FORM ADV PART 2A DISCLOSURE BROCHURE



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This brochure provides information about the qualifications and business practices of Blue Ladder Financial Planning, LLC. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 682-552-2669. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

ADDITIONAL INFORMATION ABOUT BLUE LADDER FINANCIAL PLANNING, LLC (CRD #319431) IS AVAILABLE ON THE SEC'S WEBSITE AT <u>WWW.ADVISERINFO.SEC.GOV</u>

Item 2: Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

Since the last filing on April 14th, 2022 the following changes have been made:

• Item 12 has been updated to reflect custodian update.

Item 15 has been updated to reflect custodian update. Full Brochure Available

This Firm Brochure being delivered is the complete brochure for the Firm.

Item 3: Table of Contents

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Item 4: Advisory Business

Firm Description

Blue Ladder Financial Planning, LLC ("Blue Ladder") was founded in 2022. Omar Aguilar is 100% owner.

Types of Advisory Services

ASSET MANAGEMENT

Blue Ladder offers discretionary direct asset management services to advisory Clients. Blue Ladder will determine the securities to be bought or sold and the amount of the securities to be bought or sold. However, Blue Ladder will obtain prior Client approval before executing any transactions. Blue Ladder will offer Clients ongoing portfolio management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors.

FINANCIAL PLANNING AND CONSULTING

Financial planning services include a comprehensive evaluation of an investor's current and future financial state and will be provided by using currently known variables to predict future cash flows, asset values and withdrawal plans. Blue Ladder will use current net worth, tax liabilities, asset allocation, and future retirement and estate plans in developing financial plans.

Typical topics reviewed in a financial plan may include but are not limited to:

- **Financial goals**: Based on an individual's or a family's clearly defined financial goals, including funding a college education for the children, buying a larger home, starting a business, retiring on time or leaving a legacy. Financial goals should be quantified and set to milestones for tracking.
- **Personal net worth statement**: A snapshot of assets and liabilities serves as a benchmark for measuring progress towards financial goals.
- **Cash flow analysis**: An income and spending plan determines how much can be set aside for debt repayment, savings and investing each month.
- **Retirement strategy**: A strategy for achieving retirement independent of other financial priorities. Including a strategy for accumulating the required retirement capital and its planned lifetime distribution.
- **Comprehensive risk management plan**: Identify all risk exposures and provide the necessary coverage to protect the family and its assets against financial loss. The risk management plan includes a full review of life and disability insurance, personal liability coverage, property and casualty coverage, and catastrophic coverage.
- **Long-term investment plan**: Include a customized asset allocation strategy based on specific investment objectives and a risk profile. This investment plan sets guidelines for selecting, buying and selling investments and establishing benchmarks for performance review.
- **Tax reduction strategy**: Identify ways to minimize taxes on personal income to the extent permissible by the tax code. The strategy should include identification of tax-favored investment vehicles that can reduce taxation of investment income.

If a conflict of interest exists between the interests of Blue Ladder and the interests of the Client, the Client is under no obligation to act upon Blue Ladder's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through Blue Ladder. Financial plans will be completed and delivered inside of thirty (30) days contingent upon timely delivery of all required documentation.

Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without written Client consent.

Wrap Fee Programs

Blue Ladder does not sponsor any wrap fee programs.

Client Assets under Management

As of the date of this brochure, Blue Ladder has no assets under management.

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

ASSET MANAGEMENT

Blue Ladder offers discretionary direct asset management services to advisory Clients. Blue Ladder charges an annual investment advisory fee based on the total assets under management as follows:

Assets Under Management	Annual Fee	Quarterly Fee
Up to \$100,000	1.25%	.313%
\$100,001 to \$500,000	1.15%	.288%
\$500,001 to \$1,000,000	1.00%	.250%
Over \$1,000,000	.750%	.188%

This is a flat rate/breakpoint fee schedule, the entire portfolio is charged the same asset management fee. For example, a Client with \$750,000 under management would pay \$7,500 on an annual basis. $750,000 \ge 7,500$.

The annual fee is negotiable. Accounts within the same household may be combined for a reduced fee. Fees are billed quarterly in arrears based on an average daily balance of the account for the previous quarter. The calculation for the average daily balance is based on the formula $(A/D) \times (F/P)$.

- A = the sum of the daily balances in the billing period
- D = number of days in the billing period
- F = annual management fee
- P = number of billing periods per year

For example (based on quarterly billing period): the first step taken using the average daily-balance calculation method would be to take the average of the values of the Client's account over the course of the entire quarter. For instance 85 days at \$1 million plus 6 days

at \$500,000 averages out to approximately \$967,032. Based on the formula (A/D) x (F/P), the example would be: $(88,000,000/91) \times (.0115/4) = $2,780$

Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. After the initial five (5) business days, the agreement may be terminated by Blue Ladder with thirty (30) days written notice to Client and by the Client at any time with written notice to Blue Ladder. New investments made during the quarter will be assessed and billed for the remainder of the quarter.

For example:						
Mid quarter calculation		Full quarter calculation				
The calculation for an account opened mid quarter is based on the formula:		The calculation for the average daily balance is based on the formula: (A/D) x				
AV x (F/P)/# of days in quarter) x # of days remaining in quarter AV = Account value F = annual management fee P = number of billing periods per year		 (F/P) A = the sum of the daily balances in the billing period D = number of days in the billing period F = annual management fee P = number of billing periods per year 				
Mid quarter investment		Full quarter investment				
Based on assets being held in account for less than full quarter.Step1:Investment of \$1,000,000 on		Based on assets being held in account for the full quarter. Step 1: \$1 million for 85 days plus				
	August 10.		account value of \$500,000 for six days.			
Step 2:	\$1,000,000 x .0029 (1/4 of annual fee) = \$2,500	Step 2:	\$1 million x 85 = \$85 million \$500,000 x 6 = \$3 million \$88 million (A) /91 (D) = \$967,033			
Step 3:	\$2,500/91 (days in the quarter) = \$27.47	Step 3:	.01 (F) / 4 (P) = .002875			
Step 4:	\$27.47 x 51 (days remaining in the quarter) = \$1,401.10	Step 4:	\$967,033 x .002875 = \$2,780.22			

Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

FINANCIAL PLANNING AND CONSULTING

Blue Ladder charges a fixed fee based on complexity and unique Client needs for financial planning. Prior to the planning process the Client will be provided an estimated plan fee. Services are completed and delivered inside of thirty (30) days contingent upon timely delivery of all required documentation. Client may cancel within five (5) business days of signing Agreement with no obligation and without penalty. If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees

will be due to Blue Ladder. Blue Ladder reserves the right to waive the fee should the Client implement the plan through Blue Ladder.

FIXED FEES

Financial Planning Services are offered based on a flat fee between \$500-\$1,250.

Fees for financial plans are:

Billed 50% in advance with the balance due upon plan delivery.

Client Payment of Fees

Fees for asset management services are deducted from a designated Client account to facilitate billing or they may pay Blue Ladder directly. The Client must consent in advance to direct debiting of their investment account.

Fees for financial plans will be billed to the Client and paid directly to Blue Ladder.

Additional Client Fees Charged

Custodians may charge transaction fees and other related costs on the purchases or sales of mutual funds, equities, bonds, options and exchange-traded funds. Mutual funds, money market funds and exchange-traded funds also charge internal management fees, which are disclosed in the fund's prospectus. Blue Ladder does not receive any compensation from these fees. All of these fees are in addition to the management fee you pay to Blue Ladder. For more details on the brokerage practices, see Item 12 of this brochure.

Prepayment of Client Fees

Blue Ladder does not require any prepayment of fees of more than \$500 per Client and six months or more in advance.

Fees for financial plans are billed 50% in advance with the balance due upon plan delivery

If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to Blue Ladder.

External Compensation for the Sale of Securities to Clients

Investment Advisor Representatives of Blue Ladder receive external compensation from sales of investment related products such as insurance as licensed insurance agents. This represents a conflict of interest because it gives an incentive to recommend products based on the commission received. This conflict is mitigated by disclosures, procedures, and Blue Ladder's fiduciary obligation to place the best interest of the Client first and Clients are not required to purchase any products or services. Clients have the option to purchase these products through another insurance agent of their choosing.

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

Sharing of Capital Gains

Fees are <u>not</u> based on a share of the capital gains or capital appreciation of managed securities.

Blue Ladder does not use a performance-based fee structure because of the conflict of interest. Performance-based compensation may create an incentive for Blue Ladder to recommend an investment that may carry a higher degree of risk to the Client.

Item 7: Types of Clients

Description

Blue Ladder generally provides investment advice to individuals.

Client relationships vary in scope and length of service.

Account Minimums

Blue Ladder does not require a minimum to open an account.

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

Methods of Analysis

Security analysis methods may include fundamental analysis, technical analysis, charting, cyclical analysis, and Monte Carlo analysis. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

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

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are twofold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

Monte Carlo planning technique is used to calculate the percentage probability of specific scenarios that are based upon a set group of assumptions and standard deviations. This method of calculation has often been used in investment and retirement planning to project the likelihood of achieving one's financial or retirement goals and whether or not a retiree will have enough income to live on for life, given a wide range of possible outcomes in the markets. While there are no absolute parameters for this type of projection, the underlying assumptions for these calculations typically include such factors as interest rates, the client's

age and projected time to retirement, the amount of the investment portfolio that is spent or withdrawn each year and the portfolio allocation.

Investment Strategy

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

Security Specific Material Risks

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with Blue Ladder:

- *Market Risk*: The prices of securities in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.
- *Interest-rate Risk*: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Inflation Risk*: When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk*: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk*: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Liquidity Risk*: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Management Risk:* The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the client's portfolio may suffer.
- *Equity Risk:* Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may

experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.

- *Fixed Income Risk:* The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- Investment Companies Risk: When a client invests in open end mutual funds or ETFs, the client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, 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). 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 or (ii) 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. Adviser has no control over the risks taken by the underlying funds in which client invests.
- Long-term purchases: Long-term investments are those vehicles purchased with the intension of being held for more than one year. Typically the expectation of the investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.
- *Short-term purchases*: Short-term investments are typically held for one year or less. Generally there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk the risk that your investment's return will not keep up with inflation.

All investment programs have certain risks that are borne by the investor.

Item 9: Disciplinary Information

Criminal or Civil Actions

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

Administrative Enforcement Proceedings

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

Self- Regulatory Organization Enforcement Proceedings

Blue Ladder and its management have not been involved in any self-regulatory organizational enforcement proceedings that are material to a Client's or prospective Client's evaluation of Blue Ladder or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

Blue Ladder is not registered as a broker-dealer and no affiliated representatives of Blue Ladder are registered representatives of a broker-dealer.

Futures or Commodity Registration

Neither Blue Ladder nor its employees are registered or has an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Mr. Aguilar has a financial affiliated business as an independent insurance agent. Approximately 40% of his time is spent on these activities. He will offer Clients services from those activities. As an insurance agent, he will receive separate yet typical compensation.

These practices represent conflicts of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

Additionally, Mr. Aguilar is a Sr. Airman/E4 with the Air Force Reserves. Approximately 10% of his time is spent in this activity. He also owns rental property that he receives income from. A minimal amount of time is spent on this activity. These activities do not represent a conflict of interest as they do not involve clients.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

Blue Ladder does not select or recommend other investment advisors.

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

Code of Ethics Description

The employees of Blue Ladder have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of Blue Ladder employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of Blue Ladder. The Code reflects Blue Ladder and its supervised persons' responsibility to act in the best interest of their Client.

One area the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

Blue Ladder's policy prohibits any person from acting upon or otherwise misusing nonpublic or inside information. No advisory representative or other employee, officer or director of Blue Ladder may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Blue Ladder's Code is based on the guiding principle that the interests of the Client are our top priority. Blue Ladder's officers, directors, advisors, and other employees have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either employees or the company.

The Code applies to "access" persons. "Access" persons are employees who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

Blue Ladder will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

Blue Ladder and its employees do not recommend to Clients securities in which we have a material financial interest.

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

Blue Ladder and its employees may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide Blue Ladder with copies of their brokerage statements.

The Chief Compliance Officer of Blue Ladder is Omar Aguilar. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that Clients of the firm receive preferential treatment over employee transactions.

Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

Blue Ladder does not have a material financial interest in any securities being recommended. However, affiliated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest such as front running, affiliated persons are required to disclose all reportable securities transactions as well as provide Blue Ladder with copies of their brokerage statements.

The Chief Compliance Officer of Blue Ladder is Omar Aguilar. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

Blue Ladder will recommend the use of a particular broker-dealer based on their duty to seek best execution for the client, meaning they have an obligation to obtain the most favorable terms for a client under the circumstances. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is affected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. Blue Ladder will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. Blue Ladder relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by Blue Ladder. Blue Ladder does not receive any portion of the trading fees.

Blue Ladder is not affiliated with the brokerage firm. Broker does not supervise the Blue Ladder, its agents or activities.

Blue Ladder will recommend the use of SSG and Altruist.

For the benefit of no commissions or transaction fees, fully digital account opening, a large variety of security options and complete integration with software tools, Blue Ladder Financial Planning, LLC recommends Altruist Financial LLC, an unaffiliated SEC-registered broker dealer and FINRA/SIPC member, as the introducing broker to Apex Clearing Corporation, an unaffiliated SEC-registered broker dealer and FINRA/SIPC member, as the clients' custodian. Blue Ladder Financial Planning, LLC does not receive any research or other soft-dollar benefit by nature from its relationship with Altruist Financial LLC. Blue Ladder Financial Planning, LLC does not receive any referrals in exchange for using Altruist Financial LLC as a broker dealer.

Blue Ladder Financial Planning, LLC participates in the Model Marketplace of Altruist LLC, an SEC-registered investment adviser and affiliate of Altruist Financial LLC. Blue Ladder Financial Planning, LLC may assign to client accounts any of the available Altruist LLC-generated portfolios, Third-Party Portfolios, or other portfolios made available through Altruist LLC's Model Marketplace. All Altruist LLC advisory fees for assigned portfolios are charged directly to client accounts.

• Research and Other Soft Dollar Benefits

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by Blue Ladder from or through a broker-dealer in exchange for directing Client transactions to the broker-dealer. Although Blue Ladder has no formal soft dollar arrangements, Blue Ladder may receive products, research and/or other services from custodians or broker-dealers connected to client transactions or "soft dollar benefits". As permitted by Section 28(e) of the Securities Exchange Act of 1934, Blue Ladder receives economic benefits as a result of commissions generated from securities transactions by the custodian or broker-dealer from the accounts of Blue Ladder. Blue Ladder cannot ensure that a particular client will benefit from soft dollars or the client's transactions paid for the soft dollar benefits. Blue Ladder does not seek to proportionately allocate benefits to client accounts to any soft dollar benefits generated by the accounts.

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by Blue Ladder from or through a broker-dealer in exchange for directing Client transactions to the broker-dealer. SSB does not provide any soft dollar arrangements.

• Brokerage for Client Referrals

Blue Ladder does not receive client referrals from any custodian or third party in exchange for using that broker-dealer or third party.

• Directed Brokerage

Clients who direct brokerage outside our recommendation may be unable to achieve the most favorable execution of client transactions as client directed brokerage may cost clients more money. For example, in a directed brokerage account, you may pay higher brokerage commissions because we may not be able to aggregate orders to reduce transaction costs, or you may receive less favorable prices.

Aggregating Securities Transactions for Client Accounts

Blue Ladder manages each account separately, and therefore, does not aggregate purchases and sales and other transactions. If orders are not aggregated, some clients purchasing securities around the same time may receive a less favorable price than other clients which may cost clients more money.

Item 13: Review of Accounts

Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

Account reviews are performed quarterly by the Chief Compliance Officer of Blue Ladder, Omar Aguilar. Account reviews are performed more frequently when market conditions dictate. Reviews of Client accounts include, but are not limited to, a review of Client documented risk tolerance, adherence to account objectives, investment time horizon, and suitability criteria, reviewing target allocations of each asset class to identify if there is an opportunity for rebalancing, and reviewing accounts for tax loss harvesting opportunities.

Financial plans generated are updated as requested by the Client and pursuant to a new or amended agreement, Blue Ladder suggests updating at least annually.

Review of Client Accounts on Non-Periodic Basis

Other conditions that may trigger a review of Clients' accounts are changes in the tax laws, new investment information, and changes in a Client's own situation.

Content of Client Provided Reports and Frequency

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by the Blue Ladder's custodian. Client receives confirmations of each transaction in account from the custodian and an additional statement during any month in which a transaction occurs. Blue Ladder does not provide additional reports to Clients.

Item 14: Client Referrals and Other Compensation

Economic benefits provided to the Advisory Firm from External Sources and Conflicts of Interest

Blue Ladder does not receive any economic benefits from external sources.

Advisory Firm Payments for Client Referrals

Blue Ladder does not compensate for Client referrals.

Item 15: Custody

Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly. Clients are urged to carefully compare the account statements received directly from their custodians to any documentation or reports prepared by Blue Ladder. Blue Ladder is not affiliated with the custodian. The custodian does not supervise the Blue Ladder, its agents or activities.

Blue Ladder is deemed to have limited custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of Blue Ladder.

Item 16: Investment Discretion

Discretionary Authority for Trading

Blue Ladder accepts discretionary authority to manage securities accounts on behalf of Clients. Blue Ladder will obtain prior Client approval before executing each transaction.

The Client approves the custodian to be used and the commission rates paid to the custodian. Blue Ladder does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

Item 17: Voting Client Securities

Proxy Votes

Blue Ladder does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, Blue Ladder may provide recommendations to the Client. If a conflict of interest exists, it will be disclosed. If the Client requires assistance or has questions, they can reach out to the investment advisor representatives of the firm at the contact information on the cover page of this document.

Item 18: Financial Information

Balance Sheet

A balance sheet is not required to be provided to Clients because Blue Ladder does not serve as a custodian for Client funds or securities and Blue Ladder does not require prepayment of fees of more than \$500 per Client and six months or more in advance.

Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

Blue Ladder has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

Bankruptcy Petitions during the Past Ten Years

Blue Ladder has not had any bankruptcy petitions in the last ten years.

Item 19: Requirements for State Registered Advisors

Principal Executive Officers and Management Persons

The education and business background for all management and supervised persons can be found in the Part 2B of this Brochure.

Outside Business Activities

The outside business activities for all management and supervised persons can be found in the Part 2B of this Brochure.

Performance Based Fee Description

Neither Blue Ladder nor its management receive performance based fees. Please see Item 6 of the ADV 2A for more information.

Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons

Neither Blue Ladder nor its management have been involved in any of the following:

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

Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities

There are no material relationships with issuers of securities to disclose.

Item 1 Cover Page

SUPERVISED PERSON BROCHURE

FORM ADV PART 2B

Omar Aguilar



Office Address: 10129 Locksley Dr. Benbrook, TX 76126

Tel: 682-552-2669

Email: <u>oaguilar@blueladderfp.com</u> **Website:** <u>www.blueladderfp.com</u>

Jun 16th 2022

This brochure supplement provides information about Omar Aguilar and supplements the Blue Ladder Financial Planning, LLC brochure. You should have received a copy of that brochure. Please contact Omar Aguilar if you did not receive the brochure or if you have any questions about the contents of this supplement.

ADDITIONAL INFORMATION ABOUT OMAR AGUILAR (CRD #6014824) IS AVAILABLE ON THE SEC'S WEBSITE AT <u>WWW.ADVISERINFO.SEC.GOV</u>.

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Principal Executive Officer – Omar Aguilar

• Year of birth: 1988

Item 2 - Educational Background and Business Experience

Educational Background:

• Tarrant County College; Education; 2006-2009

Business Experience:

- Blue Ladder Financial Planning, LLC.; Managing Member/Investment Advisor Representative; 04/2022-Present
- Omar Aguilar Sole Proprietor; Insurance Agent; 03/2022-Present
- Air Force Reserves; Sr. Airman/E4; 12/2018-Present
- First Command Brokerage Services, Inc; Registered Representative; 02/2016-04/2022
- First Command Advisory Services; Investment Advisor Representative ; 04/2016-04/2022
- JP Morgan Chase; Branch Manager; 07/2007-02/2016

Item 3 - Disciplinary Information

- A. Mr. Aguilar has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:
 - 1. Was convicted of, or pled guilty or nolo contender ("no contest") to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
 - 2. Is the named subject of a pending criminal proceeding that involves an investmentrelated business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
 - 3. Was found to have been involved in a violation of an investment-related statute or regulation; or
 - 4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.
- B. Mr. Aguilar never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:
 - 1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;

2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority

(a)denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investmentrelated activities; or (d) imposing a civil money penalty of more than \$2,500 on him.

- C. Mr. Aguilar has never been the subject of a self-regulatory organization (SRO) proceeding in which he:
 - 1. Was found to have caused an investment-related business to lose its authorization to do business; or
 - 2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.
- D. Mr. Aguilar has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

Item 4 - Other Business Activities

Mr. Aguilar has a financial affiliated business as an independent insurance agent. Approximately 40% of his time is spent on these activities. He will offer Clients services from those activities. As an insurance agent, he will receive separate yet typical compensation.

These practices represent conflicts of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

Additionally, Mr. Aguilar is a Sr. Airman/E4 with the Air Force Reserves. Approximately 10% of his time is spent in this activity. He also owns rental property that he receives income from. A minimal amount of time is spent on this activity. These activities do not represent a conflict of interest as they do not involve clients.

Item 5 - Additional Compensation

Mr. Aguilar receives commissions on the insurance products he sells. He does not receive any performance-based fees and does not receive any additional compensation for performing advisory services other than what is described in Item 5 of Part 2A.

Item 6 - Supervision

Since Mr. Aguilar is the sole owner and investment adviser representative of Blue Ladder and is solely responsible for all supervision and formulation and monitoring of investment advice offered to Clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual. He can be reached at <u>oaguilar@blueladderfp.com</u> or 682-552-2669.

Item 7 - Requirements for State-Registered Advisors

- A. Mr. Aguilar has not been involved in any of the following:
 - 1. An award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500 involving any of the following:
 - a) An investment or an investment-related business or activity;
 - b) Fraud, false statement(s) or omissions;
 - c) Theft, embezzlement or other wrongful taking of property;
 - d) Bribery, forgery, counterfeiting, or extortion;
 - e) Dishonest, unfair or unethical practices.
 - 2. An award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a) An investment or an investment-related business or activity;
 - b) Fraud, false statement(s) or omissions;
 - c) Theft, embezzlement or other wrongful taking of property;
 - d) Bribery, forgery, counterfeiting, or extortion;
 - e) Dishonest, unfair or unethical practices.
- B. Mr. Aguilar has never been the subject of a bankruptcy petition.