



**Form ADV Part 2A  
Firm Brochure  
March 31, 2020**

This Brochure provides information about the qualifications and business practices of Tuyyo Planning Group, LLC. If you have any questions about the contents of this Brochure, please contact us at 512.522.0201, or via email at [luis@tuyyoplanning.com](mailto:luis@tuyyoplanning.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.

Tuyyo Planning Group, LLC is a registered investment advisory firm. Registration of an investment advisory firm does not imply a particular level of skill or training.

Additional information about Tuyyo Planning Group, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Tuyyo Planning Group, LLC**

**IARD# 298052**

**512.522.0201**

**13317 Perthshire St.**

**Austin, Texas 78729**

**[luis@tuyyoplanning.com](mailto:luis@tuyyoplanning.com)**

**[www.tuyyoplanning.com](http://www.tuyyoplanning.com)**

## ITEM 2

# Material Changes

### Annual Update

The Material Changes section of this brochure will be updated annually, or when material changes occur since the previous release of our Firm Brochure. This Item discusses only specific material changes that are made to this Brochure and provides our clients with a summary of such changes.

### Material Changes since the Last Update

The following changes have been made to this version of the Disclosure Brochure since our last amendment filed on 03/05/2019.

Item 1- Updated our principle office phone number to reflect (512)522-0201, added website: [www.facebook.com/LuisGuardia11/](https://www.facebook.com/LuisGuardia11/), updated TPG's Logo.

Item 4- Updated our Assets Under Management.

Item 14- Removed the following wording "While we do not have any current arrangements with any TPMs, at such time that we do we will receive compensation based on the service they provide to our clients. Any such compensation arrangement will be formalized in an agreement and disclosed to our clients." Since we use Betterment Securities and Betterment for Advisors services.

### Full Brochure and Additional Information

Full Brochure and additional information about Tuyyo Planning Group, LLC are available via the SEC's website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's website also provides information about any persons affiliated with us who are registered or are required to be registered, as investment adviser representatives ("IAR").

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## Advisory Business

### FIRM INFORMATION

Tuyyo Planning Group, LLC ("TPG," "we," "us," "our"), a Limited Liability Company formed in July 2018, is a registered investment advisory firm located in Austin, Texas. TPG currently reports \$443,867 in Assets Under Management managed on a discretionary basis as of December 31, 2019.

### PRINCIPAL OWNERS

TPG is owned and controlled by Luis Guardia, its Founder and Chief Compliance Officer.

### INVESTMENT ADVISORY SERVICES

#### **Annual Comprehensive Financial Planning and Consulting Services:**

Tuyyo Planning Group specializes in ongoing comprehensive financial planning for those that work in the field of or families that are/will be/or have been impacted by infertility. Your journey to start and grow your family is unique, and our approach in helping you is too.

These are our most common services for our clients and involve working one-on-one with a planner over an extended period of time. By paying a fixed financial planning fee paid quarterly or monthly, clients get continuous access to a planner who will work with them to design their plan. The planner will monitor the plan, recommend any changes and ensure the plan is up to date.

Clients will be guided through establishing their goals and values around money. The client will be required to provide information to help complete the following areas of analysis: net worth, cash flow/debt management, insurance, credit scores/reports, employee benefits, retirement planning, insurance, investments, college planning and estate planning

Once the client's information is reviewed, their plan will be built and analyzed, and then the findings, analysis and potential changes to their current situation will be reviewed with the client. Clients subscribing to this service will receive a written or an electronic report providing the client with a detailed financial plan designed to achieve his or her stated financial goals, suitability, and objectives. If follow up meetings are required, we will schedule them at the client's convenience.

The plan and the client's financial situation and goals will be monitored throughout the year, and follow-up phone calls and emails will be made to the client to confirm that any agreed upon action steps have been carried out. On at least an annual basis there will be a full review of this plan in person, if possible, or a phone call, depending on the client's location, to ensure its accuracy and ongoing appropriateness. Any needed updates will be implemented at that time.

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

We also provide project-based, modular financial planning services on topics to include retirement planning, risk management, college savings, cash flow, debt management, work benefits, and estate and incapacity planning.

Financial planning is an evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values, and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information, and analysis

will be considered as they impact and are impacted by the entire financial and life situation of the client. Clients purchasing this service will receive a written or an electronic report, providing the client with a detailed financial plan designed to achieve his or her stated financial goals and objectives.

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

Financial Goals: We will help clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.

Cash Flow and Debt Management: We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.

Employee Benefits Optimization: We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.

Estate Planning: This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts, and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts.

We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. There will be no compensation paid to or received from an attorney contact provided by TPG. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

Insurance Planning: Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile.

Investment Analysis: This may involve developing an asset allocation strategy to meet clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed on page 11.

Risk Management: A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance ("self-insuring").

**Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their “tax efficiency,” with consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

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

**Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (i.e., working longer, saving more, spending less, taking more risk with investments).

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

**College Savings:** Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid.

**Business Planning:** We provide consulting services for clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.

**Asset Management Services:**

We provide discretionary and non-discretionary investment management services tailored to meet our clients’ needs and objectives. Our process begins with an initial meeting in which we discuss a client’s goals and objectives, risk tolerance, liquidity needs and other relevant information. We may also review and discuss a client’s prior investment history, as well as family composition and background. Once we have a thorough understanding of a client’s needs, we develop a personal investment plan by using an asset allocation model with specified targets. As part of the investment management services, we invest a client’s assets according to one or more model portfolios developed by our firm. Our models primarily include no-load mutual fund shares and exchange-traded funds. In certain situations, we may create a customized portfolio that will adhere to the client’s risk tolerance and investment objectives.

Account supervision is guided by the Investment Policy Statement (“IPS”), which will outline the client’s stated objectives, as well as tax considerations. The IPS serves as the road map to investment management. The IPS is developed based on the client’s risk tolerance, goals, objectives, income needs, and time horizons. Based on the IPS, we invest a client’s assets to one or more model portfolios developed by our firm. The model portfolios are set up as an asset allocation with specified targets for each asset class. The asset allocation targets will align with the goals and objectives discussed with the client. We review the accounts regularly and rebalance periodically as needed. We may also perform tax loss

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

#### **Third Party Money Management Services:**

We may recommend third-party money managers (“TPMMs”) to manage part or all of the client’s portfolio. Currently, we will recommend the use of Betterment Institutional’s platform and services. TPMMs may be recommended when the TPMMs’ philosophy, investment strategy, and style meets the client’s financial situation, investment objectives, and risk tolerance. The asset management services provided by the TPMMs, the compensation to be paid, and other terms of the relationship between the client and the TPMMs will be described in the TPMMs’ disclosure documents and its managed account agreement. We will receive a portion of the investment advisory fee paid by the client to the TPMMs.

#### **Educational Seminars & eBooks**

We offer various services that provide financial education to clients including educational seminars and eBooks made available on our website. These programs and materials are purely educational in nature and do not involve the sale of any investment or insurance product. Information presented will be of a general nature and not individualized investment advice.

### **CLIENT INVESTMENT OBJECTIVES/RESTRICTIONS**

TPG offers the same suite of services to all our clients. However, specific client financial plans and their implementation are dependent upon the individual client’s Investment Policy Statement which outlines a client’s current financial situation such as income, net worth and risk tolerance levels. This information is essential in the development of a client-specific plan for the selection of investments that matches restrictions, needs, and targets. On a case by case basis, our clients may impose restrictions on investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent us from properly servicing the client’s account, or if the restrictions would require us to deviate from our standard suite of services, we reserve the right to end the relationship. We may request additional information and documentation such as current investments, tax returns, insurance policies, and estate plan. We will discuss your investment objectives, needs, and goals, but you must inform us of any changes. Unless directed by you, we do not independently verify any information provided to us by you or your attorney, accountant or other professionals.

### **WRAP FEE PROGRAMS**

TPG does not participate in or offer wrap fee programs.

### **ASSETS UNDER MANAGEMENT**

As of March 31, 2020, TPG is a newly registered investment advisory firm with the state of Texas and currently does not have any assets under management.

## **ITEM 5**

# **Fees and Compensation**

### **ANNUAL FEES FOR ADVISORY SERVICES**

TPG is compensated for providing asset management and financial planning services. The fee paid is dependent on the client’s current phase of life: wealth accumulation or wealth preservation.

The fees charged for financial planning services are negotiable and vary depending on the complexity of the process undertaken, the types of issues addressed, the scope of services provided and the frequency with which the services are rendered. Clients may choose to engage TPG for either ongoing

Comprehensive Financial Planning and Consulting services or for project-based Modular Financial Planning and Consulting services. All fees are agreed upon before entering into the Financial Planning and Consulting Agreement you sign.

The asset management fee is based on the total assets under management.

The below ranges are the standard fee ranges that are typically charged. We will waive the asset management fee for clients in the wealth accumulation phase of life if you engage our Comprehensive Financial Planning and Consulting services.

Financial Planning & Consulting Fee Schedule	
Fixed Fee for Individuals	Up to \$10,000 Annually*
Fixed Fee for Couples	Up to \$20,000 Annually*

\*While these are the maximum fees charged for financial planning and consulting services, TPG's average fixed fees are \$3,000 and \$4,800 for individuals and couples, respectively.

Comprehensive Financial Planning & Consulting Initial Fee	
Initial Set Up Fee for Individuals	\$1,200
Initial Set Up Fee for Couples	\$2,000

Asset Management Fee Schedule	
Assets under Management	Annualized Fee
\$0 - \$250,000	1.25%
\$250,001 - \$1,000,000	1.00%
\$1,000,001 - \$2,000,000	0.85%
\$2,000,001 - \$3,000,000	0.75%
\$3,000,001 - \$5,000,000	0.65%
\$5,000,001 +	Negotiable

## FEE BILLING & PAYMENT

The fee billing will be pre-determined in writing in the agreement that is executed by you and TPG.

Financial planning and consulting fees may be assessed as an annual fee or as a one-time project fee. Ongoing Comprehensive Financial Planning and Consulting fees will be assessed as an annual fee payable monthly or quarterly in advance which includes an initial plan set up fee payable upon signing the agreement. For one-time Modular Financial Planning and Consulting projects, a fixed fee will be assessed in which you will pay one half of the total fee upon signing the agreement and remaining fee upon delivery of the plan. In no case will TPG require a fee of \$500 or more to be paid six (6) months or more in advance. Financial planning and consulting fees are paid via credit card or check.



Asset management fees will be payable in advance or arrears either monthly or quarterly. We will deduct our asset management fee only when in receipt of your written authorization by executing an investment advisory agreement permitting the fees to be paid directly from your account. We will send a copy of your invoice to the custodian at the same time that we send a copy to you. The qualified custodian will deliver an account statement to you at least quarterly which will show all disbursements from your account. We urge you to review all statements for accuracy.

In TPMM accounts, the adviser may deduct the advisory fee from the client's account and then will forward a portion of the fee to our firm. We urge our clients to refer to the selected TPMM's disclosure documents for exact fees and expenses charged by each such TPMM, as well as minimum account requirements, refund, and termination provisions. A complete description of each program can be found in disclosure materials prepared by the TPMM, which we will provide to the client at the time we recommend the program.

Our financial education seminars and eBooks are provided for a fee. This fee is non-negotiable and is dependent on the specific course in which you enroll or eBook purchased. Seminar fees will not exceed \$200 per course, and eBooks will typically be available for \$0.99. The seminar fee includes all course materials and an optional consultation.

You are responsible for all third-party fees (i.e., custodian fees, mutual fund fees, transaction fees, etc.). These fees are separate and distinct from the fees and expenses charged by TPG.

## **TERMINATION OF AGREEMENT**

Either party may terminate investment management agreement by providing 30-day advance written the notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable up to and including the effective date of termination.

Notwithstanding the above, if we do not deliver the appropriate disclosure statement to you at least 48 hours prior to you entering into any written or oral advisory contract with this us, then you have the right to terminate the contract without penalty within five (5) business days after entering into the contract.

## **OTHER EXPENSES AND FEES**

The fees discussed above include payment solely for our asset management and financial planning services provided by us and are separate to certain fees or charges that are imposed by third parties in connection with investments made on your behalf for your account. Third-party fees may include markdowns, markups, brokerage commissions, other transaction costs and/or custodial fees.

Also, all fees paid to us for asset management services are separate from the expenses charged by exchange-traded funds and mutual funds to their shareholders. These fees and expenses will be used to pay management fees for the funds, other fund expenses, account administration, and a possible distribution fee. Exchanged traded funds and mutual funds can be invested in directly by you without our services. However, you would not receive our services to assist you in determining which products or services are most suitable for your financial situation and objectives. You should review both the fees we charge and the fees charged by the fund(s) to understand the total fees to be paid fully.

## OTHER COMPENSATION

Luis Guardia is also a licensed insurance agent. In this capacity, he may recommend insurance, advisory, or other products, and receive normal insurance commissions if products are purchased through him in this capacity. Thus, a conflict of interest exists between the interests of this individual and those of the advisory clients, creating an incentive for him to recommend products based on the compensation received, rather than on a client's needs. However, clients are under no obligation to act upon any of these recommendations. Although our recommendations may include products offered by third parties, these recommendations are not limited to such products as all financial planning advice provided is of a generic nature. Clients have the option to purchase insurance products recommended by Mr. Guardia through other agents not affiliated with our firm.

### ITEM 6

## Performance-Based Fees

We do not charge any performance-based fees which are fees based on a share of capital gains on or capital appreciation of your assets.

### ITEM 7

## Types of Clients Description

We provide our investment advisory services to:

- Individuals
- High Net Worth Individuals
- Members of LGBTQ community

We do not have a minimum account size for our asset management services.

### ITEM 8

## Methods of Analysis, Investment Strategies, and Risk of Loss

### METHODS OF ANALYSIS

We use various methods of analysis and investment strategies, including the following:

**Modern Portfolio Theory** - Modern portfolio theory (MPT) is a risk-averse theory that involves the construction of portfolios to maximize and optimize expected return based on a given level of market risk, emphasizing that risk is an inherent part of higher reward. According to the theory, it's possible to construct an "efficient frontier" of optimal portfolios offering the maximum possible expected return for a given level of risk. Because MPT uses historical returns, actual returns may change over time, leading to the risk of lower than expected returns and/or higher than expected risk of loss.

**Efficient Market Hypothesis** – Efficient Market Hypothesis presumes that markets are reasonably efficient and integrate all known and imagined information rapidly throughout the entire market. As such, proponents of the Efficient Market Hypothesis believe that, more often than not, securities are properly priced by the markets themselves and underpricing and inefficiencies are either random or the result of unexpected and unforeseeable events which makes them extremely difficult to detect and act upon. The primary risk involved with utilizing this method of analysis is that securities are not properly priced by the market resulting in lower than expected returns and/or higher than expected risk of loss.

## INVESTMENT STRATEGIES

When formulating investment advice or managing your assets, we will use long-term investment strategies. There are inherent risks associated with this type of strategy in that a long-term strategy may not take advantage of short-term gains or may experience more volatility over the life of the portfolio. During the wealth accumulation phase, we will utilize a passive indexing strategy for managing accounts. Your accounts are managed separately with your underlying investment strategies, restrictions, or investment limitations defined within the investment management agreement.

## POTENTIAL RISKS

Investing involves different levels of risk that can result in loss of any profits and/or principal you have not realized. We manage your account in a manner consistent with your pre-determined risk tolerance and suitability profile. However, we cannot guarantee that our efforts will be successful. Investing in securities involves the risk of loss clients should be prepared to bear.

**Investing involves the assumption of risk including:**

**Financial Risk:** which is the risk that the companies we recommend to you perform poorly, which affect the price of your investment.

**Market Risk:** which is the risk that the stock market will decline, decreasing the value of the securities we recommend to you with it.

**Inflation Risk:** which is the risk that the rate of price increases in the economy deteriorates the returns associated with the stock.

**Political and Governmental Risk:** which is the risk that the value of your investment is affected by the introduction of new laws or regulations.

**Interest Rate Risk:** which is the risk that the value of the investments we recommend to you will fall if interest rates rise.

**Call Risk:** which is the risk that your investment will be called or purchased back from you when conditions are favorable to the bond issuer and unfavorable to you.

**Default Risk:** which is the risk that issuer is unable to pay the contractual interest or principal on the investment promptly or at all.

**Manager Risk:** which is the risk that an actively managed mutual fund's investment adviser will fail to execute the fund's stated investment strategy.

**Industry Risk:** which is the risk that a group of stocks in a single industry will decline in price due to adverse developments in that industry, decreasing the value of mutual funds that are significantly invested in that industry.

## ITEM 9

## Disciplinary Information

As of the date of this brochure, we have not been subject to any disciplinary, legal, or regulatory events related to past or present investment clients. There has been no disciplinary, legal, or regulatory events related to us or any of our management persons.

**ITEM 10****Other Financial Activities and Affiliations****FINANCIAL INDUSTRY ACTIVITIES**

Neither TPG nor its management persons are registered or has an application pending to register as a broker-dealer or a registered representative of a broker-dealer.

Neither TPG nor its management persons are registered or has an application pending to register as a futures commission merchant, commodity pool operator or commodity trading advisor. is not registered as a securities broker-dealer, or a futures commission merchant, commodity pool operator or commodity trading advisor.

**AFFILIATIONS**

Certain associates of the firm's IARs are also insurance agents licensed to sell insurance products under the company name ATX Term Life. ATX Term Life is a "dba" of TPG. A conflict of interest exists in that these services pay a commission which conflicts with the IAR's fiduciary duties. TPG does not require its IARs to encourage clients to implement investment advice through our insurance product recommendations. Clients have the right to implement insurance product recommendations through the insurance agency and agent of their choice. We require that all IARs disclose this conflict of interest when such recommendations are made. We also require IARs to disclose that the client has the right to purchase recommended products from individuals not affiliated with us.

**SELECTION OF OTHER INVESTMENT ADVISERS**

We may recommend or select TPMMs for our clients and receive compensation from the third-party via a fee sharing agreement; thus, a material conflict of interest exists between our interests, and those of our clients in that TPG has an incentive to direct clients to TPMMs that provide us with a larger fee split. TPG will always act in the best interest of our clients when making recommendations or selecting TPMMs. The client always has the right to decide whether to act on our recommendations and whether to utilize the services of the recommended TPMM. The client always has the right to utilize the professional of his or her choice. All TPMMs will be properly licensed and registered as investment advisers in the proper jurisdictions. The fees shared will not exceed any limit imposed by any regulatory agency.

**ITEM 11****Code of Ethics, Participation in Client Transactions and Personal Trading****CODE OF ETHICS**

TPG has developed a code of ethics that will apply to all of our supervised persons. We and our IARs must act in a fiduciary capacity when providing investment advisory services to you. 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. TPG has a fiduciary duty to all clients. This fiduciary duty is considered the core underlying principle of our code of ethics, which also covers our 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 acknowledge that they have read, understand and agree to comply with our Code of Ethics.

Our Code of Ethics is available to clients and prospective clients upon request.

### **RECOMMENDATIONS INVOLVING A MATERIAL FINANCIAL INTEREST**

Neither we nor any related person recommend to clients, or buys or sells for clients' accounts, securities in which we or a related person has a material financial interest.

### **PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS**

There may be instances where an IAR will recommend to investment advisory clients or prospective clients the purchase or sale of securities in which an IAR, its affiliates or other clients may also have a position or interest. Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis. Generally, in such circumstances, the affiliated and client accounts will share execution costs equally. Completed trade orders will be allocated according to the instructions from the initial trade order. Partially filled trade orders will be allocated on a pro-rata basis. Any exceptions will be explained in the trade order.

### **PERSONAL TRADING**

Employees are permitted to have personal securities accounts as long as personal investing practices are in line with fiduciary standards and regulatory requirements, and do not conflict with their duty to TPG and our clients. TPG monitors and controls personal trading through pre-approval of all personal securities transactions or blackout periods imposed upon employees trading in the same securities as TPG. We forbid any officer or employee, either personally or on behalf of others, to trade on material, nonpublic information or to communicate such information to others in violation of the law.

## **ITEM 12**

## **Brokerage Practices**

TPG ("we"/"our") does not maintain custody of your assets that we manage or on which we advise, although we may be deemed to have custody of your assets if you give us authority to withdraw advisory fees from your account (see Item 15—Custody, below). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. We recommend that our clients use MTG, LLC dba Betterment Securities ("Betterment Securities"), a registered broker-dealer and member of the SIPC, as the qualified custodian. We are not affiliated with Betterment Securities. Betterment Securities will hold your assets in a brokerage account and buy and sell securities when we and/or you instruct them to. While we recommend that you use Betterment Securities as custodian/broker, you will decide whether to do so and will open your account with Betterment Securities by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. If you do not wish to place your assets with Betterment Securities, then we cannot manage your account on Betterment for Advisors (defined below).

### **HOW WE SELECT BROKERS/CUSTODIANS**

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

- Capability to execute, clear, and settle trades (buy and sell securities for your account) itself or to facilitate such services.
- Capability to facilitate timely transfers and payments to and from accounts.
- Availability of investment research and tools that assist us in making investment decisions.
- Quality of services.
- Competitiveness of the price of those services and willingness to negotiate the prices.
- Reputation, financial strength, and stability.
- Prior service to us and our other clients.

## **YOUR BROKERAGE AND CUSTODY COSTS**

For our clients' accounts that Betterment Securities maintains, Betterment Securities does not charge you separately for custody/brokerage services but is compensated as part of the Betterment for Advisors (defined below) platform fee, which is charged for a suite of platform services, including custody, brokerage, and sub-advisory services provided by Betterment and access to the Betterment for Advisors platform. The platform fee is an asset-based fee charged as a percentage of assets in your Betterment account. Clients utilizing the Betterment for Advisors platform may pay a higher aggregate fee than if the investment management, brokerage and other platform services are purchased separately. Nonetheless, for those Clients participating in the Betterment for Advisors platform, we have determined that having Betterment Securities execute trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see "How we select brokers/custodians").

## **SERVICES AVAILABLE TO US VIA BETTERMENT FOR ADVISORS**

Betterment Securities serves as broker-dealer to Betterment for Advisors, an investment and advice platform serving independent investment advisory firms like us ("Betterment for Advisors"). Betterment for Advisors also makes available various support services which may not be available to Betterment's retail customers. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Betterment for Advisors' support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of Betterment for Advisors' support services:

1. **SERVICES THAT BENEFIT YOU.** Betterment for Advisors includes access to a globally diversified, low-cost portfolio of ETFs, execution of securities transactions, and custody of client assets through Betterment Securities. In addition, a series of model portfolios created by third-party providers are also available on the platform. Betterment Securities' services described in this paragraph generally benefit you and your account.
2. **SERVICES THAT MAY NOT DIRECTLY BENEFIT YOU.** Betterment for Advisors also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts, such as software and technology that may:
  - Assist with back-office functions, recordkeeping, and client reporting of our clients' accounts.
  - Provide access to client account data (such as duplicate trade confirmations and account statements).
  - Provide pricing and other market data.

3. **SERVICES THAT GENERALLY BENEFIT ONLY US.** By using Betterment for Advisors, we may be offered other services intended to help us manage and further develop our business enterprise.

These services include:

- Consulting (including through webinars) on technology and business needs.
- Access to publications and conferences on practice management and business succession.

#### **OUR INTEREST IN BETTERMENT SECURITIES' SERVICES**

The availability of these services from Betterment for Advisors benefits us because we do not have to produce or purchase them. In addition, we do not have to pay for Betterment Securities' services. These services may be contingent upon us committing a certain amount of business to Betterment Securities in assets in custody. We may have an incentive to recommend that you maintain your account with Betterment Securities, based on our interest in receiving Betterment for Advisors and Betterment Securities' services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Betterment Securities as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Betterment Securities' services (see "How we select brokers/custodians") and not Betterment for Advisors and Betterment Securities' services that benefit only us or that may not directly benefit you.

#### **BETTERMENT FOR ADVISORS' TRADING POLICY**

When using the Betterment for Advisors platform, we and you are subject to the trading policies and procedures established by Betterment. These policies and procedures limit our ability to control, among other things, the timing of the execution of certain trades (including in response to withdrawals, deposits, or asset allocation changes) within your account. You should not expect that trading on Betterment is instant, and, accordingly, you should be aware that Betterment does not permit you or us to control the specific time during a day that securities are bought or sold in your account (i.e., to "time the market"). Betterment describes its trading policies in Betterment LLC's Form ADV Part 2A. As detailed in that document, Betterment generally trades on the same business day as it receives instructions from you or us. However, transactions will be subject to processing delays in certain circumstances. In particular, orders initiated on non-business days and after markets close generally will not transact until the next business day. Betterment also maintains a general approach of not placing securities orders during approximately the first thirty minutes after the opening of any market session. Betterment also generally stops placing orders arising from allocation changes in existing portfolios approximately thirty minutes before the close of any market session. Betterment continues placing orders associated with deposit and withdrawal requests until market close. Betterment maintains a general approach of not placing orders around the time of scheduled Federal Reserve interest rate announcements. Furthermore, Betterment may delay or manage trading in response to market instability. For further information, please consult Betterment LLC's Form ADV Part 2A.

#### **BROKERAGE FOR CLIENT REFERRALS**

We do not receive client referrals from broker/dealers.



### **DIRECTED BROKERAGE**

Clients will be permitted to select any broker/dealer of their choosing. In these situations, we may be unable to achieve the most favorable execution for client transactions. Directing brokerage may cost clients more money in that the client may pay higher brokerage commissions because we may not be able to aggregate orders to reduce transaction costs, or the client may receive less favorable prices.

### **TRADE AGGREGATION**

We attempt to allocate trade executions in the most equitable manner possible, taking into consideration current asset allocation and availability of funds using price averaging, proration and consistently non-arbitrary methods of allocation. We may aggregate orders in order to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among our clients' differences in prices and commission or other transaction costs. In aggregated orders, transactions will be price-averaged and allocated among our clients in proportion to the purchase and sale orders placed for each client account on any given day.

## **ITEM 13**

## **Review of Accounts**

### **PERIODIC REVIEWS**

We review asset management accounts on a quarterly basis but in no case no less than annually. These accounts will be reviewed by Luis Guardia. Accounts are reviewed to evaluate asset allocation, investment strategy and objectives, cash balance, and performance as well as the general economic outlook and current investment trends.

Financial plans created utilizing our Comprehensive Financial Planning and Consulting services will be reviewed quarterly by Luis Guardia during the first year of service and no less than annually thereafter. Modular Financial Planning and Consulting plans will receive no review after delivery of the plan to the client.

### **REVIEW TRIGGERS**

We conduct periodic reviews to evaluate current market, economic and political events and how these may affect client accounts. Additional reviews may be triggered by these events or by events in the client's financial or personal status.

### **REGULAR REPORTS**

Asset management clients will receive advisory account reports no less than quarterly. These reports show asset value by cash balances, security, unit cost, total cost, current per share values, etc. Clients are urged to review the quarterly reports provided by us with those provided by their custodian and notify us of any differences. Clients are encouraged to phone or email us as often as they deem necessary to receive information regarding the investment tactics and strategies being followed. Upon specific client request, we will prepare a written portfolio analysis and reports to satisfy the client's informational needs.

Comprehensive Financial Planning and Consulting clients are provided a one-time written financial plan concerning their financial situation over the course of a year. After the presentation of project-based plans, there are no further reports provided to clients. Clients may request additional plans or reports.



**ITEM 14**

## **Client Referrals and Other Compensation**

We receive a non-economic benefit from Betterment for Advisors and Betterment Securities in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Betterment Securities. 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 Betterment for Advisors' and Betterment Securities' products and services is not based on us giving particular investment advice, such as buying particular securities for our clients. We do not pay a referral fee to third party solicitors.

**ITEM 15**

## **Custody**

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct Betterment Securities to deduct our advisory fees directly from your account. Betterment Securities maintains actual custody of your assets. Your statements will be available for you to review on the activity section of your Betterment for Advisors account portal. You will also receive account statements directly from Betterment Securities at least quarterly at [www.bettermentsecurities.com](http://www.bettermentsecurities.com). You should carefully review those statements promptly.

**ITEM 16**

## **Investment Discretion**

If you are participating in our asset management services, upon receiving your written authorization via our executed investment advisory agreement, we will maintain trading authorization over your designated account and may also implement trades on a discretionary basis.

When discretionary authority is granted, we will have the limited authority to determine the type of securities to be purchased, sold or exchanged and the number of securities that can be bought, sold or exchanged for your portfolio without obtaining your consent for each transaction.

If you do not grant this limited investment discretion, your IAR will be required to contact you and get affirmation regarding our investment recommendations such as the security being recommended, the number of shares, whether the security should be bought or sold before implementing changes in your account.

Once the above factors are agreed upon, we will be responsible for making decisions regarding the timing of buying or selling an investment and the price at which the investment is bought or sold. If your accounts are managed on a non-discretionary basis, it is critical that you respond promptly. If we do not receive a response to our request immediately, the timing of trade implementation may lead to an adverse impact where we may not achieve the optimal trading price.

On a case by case basis, you may place reasonable restrictions on the types of investments that may be purchased or sold in your account so long as the restrictions are explicitly set forth or included as an attachment to the investment advisory agreement.

**ITEM 17**

## **Voting Client Securities**

We do not have the authority to vote proxies as it pertains to the issuers of securities held in your account. The responsibility for voting your securities places increased liability to us and does not add enough value to the services provided to you to justify the additional compliance and regulatory costs associated with voting your securities.

Therefore, you are responsible for voting all proxies for securities held in accounts managed by us. Typically, our qualified custodian will forward you your proxy information. Although we do not vote your proxies, you can contact us if you have a question about a particular proxy.

## **ITEM 18** Financial Information

We are not required to include a balance sheet for our most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

We are currently not in, nor have been historically in a financially precarious situation or the subject of a bankruptcy petition.

## **ITEM 19** Requirements for State-Registered Advisers

### **EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE OF PRINCIPAL OFFICERS**

Please see the brochure supplement supplied as Part 2B.

### **OTHER BUSINESS ACTIVITIES OF PRINCIPAL OFFICER**

Please see the brochure supplement supplied as Part 2B.

### **PERFORMANCE-BASED FEES**

TPG's IARs do not currently charge any performance-based fees (fees based on a share of capital gains or capital appreciation of the assets of a client).

### **DISCIPLINARY INFORMATION**

TPG's IARs are not subject to any arbitration claim or found liable in a civil, self-regulatory, or administrative proceeding.

### **MATERIAL RELATIONSHIPS WITH ISSUERS OF SECURITIES**

Neither TPG nor its IARs have any relationship or arrangement with issuers of securities.



**Luis Guardia**  
**CRD#5785874**

Tuyyo Planning Group, LLC  
(512)522-0201  
13317 Perthshire St.  
Austin, Texas 78729  
luis@tuyyoplanning.com  
www.tuyyoplanning.com

**Form ADV Part 2B**  
**Firm Brochure**  
**Supplement**  
**March 31, 2020**

This Brochure Supplement provides information for Luis Guardia that supplements the Tuyyo Planning Group, LLC brochure. You should have received a copy of that brochure. Please contact us at (512)522-0201 or luis@tuyyoplanning.com if you did not receive TPG's Brochure or if you have any questions.

Additional information about Tuyyo Planning Group, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## ITEM 2

### Educational Background and Business Experience

Luis Guardia, born in 1985, graduated from Texas State University-San Marcos in 2008 with a Bachelor of Arts in International Business. Luis Guardia's employment information is listed below.

Tuyyo Planning Group, LLC, Founder	07/2018 to Present
Professional Referee Organization, PRO Referee	03/2014 to Present
NCAA Big 12, NCAA Soccer Referee	06/2005 to Present
United States Soccer Federation, Referee	07/1995 to Present
MWA Financial Services Inc., Registered Representative	05/2010 to 05/2016
Modern Woodmen of America, Managing Partner	05/2009 to 05/2016

### LICENSING/EXAMINATIONS

Luis Guardia has passed the Series 65 examination.

### PROFESSIONAL DESIGNATIONS

#### AIF® - Accredited Investment Fiduciary®

- The AIF designation, awarded by the Center for Fiduciary Studies, an fi360 company, demonstrates the focus on all the components of a comprehensive investment process, related fiduciary standards of care, and commitment to excellence.
- AIF designees must complete 6 steps to earn the designation: 1. submit registration and fee; 2. successfully complete a specialized program on investment fiduciary standards of care; 3. pass a comprehensive examination; 4. upon passing, submit the accreditation application and fee; 5. complete annual continuing educational requirements; 6. pledge to abide by the designation's code of ethics.

#### LUTC Fellow (LUTCF)

##### MINIMUM REQUIREMENT:

- To earn the LUTCF designation, one must successfully complete 300 designation credits (or 5 courses) and one Ethics course – and be a National Association of Insurance and Financial Advisors (NAIFA) member in good standing during conferment year
- Courses in the LUTCF Program are either in an 8-week or 12-week format

## ITEM 3

### Disciplinary Information

Luis Guardia has not been and/or is presently not involved in any disciplinary, legal, or regulatory events that would be material to a client's evaluation of him or of TPG.

**ITEM 4****Other Business Activities**

Luis Guardia is also a licensed insurance agent. In this capacity, he may recommend insurance, advisory, or other products, and receive normal insurance commissions if products are purchased through him in this capacity. Thus, a conflict of interest exists between the interests of this individual and those of the advisory clients, creating an incentive for him to recommend products based on the compensation received, rather than on a client's needs. Clients have the right to implement insurance product recommendations through the insurance agency and agent of their choice. Although our recommendations may include products offered by third parties, these recommendations are not limited to such products as all financial planning advice provided is of a generic nature. Clients have the option to purchase insurance products recommended by Mr. Guardia through other agents not affiliated with our firm. Mr. Guardia spends approximately twenty (20) hours per week in this role.

Luis Guardia is a soccer referee for the United States Soccer Federation. He spends approximately twenty-four (24) weekend hours per month in this role.

Luis Guardia is a soccer referee for the NCAA. This role is seasonal (September through November). During the season, Mr. Guardia spends approximately forty (40) weekend hours per month in this role.

**ITEM 5****Additional Compensation**

Luis Guardia does not receive any additional compensation.

**ITEM 6****Supervision**

Luis Guardia, Founder and Chief Compliance Officer of TPG, is responsible for supervising the investment advisory activities of Tuyyo Planning Group, LLC. Mr. Guardia monitors and reviews all forms of written communications to clients and can be contacted via telephone at 713-828-5095 and via email at [luis@tuyyoplaning.com](mailto:luis@tuyyoplaning.com).

**ITEM 7****Requirements for State-Registered Advisers**

A. Luis Guardia has not been involved in an award or found liable in any arbitration claim or in any civil, self-regulatory organization or administrative proceedings.

B. Luis Guardia has not been the subject of a bankruptcy petition.