

# Item 1: Cover Page

## Franklin Star Wealth Planning

221 N. Kansas Street, Ste. 700  
El Paso, Texas 79901

### **Form ADV Part 2A – Firm Brochure**

(915) 490-6205

Dated January 20, 2020

<http://www.franklinstarwealth.com>

This Brochure provides information about the qualifications and business practices of Franklin Star Wealth Planning, “FSWP”. If you have any questions about the contents of this Brochure, please contact us at (915) 490-6205. 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.

Franklin Star Wealth Planning is registered as an Investment Adviser with the State of Texas. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about FSWP is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the firm’s identification number 299474.

## Item 2: Material Changes

**The following material changes have taken effect for FSWP effective March 4th, 2019:**

- FSWP added additional Sub-Advisers under Item 4, Types of Advisory Services.
- FSWP added “Single Engagement Financial Planning Services” under Item 4, Types of Advisory Services.
- FSWP now offers Ongoing Business Accounting Service as a stand alone service and altered Bullet Point #4 to include “EA’s and Tax Professionals” under Item 4, Types of Advisory Services.
- FSWP changed the Annual Advisory Fee under Item 5, Fees and Compensation.
- FSWP no longer includes Advisory Services as part of Ongoing Financial Planning services.
- FSWP no longer charges a flat monthly fee for Ongoing Financial Planning based upon Net Worth. The new fee calculation can be found under Item 5, Fees and Compensation.
- FSWP added information regarding fees for Single Engagement Financial Planning Services under Item 5, Fees and Compensation.
- FSWP changed the monthly fee range for Ongoing Business Accounting Service.
- FSWP added a new brokerage and custodian to Item 12, The Custodians and Brokers We Use.

# Item 3: Table of Contents

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# Item 4: Advisory Business

## Description of Advisory Firm

Franklin Star Wealth Planning is registered as an Investment Adviser with the State of Texas. FSWP and Adrian Urias have been registered with the State of Texas since January of 2019. Adrian Urias is the principal owner of FSWP. FSWP currently reports \$1,087,706 in discretionary and \$668,859 in non-discretionary Assets Under Management. Assets Under Management were calculated as of December 31, 2019.

## Types of Advisory Services

### Investment Advisory Services through the use of Third Party Managers, Outside Managers, or Sub-Advisors

We provide investment advisory services through the use of Third Party Managers, Outside Managers, or Sub-Advisors for portfolio management services. We will assist clients in selecting an appropriate allocation model, completing the Outside Manager's investor profile questionnaire, interacting with the Outside Manager and reviewing the Outside Manager. Our review process and analysis of outside managers is further discussed in Item 8 of this Form ADV Part 2A. Additionally, we will meet with the client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account. Fees pertaining to this service are outlined in Item 5 of this brochure.

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.

Betterment for Advisors ("Betterment") as a Sub-Adviser

Betterment for Advisors ("Betterment") builds investment models through a technology solution and supports financial planners with investment strategies based on research, experience, and sound rationale. Betterment primarily allocates client assets among various exchange-traded funds ("ETFs"). Betterment's services are based on long-term investment strategies incorporating the principles of Modern Portfolio Theory. Betterment manages client investments in model portfolios on a discretionary basis.

BNY Mellon Wealth Management ("BNY Mellon") as a Sub-Adviser

BNY Mellon Wealth Management ("BNY Mellon") provides portfolio and wealth management services to high net worth individuals, families, corporate entities and trusts. BNY Mellon primarily allocates client assets among various mutual funds, exchange-traded funds ("ETFs"). BNY Mellon may also allocate client assets in individual debt and equity securities, options, and independent investment managers. BNY Mellon's services are based on long-term investment strategies incorporating the principles of Modern Portfolio Theory. BNY Mellon manages client investments in model portfolios on a discretionary basis.

## XY Investment Solutions ("XYIS") as a Sub-Adviser

XY Investment Solutions ("XYIS") builds investment models through a technology solution and supports financial planners with investment strategies based on research, experience, and sound rationale. XYIS primarily allocates client assets among various mutual funds, exchange-traded funds ("ETFs"). XYIS may also allocate client assets in individual debt and equity securities, options, and independent investment managers. XYIS's services are based on long-term investment strategies incorporating the principles of Modern Portfolio Theory. XYIS manages client investments in model portfolios on a discretionary basis.

### Ongoing Financial Planning

Ongoing Financial Planning involves working one-on-one with a planner over an extended period of time. By paying a fixed monthly, quarterly, semi-annual or annual fee, clients get to work with a planner who will work with them to develop and implement their plan. The planner will monitor the plan, recommend any changes and ensure the plan is up to date. Upon desiring a comprehensive plan, a client will be taken through establishing their goals and values around money. They will be required to provide information to help complete the following areas of analysis: net worth, cash flow, insurance, credit scores/reports, employee benefit, retirement planning, insurance, investments, college planning and estate planning. Once the client's information is reviewed, their plan will be built and analyzed, and then the findings, analysis and potential changes to their current situation will be reviewed with the client. Clients subscribing to this service will receive a written or an electronic report, providing the client with a detailed financial plan designed to achieve his or her stated financial goals and objectives. If a follow-up meeting is required, we will meet at the client's convenience. The plan and the client's financial situation and goals will be monitored throughout the year and follow-up phone calls and emails will be made to the client to confirm that any agreed upon action steps have been carried out. On an annual basis, there will be a full review of this plan to ensure its accuracy and ongoing appropriateness. Any needed updates will be implemented at that time. Client's of this service will be required to sign an annual agreement.

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

- **Business Planning:** We provide consulting services for clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.
- **Cash Flow and Debt Management:** We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.

- **College Savings:** Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren (if appropriate).
- **Employee Benefits Optimization:** We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.
- **Estate Planning:** This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts, and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.
- **Financial Goals:** We will help clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- **Insurance:** Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile.
- **Investment Analysis:** This may involve developing an asset allocation strategy to meet clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.
- **Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments).

If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your

retirement years.

- **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance (“self-insuring”).
- **Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their “tax efficiency,” with consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

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

### **Single Engagement Financial Planning Services**

Single Engagement Financial Planning Services involves working one-on-one with a planner over a period not to exceed (3) months. By paying a fixed, one-time fee, clients get to work with a planner who will work with them to develop their plan. The planner will create the plan and recommend any changes. Upon desiring a comprehensive plan, a client will be taken through establishing their goals and values around money. They will be required to provide information to help complete the following areas of analysis: net worth, cash flow, insurance, credit scores/reports, employee benefit, retirement planning, insurance, investments, college planning and estate planning. Once the client's information is reviewed, their plan will be built and analyzed, and then the findings, analysis and potential changes to their current situation will be reviewed with the client. Clients engaging in this service will receive a written or an electronic report, providing the client with a detailed financial plan designed to achieve his or her stated financial goals and objectives. If a follow-up meeting is required, the client will be granted (1) meeting at the client's convenience. The client(s) plan will not be continuously monitored on an on going basis. Implementation of the plan will be the responsibility of the client(s). Any follow up or questions via email, text, or phone call regarding the plan after the follow-up meeting will be subject to a new agreement between client and planner.

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

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

## Wrap Fee Programs

We do not participate in wrap fee programs.

## Ongoing Business Accounting Services

Ongoing Business Accounting Services consist of helping small business owners establish or maintain Quickbooks accounting files or similar accounting software. This will include initial setup of accounts (if needed), and/or ongoing quarterly maintenance in the form of reconciliation of accounts. Payroll Services will not be provided as part of Ongoing Business Accounting Services.

In general, the Ongoing Business Accounting Services will address any or all of the following areas of concern. The client and advisor will work together to select the specific areas to cover. These areas may include, but are not limited to, the following:

- **Initial Setup of Quickbooks Online or similar software:** Assistance regarding initial setup of accounting software will be provided when needed. This will include a detailed review of accounts needed for each accounting business. Should account setup already exist, coordinating the importing of data into FSWP house account with access will be provided.
- **Quarterly Reconciliation of Accounts:** Quarterly bank account reconciliation will be provided to ensure that all entries have been made and properly accounted for by the client. Coordination via FSWP and the client will be made in order to obtain all relevant bank statements.
- **Helping and Providing Balance Sheets, Profit and Loss Statements, and any other financial statements needed by the client:** Financial Accounting Statements will be generated and provided at the client's request. At minimum, the client will receive annual Balance Sheets and Profit and Loss Statements for their records. Clients may request other financial forms at their discretion and at various times of the year depending on need.
- **Coordinating with an outside CPA/EA and/or tax professional the preparation and handling of all required tax returns:** Individual, Business and/or Corporate tax returns will be prepared by an outside CPA/EA and/or tax professional firm. Coordination will be conducted via the client's preferred CPA/EA and/or tax professional. Should the client not have a preferred CPA, EA and/or tax professional FSWP will provide recommendations. The cost of tax preparation will be paid directly from FSWP as part of the client's monthly fee. FSWP will not sign off on any tax return as part of Business Accounting Services.

Please note: This service is reserved ONLY for business owners. FSWP reserves the right to terminate the client relationship at its sole discretion at suspicion of fraud or wrongdoing.

## Item 5: Fees and Compensation

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

### **Investment Advisory Services through the use of Third Party Managers, Outside Managers, or Sub-Advisors**

The Adviser charges a fee for Investment Advisory Services. This service and its associated fees are specified below according to account value. The Investment Advisory fee is inclusive of the Third Party Manager, Outside Managers, or Sub-Advisors portfolio management services.

### **Use of Third Party Managers, Outside Managers, or Sub-Advisors (TAMPs)**

The standard advisory fee is based on the market value of the account and is calculated as follows:

Account Value	Annual Advisory Fee
\$0 - \$999,999	1.25%
\$1,000,000 - \$2,999,999	1.15%
\$3,000,000 - \$4,999,999	1.05%
\$5,000,000 +	0.95%

The annual fees are negotiable and are pro-rated and paid in arrears on a quarterly basis. The Outside Manager will debit the client's account for both the Outside Manager's fee, and FSWP's advisory fee, and will remit FSWP's fee to FSWP. 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 30 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

The Outside Manager (Sub-Adviser) will debit the client's account for the Outside Manager's fee, and FSWP's advisory fee will be debited separately. Please note, the above fee schedule does include the Outside Manager's fee. 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.

### **Ongoing Financial Planning Fee**

Ongoing Financial Planning consists of an upfront charge of between \$500-\$3,000 and an ongoing fee of \$150-\$400 per month. The fees are paid in advance and may be paid monthly/quarterly. The fee may be negotiable in certain cases. Fees for this service may be paid by electronic funds transfer or check. This service may be terminated with 30 days' notice. Upon termination of any account, the fee will be prorated and any unearned fee will be refunded to the client.

For clients that had a prior relationship with the adviser at a previous registered investment adviser firm and have become clients of FSWP, they will be charged a legacy fee that will be equivalent to their previous monthly fee.

### **Single Engagement Financial Planning Services**

Single Engagement Financial Planning Services will offered at a flat rate of \$500-\$5,000 depending upon the complexity of the comprehensive financial plan to be created. Half of the flat rate fee is due upon signing of Financial Planning Agreement, while the other half is due upon delivery of the comprehensive financial plan. This engagement will not last longer than (3) months and is subject to the description and details outlined in Item 4 of this brochure.

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

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

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

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

### **Ongoing Business Accounting Services**

Ongoing Business Accounting Services will be offered at a flat fee of \$400-\$1,200 per month depending on the complexity of services to be performed. The fees are paid in advance. The fee may be negotiable in certain cases. Fees for this service may be paid by electronic funds transfer or check. This service may be terminated with 30 days' notice. Upon termination of any account, the fee will be prorated and any unearned fee will be refunded to the client.

Please note: The stated fee above is per business entity. Fees may be negotiable in certain cases for multiple entities depending on the complexity of the services to be provided.

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

We do not offer performance-based fees and do not engage in side-by-side management.

## Item 7: Types of Clients

We provide financial planning and portfolio management services to individuals, high net-worth individuals, and pension and profit sharing plans. Profit sharing references 401(k) plans and the profit sharing component of these plans. No management will be done for pooled investment vehicles.

We do not have a minimum account size requirement.

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

When clients have us complete an Investment Analysis (described in Item 4 of this brochure) as part of the financial plan, our primary method of investment analysis is fundamental analysis.

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

**Use of Outside Managers:** We refer clients to third-party investment advisers ("outside managers"). Our analysis of outside managers involves the examination of the experience, expertise, investment philosophies, and past performance of the outside managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's underlying holdings, strategies, concentrations, and leverage as part of our overall periodic risk assessment. Additionally, as part of our due-diligence process, we survey the manager's compliance and business enterprise risks. A risk of investing with an outside manager who has been successful in the past is that he/she may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in an outside manager's portfolio. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

## **Passive Investment Management**

We primarily practice passive investment management. Passive investing involves building portfolios that are comprised of various distinct asset classes. The asset classes are weighted in a manner to achieve the desired relationship between correlation, risk, and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange traded funds.

Passive investment management is characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Academic research indicates most active managers underperform the market.

## **Material Risks Involved**

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

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

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

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

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

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

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

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

## **Risks Associated with Securities**

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

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

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

## Item 9: Disciplinary Information

### **Criminal or Civil Actions**

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

### **Administrative Enforcement Proceedings**

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

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

FSWP 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 FSWP or the integrity of its management.

## Item 10: Other Financial Industry Activities and Affiliations

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

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

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

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

Adrian Urias is licensed to sell life and health insurance and may engage in product sales with our clients, for which they will receive additional compensation. Any commissions received through life or health insurance sales do not offset advisory fees the client may pay for advisory services under FSWP.

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

As referenced in Item 4 of this brochure, FSWP recommends clients to Outside Managers to manage their accounts. In the event that we recommend an Outside Manager, please note that we do not share in their advisory fee. Our fee is separate and in addition to their compensation (as noted in Item 5) and will be described to you prior to engagement. You are not obligated, contractually or otherwise, to use the services of any Outside Manager we recommend. Additionally, FSWP will only recommend an Outside Manager who is properly licensed or registered as an investment adviser.

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

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

### **Code of Ethics Description**

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

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to clients.
- Competence - Associated persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.

- Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Associated persons shall not disclose confidential client information without the specific consent of the client unless in response to proper legal process, or as required by law.
- Professionalism - Associated persons' conduct in all matter shall reflect the credit of the profession.
- Diligence - Associated persons shall act diligently in providing professional services.

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

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

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

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

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

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

From time to time, our firm or its “related persons” may buy or sell securities for themselves at or around the same time as clients. We will not trade non-mutual fund securities 5 days prior to the same security for clients.

## **Item 12: Brokerage Practices**

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

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

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

We currently do not receive soft dollar benefits.

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

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

### **3. Clients Directing Which Broker/Dealer/Custodian to Use**

We do recommend a specific custodian for clients to use, however, clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing clients to choose a specific custodian, we may be unable to achieve most favorable execution of client transaction and this may cost clients money over using a lower-cost custodian.

### **The Custodian and Brokers We Use**

#### **Betterment for Advisors**

Advisor participates in the Betterment for Advisors program. Betterment for Advisors is a division of Betterment Securities, an SEC registered broker-dealer and member FINRA/SIPC. Betterment for Advisors is an independent [and unaffiliated] SEC-registered broker-dealer. Betterment for Advisors offers to independent investment Advisors services which include custody of securities, trade execution, clearance, and settlement of transactions. Advisor receives some benefits from Betterment for Advisors through its participation in the program. (Please see the disclosure under Item 14 below.)

#### **TD Ameritrade**

Advisor participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade"), member FINRA/SIPC. TD Ameritrade is an independent [and unaffiliated] SEC-registered broker-dealer. TD Ameritrade offers to independent investment Advisors services which include custody of securities, trade execution, clearance, and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under Item 14 below.)

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

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

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

Client accounts with the Investment Management Service will be reviewed regularly on a quarterly basis by Adrian Urias, Owner 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.

FSWP will provide written reports to Investment Management clients on a quarterly basis. We urge clients to compare these reports against the account statements they receive from their custodian.

## Item 14: Client Referrals and Other Compensation

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

## Item 15: Custody

FSWP does not accept custody of client funds except in the instance of withdrawing client fees.

For client accounts in which FSWP directly debits their advisory fee:

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

Clients should receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## Item 16: Investment Discretion

For those client accounts where we provide Investment Advisory 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 FSWP in regard to investing in certain securities, types of securities, or industry sectors. Fees pertaining to this service are outlined in Item 5 of this brochure.

## Item 17: Voting Client Securities

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

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

## Item 18: Financial Information

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding. We do not have custody of client funds or securities or require or solicit prepayment of more than \$500 in fees per client six months in advance.

# Item 19: Requirements for State-Registered Advisers

## **Adrian Urias**

Born: 1982

### **Educational Background**

- 2005 – B.S.B, DePaul University

### **Business Experience**

- 02/2017 – Present, Franklin Star Wealth Planning, Owner and CCO
- 11/2016 – 12/2018, Cambridge Investment Research, Registered Representative
- 11/2016 – 12/2018, Cambridge Investment Research, Investment Adviser Representative
- 02/2008 – 11/2016, MML Investors Services, Investment Adviser Representative
- 08/2007 – 11/2016, MassMutual, Agent
- 06/2006 – 06/2011, Valley Forge, Inc., Treasurer
- 03/2005 – 05/2006, Six Degrees, Inc., Account Coordinator
- 09/2001 – 06/2005, DePaul University, Student
- 09/2004 – 05/2005, General Nutrition Company
- 05/2001 – 09/2001, Unemployed
- 08/1998 – 05/2001, Eastwood High School
- 08/1996 – 08/1998, Eastwood Middle School

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

Adrian Urias holds no professional designations or licenses.

### **Other Business Activities**

Adrian Urias is currently a contract labor Tax Preparer for Zaragosa Tax Service. This activity accounts for approximately 20% of the advisers time.

### **Performance-Based Fees**

FSWP is not compensated by performance-based fees.

### **Material Disciplinary Disclosures**

No management person at Franklin Star Wealth Planning 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**

Franklin Star Wealth Planning, nor Adrian Urias, have any relationship or arrangement with issuers of securities.

## **Additional Compensation**

Adrian Urias does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through FSWP.

## **Supervision**

Adrian Urias, as Owner and Chief Compliance Officer of FSWP, is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

## **Requirements for State Registered Advisers**

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

## Franklin Star Wealth Planning

221 N. Kansas Street, Ste. 700  
El Paso, Texas 79901  
(915) 490-6205

Dated January 20, 2020

### Form ADV Part 2B – Brochure Supplement

*For*

**Adrian Urias 5361715**

Owner, and Chief Compliance Officer

This brochure supplement provides information about Adrian Urias that supplements the Franklin Star Wealth Planning (“FSWP”) brochure. A copy of that brochure precedes this supplement. Please contact Adrian Urias if the FSWP brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Adrian Urias 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 5361715.

## Item 2: Educational Background and Business Experience

### **Adrian Urias**

Born: 1982

#### **Educational Background**

- 2005 – B.S.B., DePaul University

#### **Business Experience**

- 02/2017 – Present, Franklin Star Wealth Planning, Owner and CCO
- 11/2016 – 12/2018, Cambridge Investment Research, Registered Representative
- 11/2016 – 12/2018, Cambridge Investment Research, Investment Adviser Representative
- 02/2008 – 11/2016, MML Investors Services, Investment Adviser Representative
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- 05/2001 – 09/2001, Unemployed
- 08/1998 – 05/2001, Eastwood High School
- 08/1996 – 08/1998, Eastwood Middle School

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

Adrian Urias holds no professional designations or licenses.

## Item 3: Disciplinary Information

No management person at Franklin Star Wealth Planning 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

Adrian Urias is currently a contract labor Tax Preparer for Zaragoza Tax Service. This activity accounts for approximately 20% of the advisers time.

## Item 5: Additional Compensation

Adrian Urias does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through FSWP.

## Item 6: Supervision

Adrian Urias, as Owner and Chief Compliance Officer of FSWP, is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

## Item 7: Requirements for State Registered Advisers

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