



Harry Licursi
Tax and Retirement Planning

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Firm Brochure
Form ADV Part 2A

This brochure provides information about the advisory service, fees and business practices of Harry Licursi Tax and Retirement Planning. If you have any questions about the contents of this brochure, please contact me, Harry Licursi, at 707-478-3411 or mail@harrylicursi.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.

Harry Licursi, of Harry Licursi Tax and Retirement Planning, is a Registered Investment Adviser through the State of California, Department of Corporations. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information about which you can determine to hire or retain an adviser. Additional information about Harry Licursi Tax and Retirement Planning also is available on the SEC's website at www.adviserinfo.sec.gov.

Brochure prepared on January 1, 2018

Item 2 – Material Changes

ANNUAL UPDATE

I offer or deliver information about my qualifications and business practices to clients on at least an annual basis. I will ensure that you receive a summary of any materials changes to this and subsequent brochures within 120 days of the close of our business' fiscal year. I may further provide other ongoing disclosure information about material changes as necessary.

BROCHURE AVAILABILITY

My brochure may be requested by contacting me at 707-478-3411 or you may email my office at mail@harrylicursi.com. The brochure will be available on my web site www.harrylicursi.com free of charge. I will provide you with a new brochure as necessary based on changes or new information, at any time.

Additional information about Harry Licursi, Tax and Retirement Planning is also available via the SEC's web site www.adviserinfo.sec.gov

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Item 4 - Advisory Business

A. Harry Licursi of Harry Licursi Tax and Retirement Planning (hereafter referred to as HLTRP), is the sole-proprietor of HLTRP. HLTRP is an independent fee-based investment advisor service registered with the State of California, Department of Corporations. HLTRP offers personalized investment advisory services to include financial consulting and asset management. HLTRP does not have any investment company subsidiaries. Harry Licursi began his business in 1976 as a career agent with Lincoln National Life and was licensed in Insurance as well as Securities and Investments. He has been in business for over 40 years.

B. Harry Licursi provides investment advice, portfolio review and design and portfolio management services on a continuous basis. Fees for investment advice, portfolio review, design, or portfolio management services charged on a continuing basis, are individually negotiated to suit the needs of the client and complexity of the services provided. Harry Licursi does not sell or recommend individual specific stock purchases. Investments are limited to mutual funds and insurance based products. Harry Licursi is an Enrolled Agent, currently licensed with the IRS. As an Enrolled Agent, Harry Licursi provides tax advice and preparation. In addition, Harry Licursi previously held licenses in Property Casualty and in Real Estate, and was a Notary Public.

The focus of HLTRP is to manage a client's investment risk. This is accomplished through a series of consultations where the client's confidential information is gathered and analyzed to produce a unique roadmap designed to meet the client's short-term and long-term financial goals. As an Enrolled Agent, Harry Licursi is licensed to represent his client before the IRS. As a result, value is added to every financial analysis, review and recommendation, utilizing tax efficient investment practices.

C. The financial services offered

C. The financinclude, but are not limited to, portfolio analysis, portfolio design, and portfolio management services on a continuous basis. Services offered involve analysis of the clients needs and risk tolerance, the appropriate allocation of managed assets among cash and mutual funds with the selection of specific securities designed to provide proper diversification to best meet the client's stated investment objectives. HLTRP does not sell un-registered securities. Pension consulting services are also provided. For the employee, I help them pick and/or monitor their investment choices.

I offer pension services to new and existing businesses as well. For businesses without a pension plan, I explore which pension plan is best suited for them. For businesses with an existing pension plan, I review their current plan and suggest alternative plans, if suitable.

For self-employed individuals, we take a tax-advantaged perspective when deciding which retirement plan is most appropriate, SEP IRA, Solo 401(k), IRA or Roth. My fee for pension consulting services is at the hourly rate negotiated with my client, not to exceed \$350/hr. In addition to this, on an ongoing basis, I charge an asset management fee as per the schedule described in Item 5.

D. Some companies offer accounts in which all services are covered by a single fee, appropriately called a *wrap* fee. This fee covers everything, including annual maintenance charges and brokerage commissions. HLTRP does not participate in wrap fee programs.

E. Harry Licursi has discretionary trading authority in FTJ Fund Choice **Fund Choice**TM managed accounts. He does not service non-discretionary accounts. The majority of the clients of HLTRP are referrals. Harry Licursi limits his managed securities clients to 150 and expects to maintain assets under management at less than \$25,000,000. As of 1/1/18, assets under management were \$15,000,000.

Item 5 - Fees and Compensation

A. Fees are agreed upon at the time of engagement and established in an advisory contract. The annual fee for investment advisory services, although negotiable, is charged as a percentage of assets under management according to the schedule below. Fees may vary from client to client depending on the complexity of services.

Assets Under Management	Annual Fee
\$0-\$1,000,000	1.00%
1,000,001-\$2,000,000	0.90%
\$2,000,001- \$3,000,000	0.80%
\$3,000,001-\$4,000,000	0.70%
\$4,000,001– \$5,000,000	0.55%
\$5,000,001 - \$20,000,000	0.45%

Fees are payable quarterly, in advance within 30 days of the beginning of the quarter for which said fees will be incurred. In-person initial consultations of up to one hour require a non-refundable pre-payment of \$250 and, if applicable, the payment of a retainer. If after consultation with Harry Licursi Tax and Retirement Planning, additional work is agreed upon, half of this sum may be applicable toward any flat fee, retainer or first hourly bill at standard rates within three months following the date of the initial meeting. No advice is provided to non-clients; thus advice is not provided during initial telephone or email consultations. In-office consultations are not scheduled until payment and the signed Client Services Agreement has been received.

Lower fees for comparable services may be available from other sources.

B. Clients authorize the account custodian to debit their account for the amount of the investment advisory fees. At the inception of the relationship and each quarter thereafter, we will notify the custodian of the amount of the fees due and payable, in accordance with the fee schedule and advisory contract.

The custodian does not validate or check the fee, its calculation or the assets on which the fee is based. They will deduct the fee from the client's account(s) or, where there is more than one account, or from the account the client has designated to pay the advisory fees, as per the agreement. In limited situations, an alternate payment method may be made available. Accounts opened or closed in mid-quarter will be assessed or refunded at a pro-rated management fee. Clients receive statements directly from their custodian.

C. Harry Licursi Tax and Retirement Planning clients may also participate in the FTJ Fund Choice **Fund Choice**TM program. FTJ Fund Choice **Fund Choice**TM is a fee-based mutual fund platform offering no-load and load-waived mutual funds. It is an asset management program that allows financial advisors the ability to develop their own model portfolios or outsource the asset allocation decision to institutional portfolio strategists.

Asset Allocation Strategist Options - Proprietary Model – FTJ Fund Choice Fund Choice™ will work with the individual advisor to develop asset class and fund specific portfolios for use with their clients based on each advisors proprietary approach to investing. In addition, an advisor can outsource the asset allocation and manager selection decisions to any of the following institutional consulting firms:

- Wilshire Funds Management – Strategic
- First Affirmative – Strategic
- PGR Solutions- Strategic (*Some Restrictions May Apply)
- Toews Corporation- Dynamic
- Advanced Asset Management Advisors – Dynamic
- Iron Point Capital Management – Dynamic
- Frontier Asset Management- Dynamic
- Litman/Gregory – Dynamic

An advisor may make allocation adjustments, fund transfers and strategist changes without transaction fees. These types of changes can be made at www.ftjfundchoice.com

FTJ Fund Choice Fund Choice™ Account Maintenance Fee per Account w/ Electronic Delivery \$25.00 Annual Account Maintenance Fee per Account w/ Mailed Statements \$50.00

To participate in the program, Harry Licursi and the client must execute the FTJ Services Agreement. Harry Licursi has a selling agreement in place with FTJ. FTJ collects the following step rate fee schedule depending on the assets in the account.

Assets		Fee
• \$0	to \$50,000.00	0.450%
• \$50,000.01	to \$100,000.00	0.350%
• \$100,000.01	to \$250,000.00	0.200%
• \$250,000.01	to \$500,000.00	0.175%
• \$500,000.01	and up	0.150%

Fees, other than FTJ Fund Choice, are payable quarterly, in advance within 30 days of the beginning of the quarter for which said fees will be incurred. FTJ management services and my advisory fees there in are automatically deducted from the client’s accounts by FTJ monthly (in arrears) based on the daily average account balance. Clients are provided a fee agreement as part of the account form as well as an FTJ Client Services Agreement (the “Agreement”), and the Custodial Agreement. Harry Licursi has no authority on his own to deduct any fees from the client’s account. The client authorizes FTJ to deduct and pay the advisory fee to HLTRP per the Client Service Agreement.

Additional Fees and Expenses

Advisory fees do not include fees or expenses paid directly to third parties, whether a security is being purchased, sold or held in the account(s). HLTRP does not receive, directly or indirectly any of these fees which may be charged to a client. These fees may include transaction fees, exchange fees, SEC fees, advisory fees and administrative fees charged by Mutual Funds (MF), Exchange Traded Funds, Money Markets, or Money Market Mutual Funds, advisory fees charged by sub-advisers (if any are used for your account), custodial fees, deferred sales charges (on MF or annuities), deferred sales charges (charged by two MFs), transfer taxes, wire transfer fees, electronic fund processing fees, and commissions or mark-ups/mark-downs on security transactions.

D. Consulting fees are due at time of service. Any termination of the service agreement involving quarterly fees paid in advance will be returned on a pro-rata basis to the closest month-end going forward.

E. HLTRP does not have or employ anyone who receives (directly or indirectly) any compensation for the sale of securities or investment products, including asset-based sales charges or service from the sale of mutual funds. As such, questions 5.E. 1- 4 do not apply.

Harry Licursi can offer fixed annuities, which are life insurance products. If a client purchases a fixed annuity, the company pays compensation to HLTRP. Harry Licursi does not charge an advisory fee on life insurance products held in a portfolio. He is licensed to sell insurance through the State of California, license # 0513944.

Clients may hire Harry Licursi by the hour and then purchase products either through HLTRP, or another broker or agent not associated with HLTRP. Harry Licursi does not participate in any 12b1 fees or receive commission for the sale of mutual funds. Harry Licursi does not charge commissions or markup on securities products.

General financial consultation services are provided on an hourly basis or on flat fee basis, by agreement. Consultation services may also involve a financial plan or ongoing services at a flat rate. Fees for consulting services are billed at an hourly rate not to exceed \$395.00/hour. A signed agreement precedes consulting services. Payment is due at time of service. A retainer may be required.

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

Performance based fees are fees based on a share of capital gains on or capital appreciation of the assets of a client. An advisor charging performance fees to some accounts faces a variety of conflicts because the advisor can potentially receive greater fees from its accounts having a performance-based compensation structure than from those accounts it charges a fee unrelated to performance (e.g., an asset-based fee). As a result, the advisor may have an incentive to direct the best investment approach, or to allocate or sequence trades in favor of the account that pays a performance fee. I do not charge [performance-based](#) fees.

Item 7 - Types of Clients

I provide services to a number of client types. Such clients may include but are limited to the following:

- Individuals, including high net worth individuals
- Trusts and estates
- Endowments, foundations, and other charitable organizations
- Corporations and other business entities
- Pension and profit sharing plans

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

Investing in securities involves risk of loss that clients should be prepared to bear.

A. Methods of Analysis

HLTRP utilizes methods of security analysis, which are attentive to risk factors that may impact the value of a security. Research information is generally obtained from external sources. This information is carefully reviewed and subjected [ted](#) to numerous quantitative and qualitative considerations.

Below is a partial listing of external research sources utilized.

- Research materials prepared by others
- Company earnings announcements, news releases and websites
- Financial newspapers, magazines and industry publications
- Analyst conference calls
- Government and economic reports
- Corporate rating services
- Prospectuses and filings with the Securities and Exchange commission
-

HLTRP utilizes a comprehensive method of analysis. Fundamental analysis involves an assessment of a fund's potential for return in relationship to many factors including its management style and current economic and market conditions. A primary objective of fundamental analysis is to determine a reasoned value for a fund that can be compared with its current market price. A decision to buy, sell or hold in a client's portfolio is directly influenced by a client's needs and risk tolerance and anticipated impact to their long-term goals. Under this approach, HLTRP routinely examines a fund's performance and considers the impact that prevailing economic, political, and industry circumstances may have on its future value. After researching and analyzing relevant fundamental information, the fund's investment potential is accepted or rejected. Technical analysis concentrates on current and historical trends and their relationships among and between various quantitative measures. These variables are typically displayed in charts and graphs and

studied to determine if particular patterns may be repeating, ongoing or non-existent. Attention is given to a company's present earnings, strategy, products, services or other pertinent qualitative issues. This is a data, statistical, or quantitative approach to security fund analysis. Examples of technical analysis factors include, but are not limited to market trading volume, price, and potential risk versus return. HLTRP employs technical security analysis on a limited basis and as a supplement to fundamental security analysis discussed above. Most research material used is public information and available at no charge. Other research material is available in periodicals, supplied to licensed advisors, tax and insurance professionals, free of charge.

B. Significant Investment Strategies

HLTRP employs both fundamental and technical investment analysis with a philosophy emphasizing portfolio management that is custom tailored to the needs of each client. The investment process begins by carefully listening to the client to gain a complete understanding of the client's unique goals, personal risk tolerance, specific time horizon, and any unusual circumstances. Utilizing a risk tolerance questionnaire, the client, either alone or with a partner, answers personal investment and life questions. A customized portfolio is developed, which takes into consideration the individual client preferences such as social investing, concentrated positions, existing holdings, taxes, and other considerations. The investment strategy provides a framework for determining the asset allocation that properly balances risk and reward over the long-term. Asset allocation is the relative mix of cash, fixed income and equity securities suitable for a client's investment portfolio where investment risk is lessened when a portfolio is diversified. Diversification is a disciplined long-term investment strategy that does not include frequent trading. This strategy helps to prevent over-exposure in a manner that is intended to limit a client's portfolio volatility.

Assets allocated to all equities are primarily invested in a diversified portfolio of mutual funds, invest in U.S. domestic companies and achieve international and global diversification through non-US equity invested funds. Investments in equity portfolios are intended to be long-term with an emphasis on capital appreciation and dividend income as a secondary consideration.

HLTRP utilizes many investment styles. This means HLTRP may invest in large, mid or small cap stock funds having particular value, blend or growth qualities. However, HLTRP generally invests a majority of assets in quality funds that hold large cap stocks and are top performers.

Fixed income funds are primarily invested in a diversified portfolio of publicly traded corporate bonds, government securities, agency securities and municipal bonds. Fixed income funds are managed to generate income as well as add stability to our clients' portfolios. Here, the concern is asset preservation, safety, and a fair return, as per the client's specific needs.

Model Investment Strategy

<u>Portfolio Composition</u>	<u>Conservative</u>	<u>Moderate</u>	<u>Balanced</u>	<u>Mod. Agg</u>	<u>Agg. Growth</u>
US Fixed Income	0	35	40	50	60
US Stocks	0	10	12	17	20
Non-US Stocks	0	2	3	7	10
Emerging Markets	0	3	5	6	10
REITS	10	0	0	0	0
Non-US Fixed Income	90	50	40	20	0

<u>Principle risk</u>	<u>low</u>	<u>moderate</u>	<u>more</u>	<u>high</u>	<u>very high</u>
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C. Securities recommended and significant risks

Portfolio design centers on the client's tolerance for risk, their investment objective, the principle risk, and performance. As the client moves from the fixed income securities portfolio to an all equity portfolio the risk increases, as the chart above demonstrates. These are model portfolios for demonstration purposes only. Investing in securities involves risk of loss that clients should be prepared to bear. Security markets, especially foreign markets, are volatile and the account value can decline significantly in response to adverse issues, including, but not limited to, local politics, regulatory changes, currency change, interest rate changes, taxes, market, and economic developments. When securities are sold they may be worth more or less than what they were purchased for, which means that you could lose the money you invested.

HLTRP recommends only registered securities. Risk is reduced when compared to unregistered similar securities. Securities purchased are no-load or load waived. The client saves between 3-5.75% commission. This means that there are more of the client's dollars retained and available to invest. Over time this can have a significant effect on the account value.

Item 9 - Disciplinary Information

Neither Harry Licursi nor HLTRP have been the subject of an investment related regulatory or legal complaint in the past 10 years that would be material to a client's evaluation of the proprietor or his business. Harry Licursi has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which he was convicted, pleaded guilty or no contest to any felony or misdemeanor that involved investments or an investment related business. There has been no material events required to be disclosed under 9A (criminal or civil action in a domestic or military court), 9B (administrative proceedings before the SEC, or any other regulatory agency) or 9C (a self regulatory organization).

Item 10 - Other Financial Industry Activities and Affiliations

As a California Licensed Life and Disability agent, Harry Licursi receives commission on products sold under his CA state license # 0513944. He is currently appointed with various companies for life and disability products. This license information can be viewed on the CA Department of Insurance website <http://www.insurance.ca.gov/license-status/> under the 'Broker Check' link. I do not receive an advisory fee for these Insurance products.

- A. I am not nor do I intend to register as a broker-dealer or an IAR of a broker dealer.
- B. I am not nor do I intend to register as a futures commission merchant, commodity pool operator, or commodity trading advisor.
- C. I have no relationship or arrangement with any related person that is material to my advisory business or my clients.
- D. I do not recommend or select other investment advisors for my client and do not receive compensation directly or indirectly from another advisor that may create a material conflict.

Item 11 - Code of Ethics

- A. HLTRP has adopted a Code of Ethics ("Code") to the extent of the requirements as a CA State licensed investment advisor. It is predicated on the principal that Harry Licursi owes a fiduciary duty to his clients. Unique to the business, a copy of the procedures is being prepared as of January 1, 2015 and will be available upon request by contacting the office at 707-478-3411.
- B. I do not recommend or sell any securities in which I have a financial interest.
- C. I do invest in the same mutual funds as my clients. This does not present a conflict of interest since the effect of any individual buy or sell, is considered de minimis.
- D. I trade portfolio sub-accounts pro-rata, increasing or decreasing the risk. One or more of clients' portfolio sub-accounts may be the same as one of my my own. Since there is no individual stock purchase, only a mutual fund purchase, the effect of any individual buy or sell is considered de minimis.

Item 12 - Brokerage Practices

A. HLTRP does not recommend to clients or prospective clients any broker-dealers for transactions. Harry Licursi works with FTJ Fund Choice Fund Choice™ an investment advisory firm that is registered with the SEC under CRD # 125446, and provides a fee-based mutual fund platform allowing "Investment Advisors" the ability to develop their own model portfolios or outsource the asset allocation decision to institutional portfolio strategists that FTJ has selected. FTJ provides trading, reporting and administrative services. There are no front-end charges, no transaction costs, no required minimum to open or maintain an account in the FTJFC Program, and no surrender charges.

1. Research and Other Soft Dollars Benefits.

Neither Harry Licursi nor HLTRP receives research money or "soft dollars".

- a. Does not apply.

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- b. Does not apply.
- c. Does not apply.
- d. Does not apply.
- e. Does not apply. I have no “related persons”.
- f. Does not apply.

2. Brokerage for Client referrals.

Neither Harry Licursi nor HLTRP refers clients to broker-dealers. Neither Harry Licursi nor HLTRP selects or recommends a broker dealer, and has no conflict of interest to disclose on this issue.

- a. Does not apply.
- b. Does not apply.

3. Directed Brokerage

- a. Does not apply
- b. Does not apply

B. All securities I sell under agreement with the FTJ Fund Choice **Fund Choice**TM are at net asset value. There is no commission. Therefore aggregation is a non-issue. If a client purchases a loaded security outside of the FTJ Fund Choice **Fund Choice**TM platform, aggregation, if any, is done by the custodian. I receive no commission on those transactions and participate in no way.

Item 13 - Review of Accounts

A. Portfolios are subject to quantitative and qualitative reviews initially, and periodically thereafter, either quarterly, as needed, or at the client’s request. Portfolios are reviewed for performance specific to a client’s stated objectives and expectations. At the client’s request, portfolios in FTJ accounts are rebalanced monthly at no additional charge.

B. If a client is risk adverse and economic indicators are such to require immediate attention or potential portfolio change, the client is contacted, apprised and solicited for their unscheduled review.

C. The account custodian provides quarterly written reports. Activity notices are emailed after there have been transactions in their account. Please refer to the custodian’s ADV Part 2A to understand their reporting process over accounts.

Item 14 - Client Referrals and Other Compensation

A. Neither Harry Licursi nor HLTRP receives any sales awards or other prizes as an economic benefit for providing investment advice or other advisory services. Such a potential conflict of interest could interfere with objectivity and might jeopardize the fiduciary capacity to act in the best interest of the client.

B. Neither Harry Licursi nor HLTRP participates in any referral programs.

Item 15 - Custody

Neither Harry Licursi nor HLTRP has custody of client’s funds.

Clients should receive at least quarterly statements from their broker dealer, bank or other qualified custodian that holds and maintains client’s investment assets. You are urged to carefully review such statements and compare such official custodial records to the account statements. Bank statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 - Investment Discretion

Harry Licursi and HLTRP have discretionary authority to make determinations regarding the securities that are to be bought and sold, as well as the quantities of such securities. Such authority is provided in the contract with each client. In many cases, this discretion is subject to mutually agreed upon investment guidelines relative to the client’s portfolio. Client investment guidelines may or may not limit the scope of

potential investments. As a result, clients can impose restrictions on investing in certain securities or types of securities. Within client guidelines and instructions, Harry Licursi or HLTRP makes the decision as to the nature and quantity to be bought, sold or traded.

Item 17 - Voting Client Securities

- A. Neither Harry Licursi nor HLTRP accepts voting authority on clients' securities.
- B. Neither Harry Licursi nor HLTRP has authority to vote client securities. Clients will receive their proxies or other solicitations directly from their custodian or a transfer agent, not from HLTRP. Neither Harry Licursi nor HLTRP addresses questions regarding solicitations [solicitations](#).

Item 18 - Financial Information

- A. Harry Licursi does not require or solicit pre-payment of advisory fees in the amount of \$500 and six months or more in advance.
- B. HLTRP does not have any financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients.
- C. Harry Licursi has never been the subject of a bankruptcy proceeding.

Item 19- Requirements for State Registered Advisors

- A. Principal: Harry Eugene Licursi
DOB: 7/17/1954
Business Name: Harry Eugene Licursi Tax and Retirement Planning
Formal Education: San Jose City College AA Marketing
University of Denver Labor Law
San Jose State University Pre-Med
Professional Accreditations: NASD 6, 26, 63, 65 [exams passed](#)
California Life/ Disability / Long Term Care
Enrolled Agent with the IRS
Business Employment: Self-Employed since 12/1999 to present
Previously employed by Nationwide Advisory Services as Affiliate Relations Manager for the National Education Association account, California, Oregon, Alaska, Hawaii 1992-1999
Educational Community Insurance Services as Manager for the California Teachers Association account 1985-1992
CIGNA Corp as group representative
National Guard [CIGNA Corp as Group Representative for the National Guard California, California Correctional Peace Officers](#)
Of California, California Correctional Peace Officers Association, California Highway Patrol Association, various [Association, California Highway Patrol Association, various](#)
brokerage groups focusing on Employee Benefits and Pension Plans 1988-1992 [groups focusing on Employee Benefits and Pension Plans 1988-1992](#)
[Insurance and Investment licensed since 1975](#)
B. Actively engaged as an Enrolled Agent for the IRS; approximately 25% of my time.
C. I do not participate in performance-based fees.
D. I have not been involved in any arbitration claims alleging damages, or civil, SRO, or administrative proceedings.
E. I have no relationship or arrangement with any issuer of securities.

Conflict of Interest Disclosure (CCR Section 260.238(k))

There is no material conflict of interest relating to you by me or my representatives and employees that could be reasonably expected to impair the rendering of unbiased or objective advice. Conflicts of interest

may include, but are not limited to: (a) compensation arrangements connected with advisory services which are in addition to the advisory fees; (b) other financial industry activities or affiliations; and (c) participation of interest in client transactions.

Financial Planning Conflict of Interest Statement (CCR Section 260.235.2).

If I provide you with financial planning services and receive compensation (e.g. commissions, fees) from the sale of securities, insurance, real estate or other products or services recommended in a financial plan, a copy of the conflict of interest statement will be filed directly with the Commissioner. This statement will include, at a minimum, that: (a) a conflict exists between your interests and mine; (b) you are under no obligation to act upon my recommendation; and (c) if you elect to act on any of the recommendations, you are under no obligation to effect the transaction through me.

Performance Fee Disclosure Statement (CCR section 260.234).

I do not charge a performance fee.

Advisory Fees (CCR section 260.238(j)).

Fees for services services of Harry Licursi Tax and Retirement Planning Harry Licursi Tax and Retirement Planning can be assessed in one or more of three ways; in one or more of three ways; a) An agreed flat fee basis for a specific service, b) on an agreed hourly rate basis, or c) on a basis of an account value fee structure for ongoing and long term asset management (see 5 on an agreed flat fee basis for a specific service, on an agreed hourly rate basis on the basis of an account value fee structure for ongoing and long term asset management (see 5 above).). The fees charged are reasonable, in light of the type of services provided, the expertise and experience, and the sophistication and bargaining power of each unique client when compared to similar service charges by others.