

Item 1: Cover Page for Part 2A of Form ADV: Firm Brochure

February 2020



**200 Kentucky St., 2nd Floor, Suite C
Petaluma, CA 94952**

**Firm Contact:
Brian Breen
Chief Compliance Officer**

**Firm Website Address:
www.breenwealth.com**

This brochure provides information about the qualifications and business practices of Breen Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us by telephone at (707) 595-6556 or email brian@breenwealth.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any State Securities Authority.

Additional information about Breen Wealth Management, LLC also is available on the SEC's website at www.adviserinfo.sec.gov by searching CRD# 169401.

Please note that the use of the term "registered investment adviser" and description of Breen Wealth Management, LLC and/or our associates as "registered" does not imply a certain level of skill or training. You are encouraged to review this Brochure and Brochure Supplements for our firm's associates who advise you for more information on the qualifications of our firm and our employees.

Item 2: Material Changes to Our Part 2A of Form ADV: Firm Brochure

Breen Wealth Management, LLC is required to make clients aware of information that has changed since the last annual update to the Firm Brochure (“Brochure”) and that may be important to them. Clients can then determine whether to review the brochure in its entirety or to contact us with questions about the changes.

Since the last annual amendment filed on January 15, 2019, the following changes have been made:

- Charles Schwab & Co., Inc. (“Schwab”) recently eliminated transaction fees for U.S. listed equities and exchange traded funds.
- Our firm has retired its B-Online Portfolio service. Clients whose accounts were with this service will be appropriately re-papered with our Private Client Group Service, or another provider’s retail service as deemed appropriate.
- Our Assets Under Management have been updated to reflect that we now manage \$145,771,000 on a discretionary basis.

Item 3: Table of Contents

Item 1: Cover Page for Part 2A of Form ADV: Firm Brochure 1
Item 2: Material Changes to Our Part 2A of Form ADV: Firm Brochure 2
Item 3: Table of Contents..... 3
Item 4: Advisory Business..... 4
Item 5: Fees & Compensation 5
Item 6: Performance-Based Fees & Side-By-Side Management 6
Item 7: Types of Clients & Account Requirements..... 7
Item 8: Methods of Analysis, Investment Strategies & Risk of Loss 7
Item 9: Disciplinary Information..... 8
Item 10: Other Financial Industry Activities & Affiliations 8
Item 11: Code of Ethics, Participation or Interest in Client Transactions & Personal Trading 8
Item 12: Brokerage Practices..... 9
Item 13: Review of Accounts or Financial Plans..... 10
Item 14: Client Referrals & Other Compensation..... 11
Item 15: Custody..... 11
Item 16: Investment Discretion..... 12
Item 17: Voting Client Securities..... 12
Item 18: Financial Information 12

Item 4: Advisory Business

Breen Wealth Management, LLC is a fee-only wealth management firm dedicated to providing individuals and other types of clients with a wide array of investment advisory services. Our firm is solely owned by Brian J. Breen CFP® and is a limited liability company formed in the State of California. Mr. Breen has owned and operated an independent advisory firm since 2009.

Types of Advisory Services We Offer

Private Client Group:

Breen Wealth Management's primary service to clients of the firm is termed the "Private Client Group". This is an all-inclusive, comprehensive wealth management service encompassing financial planning, financial consulting, pension consulting, and discretionary investment management. It is designed to assist clients in meeting their financial goals and objectives through implementing the use of financial investments and/or assist employer plan sponsors in establishing, monitoring, and reviewing their company's participant-directed retirement plan. The planning or consulting may encompass one or more of the following areas: Investment Planning, Retirement Planning, Corporate and Personal Tax Planning, Estate Planning, Charitable Planning, Education Planning, Real Estate Analysis, Mortgage/Debt Analysis, Insurance Analysis, Business, and Personal Financial Planning. We conduct at least one, but sometimes more than one meeting (in person, if possible, otherwise via telephone conference) with clients in order to understand their current financial situation, existing resources, financial goals, and tolerance for risk. Based on what we learn, we utilize our firm's technology resources, academic research, and professional expertise to develop and propose an investment approach to the client. This proposal will be for Breen Wealth Management to implement an asset allocated investment portfolio, consisting of low-cost exchange traded funds ("ETFs") and/or institutional mutual funds only available to institutional investors and clients of select investment advisors. For engagements with plan sponsors to retirement accounts the proposal may include investment options, plan structure, developing an IPS, and participant education. Upon the client's agreement to the proposed investment plan, we work with the client to establish or transfer investment accounts so that we can manage the client's portfolio on a discretionary basis. Once the relevant accounts are under our management, we review such accounts daily and conduct a portfolio rebalance assessment quarterly. If the client experiences any significant changes to his/her financial or personal circumstances, the client must notify us so that we can consider such information in managing the client's investments.

All pension consulting services shall be in compliance with the applicable federal law(s) regulating pension consulting services. This applies to client accounts that are pension or other employee benefit plans ("Plan") governed by the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). If the client accounts are part of a Plan, and we accept appointments to provide our services to such accounts, we acknowledge that we are a fiduciary within the meaning of Section 3(21) of ERISA (but only with respect to the provision of services described in section 1(a) of the advisory agreement).

Financial Planning & Consulting Services

Our firm provides a variety of standalone financial planning and consulting services to clients for the management of financial resources based upon an analysis of current situation, goals, and objectives. Financial planning services will typically involve preparing a financial plan or rendering a financial consultation for clients based on the client's financial goals and objectives. This planning or consulting may encompass Investment Planning, Retirement Planning, Estate Planning, Charitable

Planning, Education Planning, Corporate and Personal Tax Planning, Cost Segregation Study, Corporate Structure, Real Estate Analysis, Mortgage/Debt Analysis, Insurance Analysis, Lines of Credit Evaluation, or Business and Personal Financial Planning.

Written financial plans or financial consultations rendered to clients usually include general recommendations for a course of activity or specific actions to be taken by the clients. Implementation of the recommendations will be at the discretion of the client. Our firm provides clients with a summary of their financial situation, and observations for financial planning engagements. Financial consultations are not typically accompanied by a written summary of observations and recommendations, as the process is less formal than the planning service. Assuming that all the information and documents requested from the client are provided promptly, plans or consultations are typically completed within 6 months of the client signing a contract with our firm.

Individual Tailoring of Advice to Clients

We offer individualized investment management to clients utilizing our Private Client Group and Financial Planning & Consulting services.

Each client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio. Restrictions on investments in certain securities or types of securities may not be possible due to the level of difficulty this would entail in managing the account. Restrictions would be limited to our Private Client Group.

Participation in Wrap Fee Programs

We do not offer wrap fee programs.

Regulatory Assets Under Management

As of December 31, 2019, our firm manages \$145,771,000 on a discretionary basis.

Item 5: Fees & Compensation

Private Client Group Services:

The maximum annual fee to be charged for our Private Client Group services will not exceed 1.40% and will be based on the market value of the investments held in each client's account. The agreed upon fee to be assessed will be outlined in the advisory agreement to be signed by the client.

The Firm receives no sales commissions on investment products purchased or sold for client accounts. We do not provide clients advice as to the tax deductibility of our advisory fees. Clients are directed to consult a tax professional to determine the potential tax deductibility of the payment of advisory fees.

Our firm's fees are billed on a pro-rata annualized basis quarterly in advance based on the value of your account on the last day of the previous quarter. Fees will be deducted from your managed account. Adjustments will be made for deposits exceeding \$25,000 during the quarter. In rare cases, we will agree to direct bill clients. As part of this process, you understand and acknowledge the following:

- a) The client's independent custodian sends statements at least quarterly showing the market values for each security included in the Assets and all account disbursements, including the amount of the advisory fees paid to our firm;
- b) Clients will provide authorization permitting our firm to be directly paid by these terms. Our firm will send an invoice directly to the custodian; and
- c) If our firm sends a copy of our invoice to the client, legend urging the comparison of information provided in our statement with those from the qualified custodian will be included.

Financial Planning & Consulting Services

Our firm charges on a flat fee basis for financial planning and consulting services. The total estimated fee, as well as the ultimate fee charged, is based on the scope and complexity of our engagement with the client. Flat fees range from \$2,500 to \$10,000. Our firm requires a retainer of 50% of the ultimate financial planning or consulting fee at the time of signing. The remainder of the fee will be directly billed to the client and due within 30 days of a financial plan being delivered or consultation rendered. Our firm will not require a retainer exceeding \$1,200 when services cannot be rendered within 6 months.

Other Fees & Expenses

Clients will incur transaction charges for trades executed in their accounts. These transaction fees are separate from our fees and will be disclosed by the firm that the trades are executed through. Charles Schwab & Co., Inc. ("Schwab") does not charge transaction fees for U.S. listed equities and exchange traded funds.

Also, clients will pay the following separately incurred expenses, which we do not receive any part of: charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses). Our firm does not accept nor receive 12b-1 fees from mutual funds that we select for our clients.

Termination & Refunds

In the event that you wish to terminate our services, we will refund the unearned portion of our advisory fee to you. You need to contact us in writing and state that you wish to terminate our services. Upon receipt of your notice of termination, we will proceed to close out your account and process a pro-rata refund of unearned advisory fees.

Financial Planning & Consulting clients may terminate their agreement at any time before the delivery of a financial plan by providing written notice. Clients will incur charges for bona fide advisory services rendered up to the point of termination (determined as 30 days from receipt of said written notice) and such fees will be due and payable. Clients will receive a pro-rata refund of unearned fees based on the time and effort expended by our firm.

Commissionable Securities Sales

We do not sell securities for a commission in our advisory accounts.

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

Our firm does not charge performance-based fees.

Item 7: Types of Clients & Account Requirements

We have the following types of clients:

- Individuals and High Net Worth Individuals;
- Pension & Profit Sharing Plans

While we do not have a defined minimum account size for our Private Client Group, however we do require that our client's expectations are aligned with the values and services that our firm provides.

We require a minimum fee of \$2,500 for Financial Planning and/or Consulting services. This may only be waived at our firm's discretion.

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

Methods of Analysis

Breen Wealth Management follows the principles of Modern Portfolio Theory and is firmly rooted in the belief that markets are "efficient" and that investors' returns are determined principally by asset allocation decisions rather than market timing or stock picking. Our firm's asset-class allocation decisions are based upon academic and behavioral economic research.

We recommend diversified portfolios, principally through the use of low-cost exchange traded funds (ETF's) and institutional mutual funds only available to institutional investors and clients of select investment advisors.

Breen Wealth Management's recommendations are designed for longer-term investors. Our firm uses financial simulation technology that calculates the effects of various historical rates of return from different asset classes to assist in the preparation of asset allocation plans for individual clients.

Investment Strategies

Our investment strategy is a prudent, proactive, risk management discipline that follows a 4-step process in order to meet our client's long-term investment objectives.

- i) We build a portfolio's asset allocation around the client's risk tolerance and financial planning goals.
- ii) Using our firm's expertise and research, we select low cost, non-proprietary, diversified funds to hold within our client's portfolio.
- iii) We proactively conduct quarterly rebalance and re-allocation adjustments based on changes to the client's risks, goals, and objectives.
- iv) We conduct ongoing portfolio monitoring in order to maintain cost efficiency, tax efficiency, and mitigate risk to reduce portfolio drawdown.

Please Note: Investing in securities involves risk of loss that clients should be prepared to bear. While the stock market may increase and your account(s) could enjoy a gain, it is also possible that the stock market may decrease, and your account(s) could suffer a loss. It is important that you understand the risks associated with investing in the stock market, are appropriately diversified in your investments, and ask us any questions you may have.

(Continued on Next Page)

Item 9: Disciplinary Information

There are no legal or disciplinary events that are material to the evaluation of our advisory business or the integrity of our management.

Item 10: Other Financial Industry Activities & Affiliations

Our firm has no other financial industry activities and affiliations to disclose.

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

We recognize that the personal investment transactions of members and employees of our firm demand the application of a high Code of Ethics and require that all such transactions be carried out in a way that does not endanger the interest of any client. At the same time, we believe that if investment goals are similar for clients and for members and employees of our firm, it is logical and even desirable that there be common ownership of some securities.

Therefore, in order to prevent conflicts of interest, we have in place a set of procedures (including a pre-clearing procedure) with respect to transactions effected by our members, officers and employees for their personal accounts¹. In order to monitor compliance with our personal trading policy, we have a quarterly securities transaction reporting system for all of our associates.

Furthermore, our firm has established a Code of Ethics which applies to all of our associated persons. An investment adviser is considered a fiduciary.

As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. We have a fiduciary duty to all clients. Our fiduciary duty is considered the core underlying principle for our Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. We require all of our supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with our Code of Ethics.

Our firm and supervised persons must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics. However, if a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided promptly upon request. Neither our firm nor a related person recommends to clients, or buys or sells for client accounts, securities in which our firm or a related person has a material financial interest.

Related persons of our firm buy or sell securities and other investments that are also recommended to clients. In order to minimize this conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics, a copy of which is available upon request.

¹ For purposes of the policy, our associate's personal account generally includes any account (a) in the name of our associate, his/her spouse, his/her minor children or other dependents residing in the same household, (b) for which our associate is a trustee or executor, or (c) which our associate controls, including our client accounts which our associate controls and/or a member of his/her household has a direct or indirect beneficial interest in.

Related persons of our firm may buy or sell securities for themselves at or about the same time they buy or sell the same securities for client accounts. In order to minimize this conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics, a copy of which is available upon request. Further, our related persons will refrain from buying or selling the same securities the same day as our clients. If related persons' accounts are included in a block trade, our related persons will always trade personal accounts last.

Item 12: Brokerage Practices

We seek to recommend a custodian/broker who will hold your assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others, these:

- Ability to maintain the confidentiality of trading intentions
- Timeliness of execution
- Timeliness and accuracy of trade confirmations
- Liquidity of the securities traded
- Willingness to commit capital
- Ability to place trades in difficult market environments
- Research services provided
- Ability to provide investment ideas
- Execution facilitation services provided
- Record keeping services provided
- Custody services provided
- Frequency and correction of trading errors
- Ability to access a variety of market venues
- Expertise as it relates to specific securities
- Financial condition
- Business reputation

With this in consideration, our firm has an arrangement with Charles Schwab & Co., Inc. ("Schwab"). Schwab offers to independent investment advisers non-soft dollar services which include custody of securities, trade execution, clearance and settlement of transactions. We receive some non-soft dollar benefits from Schwab through our participation in the program. (Please see the disclosure under Item 14 of this Brochure.)

Schwab may make certain research and brokerage services available at no additional cost to our firm. These services may be directly from independent research companies, as selected by our firm (within specific parameters). Research products and services provided by Schwab may include research reports on recommendations or other information about, particular companies or industries; economic surveys, data and analyses; financial publications; portfolio evaluation services; financial database software and services; computerized news and pricing services; quotation equipment for use in running software used in investment decision-making; and other products or services that provide lawful and appropriate assistance by Schwab to our firm in the performance of our investment decision-making responsibilities.

The aforementioned research and brokerage services are used by our firm to manage accounts for which we have investment discretion. Without this arrangement, our firm might be compelled to purchase the same or similar services at our own expense. We may have an incentive to continue to use or expand the use of Schwab services. Our firm examined this potential conflict of interest when we chose to enter into the relationship with Schwab and we have determined that the relationship is in the best interest of our firm's clients and satisfies our fiduciary obligations, including our duty to seek best execution.

Schwab charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Schwab enables us to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. Schwab commission rates are generally discounted from customary retail commission rates. However, the commission and transaction fees charged by Schwab may be higher or lower than those charged by other custodians and broker-dealers.

Investment research products and services that may be obtained by our firm will generally be used to service all of our clients, a brokerage commission paid by a specific client may be used to pay for research that is not used in managing that specific client's account.

Our firm does not receive brokerage for client referrals. Neither do we nor any of our firm's related persons have discretionary authority in making the determination of the brokers with whom orders for the purchase or sale of securities are placed for execution, and the commission rates at which such securities transactions are effected. We routinely recommend that a client directs us to execute through a specified broker-dealer. Our firm recommends the use of Schwab.

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

We perform investment management services for various clients. There are occasions on which portfolio transactions may be executed as part of concurrent authorizations to purchase or sell the same security for numerous accounts served by our firm, which involve accounts with similar investment objectives. Although such concurrent authorizations potentially could be either advantageous or disadvantageous to any one or more particular accounts, they are affected only when we believe that to do so will be in the best interest of the effected accounts.

When such concurrent authorizations occur, the objective is to allocate the executions in a manner which is deemed equitable to the accounts involved. In any given situation, we attempt to allocate trade executions in the most equitable manner possible, taking into consideration client objectives, current asset allocation and availability of funds using price averaging, proration and consistently non-arbitrary methods of allocation.

Special Considerations for ERISA Clients

A retirement or ERISA plan client may direct all or part of portfolio transactions for its account through a specific broker or dealer in order to obtain goods or services on behalf of the plan. Such direction is permitted provided that the goods and services provided are reasonable expenses of the plan incurred in the ordinary course of its business for which it otherwise would be obligated and empowered to pay. ERISA prohibits directed brokerage arrangements when the goods or services purchased are not for the exclusive benefit of the plan. Consequently, we will request that plan sponsors who direct plan brokerage provide us with a letter documenting that this arrangement will be for the exclusive benefit of the plan.

Item 13: Review of Accounts or Financial Plans

We review accounts on at least a quarterly basis for our clients subscribing to our Private Client Group services. The nature of these reviews is to learn whether clients' accounts are in line with their

investment objectives, appropriately positioned based on market conditions, and investment policies, if applicable. Only our Chief Compliance Officer, Brian Breen, will conduct reviews. Verbal reports to clients take place on at least an annual basis when we contact clients who subscribe to our Private Client Group services. We do not provide written reports to clients, unless asked to do so. We may review client accounts more frequently than described above. Among the factors which may trigger an off-cycle review are major market or economic events, the client's life events, requests by the client, etc.

Financial Planning clients do not receive reviews of their written plans unless they take action to schedule a financial consultation with us. Our firm does not provide ongoing services to financial planning clients, but are willing to meet with such clients upon their request to discuss updates to their plans, changes in their circumstances, etc. Financial Planning clients do not receive written or verbal updated reports regarding their financial plans unless they separately engage our firm for a post-financial plan meeting or update to their initial written financial plan.

Item 14: Client Referrals & Other Compensation

Adviser places trades for its clients' accounts subject to its duty to seek best execution and its other fiduciary duties. Adviser may use broker-dealers other than Schwab to execute trades for client accounts maintained at Schwab, but this practice may result in additional costs to clients so that Adviser is more likely to place trades through Schwab rather than other broker-dealers. Schwab's execution quality may be different than other broker-dealers.

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisers that have their clients maintain accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (*see Item 12 – Brokerage Practices*). The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

We do not pay referral fees (non-commission based) to independent solicitors (non-registered representatives) for the referral of their clients to our firm in accordance with Rule 206 (4)-3 of the Investment Advisers Act of 1940.

Item 15: Custody

Our firm does not have custody of client funds or securities. All of our clients receive account statements directly from their qualified custodians at least quarterly upon opening of an account. If our firm decides to also send account statements to clients, such notice and account statements include a legend that recommends that the client compare the account statements received from the qualified custodian with those received from our firm. Clients are encouraged to raise any questions with us about the custody, safety or security of their assets and our custodial recommendations.

Third Party Money Movement

The SEC issued a no-action letter ("Letter") with respect to the Rule 206(4)-2 ("Custody Rule") under the Investment Advisers Act of 1940 ("Advisers Act"). The letter provided guidance on the Custody Rule as well as clarified that an adviser who has the power to disburse client funds to a third party under a standing letter of instruction ("SLOA") is deemed to have custody. As such, our firm has adopted the following safeguards in conjunction with our custodian, Schwab:

- The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
- The client authorizes the investment adviser, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
- The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization, and provides a transfer of funds notice to the client promptly after each transfer.
- The client has the ability to terminate or change the instruction to the client's qualified custodian.
- The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
- The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.
- The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

Item 16: Investment Discretion

Our clients are required to sign a discretionary investment advisory agreement with our firm for the management of their account authorizing us to determine which securities and the amount of securities to be purchased and sold in client accounts without prior authorization.

Item 17: Voting Client Securities

We do not and will not accept the proxy authority to vote client securities. Clients will receive proxies or other solicitations directly from their custodian or a transfer agent. In the event that proxies are sent to our firm, we will forward them on to you and ask the party who sent them to mail them directly to you in the future. Clients may call, write or email us to discuss questions they may have about proxy votes or other solicitations.

Item 18: Financial Information

Our firm is not required to provide financial information in this Brochure because:

- Our firm does not require the prepayment of more than \$1,200 in fees when services cannot be rendered within 6 months.
- Our firm does not take custody of client funds or securities.
- Our firm does not have a financial condition or commitment that impairs our ability to meet contractual and fiduciary obligations to clients.
- Our firm has never been the subject of a bankruptcy proceeding.

**Item 1: Cover Page for Part 2B of Form ADV:
Brochure Supplement
February 2020**



Brian Breen

**200 Kentucky St., 2nd Floor, Suite C
Petaluma, CA 94952**

**Firm Contact:
Brian Breen
Chief Compliance Officer**

**Firm Website Address:
www.breenwealth.com**

This brochure supplement provides information about Brian Breen that supplements our brochure. You should have received a copy of that brochure. Please contact Mr. Breen if you did not receive the firm's brochure or if you have any questions about the contents of this supplement.

Additional information about Brian Breen is available on the SEC's website at www.adviserinfo.sec.gov by searching CRD#4731645.

Item 2: Educational Background & Business Experience

Brian Jeffery Breen

Year of Birth: 1977

Educational Background:

- 2000: Sonoma State University; Bachelor of Science in Business Management

Business Background:

- 01/2017 – Present Breen Wealth Management, LLC; Managing Member, Chief Compliance Officer & Investment Advisor Representative
- 01/2014 – 01/2017 Jacobson & Breen Wealth Management, LLC; Managing Member, Chief Compliance Officer & Investment Advisor Representative
- 09/2009 – 01/2014 Raymond James Financial Services, Inc dba Jacobson & Breen Wealth Strategies; Financial Advisor & Registered Representative
- 02/2007 – 09/2009 Wachovia Securities; Financial Advisor/VP of Investments
- 02/2005 – 02/2007 Atlas Securities; Financial Advisor
- 03/2004 – 02/2005 MetLife Securities; Financial Advisor
- 11/2003 – 03/2004 American Express Financial Advisors; Financial Advisor

Exams, Licenses & Other Professional Designations:

- 2009 – CERTIFIED FINANCIAL PLANNER, CFP®
- 2004 – Series 7 & 66 Exams

CERTIFIED FINANCIAL PLANNER™, CFP®

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 high standard of professional education, stringent code of conduct and standards of practice and ethical requirements that govern professional engagements with clients. To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements: 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, pass the comprehensive CFP® Certification Examination, Complete at least three years of full-time financial planning-related experience and agree to be bound by CFP® Board's *Standards of Professional Conduct*.

Individuals who become certified must 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 industry and 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.

Item 3: Disciplinary Information²

There are no legal or disciplinary events that are material to the evaluation of Mr. Breen.

Item 4: Other Business Activities

Mr. Breen does not have any outside business activities to report.

Item 5: Additional Compensation

Mr. Breen does not receive any other economic benefit for providing advisory services in addition to advisory fees

Item 6: Supervision

Mr. Breen is the firm's sole owner and Chief Compliance Officer and has no internal supervision placed over him. He is, however, bound by our firm's Code of Ethics.

² Note: Our firm may, under certain circumstances, rebut the presumption that a disciplinary event is material. If an event is immaterial, we are not required to disclose it. When we review a legal or disciplinary event involving the advisor to determine whether it is appropriate to rebut the presumption of materiality, we consider all of the following factors: (1) the proximity of advisor to the advisory function; (2) the nature of the infraction that led to the disciplinary event; (3) the severity of the disciplinary sanction; and (4) the time elapsed since the date of the disciplinary event. If we conclude that the materiality presumption has been overcome, we prepare and maintain a file memorandum of our determination in our records. We follow SEC rule 204-2(a)(14)(iii) and similar state rules.

**Item 19: Item 1: Cover Page for Part 2B of Form
ADV: Brochure Supplement
February 2020**



Anthony M. Borba Jr.

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Petaluma, CA 94952**

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This brochure supplement provides information about Anthony M. Borba Jr. that supplements our brochure. You should have received a copy of that brochure. Please contact Brian Breen if you did not receive the firm's brochure or if you have any questions about the contents of this supplement.

Additional information about Anthony M. Borba Jr. is available on the SEC's website at www.adviserinfo.sec.gov by searching CRD# 6856662.

Item 2: Educational Background & Business Experience

Anthony Michael Borba Jr.

Year of Birth: 1981

Educational Background:

- 2006; Sonoma State University; Bachelor of Arts in History

Business Background:

- 12/2017 – Present Breen Wealth Management, LLC; Research Assistant & Investment Adviser Representative
- 12/2015 – 12/2017 Breen Wealth Management, LLC; Research Assistant
- 10/2008 – 12/2015 Pacific Catch; Server & Shift Supervisor

Exams, Licenses & Other Professional Designations:

- 2017 – Series 65 Exam
- 2016 – Chartered Mutual Fund Counselor, CMFC®

Chartered Mutual Fund Counselor, CMFC®

The CMFC® Program is the only industry-recognized mutual fund designation. It is the result of collaboration between the College for Financial Planning® and the Investment Company Institute (“ICI”), the primary trade association for the mutual fund industry. The program’s quality and thoroughness reflect the combined experience and expertise of the College and the ICI. The College for Financial Planning® awards the CMFC® designation to students who successfully complete the program; pass the final examination and comply with the Code of Ethics, which includes agreeing to abide by the *Standards of Professional Conduct* and *Terms and Conditions*. Applicants must also disclose of any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct. Conferment of the designation is contingent upon the College for Financial Planning’s review of matters either self-disclosed or which are discovered by the College that are required to be disclosed. Continued use of the CMFC® designation is subject to ongoing renewal requirements. Every two years individuals must renew their right to continue using the CMFC® designation by completing 16 hours of continuing education and reaffirming to abide by the *Standards of Professional Conduct, Terms and Conditions*, and self disclose any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct.

Item 3: Disciplinary Information³

There are no legal or disciplinary events that are material to the evaluation of Anthony M. Borba Jr.

Item 4: Other Business Activities

Mr. Borba does not have any outside business activities to report.

³ Note: Our firm may, under certain circumstances, rebut the presumption that a disciplinary event is material. If an event is immaterial, we are not required to disclose it. When we review a legal or disciplinary event involving the advisor to determine whether it is appropriate to rebut the presumption of materiality, we consider all of the following factors: (1) the proximity of advisor to the advisory function; (2) the nature of the infraction that led to the disciplinary event; (3) the severity of the disciplinary sanction; and (4) the time elapsed since the date of the disciplinary event. If we conclude that the materiality presumption has been overcome, we prepare and maintain a file memorandum of our determination in our records. We follow SEC rule 204-2(a)(14)(iii) and similar state rules.

Item 5: Additional Compensation

Mr. Borba does not receive any other economic benefit for providing advisory services in addition to advisory fees.

Item 6: Supervision

Brian Breen, Managing Member and Chief Compliance Officer of Breen Wealth Management, LLC, supervises and monitors Anthony M. Borba Jr.'s activities on a regular basis to ensure compliance with our firm's Code of Ethics. Please contact Brian Breen if you have any questions about Anthony M. Borba Jr.'s brochure supplement at (707) 595-6556.

Breen Wealth Management, LLC

PRIVACY NOTICE REGARDING CLIENT PRIVACY AS REQUIRED BY REGULATION S-P & REGULATION S-AM

Updated May 2019

Maintaining the trust and confidence of our clients is a high priority. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information. This notice is provided to you on behalf of Breen Wealth Management, LLC.

Information We Collect: In connection with providing investment products, financial advice, or other services, we obtain non-public personal information about you, including:

- Information we receive from you on account applications, such as your address, date of birth, Social Security Number, occupation, financial goals, assets and income;
- Information about your transactions with us, our affiliates, or others; and
- Information received from credit or service bureaus or other third parties, such as your credit history or employment status.

Categories of Information We Disclose: We may only disclose information that we collect in accordance with this policy. Breen Wealth Management, LLC does not sell customer lists and will not sell your name to telemarketers.

Categories of Parties to Whom We Disclose: We will not disclose information regarding you or your account at Breen Wealth Management, LLC, except under the following circumstances:

- To entities that perform services for us or function on our behalf, including financial service providers, such as a clearing broker-dealer, investment company, or insurance company;
- To third parties who perform services on our behalf such as technology solution providers;
- To your attorney, trustee or anyone else who represents you in a fiduciary capacity;
- To our attorneys, accountants or auditors; and
- To government entities or other third parties in response to subpoenas or other legal process as required by law or to comply with regulatory inquiries.

How We Use Information: Information may be used among companies that perform support services for us, such as data processors, technical systems consultants and programmers, or companies that help us market products and services to you for a number of purposes, such as:

- **To protect your accounts** from unauthorized access or identity theft;
- **To process your requests** such as securities purchases and sales;
- **To establish or maintain an account with an unaffiliated third party**, such as a clearing broker-dealer providing services to you and/or Breen Wealth Management, LLC;
- **To service your accounts**, such as by issuing checks and account statements;
- **To comply** with Federal, State, and Self-Regulatory Organization requirements;
- **To keep you informed** about financial services of interest to you.

Regulation S-AM: Under Regulation S-AM, a registered investment adviser is prohibited from using eligibility information that it receives from an affiliate to make a marketing solicitation unless: (1) the potential marketing use of that information has been clearly, conspicuously and concisely disclosed to the consumer; (2) the consumer has been provided a reasonable opportunity and a simple method to opt out of receiving the marketing solicitations; and (3) the consumer has not opted out. Breen Wealth Management, LLC does not receive information regarding marketing eligibility from affiliates to make solicitations.

Regulation S-ID: Regulation S-ID requires our firm to have an Identity Theft Protection Program (ITPP) that controls reasonably foreseeable risks to customers or to the safety and soundness of our firm from identity theft. We have developed an ITPP to adequately identify and detect to prevent and mitigate identity theft.

Our Security Policy: We restrict access to nonpublic personal information about you to those individuals who need to know that information to provide products or services to you and perform their respective duties. We maintain physical, electronic, and procedural security measures to safeguard confidential client information.

Closed or Inactive Accounts: If you decide to close your account(s) or become an inactive customer, our Privacy Policy will continue to apply to you.

Complaint Notification: Please direct complaints to: Brian Breen, CCO at Breen Wealth Management, LLC, 200 Kentucky St., 2nd Floor, Suite C, Petaluma, CA 94952; (707) 595-6556.

Changes to This Privacy Policy: If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Policy, please contact us at: Breen Wealth Management, LLC, 200 Kentucky St., 2nd Floor, Suite C, Petaluma, CA 94952; (707) 595-6556.