

# Form ADV Part 2A

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## Fiduciary Planners

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*This brochure provides information about the qualifications and business practices of DILIBERTO, A.J. DBA Fiduciary Planners. Additional information about DILIBERTO, A.J. DBA Fiduciary Planners is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

*If you have any questions about the contents of this brochure, please contact us at (714) 421-3023 and/or via [aj@fiduciaryplanners.net](mailto:aj@fiduciaryplanners.net). 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.*

*Although Fiduciary Planners may use the term “registered investment adviser” or use the term “registered” through this Form ADV Part 2A, the use of these terms is not intended to imply a certain level of skill or training.*

## **Item 2. Material Changes since Last Update**

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**Material Changes since last update:**

### **Full Brochure Available**

Clients who would like to receive a complete copy of our Firm Brochure, please contact us by telephone at (714) 421-3023 or visit our website at <https://fiduciaryplanners.net>.

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## **Item 4. Advisory Business**

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Fiduciary Planners is a registered investment adviser based in Huntington Beach, California. This is a DBA in the County of Orange, California. We have been providing financial planning and wealth management services since 2025. Anthony J. "A.J." DiLiberto is the Owner and Chief Compliance Officer. Currently, we offer the following services, which are personalized to each individual client:

- Financial Planning Services
- Portfolio Management Services
- Investment Consulting and Portfolio Review Services
- Pension Consulting Services
- Selection of Other Advisers

The following paragraphs describe our services and fees. Please refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs. As used in this brochure, the words "we", "our" and "us" refer to and the words "you", "your" and "client" refer to you as either a client or prospective client of our firm.

We are not a publicly held company and no part of us is owned by an individual or company through any subsidiaries or "intermediate subsidiaries."

### **Types of Advisory Services Offered**

#### **Financial Planning Services**

We offer financial planning services which typically involves providing a variety of advisory services to clients regarding the management of their financial resources based upon an analysis of their individual needs. These services can range from broad, comprehensive, financial planning to consultative or single subject planning. We also offer hourly financial consultation as well. If you retain our firm for financial planning services, we will meet with you to gather information about your financial circumstances and objectives. We will gather income and other financial information from each client to prepare a current cash flow and balance sheet; and then discuss and agree on assumptions for future years so that we can analyze long term effects of various alternatives. Once we specify those long-term objectives (both financial and non-financial), we will develop shorter-term, targeted objectives. Once we review and analyze the information you provide to our firm, we will deliver a written plan to you, designed to help you achieve your stated financial goals and objectives.

Financial plans are based on your financial situation at the time we present the plan to you, and on the financial information you provide to us. You must promptly notify our firm if your financial situation, goals, objectives, or needs change.

You are under no obligation to act on our financial planning recommendations. Should you choose to act on any of our recommendations, you are not obligated to implement the financial plan through any of our other investment advisory services. Moreover, you may act on our recommendations by placing securities transactions with any brokerage firm.

#### **Portfolio Management Services**

We offer discretionary portfolio management services. Our investment advice is tailored to meet our clients' needs and investment objectives. If you retain our firm for portfolio management services, we will meet with you to determine your investment objectives, risk tolerance, and other relevant information at the beginning of our advisory relationship. We will use the information we gather to develop a strategy that enables our firm to give you continuous and focused investment advice and/or to make investments on your behalf. As part of our portfolio management services, we will determine to allocate your assets in among various individual debt and/or equity securities and/or mutual funds in accordance with your investment objective(s), and may use one or more of our own proprietary model portfolios, a custom designed portfolio, or any combination thereof. Once we create or select a model portfolio or third party manager, we will monitor your portfolio on an ongoing basis, and rebalance your portfolio as required by changes in market conditions and in your financial circumstances.

If you participate in a third party program, a manager on the third party's platform will be appointed to place trades in accordance with the strategy or model that the manager uses. In that regard, the manager would take discretion over the investment decisions related to your account. This means that manager has the discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. See *Selection of Other Advisers* below.

### **Investment Consulting and Portfolio Review Services**

We provide non-discretionary portfolio review, asset allocation analysis, and investment recommendations for assets not directly under the management of Fiduciary Planners. These accounts could include participant directed plans, such as 401Ks and 403Bs, or other qualified plans, and may also include assets invested with other custodians. After an initial review and analysis of each account receiving this service, and depending on the specifics of each account, the services may include specific investment recommendations, general advice and direction, allocation education and consultation, and ongoing review and/or other services as agreed upon in writing by the advisor and the client. The advisor is not responsible for implementing any recommendations for these services and will not be involved in any way in the purchase or sale of any specific investments being recommended using this service.

### **Pension Consulting Services**

We offer pension consulting services to employee benefit plans and their fiduciaries based upon the needs of the plan and the services requested by the plan sponsor or named fiduciary. In general, these services may include an existing plan review and analysis, plan-level advice regarding fund selection and investment options, education services to plan participants, investment performance monitoring, and/or ongoing consulting. These pension consulting services will generally be non-discretionary and advisory in nature. The ultimate decision to act on behalf of the plan shall remain with the plan sponsor or other named fiduciary.

We may also assist with participant enrollment meetings and provide investment-related educational information to plan participants on such topics as:

- Diversification
- Asset allocation
- Risk tolerance
- Time horizon

We may also provide additional types of pension consulting services to plans on an individually negotiated basis. All services, whether discussed above or customized for the plan based upon requirements from the plan fiduciaries (which may include additional plan-level or participant-level services) shall be detailed in a written agreement and be consistent with the parameters set forth in the plan documents.

Party to the pension consulting agreement may terminate the agreement upon written notice to the other party in accordance with the terms of the agreement for services. The pension consulting fees will be prorated for the quarter in which the termination notice is given and any unearned fees will be refunded to the client.

### **Acknowledgment of Fiduciary Status under ERISA**

On occasion, Fiduciary Planners investment professionals may recommend rollovers to retirement plan participants, including; (i) from an ERISA plan to another ERISA plan or to an IRA; (ii) from an IRA to another IRA; or (iii) from one type of account to another, such as a commission-based account to a fee-based account.

In such cases, Fiduciary Planners investment professionals would be providing ERISA fiduciary advice when it discusses specific investment products or advice with a client prior to the rollover, and the clients and Fiduciary Planners investment professionals have a mutual understanding that Fiduciary Planners investment professionals will be providing investment advice on a regular basis after the rollover.

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

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

### **Selection of Other Advisers**

As part of our investment advisory services, we may recommend that you use the services of a third-party money manager ("MM") to manage all, or a portion of, your investment portfolio. After gathering information about your financial situation and objectives, we could recommend that you engage a specific MM or investment program. Factors that we take into consideration when making our recommendation(s) include, but are not limited to, the following: the MM's performance, methods of analysis, fees, your financial needs, investment goals, risk tolerance, and investment objectives. We will periodically monitor the MM(s)' performance to ensure its management and investment style remains aligned with your investment goals and objectives.

Before selecting other advisers, we will review the MM's registration status to ensure the MM is properly licensed or registered as an investment adviser.

### **Wrap Fee Program**

Fiduciary Planners does not participate in a wrap fee program at this time.

### **Assets under Management**

As of November 25, 2025, the amount of client assets under advisement is calculated as follows:

Discretionary:	\$1,700,000 (22Accounts)
<u>Non-discretionary:</u>	\$ 0 ( 0Accounts)
Total	\$1,700,000 (22Accounts)

The amount as disclosed above is rounded to the nearest \$100,000. The date of the calculation above is not more than ninety (90) days before the date Fiduciary Planners last updated its *brochure*.

## **Item 5. Fees and Compensation**

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### **Personal Wealth Management Fees**

Financial planning services are at the forefront of everything we do at Fiduciary Planners. We view financial planning as an ongoing and collaborative service, not a one-time, one and done type of service. Because of this core philosophy, we base our fee on the totality of the client's financial situation, and we call this fee a Personal Wealth Management Fee.

Personal Wealth Management fees are based on many factors including total wealth under advisement (TWA) as well as an evaluation of each client's unique financial situation, including tax, business, real estate, crypto, and other family complexities. Personal Wealth Management fees are a "fixed annual fee" and are paid monthly or quarterly in advance. We do not manage any cryptocurrency or digital assets directly, and will not provide specific recommendations on these investments, but as with taxes, real estate and other financial planning strategies and vehicles, we will consult and discuss pros and cons and risks and potential consequences of investing in any type of investment vehicle.

We derive a negotiated fixed Personal Wealth Management fee by first reviewing your net worth and calculate .25% as a starting point. We will also review "investable assets" (generally liquid assets invested with custodians and or available to be invested with a custodian), and calculate what the fee would be assuming an industry average of 1%. These two formulas will outline a possible range for the fee, at which time, the additional factors of

complexity of situation, time, value of experience, expected work and analysis, and interaction with other advisors will be looked at to negotiate a fixed Personal Wealth Management fee.

While there is no stated “minimum fee”, Personal Wealth Management fees could start at low as \$200 per month (\$2,400 annually) with a maximum fee of \$10,000 per month (\$120,000 annually). Fiduciary Planners acknowledges that situations may come up with family or other smaller investors that lower fees may be warranted for those situations and as such, we do not believe in stated minimum fees. Hourly services may also be warranted in certain situations. On the other end of the financial spectrum, some clients have very complex financial, estate and tax planning needs that will require not only the time, but the necessary experience to advise and consult with other advisors to accomplish the clients goals.

Fiduciary Planners does not charge a separate fee for Portfolio Management services for Personal Wealth Management clients. Personal Wealth Management Clients pay a fixed Personal Wealth Management fee, which includes financial planning services, regular meetings, advice and discretionary management of investments accounts as agreed to by the client and Fiduciary Planners.

The Personal Wealth Management fee will be reviewed annually, using the financial plan and interactions throughout the year as a guide to adjust this fee up or down as each client’s TWA or complexity changes. Examples of changes would be the acquisition or sale of a business, acquisition of material corporate stock options, acquisition or sale of illiquid investment or real estate investment properties, inheritance, inflationary impacts, the depletion of assets during retirement or family/multi-generational planning that increases the complexity of your planning needs. Should a change to the fee be warranted, you will be notified in advance.

Fees are paid monthly (or quarterly) in advance and a pro-rata refund will be paid to Client if services are canceled within any month (or quarter). This fixed fee is cancelable anytime without restriction.

#### Additional Compensation Information

- With client authorization, fees can be paid by deduction of fees from their managed investment account, check, Zelle, or ACH payment. If applicable, Client will be responsible to set up the automatic payment through their bank or investment account.
- Under certain circumstances, at our sole discretion, Advisor can offer existing clients a Financial Planning Only Agreement if it is in the clients’ best interest to do so. This is typically for one-time projects or situations that are outside the typical services agreed to. This could include things like an unexpected complex estate planning or inheritance situation, or heavy involvement in a business sale or merger, assistance with some kind of one-time tax or legal scenario.
- Under certain limited circumstances, at our sole discretion, Advisor offers advisory services on a pro-bono or accommodation basis.
- Fees may be paid 6 months in advance, but not more often, and in no circumstances will we require prepayment of a fee more than six months in advance and in excess of \$500.
- If the Personal Wealth Management agreement is executed at any time other than the first day of a quarter, fees will apply on a pro rata basis, which means that the advisory fee is payable in proportion to the number of days in the month for which you are a client.
- At our discretion, and your client’s written approval, we may combine the account values of family members as part of the overall Personal Wealth Management fee.

#### Financial Planning Fee

Financial Planning fees are included as part of the Personal Wealth Management fee. Fees may be paid 6 months in advance, but not more often, and in no circumstances will we require prepayment of a fee more than six months in advance and in excess of \$500. Fiduciary Planners philosophy is that Financial Planning Services is not a one-time service, but rather, an ongoing services that is ever changing and to be updated regularly as life situations are updated (family changes, job changes, location, etc.). Therefore, financial planning fees are included in the Personal Wealth Management fee and ongoing.

Financial Planning Fees are negotiable and will be based on the complexity and scope of the engagement, the specifics of the situation, and the financial objectives of the client. While the estimated number of hours spent on a project are one component of the estimated fee, the value of our knowledge and experience is also a component.

The fee for hourly Financial Consulting is \$350 per hour and is only available for clients who want limited scope consultation or topical financial advice. Personal Wealth Management clients will not pay any type of hourly fee.

At our discretion, we may reduce or eliminate any aspect of the financial planning fee for any reason.

Any services that will be billed hourly will be given an estimated amount for the services prior to signing the agreement. Subsequent hourly invoices will be agreed upon in writing, in lieu of signing a new agreement every time.

The client is under no obligation to act upon any recommendation from Fiduciary Planners; and if the client does elects to act on any of the recommendations, the client is under no obligation to affect the transactions through Fiduciary Planners.

### **Portfolio Management Services**

For Fiduciary Planners clients who pay a fixed Personal Wealth Management fee (see above), Portfolio Management Services are included in the fee. No other fee will be charged since the Personal Wealth Management fee includes portfolio management and consulting of all investments and net worth.

For clients who desire Portfolio Management Services only, the fee is negotiated, not to exceed 1.5% annually of the assets under the management of Fiduciary Planners. This service would exclude all other financial planning and other services that are included with the Personal Wealth Management Agreement.

### **Pension Consulting Services**

Fiduciary Planners does not charge a separate fee for Pension Consulting Services. Clients of Fiduciary Planners pay a fixed Personal Wealth Management fee which is negotiated based on the scope of services (see Personal Wealth Management Fees section above). Pension Consulting Services are offered only to Personal Wealth Management clients and not as a stand-alone service.

### **Selection of Other Advisers**

Third party investment manager fees are separate from any fee paid to Fiduciary Planners, however, any fee received from any 3<sup>rd</sup> party advisor will be fully disclosed to the client and used as a dollar for dollar offset to their Personal Wealth Management fee.

The fee for any third-party manager is established and payable in accordance with the brochure provided by each respective third-party manager to whom you decide to work with. These fees may or may not be negotiable. You will be required to sign an agreement directly with a third-party manager and you may terminate your advisory relationship with any third-party manager according to the terms of your agreement with the third-party manager. You should review each third-party manager's brochure for specific information on how you may terminate your advisory relationship and how you may receive a refund, if applicable. You should contact the third-party manager directly for questions regarding your advisory agreement with any third-party manager.

Fiduciary Planners does not charge a separate fee to help the client to select a 3<sup>rd</sup> party manager, however, 3<sup>rd</sup> party advisors may have an agreement to pay a portion of their fee directly to Fiduciary Planners. Any fee received from any 3<sup>rd</sup> party advisor will be fully disclosed to the client and used as a dollar for dollar offset to their Personal Wealth Management fee.

Fiduciary Planners does not have any incentive to use any particular 3<sup>rd</sup> party manager for reasons of gifts, soft dollars or any other reason other than what may be in the best interest of the client.

### **Additional Fees and Expenses**

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to Fiduciary Planners for financial planning and investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You may also incur transaction charges and/or brokerage fees when purchasing or

selling securities. These fees will be imposed by the broker-dealer or custodian through whom your account transactions are executed and are separate from any fee paid to Fiduciary Planners. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, please refer to the *Brokerage Practices* section of this brochure.

### **Termination of Services**

Client may terminate one or more services by providing written notice by mail or email to our firm. You will incur a pro rata charge for services rendered prior to the termination of the agreement and any refund will be calculated as of the date of notification.

### **Compensation for the Sale of Securities or Other Investment Products**

Persons providing investment advice on behalf of our firm are licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. You are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

At our discretion, we may offset our advisory fees to the extent persons associated with our firm earn commissions in their separate capacities as registered representatives and/or insurance agents.

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

While the firm endeavors at all times to offer clients its specialized services at reasonable costs, the fees charged by other advisers for comparable services may be lower than the fees charged by Fiduciary Planners

## **Item 6. Performance-Based Fees and Side-By-Side Management**

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We do not accept performance-based fees or participate in side-by-side management. Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Our fees are calculated as described in the *Fees and Compensation* section above and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

## **Item 7. Types of Clients**

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We offer investment advisory services to individuals (including high net worth individuals, trusts, and estates), and pension and profit sharing plans.

### **Requirement for Opening Accounts (Minimum Investment Amount)**

There is no stated minimum fee.

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

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### **Methods of Analysis**

We will use one or more of the following methods of analysis or investment strategies when providing investment advice to you:

**Technical Analysis-** involves studying past price patterns, trends, and interrelationships in the financial markets to assess risk-adjusted performance and predict the direction of both the overall market and specific securities. The risk of market timing based on technical analysis is that our analysis may not accurately detect anomalies or predict future price movements. Current prices of securities may reflect all information known about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

**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 and its 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.

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

As with most investment products, because investment portfolios include securities, investing in securities involves risk of loss that you as our client should be prepared to bear.

In the event that we employ a frequent trading strategy for our clients, it is important to note that such a strategy can have an affect on investment performance, particularly through increased brokerage and other transaction costs and taxes.

We do not recommend any particular type of security as part of its overall investment advisory services.

## **Equity Risks**

The material risks associated with these strategies are:

**Equity Market Risk** – Overall stock market risks may affect the value of the investments in equity strategies. Factors such as U.S. economic growth and market conditions, interest rates, and political events affect the equity markets.

**Management Risk** - Our judgments about the attractiveness, value and potential appreciation of a particular asset class or individual security may be incorrect and there is no guarantee that individual securities will perform as anticipated. The value of an individual security can be more volatile than the market as a whole or our intrinsic value approach may fail to produce the intended results. Our estimate of intrinsic value may be wrong or even if our estimate of intrinsic value is correct, it may take a long period of time before the price and intrinsic value converge.

**Small and Mid-Cap Company Risk** – Investments in small and mid-cap companies may be riskier than investments in larger, more established companies. The securities of these companies may trade less frequently and in smaller volumes than securities of larger companies. In addition, small and mid-cap companies may be more vulnerable to economic, market and industry changes. Because smaller companies may have limited product lines, markets, or financial resources, or may depend on a few key employees, they may be more susceptible to particular economic events or competitive factors than larger capitalization companies.

**Short Sale Risk** – Short sales are speculative transactions and involve special risks. In order to initiate a short position, a security must be borrowed. Strategies that execute short sales may incur a loss if the price of the security sold short increases in value between the date of the short sale and the date when we purchase the security to replace the borrowed security. Losses are potentially unlimited in a short sale transaction.

## **Fixed Income Risks**

The material risks associated with this strategy are:

**Fixed Income Market Risk** – Fixed income securities increase or decrease in value based on changes in interest rates. If rates increase, the value of fixed income securities generally declines. On the other hand, if rates fall, the value of the fixed income securities generally increases.

**Management Risk** – Our judgments about the attractiveness, value, and potential appreciation of a particular asset class or individual security may be incorrect and there is no guarantee that individual securities will perform as anticipated. The value of an individual security can be more volatile than the market as a whole, and our intrinsic value approach may fail to produce the intended results.

**Credit Risk** – There is a risk that issuers and counterparties will not make payments on the securities they issue. In addition, the credit quality of securities may be lowered if an issuer's financial condition changes. Lower credit quality may lead to greater volatility in the price of a security which may affect liquidity and our ability to sell the security.

**Real Estate Risk** – Real Estate Investment Trusts (REITS), although not a direct investment in real estate, are subject to the risks associated with investing in real estate. The value of these securities will rise and fall in response to many factors including economic conditions, the demand for rental property and changes in interest rates.

**Structured Instrument Risk** – Structured instruments may be less liquid than other debt securities, and the price of structured instruments may be more volatile. Although structured instruments may be sold in the form of a corporate debt obligation, they may not have some of the protection against counterparty default that may be available with publicly traded debt securities.

## **ETF Risks**

The material risks associated with this strategy are:

**International Limitations-** While the U.S. has a plethora of ETF products, some countries only have a few exchange traded funds in which to invest. And those regions that do offer market ETFs, usually only include large-cap products leaving a lack of mid and small-sized funds.

**Low Trading Volumes-** When ETFs have low trading volumes, the advantage of purchasing and ETF over and index or equity diminishes. The bid-ask spread can be too wide to be cost-effective. Market Makers tend to be tighter on securities that are more liquid (barring any unforeseen news or circumstances).

**Long Investment Horizon-** The intraday trading opportunities created by ETFs may not fit into a long-term investor's strategy. This is more of an advantage for short-term ETF traders. So, as an investor, it will be important to layout your investing goals before you decide how to include ETFs in your portfolio.

**Inactivity-** Some ETFs are not as actively traded as others. It can be a sector-related issue or even a regional issue. When this situation occurs, it may be more effective to invest in managed fund where activity is higher.

**Tax Implications-** In the case of foreign ETFs, sometimes there may be a tax advantage by opting to invest in an international portfolio. Tax laws vary from country to country, so it may be beneficial for your tax return to find other foreign investments.

There are many benefits to including ETFs in your portfolio, however it is important to understand that they are not the ideal investment for every situation. ETFs should be evaluated on a case-by-case basis for every investing strategy.

**Commercial Paper-** Commercial Paper (CP) is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default. There is a less risk in asset based commercial paper (ABCP). The difference between ABCP and CP is that instead of being an unsecured promissory note representing an obligation of the issuing company, ABCP is backed by securities. Therefore, the perceived quality of the ABCP depends on the underlying securities.

**Limited Partnerships-** A limited partnership is a financial affiliation that includes at least one general partner and a number of limited partners. The partnership invests in a venture, such as real estate development or oil exploration, for financial gain. The general partner does not usually invest any capital but has management authority and unlimited liability. That is, the general partner runs the business and, in the event of bankruptcy, is responsible for all debts not paid or discharged. The limited partners have no management authority and confine their participation to their capital investment. That is, limited partners invest a certain amount of money and have nothing else to do with the business. However, their liability is limited to the amount of the investment. In the worst case scenario for a limited partner, he/she loses what he/she invested. Profits are divided between general and limited partners according to an arrangement formed at the creation of the partnership.

## **Item 9. Disciplinary Information**

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### **Disclosure Events**

We are required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of our advisory business or the integrity of our management. We do not have any disclosure events involving a criminal or civil action in a domestic, foreign, or military court of competent jurisdiction; an administrative proceeding before the SEC, or any other federal or state regulatory agency, or any foreign financial regulatory authority; or a self-regulatory organization (SRO) proceeding.

All disciplinary activity can be viewed on <https://adviserinfo.sec.gov/> by searching CRD 336670

## **Item 10. Other Financial Industry Activities and Affiliations**

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We are not affiliated as a registered representative of a broker-dealer and we do not have an application pending to register as a registered representative of a broker-dealer. We do not have an application pending to register as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

A.J. DiLiberto is a registered insurance agent and is an independent agent who is appointed with many different companies and is not a captive agent with any company. A.J. has historically used the name "Fiduciary Planners Insurance" as a business name. This is not a corporation.

Prior to recommending any 3<sup>rd</sup> party manager, Fiduciary Planners will ensure that any 3<sup>rd</sup> party manager is properly licensed or reported.

Journey2Freedom, Inc. (recently changed from AJD-CFP, Inc.) is an S-Corporation 100% owned by A.J. DiLiberto. This entity is not investment related and receives revenue directly from Pre-Paid Legal Services, Inc. and serves as the operating entity for paying business expenses and compensating the owner. Journey2Freedom, Inc. also serves as the entity through which advisory fees and insurance-related revenues are reported.

A.J. DiLiberto is an Independent Marketing Associate with Pre-Paid Legal Services, Inc (PPLSI). This is company that sells memberships for legal services to businesses and individuals and identity theft protection memberships to individuals. In this capacity, A.J. DiLiberto will earn commissions and other compensation (such as bonuses if earned) for these activities. The fees you pay Fiduciary Planners for advisory services are separate and distinct from the commissions earned by IARs from PPLSI. This presents a conflict of interest because IARs may have an incentive to recommend products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

We have not provided information on the following financial industry activities and affiliations because we do not have any relationship or arrangement that is material to our advisory business or to our clients with any of the types of entities listed below.

- investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund).
- futures commission merchant, commodity pool operator, or commodity trading advisor.

- banking or thrift institution.
- lawyer or law firm.
- pension consultant.
- real estate broker or dealer.
- sponsor or syndicator of limited partnerships.

A.J. Diliberto acts as the Area Director for Missing Link Network, which is a business networking organization. A.J. receives commission compensation for recruiting and promoting new members to join the group. This presents a conflict of interest because A.J. may prioritize recommending members of the business networking group over another advisor who may be just as qualified.

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

### **Code of Ethics**

The Code is based upon the principle that we owe a fiduciary duty to clients to conduct their affairs, including their personal securities transactions, in such a manner as to avoid (i) serving their own personal interests ahead of clients, (ii) taking inappropriate advantage of their position with the firm, and (iii) any actual or potential conflicts of interest or any abuse of their position of trust and responsibility.

The purpose of our Code of Ethics is to preclude activities which may lead to or give the appearance of conflicts of interest, insider trading, and other forms of prohibited or unethical business conduct. As such, we are prohibited from engaging in fraudulent, deceptive, or manipulative conduct. We have an affirmative duty of utmost good faith to act solely in the best interest of our clients.

We have adopted the following Code of Ethics:

- Fiduciary Responsibility- we will exercise the highest standard of care in protecting and promoting the interests of our clients and will provide a written disclosure containing any conflicts of interest that may compromise their impartiality or independence.
- Integrity- All professional services will have the highest level of integrity.
- Objectivity- we will provide advice that is objective and in the best interest of the client and without conflicts of interest.
- Competence- we will maintain the necessary knowledge and skills to provide our clients with competent advice and services.
- Fairness- All professional services will be performed by us in a manner that is fair and reasonable to its clients.
- Confidentiality- we will maintain and safeguard all confidential client information in accordance with applicable laws.
- Diligence- we will ensure the accuracy and completeness of records, information, and data collected, used, and managed, and will take necessary steps to correct any discrepancies.
- Regulatory Compliance- we will comply fully with appropriate laws and internal regulations.

We will provide a complete copy of our Code of Ethics to any client or prospective client upon request.

### **Participation or Interest in Client Transactions**

Neither our firm nor any persons associated with our firm has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

### **Personal Trading Practices**

Our firm or persons associated with our firm may buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to

trade ahead of you and potentially receive more favorable prices than you will receive. To mitigate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities.

## **Item 12. Brokerage Practices**

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We currently use Charles Schwab & Co., Inc. ("Schwab") as the broker-dealer and custodian of client assets. While you are free to choose any broker-dealer or other service provider as your custodian, we recommend that you establish an account with a brokerage firm with which we have an existing relationship. Such relationships may include benefits provided to our firm, including but not limited to market information and administrative services that help our firm manage your account(s). We believe that the recommended broker-dealers provide quality execution services for our clients at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by recommended broker-dealers, including the value of the firm's reputation, execution capabilities, commission rates, and responsiveness to our clients and our firm. In recognition of the value of the services recommended broker-dealers provide, you may pay higher commissions and/or trading costs than those that may be available elsewhere.

### **Research and Other Soft Dollar Benefits**

We do not currently receive any research or other services from any specific broker-dealers, and we do not have any soft dollar arrangements with any broker-dealer firm. We do not get referrals from or have any other incentive to recommend one broker-dealer over another. Further, we do not require that a client direct us to execute transactions through a specified broker-dealer.

As an insurance agent, specifically regarding health insurance services, A.J. DiLiberto could receive referrals from 3<sup>rd</sup> party advisors.

### **Schwab - Your Custody and Brokerage Costs**

For our clients' accounts it maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. For some accounts, Schwab may charge you a percentage of the dollar amount of assets in the account in lieu of commissions. Schwab's commission rates and/or asset-based fees applicable to our client accounts were negotiated based on our commitment to maintain at least some minimum amount of our clients' assets in accounts at Schwab. This commitment benefits you because the overall commission rates and/or asset-based fees you pay are lower than they would be if we had not made the commitment. In addition to commission rates and/or asset-based fees Schwab charges you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account.

## **Item 13. Review of Accounts**

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Your Investment Advisor Representative will monitor your accounts on a periodic basis and will conduct formal account reviews at least annually. The reviews are designed to ensure the advisory services provided to you and that the portfolio mix is consistent with your stated investment needs and objectives. Additional reviews may be conducted based on various circumstances, including, but not limited to:

- contributions and withdrawals,
- year-end tax planning
- market moving events,
- security specific events, and/or
- changes in your risk/return objectives.

We will provide you with additional or regular written reports in conjunction with account reviews. The nature and frequency of reports are determined by client need and the services offered. Overall investment management, market prospects and individual issue prospects are considered in the review process. Triggering factors that may affect an account review could be any material change in a client's account such as a change in company earnings, industry/company outlook as well as other economic factors. Reports we provide to you will contain relevant account and/or market-related information such as an inventory of account holdings and account performance. You will receive trade confirmations and monthly or quarterly statements from your account custodian(s).

Your Investment Advisor Representative will review your financial plan periodically or upon your request. The reviews are designed to ensure that the planning advice and/or asset allocation recommendations made to you are consistent with your stated investment needs and objectives. We will not provide regular written reports to you for financial planning and consulting services. If you implement financial planning advice through Fiduciary Planners, you will receive trade confirmations and monthly or quarterly statements from relevant custodians.

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

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We do not receive any compensation from any third party in connection with providing investment advice to you, nor do we pay any solicitor for referrals to Fiduciary Planners.

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#### **Item 15. Custody**

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We do not maintain custody of your client funds and/or securities. As paying agent for our firm, your independent custodian will directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian. You will receive account statements from the independent, qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy. We will also provide statements to you reflecting the amount of advisory fee deducted from your account. You should compare our statements with the statements from your account custodian(s) to reconcile the information reflected on each statement. If you have a question regarding your account statement, or if you did not receive a statement from your custodian, please contact us immediately at the telephone number on the cover page of this brochure.

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#### **Item 16. Investment Discretion**

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Unless a client requests otherwise in writing, via a Non-Discretionary Asset Management Agreement, accounts will be managed on a discretionary basis. This means the advisor is expressly authorized to make trades on a client's behalf in accordance with the agreed allocation and goals and objectives of the client. In addition, if you participate in a third party program a Money Manager (MM) on the third party's platform will be appointed to place trades in accordance with the strategy or model that the MM uses. In that regard, the MM takes discretion over the investment decisions related to your account. This means that the MM has the discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. The relationship between you, the third party program sponsor, the MM and us will be governed by a separate client agreement that you execute directly with the third party program sponsor. The separate agreement will not become effective until it is accepted by the third party. By reason of the manager having discretion to make trades, and our ability to hire and fire the manager if we believe it is in your best interests, we also effectively have discretion over your account. You may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for your account(s). For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry or security. See the Advisory Business section above for more information.

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#### **Item 17. Voting Client Securities**

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We do not vote proxies on behalf of any advisory accounts.

## **Item 18. Financial Information**

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We are not required to provide a balance sheet or other financial information to our clients because we do not require the prepayment of fees in excess of \$500 and six months or more in advance; we do not take custody of client funds or securities; and, we do not have a financial condition that is reasonably likely to impair our ability to meet our commitments to you. Moreover, we have never been the subject of a bankruptcy petition.

## **Item 19. Requirements for State-Registered Advisers**

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**Principal Management:**

A.J. DiLiberto, Owner

CFP® (1998), College of New Jersey, 09/1987 - 12/1988

Former Noble Wealth Management, Inc., Investment Adviser Representative/CCO, 07/2014 – 7/2025

**Disciplinary Information:**

None.

**Other Business Activities:**

A.J. DiLiberto is also a licensed insurance agent and independent marketing associate with Legalshield. He may offer insurance and other products to clients, and may receive commissions from such sales. This presents a conflict of interest; clients are not obligated to purchase insurance or any other service through him.

**Performance-Based Fees:**

We do not charge performance-based fees.

**Other Financial Industry Affiliations:**

None.

**Financial Condition:**

We do not require prepayment of more than \$500 in fees, six months or more in advance.

In 10/2017 a compromise was reached with National Debt Relief. Original amount owed \$ 30,671.00; amount paid was \$18,928

## **Item 20. Business Continuity Plan**

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Fiduciary Planners has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us – If after a significant business disruption, you should contact us through our web site or our primary phone number (714) 421-3023 or email at [aj@fiduciaryplanners.net](mailto:aj@fiduciaryplanners.net).

We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

# Form ADV Part 2B Brochure Supplement

March 15, 2026

## Fiduciary Planners CRD Number: 336670

Supervised Persons:  
Anthony J. DiLiberto, CFP®  
CRD #1838051

17011 Beach Blvd  
Suite 900  
Huntington Beach CA 92647  
Tel (714) 421-3023  
Fax (714) 844-4906  
[www.fiduciaryplanners.net](http://www.fiduciaryplanners.net)

*This brochure supplement provides information about the Supervised Persons listed above that supplement Fiduciary Planners brochure. You should have received a copy of that brochure. Please contact Anthony J. DiLiberto at 714-421-3023 and/or via email at [aj@fiduciaryplanners.net](mailto:aj@fiduciaryplanners.net) if you did not receive Fiduciary Planners' brochure or if you have any questions about the contents of this supplement.*

## Item 2. Educational Background and Experience

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### Supervised Persons

Fiduciary Planners requires certain licensing standards as well as a certain level of business experience for giving investment advice to clients. For example, all advisers must be professionals with relevant industry experience in order to adequately demonstrate a certain level of expertise in securities management and analysis. Fiduciary Planners requires that all investment adviser representatives maintain the minimum licensing qualifications in accordance with all federal, state, and self-regulatory organization (SRO) rules and regulations.

Name: **Anthony J. DiLiberto, CFP®**  
Year of Birth: 1968  
Education: College of New Jersey, 09/1987 - 12/1988  
Background: Fiduciary Planners, Investment Adviser Representative/Owner, 08/2025 – Present  
Pre-Paid Legal Services, Inc., 07/2025 – Present  
Journey2Freedom, Inc (renamed from AJD-CFP, Inc in 8/2024), 01/2021 – Present  
Fiduciary Planners Insurance, Insurance Agent/Owner, 06/2012 – 08-2025  
Noble Wealth Management, Inc., Investment Adviser Rep/CCO, 07/2014 – 07/2025  
Foothill Securities, Inc. Registered Representative, 09/2014 - 12/2016  
Designations: Certified Financial Planner (CFP®) (1998)

### Use of Professional Designations

#### Certified Financial Planner (CFP®)

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services and attain a bachelor’s degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;

- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – 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; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

## Item 3. Disciplinary Information

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### **Criminal or Civil Action**

There are no disclosure events involving a criminal or civil action in a domestic, foreign, or military court of competent jurisdiction in which NWM or its personnel are involved.

### **Administrative Proceeding (SEC/Federal/State)**

There are no disclosure events involving an administrative *proceeding* before the SEC, any other federal regulatory agency, any state regulatory agency, or any *foreign financial regulatory authority* in which NWM or its personnel are involved.

### **Administrative Proceeding (SRO)**

There are no disclosure events involving A self-regulatory organization (SRO) proceeding in which NWM or its personnel are involved.

### **Use of BrokerCheck**

If this supplement is delivered electronically, and any supervised person under the firm has a disciplinary history, the details of any disclosure may be found on either the Financial Industry Regulatory Authority’s (FINRA) BrokerCheck system ([www.finra.org/brokercheck](http://www.finra.org/brokercheck)) or the IAPD ([www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)).

There is no other proceeding in which a professional attainment, designation, or license of any of the supervised persons as part of this Brochure Supplement was revoked or suspended because of a violation of rules relating to professional conduct, nor were there any incidents where any of the supervised persons as part of this Brochure Supplement resigned (or otherwise relinquished his attainment, designation, or license) in anticipation of such a proceeding.

## Item 4. Other Business Activities

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### Other Related Investment Business

None of the supervised person(s) listed above are actively engaged in any investment-related business or occupation, including if the supervised person is registered, or has an application pending to register, as a futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA.

### Other Business Activity

Anthony J DiLiberto is a registered insurance agent and is an independent agent who is appointed with many different companies and is not a captive agent with any company. Anthony has historically used the name "Fiduciary Planners Insurance" as a business name. This is not a corporation.

Journey2Freedom, Inc. (recently changed from AJD-CFP, Inc.) is an S-Corporation 100% owned by Anthony J. DiLiberto. This entity is not investment-related and receives revenue directly from Pre-Paid Legal Services, Inc. and serves as the operating entity for paying business expenses and compensating the owner. Journey2Freedom, Inc. also serves as the entity through which advisory fees and insurance-related revenues are reported.

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The fees you pay Fiduciary Planners for advisory services are separate and distinct from the commissions earned by IARs from any insurance product or PPLSI. This presents a conflict of interest because IARs may have an incentive to recommend products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

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## Item 5. Additional Compensation

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Anthony J DiLiberto is an Independent Marketing Associate with Pre-Paid Legal Services, Inc (PPLSI). This is company that sells memberships for legal services to businesses and individuals and identity theft protection memberships to individuals. In this capacity, Anthony J DiLiberto will earn commissions and other compensation (such as bonuses if earned) for these activities. The fees you pay Fiduciary Planners for advisory services are separate and distinct from the commissions earned by IARs from PPLSI. This presents a conflict of interest because IARs may have an incentive to recommend products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

A.J. receives commission compensation for recruiting and promoting new members to join Missing Link Network. This presents a conflict of interest because A.J. may prioritize recommending members of the business networking group over another advisor who may be just as qualified.

## Item 6. Supervision

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### **Designated Supervisor**

Anthony J. DiLiberto at 714-421-3023 is the designated supervisor for Fiduciary Planners responsible for providing supervisory oversight regarding Fiduciary Planners advisory business. Anthony J. DiLiberto's contact information is 714-421-3023 or [aj@fiduciaryplanners.net](mailto:aj@fiduciaryplanners.net). All supervision is performed on a regular and continuous basis where all transactional activity is reviewed and approved by Anthony J. DiLiberto as well as a review of ongoing management of investment advice and the issuance of financial plans.

## Item 7. Requirements for State-Registered Advisers

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### **Disclosure Events**

None of the supervised persons listed above as part of this Brochure Supplement have been involved in any disclosure event where they were found liable in an arbitration claim alleging damages in excess of \$2,500, or found liable in a civil, self-regulatory organization, or administrative proceeding; or have been the subject of a bankruptcy petition.