

Item 1: Cover Page



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Form ADV Part 2A – Firm Brochure

(408) 785-7875

Dated March 2024

<https://www.akrishfa.com/>

This Brochure provides information about the qualifications and business practices of Anandi Krishnamurthy d/b/a AKrish Financial Advisory (AKFA). If you have any questions about the contents of this Brochure, please contact us at (408) 785-7875. 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.

Anandi Krishnamurthy d/b/a AKrish Financial Advisory is registered as an Investment Adviser with the State of California. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about AKrish Financial Advisory is available on the SEC's website at www.adviserinfo.sec.gov which can be found using the firm's identification number 288700.

Item 2: Material Changes

Changes

The following changes were made to this version of the Disclosure Brochure:

- March 2023, 2024
There were no material changes to this document these years.
- March 2022
Item 5: The hourly fee has been raised and is now \$300.
Item 8: We have added private placement funds to our investment strategies.

We encourage clients and prospective clients to read this document in its entirety.

Future Changes

From time to time, as required by our state regulator, we may amend this Disclosure Brochure for routine annual updates and/or to reflect changes in regulations or our business practices. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and whenever a material change occurs in the business practices of AKrish Financial Advisory.

You may also view the current Disclosure Brochure online at the SEC's Investment Adviser Public Disclosure website at <http://www.adviserinfo.sec.gov> by searching for our firm name or our CRD number 288700.

In addition, you may request a copy of this Disclosure Brochure at any time, by contacting us at (408) 785-7875.

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Item 4: Advisory Business

Description of Advisory Firm

Anandi Krishnamurthy d/b/a AKrish Financial Advisory (AKFA) is registered as an Investment Adviser with the State of California. We were founded in June 2017. Anandi Krishnamurthy is the principal owner of AKrish Financial Advisory.

We provide a range of financial advisory solutions to our clients covering topics such as:

- financial goals and objectives,
- cash flow and debt management,
- stock compensation and other employee benefits,
- retirement planning,
- tax planning,
- advice on investments,
- saving for college,
- review of insurance coverage (risk management) and
- estate plan review.

We provide investment advice but do not manage assets. We develop customized, tax-efficient, low-cost portfolios based on our clients' goals and objectives, time horizon, risk tolerance, risk capacity and the need for risk. We deliver an account specific list of trades to our clients and, when necessary, help them implement the trades. We perform periodic reviews to reaffirm the basis for the portfolio and to rebalance.

Types of Advisory Services

We offer both broad-based, comprehensive financial planning and investment advice as well as targeted advice on select topics. Our clients engage us on an ongoing basis or for a one-time project which typically lasts between 4 to 12 weeks. Occasionally, we provide engagements that are billed hourly.

Initial Meeting

We conduct an introductory meeting with each prospective client to understand your need for financial advice and your current financial situation. We describe our background and services and provide you an opportunity to ask any questions you may have about us or our process. At the end of this meeting or soon after, we will provide you the cost of the engagement and a timeline for the engagement. There is no charge for this meeting.

You may engage us for comprehensive financial planning and investment advice or for advice on select topics. Please note that if you request advice on select topics, the scope of the engagement is limited, and your overall financial situation or needs may not be fully addressed.

During or prior to the introductory meeting, we will provide you with our current ADV Part 2 advisory brochure and our privacy policy statement. The firm will also ensure disclosure of any material conflicts of interest regarding our firm and its associates that could be reasonably expected to impair the rendering of unbiased and objective advice.

Types of Engagement

AKrish Financial Advisory offers 3 types of engagements:

- **Ongoing Planning:** This is our most comprehensive offering. We perform the initial analysis, make recommendations, and help our clients with the implementation. Afterwards, we continue to provide ongoing services such as annual tax planning, investments review and rebalancing. Clients may reach out to us at any time for financial advice. For this type of engagement, we charge an initial onboarding fee and ongoing quarterly fees.
- **Project:** This is a one-time engagement which typically lasts between 6 weeks to 6 months. We perform the initial analysis, make recommendations, and provide some help with the implementation. We charge a fixed fee for this service.
- **Hourly:** On rare occasions, we offer an hourly engagement where we charge for a minimum of two hours. These engagements are generally not comprehensive but restricted to one or more specific topics.

Agreement

Should you wish to engage our firm for its services, you (the client) and we (AKrish Financial Advisory) must first enter into a written agreement. Once the agreement is signed, depending on the scope of the engagement, we may request copies of current documents such as the ones listed below, early in the process:

- tax returns,
- pay stubs and W-2s,
- benefits provided by your employer including stock compensation, retirement plans and others such as HSA and FSA,
- primary home details,
- mortgages and other debts,
- recent account statements for retirement and non-retirement accounts,
- rental real estate and/or other investments,
- estate plan documents (wills and trusts),
- social Security statements,
- insurance policies and
- completed risk profile questionnaires and other forms provided by our firm.

We use this information to develop your financial plan and, based on the type of agreement, to provide investment advice. It is important that the information and financial statements you provide are recent and accurate. We may, but are not obligated to, verify the information you have provided.

Financial Planning and Investment Advisory Services

The following is a detailed description of the typical services we provide.

Financial Goals and Objectives

We begin all engagements by understanding your near, medium and long-term financial goals and objectives.

Cash Flow and Debt Management

We conduct a review of your income and expenses to determine your current cash flow. For clients with tight cash flows, we look for ways to increase income, reduce expenses and/or reconfigure debt to ease the crunch. For clients with surplus cash flows, we recommend optimal ways to save and invest the excess. We analyze client debts and propose payment strategies based on factors such as the interest rate of the debt, outstanding balances and any income tax implications. We may also recommend what we believe to be an appropriate cash

reserve for emergencies and other short-term financial goals, a choice of accounts (such as money market funds) for such reserves and strategies to save the desired amounts.

Stock Compensation and Other Employee Benefits

We review the benefits provided by your employer and provide recommendations on the ones applicable to you. We provide comprehensive advice on all types of stock compensation (ISOs, ESPPs, NSOs and RSUs). We pay special attention to retirement plans, such as 401k plans, ensure our clients fully understand their individual plans and recommend they maximize their contributions depending on their cash flow.

Retirement Planning

We employ financial planning software and develop projections of the likelihood of achieving your financial goals. This includes Monte Carlo simulations to estimate probability of success. For clients where the projections show less than the desired results, we use the software to demonstrate the impact of adjusting the retirement plan such as working longer, saving more, spending less, or taking more risk with investments. If you are near retirement or already retired, we plan for income replacement, tax-aware distribution from your portfolio, ROTH conversion and social security strategies.

Tax Planning

We review your recent tax returns and the sources of income and propose strategies to minimize your tax liability. This includes maximizing contributions to tax-deferred accounts, building up ROTH balances where applicable, charitable gifting, tax loss harvesting and strategies for stock options.

Investment Advice and Portfolio Design

We start the investment advisory process by considering factors such as your financial goals and objectives, time horizon, risk tolerance, risk capacity and the need for risk and propose an appropriate stock/bond ratio. The stock/bond ratio broadly determines the asset class mix for the target portfolio. We then compare your existing investments against this target portfolio and provide an assessment of the positions that are, in our opinion, aligned with the proposed investment strategy and those that need repositioning. We pay special attention to concentrated stock holdings, employee stock plans as well as the tax impact of each sell recommendation.

We may recommend you consolidate selected accounts and/or open additional accounts. We do not have a relationship with any broker/dealer or custodian and are able to handle accounts at most major firms. If needed, we help in the selection of broker/dealers or custodians and opening investment accounts.

We provide our ongoing clients with a detailed list of account-specific trades. We do not execute trades on your behalf, either with your approval or on a discretionary basis. Most of our clients execute the trades by themselves. If needed, we will assist you in executing the trades.

We provide our project clients, with high level recommendations on the portfolio, generally at the account level and the asset class level.

The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.

Saving for College

We estimate future college costs and provide tax-efficient saving strategies and investment recommendations to meet those costs. Financial aid for students entering college is a specialized field and is not one of our competencies.

Review of Insurance Coverage

We analyze your exposure to risks that could have a significant adverse impact on your finances, such as an auto accident, house fire, premature death or long-term disability. We review your current coverage for adequacy

and provide recommendations for more robust coverage, when necessary. For some clients, where we believe additional analysis is helpful, we work with 3rd party insurance brokers.

AKrish Financial Advisory is not financially compensated in any manner by these 3rd party brokers. We work with them to leverage their expertise of the subject matter and their network of insurance companies.

Estate Plan Review

For clients that currently do not have an estate plan in place, we encourage you to start the process and provide a list of estate planning attorneys for your convenience. You are under no obligation to engage an attorney from our list. For clients that currently have an estate plan, we review your plan which may include wills, powers of attorney, trusts and other related documents. Whenever there are changes to tax laws and/or to your life circumstances, we may recommend you meet with the estate planning attorney and update the plan. We review titling and beneficiary designations of your assets and encourage you to complete/update those according to instructions from the attorney. From time-to-time and with your approval, we may participate in meetings or phone calls between you and your attorney. For clients of large estates with potential future estate tax liabilities, we may work with the estate planning attorney on tax minimization strategies.

Duration of Engagement

Clients with Ongoing Engagements

We will contact you at least once a year, or more frequently, to review relevant sections of the plan and monitor implementation. Tax planning, investment review and portfolio rebalancing are ongoing activities for most clients. We periodically review other parts of the plan. You may contact us by email at any time with questions or request for advice. We strongly urge all our clients to notify us of any life-changes, and to schedule a review any time there is such a change.

Clients with Project Engagements

Unless otherwise stated in the agreement with the firm, upon completion of our presentation or delivery of advice, our engagement is typically concluded.

Educational Workshops

We may provide educational workshops, at no cost, for groups desiring general advice on investments and personal finance. Topics may include issues related to financial planning, college and estate planning, retirement strategies, or other economic and 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.

General Information

AKrish Financial Advisory does not provide legal or accounting services. With your consent, we may work with your other advisers (attorneys, accountants, etc.) to assist with coordination and implementation of accepted strategies. You should be aware that these other advisers will charge you separately for their services and these fees are in addition to our advisory fees.

Our firm will use its best judgment and good faith effort in rendering its services. AKrish Financial Advisory cannot warrant or guarantee any level of investment performance or that your investments will be profitable over time. There is even a possibility of loss of principal. 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 the 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 shall constitute a waiver of any rights that a client may have under federal and state securities laws.

Client Tailored Services and Client Imposed Restrictions

We offer the same suite of services to all our clients. However, each client's financial plan and its implementation is dependent upon client-specific circumstances, facts and client-imposed restrictions. We take these factors into account and build clients specific financial plans and portfolio recommendations.

Wrap Fee Programs

We do not participate in wrap fee programs.

CCR Section 260.235.2 Disclosure

For clients who receive our financial planning or investment advisory 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 implement 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 contract may be terminated by the client within five (5) business days of signing, without incurring any advisory fees.

Compensation and Fee Schedule

AKrish Financial Advisory charges on a fee-only basis for financial planning and investment advisory services. Fees may be hourly or fixed as detailed below. Our only source of compensation is the fees paid by our clients. We do not accept commissions, referral fees or revenue sharing arrangements.

Ongoing Engagement Fees

We offer an ongoing engagement model, for clients seeking ongoing financial planning and investment advisory services. Fees are typically between \$2,400 and \$6,000 per year depending on the complexity of a client's financial situation and are billed quarterly, in arrears. In addition, we typically charge a fixed, one-time, fee between \$2,500 and \$6,000 for the upfront time and effort involved in completing the initial financial plan and helping the client implement the resulting recommendations. 25% of the one-time fee is due at the time of signing the client agreement. The one-time fee is generally waived when a recent project client signs up for an ongoing engagement. The one-time and annual fees are negotiable and will be agreed upon before the start of any work, generally after the initial meeting.

In the event of termination by client, fees will be pro-rated to the end of the current month.

One-time Project Fees

Our financial planning and investment advisory services may be provided on a project basis for a fixed fee, typically ranging from \$2,500 to \$8,000 as determined by the complexity of the project and the time estimated. The fixed fee is negotiable and will be agreed upon before the start of any work, generally after the initial meeting.

A one-time, upfront payment of 25% of the total project cost is due at the time of signing the client agreement. The remainder of the project fee is due upon completion of the engagement. In the event of early termination by client, up to 100% of the fees may be due, based on the level of completion of the project.

Hourly Fees

We may be engaged for our financial planning and investment advisory services under an hourly fee arrangement. The hourly rate is based upon the scope and complexity of the engagement. Fees for these services \$300 per hour; billed in 15-minute increments (four increments per hour), and a partial increment (i.e., eight minutes, etc.) will be treated as a whole increment. The hourly fee is negotiable and will be agreed upon before the start of any work, generally after the initial meeting.

A one-time, upfront payment equal to two hours at the hourly rate is due at the time of signing the client agreement. The remainder of the hourly fee is due upon completion of the engagement. In the event of early termination by client, payment for the hours already worked is due.

All fees may be paid by check or electronic funds transfer using Automated Clearing House (ACH).

Other Types of Fees and Expenses

When implementing an investment recommendation, the client may incur additional fees such as brokerage commissions, transaction fees, and other related costs and expenses. Clients may incur certain charges imposed by broker-dealers, 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 recommending broker-dealers for client's transactions and determining the reasonableness of their compensation (e.g., commissions).

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

CCR Section 260.238(j) Disclosure

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

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

We do not offer performance-based fees.

Item 7: Types of Clients

We provide financial planning and investment advice to individuals, high net worth individuals, trusts, estates, retirement plans, as well as small businesses.

AKrish Financial Advisory does not require minimum income levels, minimum level of assets or other similar conditions for its advisory services. The firm reserves the right to waive or reduce certain fees based on unique individual circumstances, special arrangements or pre-existing relationships. We also reserve the right to decline services to any prospective client for any non-discriminatory reason.

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

Methods of Analysis

When clients engage us for investment advice (described in Item 4 of this brochure) as part of their financial plan, we first gather and consider several factors, including:

- current financial situation,
- current and long-term needs,
- investment goals and objectives,
- level of investment knowledge,
- tolerance for risk and
- restrictions, if any, on the investment choices.

We may employ fundamental analysis and evaluate economic factors such as prevailing interest rates, the state of the economy, and projected future growth of an industry sector. In addition to our own research, the firm's recommendations may be drawn from sources that include projections from economists and other industry professionals, corporate rating services, company press releases, annual reports, prospectuses and regulatory filings.

We make asset allocation and investment policy decisions based on these and other factors. We will discuss with you how, in our best judgment, to meet your objectives while at the same time seeking a prudent level of risk exposure.

Investment Strategies

We recognize that each client's needs and goals are different; subsequently portfolio strategies and underlying investment vehicles may vary. Generally, we ascribe to a Core + Satellite investment strategy which blends passive (or index) and active investing, where low-cost, passive investments are used as the basis or "core" of a portfolio and actively managed investments are added as "satellite" positions. We expect most portfolios to include passive investments while not all portfolios will include satellite positions.

Employing this strategy, the portfolio core holdings are indexed to potentially more efficient asset classes, while outlying selections are often active holdings that are attempting to outperform a particular sector, or a selection of positions to increase core diversification, or to improve portfolio performance, or reduce risk during downward trends in the market and during times of uncertainty.

For example, the core of a portfolio may be built with low-cost index funds or ETFs; satellite holdings would include active holdings with unique strategies that are believed capable of adding value beyond a stated benchmark over a full market cycle. Satellite holdings may employ actively managed mutual funds, unique sector or strategy ETFs/ETNs, individual securities such as stocks or bonds, etc., to assist in the over-or-under allocation to specific sectors, regions, assets classes, etc.

In rare occasions, AKrish Financial Advisory performs due diligence on private funds and may recommend clients invest in these private funds. Should a client choose to act on our recommendation to invest in a private fund, they will do so on their own accord (AKrish Financial Advisory does not implement these recommendations). A conflict of interest exists because employees of AKrish Financial Advisory may personally invest in these private funds. AKrish Financial Advisory does not receive any compensation for performing due diligence on these private funds, nor does the firm receive any compensation when an advisory client invests in a private fund the firm has performed due diligence on. AKrish Financial Advisory does not manage any private fund assets, including those on which we perform due diligence, or those in which employees may personally invest.

Risk of Loss

We believe our strategies and investment recommendations are designed to produce the appropriate potential return for the given level of risk; however, we cannot guarantee that an investment objective or planning goal will be achieved. As an investor you must be able to bear the risk of loss that is associated with your account, which may include the loss of some or your entire principal. In general, risks regarding markets may be at the investment strategy level or at the level of the individual positions selected to implement a strategy.

Investment Strategy Risks

Management Risk

The performance of 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 Market Strategies Risk

Should a portfolio employ a passive, efficient markets approach, an investor will need to consider the potential risk that the broader allocation may at times generate lower-than-expected returns than a specific asset. And, that the return for an asset class, over a specific time period, is a deviation from the average return for the asset class.

Research Data Risk

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. Therefore, 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 Risk

If you require your portfolio to be invested according to socially conscious principles, you should note that choices for investments of this type may be limited and because of this limitation you may not 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. Therefore, 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.

Security-Specific Material Risks

Examples of risk associated with specific positions:

Company Risk

When investing in securities, 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 through appropriate diversification.

ETF/ETN and Mutual Fund Risk

ETFs/ETNs 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. The risk of owning these types of holdings also reflects the risks of their underlying securities. ETF/ETNs also may face periods of significant market fluctuations that reduce their liquidity and/or increase their discount to their underlying securities. ETF/ETN liquidity can be complicated to assess, because it is affected by multiple factors, including the liquidity of the underlying securities, as well as the fact that new shares can be created, and existing shares can be repurchased in response to market demand; this ability to manipulate supply and demand can make liquidity difficult to predict.

Fixed Income Risks

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

Credit Risk - Credit risk is a 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 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 - 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., treasury notes), there are periods of market uncertainty when there are few sellers or buyers for some assets, and this causes sharp and unpredictable price movements. Conversely, when trading volume is high, there is 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

ETFs and indexed funds have the potential to be affected by “tracking error risk.” Tracking error risk is when the performance of the index fund deviates from the performance of the benchmark. This may be because the fund attempts to mirror the index with a “sample” or “optimize” strategy.

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.

QDI Ratios

While many ETFs, ETNs, and index mutual funds are 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 an ETF/ETN or mutual fund portfolio), may be considered “non-qualified” under certain tax code provisions. We consider a holding’s QDI when tax-efficiency is an important aspect of the client’s portfolio.

Private Funds Risks

Investing in private funds involves a high degree of risk which renders them a suitable investment only for persons of adequate means. These investments are generally risky and offer no guarantee of success. They are illiquid where your asset may be tied up for several years. Typical risk factors may include, but are not limited to, complicated cost structures, changes in capital markets and the economy, changes in applicable laws and regulations, natural disasters, the risk of leverage and conflicts of interest between the investors and management.

Item 9: Disciplinary Information

Criminal or Civil Actions

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

Administrative Enforcement Proceedings

AKrish Financial Advisory and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

AKrish Financial Advisory 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 AKrish Financial Advisory or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

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

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

AKrish Financial Advisory does not have any related parties. As a result, we do not have a relationship with any related parties.

AKrish Financial Advisory 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.

Disclosure of Material Conflicts

All material conflicts of interest under CCR Section 260.238(k) are disclosed regarding AKrish Financial Advisory, 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

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. AKrish Financial Advisory maintains a Code of Ethics that sets forth the standards of conduct expected of advisory personnel. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all 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 credit of the profession.
- Diligence - Associated persons shall act diligently in providing professional services.

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

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

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

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

Our firm and its "related persons" may buy or sell securities similar to, or different from, those we recommend to clients for their accounts. A recommendation made to a client may be different in nature or timing from a recommendation made to a different client. 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. 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.

Item 12: Brokerage Practices

Factors Used to Select Custodians and/or Broker-Dealers

Anandi Krishnamurthy d/b/a AKrish Financial Advisory does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to clients based on their need for such services. We recommend custodians based on the reputation, the services provided by the firm and the aggregate costs for maintaining

accounts and executing transactions. We also consider client convenience such as proximity to a branch office when recommending a custodian.

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

As a fee-only financial planner who does not offer investment management services, we do not have a concern over which broker-dealers a client may choose in order to implement our investment recommendations.

Aggregating (Block) Trading for Multiple Client Accounts

Some Registered Investment Advisers execute client accounts on an aggregated basis to lower expenses. As a fee-only financial planner who does not offer investment management services, we do not execute trades on behalf of clients. As a result, it is up to the client to negotiate their own trading costs with their broker-dealer.

Item 13: Review of Accounts

Anandi Krishnamurthy, Principal and CCO of AKrish Financial Advisory, will contact clients with ongoing engagement agreements to obtain current information regarding their assets and investment holdings and will review this information as part of our financial planning and investment advisory services. AKrish Financial Advisory does not provide specific reports to clients, other than financial plans.

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

AKrish Financial Advisory does not accept custody of client funds.

Item 16: Investment Discretion

We do not provide investment management services, and therefore do not exercise discretion.

Item 17: Voting Client Securities

AKrish Financial Advisory does not provide investment management services and does not vote client securities. 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

Anandi Krishnamurthy

Born: 1956

Educational Background

- 2012, Certificate in Personal Financial Planning, University of California Santa Cruz Extension
- 1987, Master's in Computer Science, Rochester Institute of Technology
- 1978, Bachelor's in Electrical Engineering, Birla Institute of Science and Technology

Business Experience

- 6/2017 - Present, Anandi Krishnamurthy d/b/a AKrish Financial Advisory*, Principal and CCO
- 12/2016 – 4/2017, self-employed, hourly paraplanning work for Wade Financial Advisory.
- 01/2014 - 12/2016, Wade Financial Advisory, Financial Planning Specialist
- 05/2012 - 01/2014, self-employed
- 03/2003 - 05/2012, IBM, Senior Software Developer

*On Track Financial Advisory changed its business name to AKrish Financial Advisory in 02/2018.

Professional Designations, Licensing & Exams

CFP (Certified Financial Planner) ®: CFP® certificants must have a minimum of three years of workplace experience in financial planning and develop their theoretical and practical financial planning knowledge by completing a comprehensive course of study approved by CFP® Board. Anandi passed a comprehensive 2-day, 10-hour CFP® Certification Examination that tested her ability to apply financial planning knowledge in an integrated format. Anandi must also complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field. As a final step to certification, CFP® practitioners agree to abide by a strict code of professional conduct.

Other Business Activities

Anandi Krishnamurthy does not participate in any other business activity.

Performance Based Fees

AKrish Financial Advisory is not compensated by performance-based fees.

Material Disciplinary Disclosures

No management person at Anandi Krishnamurthy d/b/a AKrish Financial Advisory 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

Anandi Krishnamurthy d/b/a AKrish Financial Advisory, nor Anandi Krishnamurthy, have any relationship or arrangement with issuers of securities.

Additional Compensation

Anandi Krishnamurthy does not receive any additional compensation from any person, company, or organization, in exchange for providing clients advisory services through AKrish Financial Advisory.

Supervision

Anandi Krishnamurthy, as Principal and Chief Compliance Officer of AKrish Financial Advisory, is responsible for supervision. She may be contacted at the phone number on this brochure supplement.

Requirements for State Registered Advisers

Anandi Krishnamurthy has NOT been involved in any arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or bankruptcy petition.

Conflicts of Interest

Pursuant to California Code of Regulations Section 260.238 (k) any material conflicts of interest regarding the investment adviser, its representatives or any of its employees are disclosed to the client prior to entering into any Advisory or Financial Planning Agreement.

Business Continuity Plan

AKrish Financial Advisory Financial maintains a written Business Continuity Plan that identifies procedures related to an emergency or significant business disruption, including death of the investment adviser or any of its representatives.

Anandi Krishnamurthy d/b/a AKrish Financial Advisory

10080 N Wolfe Rd Suite SW3-200
Cupertino, CA 95014
(408) 785-7875

Dated February 2018

Form ADV Part 2B – Brochure Supplement

For

Anandi Krishnamurthy - Individual CRD#6807787

Principal, and Chief Compliance Officer

This brochure supplement provides information about Anandi Krishnamurthy that supplements the Anandi Krishnamurthy d/b/a AKrish Financial Advisory (AKFA) brochure. A copy of that brochure precedes this supplement. Please contact Anandi Krishnamurthy if the brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Anandi Krishnamurthy is available on the SEC's website at www.adviserinfo.sec.gov which can be found using the identification number 6807787.

Item 2: Educational Background and Business Experience

Anandi Krishnamurthy

Born: 1956

Educational Background

- 2012, Certificate in Personal Financial Planning, University of California Santa Cruz Extension
- 1987, Master's in Computer Science, Rochester Institute of Technology
- 1978, Bachelor's in Electrical Engineering, Birla Institute of Science and Technology

Business Experience

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Item 3: Disciplinary Information

No management person at Anandi Krishnamurthy d/b/a AKrish Financial Advisory 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

Anandi Krishnamurthy does not participate in any other business activity.

Item 5: Additional Compensation

Anandi Krishnamurthy does not receive any additional compensation from any person, company, or organization, in exchange for providing clients advisory services through AKrish Financial Advisory.

Item 6: Supervision

Anandi Krishnamurthy, as Principal and Chief Compliance Officer of AKrish Financial Advisory, is responsible for supervision. She may be contacted at the phone number on this brochure supplement.

Item 7: Requirements for State Registered Advisers

Anandi Krishnamurthy has NOT been involved in any arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or bankruptcy petition.