default.

**Common stocks** may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

**Corporate Bonds** are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity.

The market prices of debt securities fluctuate depending on factors such as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

**Bank Obligations** including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

**Municipal Bonds** are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

Exchange Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which the Clients invest.

**Mutual Funds** When a Client invests in open-end mutual funds or ETFs, the Client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, many of which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

# Item 9: Disciplinary Information

#### **Criminal or Civil Actions**

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

#### **Administrative Enforcement Proceedings**

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

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

RWP 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 RWP or the integrity of its management.

# Item 10: Other Financial Industry Activities and Affiliations

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

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

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

RWP 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.

RWP employees are not licensed insurance agent, and are not affiliated with any insurance companies.

Tax planning advice and preparation services are available through our partner, RADIANT Tax Services. Woring with RADIANT Tax Services is optional and separate from our core financial planning services.

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

As an investment adviser registered under the Securities Act of Washington, California Corporations Code and other applicable federal and state securities laws, RWP owes the Client a fiduciary duty to put the Client's interest first which includes, but is not limited to, a duty of care, loyalty, obedience, and utmost good faith. 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. 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 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 matters shall reflect the 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. 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. We will not trade non-mutual fund securities 5 days prior to the same security for Clients. We will not engage in front-running and will not engage in trading that operates to the client's disadvantage.

# Item 12: Brokerage Practices

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

RADIANT Wealth Planning, LLC does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to the Client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

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

We currently receive benefits as a result of our standing on Charles Schwab's Institutional platform.

#### 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

Investment Management and Investment Management Using an Outside Manager are available for Clients using Charles Schwab as custodian.

### The Custodian and Brokers We Use (Charles Schwab)

The custodian and brokers we use maintain custody of your assets that we manage, although we may be deemed to have limited custody of your assets due to our ability to withdraw fees from your account (see Item 15 – Custody, below).

We recommend that our clients use Charles Schwab & Co., Inc. ("Schwab"), a registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While

we recommend that you use Schwab as custodian broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account as described below (see "Your brokerage and custody costs")

#### How we select brokers/custodians

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are overall most advantageous when compared with other available providers and their services. We consider a wide range of factors, including:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account) Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.)
- Availability of investment research and tools that assist us in making investment decisions Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, security and stability
- Prior service to us and our clients
- Availability of other products and services that benefit us, as discussed below (see
- "Products and services available to us from Schwab")

#### Your brokerage and custody costs

For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transaction fees.

#### Products and services available to us from Schwab

Schwab Advisor ServicesTM is Schwab's business serving independent investment advisory firms like us. They provide our clients and us with access to their institutional brokerage services (trading, custody,

reporting and related services), many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of Schwab's support services:

#### Services that benefit you

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

#### Services that may not directly benefit you

Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements) facilitate trade execution and allocate aggregated trade orders for multiple client accounts provide pricing and other market data
- facilitate payment of our fees from our clients' accounts
- assist with back-office functions, recordkeeping, and client reporting

#### Services that generally benefit only us

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession do not require that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business and Schwab's payment for services for which we would otherwise have to pay rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "How we select brokers/ custodians") and not Schwab's services that benefit only us.

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

Investment advisers may elect to purchase or sell the same securities for several clients at approximately the same time when they believe such action may prove advantageous to clients. This process is referred to as aggregating orders, batch trading or block trading. We do not engage in block trading. It should be noted that implementing trades on a block or aggregate basis may be less expensive for client accounts; however, it is our trading policy to implement all client orders on an individual basis. Therefore, we do not aggregate or "block" client transactions. Considering the types of investments we hold in advisory client accounts, we do not believe clients are hindered in any way because we trade accounts individually. This is because we develop individualized investment strategies for clients and holdings will vary. Our strategies are primarily developed for the long-term and minor differences in price execution are not material to our overall investment strategy.

## Item 13: Review of Accounts

Randa Hoffman, CEO and CCO of RWP, will work with Clients to obtain current information regarding their assets and investment holdings and will review this information as part of our financial planning services. RWP does not provide specific reports to financial planning Clients, other than financial plans.

Client accounts with the Investment Advisory Service will be reviewed regularly on a quarterly basis by Randa Hoffman, CEO and CCO. The account is reviewed with regards to the Client's investment policies and risk tolerance levels. Events that may trigger a special review would be unusual performance, addition or deletions of Client imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per Client's needs.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

RWP will not provide written reports to clients.

# 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

As disclosed under Item 12, above, Advisor participates in Charles Schwab's institutional customer program and Advisor may recommend Charles Schwab to Clients for custody and brokerage services. There is no direct link between Advisor's participation in the program and the investment advice it gives to its Clients, although Advisor receives economic benefits through its participation in the program that are typically not available to Charles Schwab retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Advisor by third party vendors. Charles Schwab may also have paid for business consulting and professional services received by Advisor's related persons. Some of the products and services made available by Charles Schwab through the program may benefit Advisor but may not benefit its Client accounts. These products or services may assist Advisor in managing and administering Client accounts, including accounts not maintained at Charles Schwab. Other services made available by Charles Schwab are intended to help Advisor manage and further develop its business enterprise. The benefits received by Advisor or its personnel through participation in the program do not depend on the number of brokerage transactions directed to Charles Schwab. As part of its fiduciary duties to Clients, Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of Charles Schwab for custody and brokerage services.

As an investment adviser registered under the Securities Act of Washington California Corporations Code and other applicable federal and state securities laws, RWP owes the Client a fiduciary duty to put the Client's interest first which includes, but is not limited to, a duty of care, loyalty, obedience, and utmost good faith.

# Item 15: Custody

RWP does not accept custody of Client funds except in the instance of withdrawing Client fees.

For Client accounts in which RWP directly debits their advisory fee:

- i. RWP will send a copy of its invoice to the custodian at the same time that it sends the Client a copy.
- ii. The custodian will send at least quarterly statements to the Client showing all disbursements for the account, including the amount of the advisory fee.
- iii. The Client will provide written authorization to RWP, permitting them to be paid directly for their accounts held by the custodian.

Clients should receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains Client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. We urge you to carefully review such statements and compare such official custodial records to the invoices containing billing information that we may provide to you. Our invoices may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. If the invoice sent by the Adviser differs from the amount listed on the custodial statement(s), the invoice will explain this fact, the reason for the difference, and clarify the amount the client owes to the Adviser.

# Item 16: Investment Discretion

For those Client accounts where we provide Investment Management Services, we maintain discretion over Client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. Investment discretion is explained to Clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the Client will execute a Limited Power of Attorney, which will grant our firm discretion over the account. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the Client.

# Item 17: Voting Client Securities

We do not vote Client proxies. 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 or more in advance.

# Item 19: Requirements for State-Registered Advisers

All principal executive officers and management persons are described in ADV Part 2 B, attached.

We do not receive any performance-based compensation.

No disclosure events have occurred.

#### California Disclosures

The California Code of Regulations imposes two notice requirements upon financial advisors: (a) lower-cost comparable services may be available from others, and (b) the possibility exists for a conflict of interest between Client interests and ours. Clients are under no obligation to purchase advice or services from us.

## Fair, Equitable and Ethical Principles (CCR § 260.238):

RWP is a fiduciary and has a duty to act primarily for the benefit of our clients. As a fiduciary, we act in good faith and exercise the highest standard of care. We are loyal to our clients and avoid or disclose any conflict of interest that could impair the advice given to our clients. We also have the duty and responsibility to only engage in activities that promote fair, equitable, and ethical principles.

## **Privacy Notice**

The confidentiality of our clients, past and present, is of paramount concern to us and is one of the hallmarks of our firm. Like all providers of personal financial services, we are now required by law to inform our clients of our policies regarding the privacy of client information. We have been, and continue to be, bound by professional standards of confidentiality that are even more stringent than those required by law. Therefore, we have always protected your right to privacy.

We request personal information from our clients in order to perform our duties as financial planners and investment advisors, to make recommendations and decisions that are in the best interest of our clients.

For current and former clients, we do not disclose any non-public personal information obtained in the course of business, except as required or permitted by law. Permitted disclosures include, for instance, providing information to our employees and, in limited situations, to unrelated third parties who need to know that information to assist in providing services to you. In all such situations, we stress the confidential nature of the information being shared.

We frequently recommend that a client contact an attorney, accountant, other professional, or financial institution. At the request of our clients and only with their explicit authorization, we may provide relevant information to these entities. Clients assets are held at independent custodians. We sometimes assist our clients in opening accounts at these custodians in the client's names, with Meyers Wealth Management receiving duplicate statements or RWP Firm Brochure (Part 2A and 2B of Form ADV) CRD Number: 310280 other information. Each custodian has its own privacy policy, which they will disclose to clients in a separate notice.

We retain records relating to professional services that we provide so that we are better able to assist you with your professional needs and, in some cases, to comply with professional guidelines. In order to guard your non-public personal information we maintain physical, electronic, and procedural safeguards that comply with our professional standards.

Internet email is not encrypted, and therefore, not secure.

All employees and those providing services to our firm pledge to respect our clients' privacy and maintain the confidentiality of our clients' information. This is a requirement of our code of ethics and is a mission we always have and will continue to take very seriously.



228 Hamilton Ave, Third Floor Palo Alto, CA 94301

(650) 431-7799

www.radiantwealthplanning.com

Dated March 5th, 2025

## Form ADV Part 2B – Brochure Supplement

For

## Randa Hoffman, MBA, EA 6924690

## CEO and Chief Compliance Officer

This brochure supplement provides information about Randa Hoffman that supplements the RADIANT Wealth Planning, LLC ("RWP") brochure. A copy of that brochure precedes this supplement. Please contact Randa Hoffman if the RWP brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Randa Hoffman is available on the SEC's website at <a href="www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a> which can be found using the identification number 6924690

# Item 2: Educational Background and Business Experience

#### Randa Hoffman

Born: 1981

## **Educational Background**

- 2009 MBA, Keller Graduate School Of Management
- 2005 BS, Business Administration, Devry University

## **Business Experience**

- 10/2020 Present, RADIANT Wealth Planning, LLC, CEO and CCO
- 04/2018 10/2020, Edward Jones, Financial Advisor
- 12/2014 03/2018, Liberty Mutual Group, Product Owner
- 07/2014 11/2014, Proliance Consulting, Senior Business Analyst
- 02/2014 06/2014, Prodigy Consulting, Business Analyst
- 05/2012 01/2014, Wimmer Solutions, Associate
- 07/2007 05/2012, Experis Manpower Group, Professional Consultant

### **Professional Designations, Licensing & Exams**

Series 66 - Uniform Combined State Law Examination

**Series 7** - General Securities Representative Qualification Examination

EA - Enrolled Agent

# Item 3: Disciplinary Information

No management person at RADIANT Wealth Planning, LLC 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

RADIANT Tax Services, LLC

Randa Hoffman spends 20 hours per month at RADIANT Tax Services, LLC and is the CEO and tax preparer. She holds a Enrolled Agent (EA) designation. Time spent at RADIANT Tax Services, LLC does not pose a conflict of interest.

# Item 5: Additional Compensation

Randa Hoffman does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through RWP.

# Item 6: Supervision

Randa Hoffman, as CEO and Chief Compliance Officer of RWP, is responsible for supervision of Christina Gamache. Randa Hoffman is responsible for supervising her own activities. This compliance manual is reviewed no less than annually. In the event additional employees are added to the firm, they will attest to having received the compliance manual and participate in annual ongoing compliance training.

# Item 7: Requirements for State Registered Advisers

Randa Hoffman has not been involved in any arbitration claim alleging damages in excess of \$2,500. Furthermore, he has neither been involved in nor found liable in any civil, self-regulatory organization, or administrative proceeding nor has been the subject of any bankruptcy petitions.

## Christina Gamache, CEPA®, MSE 4934184

#### Senior Wealth Advisor

This brochure supplement provides information about Randa Hoffman that supplements the RADIANT Wealth Planning, LLC ("RWP") brochure. A copy of that brochure precedes this supplement. Please contact Randa Hoffman if the RWP brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Randa Hoffman is available on the SEC's website at www.adviserinfo.sec.gov which can be found using the identification number 6924690

# Item 2: Educational Background and Business Experience

### Christina Gamache

Born: 1981

## **Educational Background**

- University of California, Irvine; Bachelor of Arts in International Studies; 2003
- University of Florida; Master of Science in Entrepreneurship (MSE); 2008
- College for Financial Planning; Masters Certificate in Personal Finance; 2012

## **Business Experience**

- 12/2024 Present, RADIANT Wealth Planning, LLC, Senior Wealth Advisor
- 9/2020 12/2024, Audax Wealth Management, LLC, CEO and CCO
- 12/2018 8/2020, UBS Financial Services Inc., Registered Representative/ Investment Advisor Representative
- 8/2013 11/2018, Self-employed, Stay at home parent
- 7/2010 7/2013, UBS Financial Services Inc., Investment Advisor Representative/ Registered Representative
- 8/2009 8/2010, Stifel, Nicolaus & Company, Inc., Investment Advisor Representative/ Registered Representative

- 6/2009 8/2009, UBS Financial Services Inc., Investment Advisor Representative/ Registered Representative
- 7/2006 6/2009, Morgan Stanley, Investment Advisor Representative/ Registered Representative
- 7/2005 6/2006, Merrill Lynch Pierce Fenner & Smith Inc., Registered Representative/ Investment Advisor Representative

### Professional Designations, Licensing & Exams

Christina Gamache has earned certifications and credentials that are required to be explained in further detail.

The CERTIFIED EXIT PLANNING ADVISOR, CEPA® is issued by the Exit Planning Institute To attain the right to use the CFP® marks, an individual must satisfactorily fulfill all the following requirements:

- Prerequisites-Five years of full-time or equivalent experience working directly with business owners as a financial advisor, attorney, CPA, business broker, investment banker, commercial lender, estate planner, insurance professional, business consultant or in a related capacity. Undergraduate degree from a qualifying institution; if no qualifying degree, must submit additional professional work experience (two years of relevant professional experience may be substituted for each year of required undergraduate studies). Exit Planning Institute member in good standing.
- Education Five-day education program.
- Examination Pass the multiple choice, proctored, closed book final exam. Individuals who become certified must complete the following ongoing education requirements in order to maintain the right to continue to use the CEPA® designation:
- Continuing Education Complete 40 hours of continuing education hours every three years.

# Item 3: Disciplinary Information

No management person at RADIANT Wealth Planning, LLC 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

Growth Consulting Firm, LLC

Christina Gamache is a consultant at Growth Consulting Firm, LLC and is responsible for preparing spreadsheets, analyzing statements. She spends 20 hours per month at Growth Consulting Firm, LLC and does not pose a conflict of interest.

# Item 5: Additional Compensation

Christina Gamache does not receive any economic benefit from any person, company, or organization in exchange for providing Clients advisory services through RWP.

# Item 6: Supervision

Randa Hoffman, as CEO and Chief Compliance Officer of RWP, is responsible for supervising and monitoring Mrs. Gamache's activities on a regular basis to ensure compliance with our firm's Code of Ethics. Please contact Randa Hoffman if you have any questions about Mrs. Gamache's brochure supplement at (650) 431-7799.

# Item 7: Requirements for State Registered Advisers

Christina Gamache has not been involved in any arbitration claim alleging damages in excess of \$2,500. Furthermore, he has neither been involved in nor found liable in any civil, self-regulatory organization, or administrative proceeding nor has been the subject of any bankruptcy petitions.