



Panoramic Financial Advice Inc.  
2909 E Los Altos Avenue  
Fresno, CA 93710

**Form ADV Part 2A – Firm Brochure**

805-244-5057

[www.panoramicfinancial.com](http://www.panoramicfinancial.com)

Dated February 11, 2025

This brochure provides clients and prospective clients with information about Panoramic Financial and the qualifications, business practices, and nature of its services that should be carefully considered before becoming an advisory client. If you have any questions about the contents of this brochure, please contact our Mr. Andrew McFadden at 805-244-5057.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or any state securities administrator. Additional information about Panoramic Financial is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Click on the “Investment Adviser Search” link and then search for “Investment Adviser Firm” using the firm’s IARD number, which is 172396.

While Panoramic Financial and anyone associated with it may be registered and/or licensed within a particular jurisdiction, that registration and/or licensing in itself does not imply an endorsement by any regulatory authority, nor does it imply a certain level of skill or training on the part of the firm or its associated personnel.

# Item 2: Material Changes

---

Since its last annual filing of this Form ADV Part 2A, dated February 24, 2024, the following material changes have occurred:

- Item 4 – As of August 2024, we are now registered in the State of Texas.
- Item 5 –We have updated our fees.
- Item 9 – Has been amended to disclose a disciplinary event.

The firm may at any time update this document and either send a copy of its updated brochure or provide a summary of material changes to its brochure and an offer to send an electronic or hard copy form of the updated brochure. Clients are also able to download this brochure from the SEC's Website: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) or may contact our firm at 805-244-5057 to request a copy at any time.

As with all firm documents, clients and prospective clients are encouraged to review this brochure in its entirety and are encouraged to ask questions at any time prior to or throughout the engagement.

# Item 3: Table of Contents

---

## Contents

Item 1: Cover Page.....	1
Item 2: Material Changes.....	2
Item 3: Table of Contents .....	3
Item 4: Advisory Business .....	4
Item 5: Fees and Compensation .....	9
Item 6: Performance-Based Fees and Side-By-Side Management.....	12
Item 7: Types of Clients.....	13
Item 8: Methods of Analysis, Investment Strategies and Risk of Loss .....	13
Item 9: Disciplinary Information .....	17
Item 10: Other Financial Industry Activities and Affiliations.....	17
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....	18
Item 12: Brokerage Practices .....	22
Item 13: Review of Accounts .....	23
Item 14: Client Referrals and Other Compensation .....	24
Item 15: Custody.....	25
Item 16: Investment Discretion .....	25
Item 17: Voting Client Securities .....	26
Item 18: Financial Information .....	26
Item 19: Requirements for State-Registered Advisers .....	27
Form ADV Part 2B – Brochure Supplement.....	29

# Item 4: Advisory Business

---

## Description of Advisory Firm

Andrew Wayne McFadden, CFP® is the Principal and Sole Shareholder of the California domiciled investment advisory firm Panoramic Financial Advice Inc (“Panoramic Financial”). The firm is not a subsidiary of, nor does it control another reportable financial industry entity. Mr. McFadden also serves as the firm’s Chief Compliance Officer (supervisor) and further information about his background may be found in Item 19 of this brochure.

In addition to registration with the State of California in 2014 State of Nebraska in 2021, and in the State of Texas in 2024, Panoramic Financial and an associate of the firm may register, become licensed or meet certain exemptions to registration and/or licensing within other jurisdictions where investment advisory business may be conducted.

## Types of Advisory Services

### ***Financial Planning***

Panoramic Financial provides a range of investment advisory solutions to its clients. *Financial planning services* provide clients with advice on key topics such as cash flow and budgeting, college funding, retirement planning, risk management, estate or tax planning strategies, as well as periodic investment advice. We also offer clients management of their portfolios through the engagement of institutional investment managers via our *investment management services*. The firm is also available for *educational workshops and seminars* upon request.

During or prior to your first meeting with Panoramic Financial you will be provided with a firm brochure that includes a statement involving our privacy policy. Our firm will also ensure that any material conflicts of interest have been disclosed to you that could be reasonably expected to impair the rendering of unbiased and objective advice.

Should you wish to engage Panoramic Financial for any advisory service, you must first execute a written engagement agreement; thereafter, discussion and analysis will be conducted to determine your financial needs, goals, holdings, etc. Depending on the scope of the engagement, you may be asked to provide current copies of the following documents early in the process:

- Wills, codicils and trusts
- Insurance policies
- Student loan documents
- Tax returns
- Mortgage information
- Credit card balances and interest rates
- Auto loans, home loans, HELOCs and other liabilities
- Current financial specifics including W-2s or 1099s
- Statements reflecting current investments in retirement and non-retirement accounts
- Employment or other business agreements you may have in place
- Information on current retirement plans and benefits provided by your employer
- Completed risk profile questionnaires or other forms provided by our firm

Our ability to provide our advisory services depends on access to important information about our clients, and it is important that the information and financial statements you provide is accurate. Our firm may, but is not obligated to, verify the information you have provided which will then be used in the financial planning or investment advisory process. In addition, it is necessary that you provide us with an adequate level of information and supporting documentation throughout the term of the engagement, including, but not limited to: source of funds, income levels, and an account holder or their legal agent's authority to act on behalf of the account, among other information. This helps us determine the appropriateness of our planning and/or investment strategies for your portfolio.

### ***Financial Planning Services***

Our financial planning services may be as broad-based or narrowly focused as you desire. The incorporation of most or all of the noted components allows not only a more thorough analysis but also an in-depth view of your plans to assist you in reaching your goals and objectives. Whether in person or online, we will ask you to respond to a sequence of questions we believe important to the development of your plan or investment portfolio, including your age, investment time horizon, income and/or net worth, among others. We will also inquire into your investment experience, as well as tolerance or appetite for risk. Based on your responses to these questions, you will receive a plan/recommendation and/or portfolio allocation believed appropriate for your situation.

### **Cash Flow/Debt Management**

A review of your income and expenses will be conducted to determine your current surplus or deficit. Based upon the results, we will provide advice on prioritizing how any surplus should be used, or how to reduce expenses if they exceed your income. In addition, advice on the prioritization of which debts to repay may be provided, based upon factors such as the debt's interest rate and any income tax ramifications.

Recommendations may also be made regarding the appropriate level of cash reserves for emergencies and other financial goals. These recommendations are based upon a review of cash accounts (such as money market funds) for such reserves and may include strategies to save desired reserve amounts.

### **Risk Management Planning**

A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial situation, 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 on 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 in order to improve or gain a better understanding of your overall financial planning situation. For example, recommendations may be offered as to which type of account(s) or specific investments should be owned based in part on their "tax efficiency," with consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

### Education Planning

Advice involving college funding may include projecting the amount that will be needed to achieve post-secondary education funding goals, along with savings strategies and the “pros-and-cons” of the various college savings options that are available. We are also able to review your financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren, if appropriate.

### Employee Benefit Planning

A review is conducted, and analysis is made as to whether you, as an employee, are taking maximum advantage of your employee benefits. We will also offer advice on your employer-sponsored retirement plan, along with other benefits that may be available to you.

### Retirement Planning

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

### Estate Planning

Our review typically 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. We may assess ways to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. We generally 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.

### Investment Planning

Investment planning services often involve providing information on the types of investment vehicles available, investment analysis and strategies, or basis asset selection, as well as assisting you with your investment account if it is maintained at another broker/dealer or custodian. The strategies and types of investments that may be recommended are further discussed in Item 8 of this brochure.

We may concentrate on reviewing only a specific area (modular planning) per your request, such as an employer retirement plan allocation, college funding or evaluating the sufficiency of savings plan. Note that when these services focus only on certain areas of your interest or need, your overall situation or needs may not be fully addressed due to limitations you may have established. In all instances involving our financial planning engagements, our clients retain full discretion over all implementation decisions and are free to accept or reject any recommendation we make. Whether we have created a broad-based or modular plan, we will present you with a summary of our recommendations, guide you in the implementation of some or all of them per your decision, as well as offer you periodic reviews thereafter.

## ***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 target. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. We may also review and discuss a client's prior investment history, as well as family composition and background.

We provide an additional service for accounts not directly held at our recommended custodian., but where we do have discretion, and may leverage an Order Management System to implement tax-efficient asset location and opportunistic rebalancing strategies on behalf of the client. These are primarily 401(k) accounts, HSA's, and other investment assets. We regularly review the available investment options in these accounts, monitor them, and rebalance and implement our strategies in the same way we do other accounts, though using different tools as necessary.

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. 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.

## ***Pension Consulting Services***

Panoramic Financial provides pension consulting services to small businesses through Guideline, Inc. ("Guideline"), a firm registered with the United States Securities and Exchange (CRD # 281515) and Human Interest Advisors LLC, ("Human Interest") a firm registered with the United States Securities and Exchange (CRD # 269875). We work with both the plan sponsors (employers) and the plan participants (employees). Generally, such pension consulting services consist of assisting employer plan sponsors in establishing, monitoring and reviewing their company's participant-directed retirement plan. When an employee enrolls, they will be given Guideline's or Human Interest's Part 2A, containing fee information. Each plan participant will also sign a separate client contract with Guideline or Human Interest, stating each individual plan participant's fees and when fees will be deducted – monthly or quarterly or annually and in advance or in arrears.

As the needs of the plan sponsor dictate, areas of advising could include investment options, plan structure and participant education.

For plan sponsors:

- We help you determine the best options for you and your employees.
- Assist with participant enrollment.

For plan participants:

- We will hold an initial participant meeting to discuss retirement planning education and review options available to employees within the employers' plan.

- We will plan and hold annual group educational meetings to provide information about a variety of topics relating to retirement and retirement accounts.

All pension consulting services shall be in compliance with the applicable state law(s) regulating pension consulting services. This applies to client accounts that are pension or other employee benefit plans governed by the Employee Retirement Income Security Act of 1974, as amended (“ERISA”).

### ***Educational Workshops***

We offer periodic complimentary educational seminar sessions for those desiring general advice on personal finance and investing. Topics may include issues related to general financial planning, educational funding, retirement strategies, implications involving changes in marital status, and various other current economic or investment topics. Our workshops are educational in nature and do not involve the sale of insurance or investment products. Information presented will not be based on any one person’s need nor do we provide individualized investment advice to attendees during our general sessions.

### **Client Assets Under Management**

As of December 31, 2024, Panoramic Financial manages \$91,738,812 on a discretionary basis.

### **Wrap Fee Programs**

We do not participate in wrap fee programs.

### **General Information**

Panoramic Financial does not provide legal or accounting related services, but with your prior written consent we will work with your attorney or accountant to assist with the coordination and implementation of accepted strategies. You should be aware that these other professionals will charge you separately for their services and these fees will be in addition to our own advisory fees.

Our firm will use its best judgment and good faith effort in rendering its services. Our firm cannot warrant or guarantee the achievement of a planning goal or any particular level of account performance or that your account will be profitable over time. Past performance is not necessarily indicative of future results.

Except as may otherwise be provided by law, our firm will not be liable to the client, heirs, or assignees for any loss an account may suffer by reason of an investment decision made or other action taken or omitted in good faith by our firm with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; any loss arising from our adherence to your direction or that of your legal agent; any act or failure to act by a service provider maintaining an account. Federal and state securities laws impose liabilities under certain circumstances on persons who act in good faith and, therefore, nothing contained in this document, or our client engagement agreement shall constitute a waiver of any rights that a client may have under federal and state securities laws.



## **CCR Section 260.235.2 Disclosure**

For clients 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 affect the transaction through our firm.

# **Item 5: Fees and Compensation**

---

Please note, unless a client has received the firm's disclosure brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees and without penalty. Forms of payment are based on the types of services being provided, term of service, etc., and will be stated in your engagement agreement with the firm. Payment is made via check or teller's draft from a U.S. financial institution as well as through qualified, unaffiliated third-party processors or your custodian of record maintaining your account; both requiring your prior authorization. We do not accept cash, money orders or similar forms of payment for advisory engagements.

## **Hourly Fee**

Limited engagements (e.g., modular financial planning components) are accomplished via our hourly fee. The rate is \$400 per hour, billed in 15-minute increments and a partial increment (e.g., nine minutes) will be treated as a whole increment. We require a minimum one-hour engagement. Prior to entering into an agreement with the firm you will receive an estimate of the overall cost based on your requirements and the time involved. An advance deposit of the lesser of \$500 or one-half the estimated fee will be due at the beginning of the engagement. Remaining fees due to our firm are paid upon delivery of our invoice which coincides with the delivery of your plan.

## **Comprehensive Financial Planning Services**

For Clients who receive comprehensive financial planning services, there is an annual fee that ranges between \$3,600 - \$20,000 depending on the complexity of the client's situation.

Annual fee payments can be made through equal monthly or quarterly installments, based on the client's preference. Fees are payable in advance. Fees are negotiable at Panoramic's discretion and may be modified based on individual circumstances. The fee will increase 3% per year, starting on the 1 year anniversary of signing the agreement. Clients will receive notification of the increase via AdvicePay.

Comprehensive Financial Planning clients receive Investment Management Services for no additional 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
First \$1,000,000	1.00%
\$1,000,001 - \$3,000,000	0.75%
\$3,000,001 - \$5,000,000	0.50%
\$5,000,001 and Above	0.25%

The annual fees are negotiable and are pro-rated and paid in advance on a quarterly basis. The advisory fee is a blended fee and is calculated by assessing the percentage rates using the predefined levels of assets as shown in the above chart, resulting in a combined weighted fee. When client contributions or withdrawals (“capital flow(s)”) occur, we will prorate the capital flow in or out of the account. 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.

Advisory fees are directly debited from client accounts, or the client may choose to pay by check. Accounts initiated or terminated during a calendar quarter will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Upon termination of the account, any unearned fee will be refunded to the client on a prorated basis.

### Pension Consulting Fee – Guideline and Human Interest

Panoramic Financial’s fee is separate from and in addition to, any program or asset management fees charged by Guideline or Human Interest, as disclosed in that Investment Adviser’s ADV Part 2A Brochure and contract. Panoramic Financial will be compensated via a fee share from each of the advisors to which it directs clients. The fees shared will not exceed any limit imposed by any regulatory agency. Guideline or Human Interest will debit the client’s account for the advisory fee and will remit Panoramic Financial’s portion of the fee to Panoramic Financial.

Panoramic Financial charges a flat fee:

**0.5%** per account, held by each plan participant.

Our annual fees are negotiable and are pro-rated and paid in arrears on a quarterly basis. Please note, the above fee schedule does not include Guidelines’ or Human Interest’s fees. 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.

Accounts initiated or terminated during a calendar quarter will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

## Educational Workshops

Educational workshops will be offered free of charge.

### ***Discounting/Negotiability of Fees***

The services to be provided to you and their specific fees will be detailed in your engagement agreement. Published fees may be discounted at the discretion of our firm but they are not negotiable. Panoramic Financial strives to offer fees that are fair and reasonable in light of the experience of our firm and the services to be provided to you. We are obligated under statute to inform you that similar services may be made available from others and potentially at a lesser fee.

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

Any transactional or service fees (sometimes termed *brokerage fees*), individual retirement account fees, qualified retirement plan fees, account termination fees, or wire transfer fees will be borne by the account holder and per the fee schedule of your custodian of record. Fees paid by our clients to our firm for our advisory services are separate from any of these fees or other similar charges. In addition, advisory fees for our firm's services are separate from any transactional charges a client may pay, as well as those for mutual funds, exchange-traded funds (ETFs), exchange-traded notes (ETNs), index mutual funds or other investments of this type.

Per annum interest at the current maximum statutory rate may be assessed on fee balances due more than 30 days; we may refer past due accounts to collections or legal counsel for processing. We reserve the right to suspend some or all services once an account is deemed past due.

Additional information about our fees in relationship to our brokerage practices is noted in Item 12 of this document.

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.

### **External Compensation for the Sale of Securities to Clients**

We do not charge or receive a commission or mark-up on your securities transactions, nor do we receive "trailer" or SEC Rule 12b-1 fees from an investment company that we may recommend. Fees charged by issuers are detailed in prospectuses or product descriptions and you are encouraged to read these documents before investing.

You retain the option to purchase recommended or similar investments through your own selected service provider.

## Termination of Services

Either party may terminate the agreement at any time, which will typically be in writing. If you verbally notify our firm of the termination and, if in two business days following this notification you have not sent in your notice in writing, we will make a written notice of the termination in our records and send you our own termination notice as a substitute. Our firm will not be responsible for investment allocation, advice or transactional services (except for limited closing transactions) upon receipt of a termination notice. It will also be necessary that we inform the selected third-party investment manager, if any, that the relationship between our firm and the client has been terminated.

If our Form ADV Part 2 firm brochure was not delivered to you at least 48 hours prior to entering into the investment advisory contract, then you have the right to terminate the engagement without fee or penalty within five business days after entering into the agreement. Should a client terminate a financial planning service after this five-day time period, the client may be assessed fees at the firm's current hourly rate for any time incurred in the preparation of the client's analysis or plan. When an investment management services client terminates their agreement after the five-day period, the client will be assessed fees on a prorated basis for services incurred from either (i) as a new client, the date of the engagement to the date of the firm's receipt of the written notice of termination, or (ii) all other accounts, the last billing period to the date of the firm's physical or constructive receipt of written termination notice.

If you were required to provide an initial deposit of \$500 or more for our financial planning services engagement, you provided all requisite information, and such plans or services have not been delivered to you within six months or less time from the date of the engagement, you may be entitled to a refund. Our firm will return any prepaid, unearned fees (if any) within 30 days of the firm's receipt of termination notice. The refund will be determined by the amount of time spent prior to termination which will then be deducted from the deposit. Earned fees in excess of any prepaid deposit will be billed at the time of termination and will be due upon your receipt of our invoice.

Our return of payment to a client for financial planning services can be completed via check from our firm's US-based financial institution or our third-party payment processor.

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

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

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

---

Our firm's advisory fees will not be based on a share of capital gains or capital appreciation (growth) of any portion of managed funds, also known as performance-based fees. We believe such compensation creates an incentive for a firm to recommend an investment that may carry a higher degree of risk to a client. We do not use a performance-based fee structure because of the conflict of interest this type of fee structure poses. Our fees will also not be based on side-by-side management, which refers to a firm simultaneously managing accounts that do pay performance-based fees (such as a hedge fund) and those that do not; this type of arrangement, and the conflict of interest it may pose, does not conform to our firm's practices.

## Item 7: Types of Clients

---

Panoramic Financial provides advisory services to individuals, high net worth individuals and physicians of all investment experience. We do not require minimum income, asset levels or other similar preconditions for our financial planning services. Mr. McFadden reserves the right to waive or reduce certain fees based on unique individual circumstances, special arrangements or pre-existing relationships, and he may also decline services to a prospective client for any non-discriminatory reason.

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

---

### **Method of Analysis**

Panoramic Financial conducts fundamental analyses; we evaluate economic factors including interest rates, the current state of the economy, or the future growth of an industry sector. We screen for options in the market, targeting funds that have lower expense ratios. Our research is drawn from sources that include financial periodicals, reports from economists and other industry professionals, company annual reports, as well as prospectuses and other regulatory filings.

### ***Investment Strategy***

Each client's needs and goals are different; subsequently portfolio strategies and underlying investment vehicles may vary. The following defines the common strategies we recommend within our financial planning clients' portfolios:

#### **Active Asset Management**

Certain clients may prefer/require an active asset management strategy. Typically, such an investor believes it is possible to create a profit from identifying or leveraging mispriced securities, or producing similar returns with less risk, or producing returns greater than a stated benchmark, such as a well-known index. For example, an investor might attempt to outperform the Standard & Poor's 500 Index by purchasing underpriced stocks or derivative instruments representing these positions. An investor may feel risk in the stock market is low and choose to increase exposure to equities to attempt to take advantage of growth opportunities. When risk in the stock market is considered high, all of or a portion of the portfolio's equity exposure may be moved to more stable short-term fixed income instruments and cash equivalent alternatives in order to preserve capital.

#### **Passive Account Management**

Our passive strategy is based on Modern Portfolio Theory; selecting securities whose price movements have historically low correlations to create efficient portfolios that offer the highest expected return for a given level of risk, or one with the lowest level of risk for a given expected return. This practice does not employ market timing or stock selection methods of investing but rather a long term, buy-and-hold strategy with periodic rebalancing of the account to maintain desired risk levels.

### ***Recommended Investments***

We will strive to create portfolios that contain investment vehicles that are diversified, tax-efficient, and low-cost whenever practical. Typically, holdings are a broad range of mutual funds and ETFs.

## **Investment Strategy and Method of Analysis Material Risks**

The firm believes its strategies and investment recommendations are designed to produce the appropriate potential return for the given level of risk; however, there is no guarantee that an investment objective will be achieved. Each client, as an investor, must be able to bear the risk of loss that is associated with their account, which may include the loss of some of or their entire principal. Examples of such risk are noted in the following paragraphs for your consideration.

### ***Active Management Strategy Risks***

A portfolio that employs active management strategies may, at times, outperform or underperform various benchmarks or other strategies. In an effort to meet or surpass these benchmarks, active portfolio management may require more frequent trading or “turnover.” This may result in shorter holding periods, higher transactional costs and/or taxable events generally borne by the client, thereby potentially reducing or negating certain benefits of active asset management.

### ***Company Risk***

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

### ***Failure to Implement***

As a financial planning client, you are free to accept or reject any or all of the recommendations made to you. While no advisory firm can guarantee future performance, no plan can succeed if it is not implemented. Clients who choose not to take the steps recommended in their financial plan may face an increased risk that their stated goals and objectives will not be achieved.

### ***Financial Risk***

Excessive borrowing to finance a business operation increases profitability risk because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

### ***Fundamental Analysis***

The challenge involving fundamental analyses is that information obtained may be incorrect; the analysis may not provide an accurate estimate of earnings, which may be the basis for a security's value. If a security's price adjusts rapidly to new information, a fundamental analysis may result in unfavorable performance.

### ***Inflation Risk***

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

### ***Management Risk***

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

### ***Market Risk***

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

### ***Passive Investing***

A portfolio that employs a passive, efficient markets approach (representative of Modern Portfolio Theory) has the potential risk at times to generate lower-than-expected returns for the broader allocation than might be the case for a more narrowly focused asset class, and the return on each type of asset may be a deviation from the average return for the asset class.

### ***Research Data***

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

### ***Socially Conscious Investing***

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

## **Risks Associated with Securities**

### ***ETF and Mutual Fund Risk***

The risk of owning ETFs and mutual funds reflect their underlying securities (e.g., stocks, bonds, etc.). ETFs and mutual funds may carry additional expenses based on their share of operating expenses and certain brokerage fees, which may result in the potential duplication of certain fees. Also, certain funds may be too large to move quickly in response to market fluctuations, meaning that investors may miss out on gains or be exposed to losses for a longer time than if they were in a nimbler portfolio. We do not recommend leveraged or inverse ETFs to our advisory clients due to their inherent heightened risk.

### ***Blockchain ETF's Risks***

Blockchains are best known for storing “blocks” of computer data in a decentralized system and play an important role in cryptocurrency markets. Blockchain ETF's invest in companies involved in blockchain technology directly or indirectly.

- Blockchain ETF's are a new option for investors and therefore it is challenging to determine the performance of these funds.
- Uncertainty of long-term viability of these ETF's.
- These funds are investing in technology startups, which can be inherently risky.

One way to overcome these challenges is to diversify your holdings.

### ***Fixed Income Risks***

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

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

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

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

*Liquidity Risk* - The inability to readily buy or sell an investment for a price close to the true underlying value of the asset due to a lack of buyers or sellers. While certain types of fixed income are generally liquid (i.e., bonds), there are risks which may occur such as when an issue trading in any given period does not readily support buys and sells at an efficient price. Conversely, when trading volume is high, there is also a risk of not being able to purchase a particular issue at the desired price.

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

### ***Index Investing***

Certain ETFs and indexed funds have the potential to be affected by “active risk” (or “tracking error risk”), which might be defined as a deviation from a stated benchmark.

### ***QDI Ratios***

While various investment holdings may be known for their potential tax-efficiency and higher “qualified dividend income” (QDI) percentages, there are asset classes within these investment vehicles or holding periods within



that may not benefit. Shorter holding periods, as well as commodities and currencies (that may be part of fund or portfolio), may be considered “non-qualified” under certain tax code provisions. A holding’s QDI will be considered when tax-efficiency is an important aspect of the client’s portfolio.

## Item 9: Disciplinary Information

---

### **Criminal or Civil Actions**

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

### **Administrative Enforcement Proceedings**

Panoramic Financial, in August 2024, entered into a consent order (Order No. REG-24-CAF-08) with the Securities Commissioner of the State of Texas. Panoramic Financial is based in California and does not have a place of business in Texas. In 2016, because Panoramic Financial had some Texas clients, it sought advice on the Texas investment adviser registration requirements. Panoramic Financial was advised that it could rely on an exemption at that time and properly relied on the exemption until August 2020. Panoramic Financial did not recognize that the exemption only applied if the firm had five or fewer clients in Texas and thus failed to seek registration immediately upon exceeding the exemption’s threshold. Upon receiving advice that full registration was necessary, Panoramic Financial immediately pursued the registration and agreed to the payment of a fine of \$6,250 for violating the investment adviser registration requirement in Texas. In connection with this resolution, Panoramic Financial was registered in Texas as an investment adviser as of August 19, 2024. Notably, at all times, Panoramic Financial was registered as an investment adviser in its home state, California.

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

Panoramic Financial 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 Panoramic Financial or the integrity of its management.

## Item 10: Other Financial Industry Activities and Affiliations

---

Internal policies require associated persons to conduct business activities in a manner that avoids conflicts of interest between the firm and its clients, or that may be contrary to law. Panoramic Financial will provide disclosure to each client prior to and throughout the term of an engagement regarding any conflicts of interest which might reasonably compromise its impartiality or independence.

Neither the firm, management, nor its associates are registered or have an application pending to register as a Financial Industry Regulatory Authority (FINRA) or National Futures Association (NFA) member firm, nor are we required to be registered with such entities. Neither our firm nor its management is or has a material relationship with any of the following types of entities:

- accountant or an accounting firm
- bank, credit union or thrift institution

- insurance company of insurance agency
- lawyer or law firm
- real estate broker or dealer
- pension consultant
- sponsor or syndicator of limited partnerships
- trust company
- issuer of a security, to include investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund,” and offshore fund)

Upon your request, you may be provided a referral to various professionals, such as an accountant or an attorney. While these referrals are based on the best information made available, the firm does not guarantee the quality or adequacy of the work provided by these referred professionals. There is not an agreement with these entities nor are referral fees received from these professionals for such informal referrals. Any fees charged by these other entities for their services are completely separate from fees charged by our firm.

### **Recommendations or Selections of Other Investment Advisers**

Panoramic Financial employs Guideline, Inc., or Human Interest Advisor LLC, unaffiliated investment advisers, to provide advisory services client accounts under its Pension Consulting Service. In such circumstances, Panoramic Financial does not share in the other investment adviser’s asset management fee. This situation creates a conflict of interest. However, when recommending Guideline or Human Interest to clients, the client’s best interest and suitability will be the main determining factors of Panoramic Financial. This relationship is disclosed to the client at the commencement of the advisory relationship. Clients are not obligated, contractually or otherwise, to use the services of any other investment advisers we recommend. Additionally, Panoramic Financial will only recommend another investment adviser who is properly licensed or registered as an investment adviser.

### **Disclosure of Material Conflicts**

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

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

---

Panoramic Financial holds itself to a *fiduciary standard*, which means the firm and its associates will act in the utmost good faith, performing in a manner believed to be in the best interest of its clients. Our firm believes that business methodologies, ethics rules, and adopted policies are designed to eliminate or at least minimize material conflicts of interest and to appropriately manage any material conflicts of interest that may remain.

You should be aware that no set of rules can possibly anticipate or relieve all material conflicts of interest. Our firm will disclose to its advisory clients any material conflict of interest relating to the firm, its representatives, or any of its employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

## **Code of Ethics Description**

The firm has adopted a Code of Ethics that establishes policies for ethical conduct for all its personnel and accepts the obligation not only to comply with all applicable laws and regulations but also to act in an ethical and professionally responsible manner in all professional services and activities. Firm policies include prohibitions against insider trading, circulation of industry rumors, and certain political contributions, among others. Our firm periodically reviews and amends the firm's Code of Ethics to ensure they remain current, and we require all personnel to annually attest to their understanding of and adherence to the Code of Ethics. A copy of the firm's Code of Ethics is made available to any client or prospective client upon request.

Associates that are CERTIFIED FINANCIAL PLANNER™ Practitioners, such as Mr. McFadden, also adhere to the Certified Financial Planner Board of Standards, Inc.'s Code of Ethics. These principles include:

### ***Principle 1 – Integrity***

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

### ***Principle 2 – Objectivity***

An advisor will provide professional services objectively. Objectivity requires intellectual honesty and impartiality. Regardless of the particular service rendered or the capacity in which an advisor functions, an advisor should protect the integrity of their work, maintain objectivity and avoid subordination of their judgment.

### ***Principle 3 – Competence***

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

### ***Principle 4 – Fairness***

Advisors will be fair and reasonable in all professional relationships. Fairness requires impartiality, intellectual honesty and disclosure of material conflict(s) of interest. It involves a subordination of one's own feelings, prejudices and desires so as to achieve a proper balance of conflicting interests. Fairness is treating others in the same fashion that you would want to be treated and is an essential trait of any professional.

### ***Principle 5 – Confidentiality***

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

### ***Principle 6 – Professionalism***

Advisors will act in a manner that demonstrates exemplary professional conduct. Professionalism requires behaving with dignity and courtesy to all who use their services, fellow professionals, and those in related professions. Advisors cooperate with fellow advisors to enhance and maintain the profession's public image and improve the quality of services.

### ***Principle 7 – Diligence***

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

## **Statement Involving the Firm's Privacy Policy**

Panoramic Financial respects the privacy of all clients and prospective clients; both past and present (collectively termed "customers" per federal guidelines). It is recognized that you have entrusted our firm with nonpublic personal information and it is important that both access persons and customers are aware of firm policy concerning what may be done with that information.

The firm collects personal information about customers from the following sources:

- Information clients provide to complete their financial plan or investment recommendation
- Information clients provide in engagement agreements, account applications, and other documents completed in connection with the opening and maintenance of their accounts
- Information customers provide verbally
- Information received from service providers, such as custodians, about client transactions

The firm does not disclose nonpublic personal information about our customers to anyone, except in the following circumstances:

- When required to provide services, our clients have requested
- When our customers have specifically authorized us to do so
- When required during the course of a firm assessment (i.e., independent audit)
- When permitted, or required by law (i.e., periodic regulatory examination)

Within the firm, access to customer information is restricted to personnel that need to know that information. All access persons and service providers understand that everything handled in firm offices are confidential and they are instructed to not discuss customer information with someone else that may request information about an account unless they are specifically authorized in writing by the customer to do so. This includes, for example, providing information about a spouse's IRA account or to adult children about parents' accounts, etc.

To ensure security and confidentiality, the firm maintains physical, electronic, and procedural safeguards to protect the privacy of customer information.

The firm will provide you with its privacy policy on an annual basis per federal law and at any time, in advance, if firm privacy policies are expected to change.

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

No associate of the firm is authorized to recommend to a client, or effect a transaction for a client, involving any security in which the firm or a “related person” (e.g., associate, an immediate family member, etc.) has a material financial interest, such as in the capacity as an underwriter or advisor to an issuer of securities, etc.

An associate is prohibited from borrowing from or lending to a client unless the client is an approved financial institution.

The firm is able to provide a broad range of advisory services to its clients, including financial planning and portfolio management; a fee may be earned by the firm for both of these services. A conflict of interest exists within these various client relationships and we hereby note that you are under no obligation to act on a recommendation from an associate. If you elect to do so, you are under no obligation to complete all of them through our firm or a service provider whom we may recommend to you. Whether an associate is serving a client in one or more capacities, they will disclose in advance how they are being compensated and if there is a conflict of interest involving any service being provided.

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

Panoramic Financial does not trade for its own account (e.g., proprietary account trading). The firm’s related persons may buy or sell securities that are the same as, similar to, or different from, those recommended to clients for their accounts. A recommendation made to one client may be different in nature or in timing from a recommendation made to a different client; clients often have different objectives and risk tolerances. At no time, will the firm or a related person receive preferential treatment over a client.

## **Trading Securities at/Around the Same Time as Client’s Securities**

In an effort to reduce or eliminate certain conflicts of interest involving personal trading (i.e., trading ahead of a client’s order, etc.), firm policy requires the restriction or prohibition of related parties’ transactions in specific securities. Any exceptions or trading pre-clearance must be approved by the firm in advance of the transaction in a related person’s account, and the firm maintains required personal securities transaction records per regulation.

## **Investment Advice Relating to Retirement Accounts**

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule’s provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);

- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

In addition and as required by this rule, we provide information regarding the services that we provide to you, and any material conflicts of interest, in this brochure and in your client agreement.

## Item 12: Brokerage Practices

---

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

Our advisory firm does not maintain physical custody of your assets (see Item 15). Your account must be maintained by a qualified custodian, such as a broker/dealer, bank or trust company. Our firm is not a custodian nor is there an affiliate that is a custodian.

You may choose to maintain your investment account at your current custodian and, following your written authorization via limited power of attorney and the approval of the custodian of record maintaining the account, we will request the execution of trades in your account at that custodian. Should you prefer a new service provider, a recommendation may be made to you by our firm that is based on your needs, overall cost, and ease of use.

Investment management services accounts may be maintained at one or more custodians of record that have been selected by the respective third-party investment manager and they will be disclosed in the third-party investment manager's disclosure documents and account opening forms.

Our firm prohibits non-cash compensation (termed "soft dollars" in certain jurisdictions) and will not "pay up" to receive additional services from a service provider. All compensation paid to our firm is paid directly by the client and, therefore, the firm does not receive any additional compensation when its clients engage a recommended custodian or other service provider. We conduct periodic assessments of any recommended service provider which generally involves a review of the range and quality of services, reasonableness of fees, among other items, and in comparison, to industry peers.

### **Best Execution**

In light of the nature of our firm's advisory services, it is believed "best execution" review obligations with regard to client transactions are not required under current industry guidelines.

### **Directed Brokerage**

We do not require or engage in directed brokerage involving client accounts, nor do we believe we are obligated to seek better execution services or prices from any provider. Clients are free to use any particular service provider to execute their transactions and they are responsible for negotiating any terms or arrangements for

their account. Since transactions are completed at a service provider of the client's choice, they may pay more for their transactions.

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

Generally, we combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

# Item 13: Review of Accounts

---

## **Schedule for Periodic Review of Client Accounts**

### ***Financial Planning Services***

Periodic reviews are recommended if you are receiving our financial planning services, and we believe they should occur at least on an annual basis if practical. Reviews will be conducted by your assigned investment advisor representative and may involve analysis and possible revision of your previous financial plan or investment allocation. A copy of revised plans or asset allocation reports will be provided to you upon request. Unless provided for in your engagement agreement, reviews are generally conducted under a new or amended agreement.

### ***Investment Management Services***

Client accounts with the Investment Management Service will be reviewed regularly on a quarterly basis by Andrew McFadden, President 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.

## **Review of Client Accounts on Non-Periodic Basis**

### ***Financial Planning Services***

You should contact our firm for additional reviews when you anticipate or have experienced changes in your financial situation (i.e., changes in employment, an inheritance, the birth of a new child, etc.), or if you prefer to modify investment account requirements. Non-periodic reviews are conducted by Mr. McFadden, which may

occur under a new or amended agreement. A copy of revised plans or asset allocation reports will be provided to the client upon request.

### ***Investment Management Services***

Additional reviews by your portfolio managers and/or our firm's supervisory personnel may be triggered by news or research related to a specific holding, a change in our view of the investment merits of a holding, or news related to the macroeconomic climate affecting a sector or holding within that sector. A portfolio may be reviewed for an additional holding or when an increase in a current position is under consideration.

Account cash levels above or below what we deem appropriate for the investment environment, given the client's stated tolerance for risk and investment objectives, may also trigger a review.

### **Content of Client Provided Reports and Frequency**

Whether you have opened and maintained an investment account on your own or with our assistance, you will receive account statements sent directly from mutual fund companies, transfer agents, custodians or brokerage companies where your investments are held. We urge you to carefully review these account statements for accuracy and clarity, and to ask questions when something is not clear.

Our firm may provide portfolio "snapshots" if we are engaged to provide periodic asset allocation or investment advice. However, we do not provide ongoing performance reporting under our financial planning engagements.

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

---

Our firm does not receive economic benefit from an external source we may recommend to you, nor do we engage in solicitation activities involving unregistered persons.

An associate of the firm may hold individual membership or serve on boards or committees of professional industry associations. Generally, participation in any of these entities require membership fees to be paid, adherence to ethical guidelines, as well as in meeting experiential and educational requirements. A benefit these entities may provide to the investing public is the availability of online search tools that allow interested parties (prospective clients) to search for individual participants within a selected state or region. These passive websites may provide means for interested persons to contact a participant via electronic mail, telephone number, or other contact information, in order to interview the participating member. The public may also choose to telephone association staff to inquire about an individual within their area and would receive the same or similar information. A portion of these participant's membership fees may be used so that their name will be listed in some or all of these entities' websites (or other listings).

Prospective clients locating our advisory firm or an associate via these methods are not actively marketed by the noted associations. Clients who find our firm in this way do not pay more for their services than clients referred in any other fashion. The firm does not pay these entities for prospective client referrals, nor is there a fee-sharing arrangement reflective of a solicitor engagement.



## Item 15: Custody

---

Your assets will be maintained by an unaffiliated, qualified custodian, such as a bank, broker/dealer, mutual fund companies or transfer agent. Your assets are not held by our firm or any associate or our firm. In keeping with this policy involving our client funds or securities, Panoramic Financial:

- Restricts the firm or an associate from serving as trustee or having general power of attorney over a client account;
- Prohibits any associate from having authority to directly withdraw securities or cash assets from a client account;
- Does not accept or forward client securities (i.e., stock certificates) erroneously delivered to our firm;
- Will not collect advance fees of \$500 or more for services that are to be performed six months or more into the future; and
- Will not authorize an associate to have knowledge of a client's account access information (i.e., online 401(k), brokerage or bank accounts) if such access would allow physical control over account assets.

Your account custodian will provide you with your investment account transaction confirmations and account statements, which will include all debits and credits as well as our firm's advisory fee for that period. Statements are provided on at least a quarterly basis and confirmations are provided as transactions occur within your account. Our advisory firm will not create an account statement for a client nor serve as the sole recipient of a client account statement. You are urged to carefully review and compare your account statements that you have received directly from your custodian of record with any performance report you may receive from any source.

## Item 16: Investment Discretion

---

### Financial Planning Engagements

If you ask us to assist you in any trade execution (including account rebalancing) under an investment consultation component of our financial planning engagement, such as assisting you with your held-away assets, it will only be accomplished on a *non-discretionary basis*. Such account authority requires your prior approval involving the investment and reinvestment of account assets, portfolio rebalancing, or for our firm to give instructions to the custodian maintaining your account. You will be required to execute our firm's client services agreement that describes our limited account authority, as well as the custodian of record's account opening document that includes their limited power of attorney clause or separate form. Please note that in light of the requirement for your pre-approval you must make yourself available and keep our firm updated on your contact information so that instructions can be efficiently affected on your behalf.

### Investment Management Services

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. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

## Item 17: Voting Client Securities

---

You may periodically receive proxies or other similar solicitations sent directly from your selected custodian or transfer agent. Should we receive a duplicate copy, note that we do not forward these or any correspondence relating to the voting of your securities, class action litigation, or other corporate actions. Our firm does not vote proxies on your behalf. We will not offer guidance involving any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise or monitor class action or other litigation involving client assets. However, we will answer limited questions with respect to what a proxy voting request or other corporate matter may be and how to reach the issuer or their legal representative.

If your account is supervised by a third-party investment manager, you should thoroughly review the third-party investment manager's Form ADV Part 2 to determine their proxy voting policies. Otherwise, you will maintain exclusive responsibility for directing the manner in which proxies solicited by issuers of securities that are beneficially owned by you shall be voted, as well as making all other elections relative to mergers, acquisitions, tender offers or other legal matters or events pertaining to your holdings. You should consider contacting the issuer or your legal counsel involving specific questions you may have with respect to a particular proxy solicitation or corporate action.

## Item 18: Financial Information

---

Panoramic Financial will not take physical custody of your assets, nor do we serve an account under a discretionary agreement that allows such control. Fee withdrawals must be done through a qualified intermediary, per your prior written agreement, and following your receipt of our firm's written notice.

Engagements with our firm do not require that we collect fees from you of \$500 or more for our advisory services that we have agreed to perform six months or more into the future.

Neither Panoramic Financial nor its management serve as general partner for a partnership or trustee for a trust in which the firm's advisory clients are either partners of the partnership or beneficiaries of the trust.

Neither the firm nor its management has a financial condition likely to impair the ability to meet commitments to our clients. The firm and its management have not been the subject of a bankruptcy petition at any time.

Due to the nature of our firm's services and operational practices, an audited balance sheet is not required nor included with this brochure.

# Item 19: Requirements for State-Registered Advisers

Andrew W. McFadden, MBA, CFP®

Born: 1983

## Educational Background

- Master of Business Administration, California State University, Fresno; Fresno, CA
- Bachelor of Science in Mathematics, California State University, Fresno; Fresno, CA

## Business Experience

- 2014 – Present, Panoramic Financial, President/Principal/Chief Compliance Officer/Investment Advisor Representative
- 2013 – 2018, Clovis Unified School District, Community Education Instructor
- 2015 – 2016, Fresno Pacific University, Adjunct Professor
- 2013 – 2015, Fresno Unified School District, Community Education Instructor
- 2012 – 2014, Regency Investment Advisors Inc., Client Advisor and Project Manager
- 2011 – 2013, University of Phoenix, Adjunct Instructor
- 2008 – 2012, The Applied Finance Group, LLC, Research Analyst

## Professional Designations, Licensing & Exams

### **CERTIFIED FINANCIAL PLANNER™ professional**

I am certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and I may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at [www.cfp.net](http://www.cfp.net).

CFP® professionals have met CFP Board’s high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor’s degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.

- **Ethics** – Satisfy the *Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement* and agree to be bound by CFP Board’s *Code of Ethics and Standards of Conduct* (“*Code and Standards*”), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board’s *Code and Standards*. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the *Code and Standards*.

## Other Business Activities

Mr. McFadden is not involved in any outside business activities.

## Performance Based Fees

Neither Mr. McFadden nor Panoramic Financial is compensated for advisory services involving performance-based fees, and firm policy does not allow associated persons to accept or receive additional economic benefit, such as sales awards or other prizes, for providing advisory services to firm clients.

## Material Disciplinary Disclosures

No management person at Panoramic Financial has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

## Material Relationships That Management Persons Have with Issuers of Securities

Neither Mr. McFadden nor Panoramic Financial has a material relationship with the issuer of a security.



Panoramic Financial Advice Inc.  
2909 E. Los Altos Avenue  
Fresno, CA 93710

805-244-5057

February 11, 2025

[www.panoramicfinancial.com](http://www.panoramicfinancial.com)

## Form ADV Part 2B – Brochure Supplement

*For*

**Andrew Wayne McFadden, MBA, CFP®**

President/Principal/Chief Compliance Officer/Investment Advisor Representative

This brochure supplement provides information about Andrew McFadden that supplements the Panoramic Financial brochure. A copy of that brochure precedes this supplement. Please contact Andrew McFadden if the Panoramic Financial brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Andrew McFadden is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number 5496210.

# Item 2: Educational Background and Business Experience

---

Andrew W. McFadden, MBA, CFP®

Born: 1983

## Educational Background

- Master of Business Administration, California State University, Fresno; Fresno, CA
- Bachelor of Science in Mathematics, California State University, Fresno; Fresno, CA

## Business Experience

- 2014 – Present, Panoramic Financial, President/Principal/Chief Compliance Officer/Investment Advisor Representative
- 2013 – 2018, Clovis Unified School District, Community Education Instructor
- 2015 – 2016, Fresno Pacific University, Adjunct Professor
- 2013 – 2015, Fresno Unified School District, Community Education Instructor
- 2012 – 2014, Regency Investment Advisors Inc., Client Advisor and Project Manager
- 2011 - 2013, University of Phoenix, Adjunct Instructor
- 2008 – 2012, The Applied Finance Group, LLC, Research Analyst

## Professional Designations, Licensing & Exams

### CERTIFIED FINANCIAL PLANNER™ professional

I am certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and I may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at [www.cfp.net](http://www.cfp.net).

CFP® professionals have met CFP Board’s high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor’s degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning

process, or 4,000 hours of apprenticeship experience that meets additional requirements.

- **Ethics** – Satisfy the *Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement* and agree to be bound by CFP Board’s *Code of Ethics and Standards of Conduct* (“*Code and Standards*”), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board’s *Code and Standards*. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the *Code and Standards*.

## Item 3: Disciplinary Information

---

No management person at Panoramic Financial 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

---

Mr. McFadden is not involved in any outside business activities.

## Item 5: Additional Compensation

---

Mr. McFadden does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through Panoramic Financial.

## Item 6: Supervision

---

Mr. McFadden serves as the firm’s Chief Compliance Officer. Because supervising oneself poses a conflict of interest, the firm has adopted policies and procedures to mitigate this conflict and may use the services of unaffiliated professionals to ensure the firm’s oversight obligations are met.

Questions relative to the firm, its services or this Form ADV Part 2 brochure may be made to the attention of Mr. McFadden at 805-244-5057. Additional information about the firm, other advisory firms, or an associated investment advisor representative is available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). A search of this site for firms may be accomplished by firm name or a unique firm identifier, known as an IARD or CRD number. The IARD number for Panoramic Financial is 172396. The business and disciplinary history, if any, of an investment

advisory firm and its representatives may also be obtained by calling the California Department of Financial Protection and Innovation at (866) 275-2677.

## Item 7: Requirements for State Registered Advisers

---

Mr. McFadden has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.