



**whisper** FINANCIAL

15975 bottle rock rd, cobb, ca 95426 510-216-3886

**form adv  
part 2a**  
***FIRM BROCHURE***  
**OCTOBER 02, 2023**

**item 1 cover page**

This Brochure provides information about the qualifications and business practices of Whisper Financial LLC. If you have any questions about the contents of this Brochure, please contact us at 510-216-3886 or by email at [ginger@whisperfinancial.sh](mailto:ginger@whisperfinancial.sh).

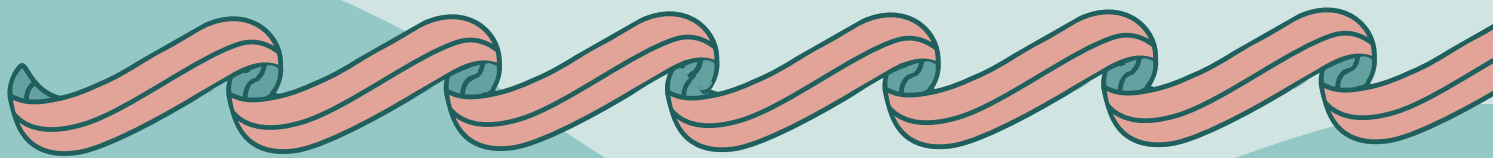
The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Whisper Financial LLC is registered as an Investment Adviser with the State of California. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about Whisper Financial LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov), which can be found using the firm's identification number, 317414.

# item 2

## *material changes*



Since the last annual ADV Update dated March 06, 2023, Whisper Financial LLC has made the following material changes:

- *Ginger Ames is now contracted with Origin Financial, LLC as a Financial Planner. See Item 10 and ADV Part 2B for further information.*

From time to time, we may amend this Brochure to reflect changes in our business practices, changes in regulations, and routine annual updates as required by securities regulators. Either this complete Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Whisper Financial LLC.



# table of contents

1

Cover Page

2

Material Changes

3

Table Of Contents

4

Advisory Business

5

Fees + Compensation

6

Performance-based  
Fees + Side-by-side  
Management

7

Types Of Clients

8

Methods Of Analysis,  
Investment Strategies + Risk Of Loss

9

Disciplinary  
Information

10

Other Financial  
Industry Activities +  
Affiliations

11

Code Of Ethics, Partic-  
ipation Or Interest In  
Client Transactions +  
Personal Trading

12

Brokerage Practices

13

Review Of Accounts

14

Client Referrals  
+ Other Compensation

15

Custody

16

Investment  
Discretion

17

Voting Client  
Securities

18

Financial Information

19

Requirements For  
State-registered  
Advisers

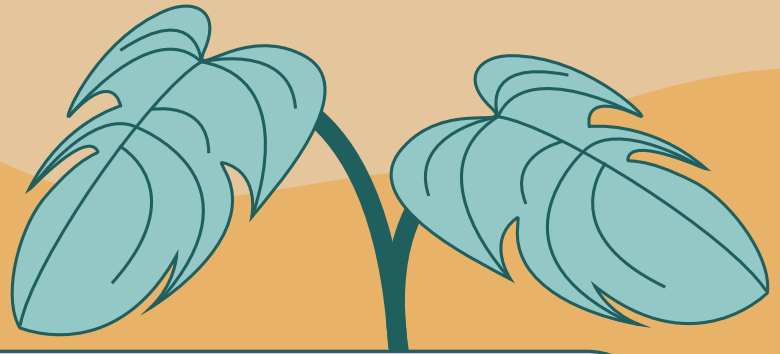


Form Adv Part 2b -  
Brochure Supplement



# item 4

## *advisory business*



### **Description of Advisory Firm**

Whisper Financial LLC (hereinafter referred to as “WF”, “we”, “firm”, and “us”) is registered as an Investment Adviser with the State of California. We are a limited liability company founded in October 2021. Ginger Ames is the principal Founder of WF.



# ***TYPES OF ADVISORY SERVICES***

***Financial Planning  
Services***

***Ongoing Financial  
Planning***

***Three-Month  
Engagement***



## *Financial Planning Services*

Financial planning involves 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 affect and are affected 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.



## *Financial Planning Services*



In general, the financial plan will address some or all of the following areas of concern. The Client and WF will work together to select specific areas to cover.

These areas may include, but are not limited to, the following:

### **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.

### **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.

### **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 or the best way to contribute to grandchildren (if appropriate).



## *Financial Planning Services*



## 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 Founder, 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

4

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. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

## 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.

## INSURANCE

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 in Item 8 of this brochure.

# 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 (e.g., 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.

# 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 the 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.



## *Financial Planning Services*

Whisper Financial offers financial planning services through two (2) types of engagements:

The logo for 'atelier' is displayed in a light blue rounded rectangle. The word 'atelier' is in a dark teal, lowercase, sans-serif font. A small, stylized purple and blue icon is positioned between the 'e' and 'l'.

Ongoing Financial Planning

The logo for 'gallery' is displayed in a light pink rounded rectangle. It features a red icon of a stylized flower or starburst with six points, followed by the word 'gallery' in a red, lowercase, sans-serif font.

3-Month Engagement Package





## ONGOING FINANCIAL PLANNING

This service involves working one-on-one with a planner over an extended period of time. Clients get to work with a planner who will work with them to develop and implement their plan. The planner will monitor the plan, recommend any changes and ensure the plan is up-to-date.

Upon desiring a comprehensive plan, a Client will be taken through establishing their goals and values around money. They will be required to provide information to help complete the following areas of analysis: net worth, cash flow, 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 help achieve his or her stated financial goals and objectives. If a follow-up meeting is required, we will meet 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 actionable steps have been carried out. On an annual basis, there will be a full review of this plan to ensure its accuracy and ongoing appropriateness. Any needed updates will be implemented at that time.



## 3-MONTH ENGAGEMENT

This service is aimed at clients who desire financial guidance but wish to implement our recommendations with no additional oversight or follow-up. We'll meet with clients for two (2) meetings over the course of three-months. We work with clients to identify their financial goals and provide a visualization of their cash flow, net worth, and overall financial profile.



## ***Client Tailored Services + Client Imposed Restrictions***

**We tailor the delivery of our services to meet the individual needs of our Clients.**

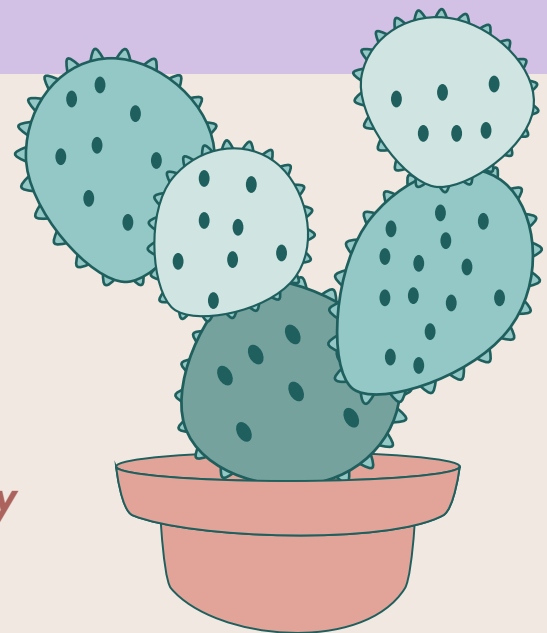
We consult with Clients initially and on an ongoing basis, through the duration of their engagement with us, to determine risk tolerance, time horizon and other factors that may impact the Clients' planning needs.

## ***WRAP FEE PROGRAMS***

***We do not participate in wrap fee programs.***

## ***ASSETS UNDER MANAGEMENT***

***The firm does not offer Investment Management Services, therefore does not have any discretionary or non-discretionary assets under management.***



## **CCR SECTION 260.235.2 DISCLOSURE**

For Clients who receive our Financial Planning services, we must state when a conflict exists between the interests of our firm and the interests of our Client. The Client is under no obligation to act upon our recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through our firm.



# item 5

## *fees + compensation*



Please note, unless a Client has received this brochure at least 48 hours prior to signing an investment advisory and/or Financial Planning Agreement (collectively, “Client Contract”), the Client Contract may be terminated by the Client within five (5) business days of signing the Client Contract without incurring any fees. How we are paid depends on the type of advisory services we perform. The following pages are a brief description of our fees, however, you should review your executed Client Contract for more detailed information regarding the exact fees you will be paying. Lower fees for comparable services may be available from other sources. Fees are not negotiable.

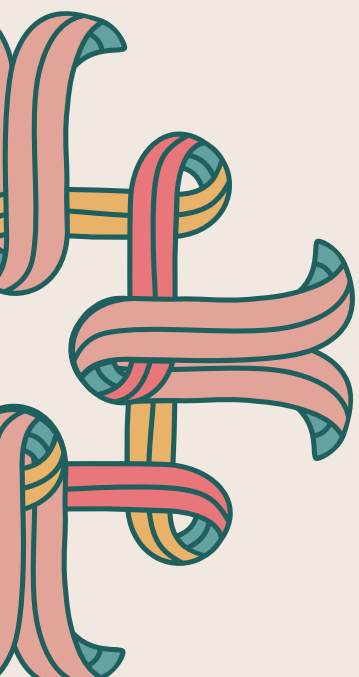


The logo for 'atelier' is displayed in a light blue rounded rectangle. The word 'atelier' is in a dark teal, lowercase, sans-serif font. A stylized, multi-colored ribbon (pink, orange, and teal) is tied around the letter 'l'.

## ONGOING FINANCIAL PLANNING

consists of an ongoing annual fee of

**\$5,000 - 14,000**

A decorative graphic on the left side of the page features a multi-colored ribbon (pink, orange, and teal) tied into a knot.

After an initial deposit of \$2,500 for one year engagement or \$0 initial deposit for two year engagement, the ongoing fee is paid monthly, in advance. Fees for this service may be paid by electronic funds transfer (EFT). This service may be terminated by either party with 30 days' notice.

Upon termination, the fee will be prorated and any unearned fee will be refunded to the Client.

The Ongoing Financial Planning fee is for the implementation and monitoring of the financial plan. This work will commence immediately after the fee is paid, and the length of time required to complete and deliver the plan is dependent on several factors including the needs of the client, the client's ability to provide any necessary information and documentation, as well as the complexity of their financial situation. At no time do we require prepayment of fees 6 or more months in advance of delivering the requested services.







## 3-MONTH ENGAGEMENT

The Gallery package is a flat fee of \$899. The fee is paid in two installments, in advance.

Fees for this service may be paid by electronic funds transfer (EFT). This service may be terminated by either party with 30 days' notice. Upon termination, the fee will be prorated and any unearned fee will be refunded to the Client.

The Gallery Package fee is for the development, delivery, and initial implementation of the financial plan. This work will commence immediately after the fee is paid, and the length of time required to complete and deliver the plan is dependent on several factors including the needs of the client, the client's ability to provide any necessary information and documentation, as well as the complexity of their financial situation. At no time do we require prepayment of fees 6 or more months in advance of delivering the requested services.

## HOURLY ADD-ONS

If clients desire additional meetings or a re-review of their previous plan, they can engage us on an hourly basis. Our hourly rate is \$350, billed hourly in arrears. Hourly engagements are only available to current or former clients of Whisper Financial.

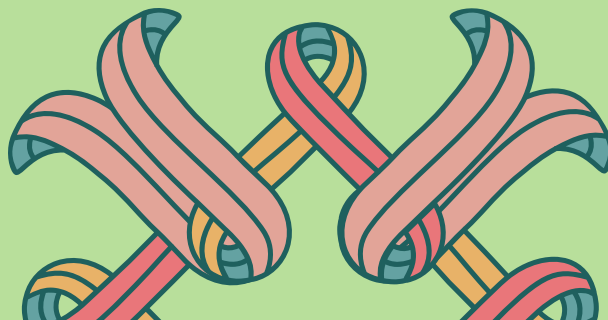
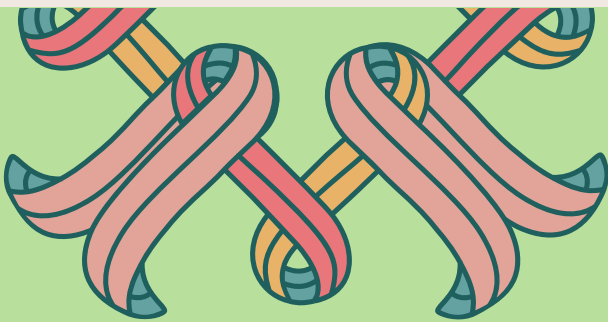




## OTHER TYPES OF FEES + EXPENSES

When implementing an investment recommendation, the Client may incur additional fees such as brokerage commissions, transaction fees, and other related costs and expenses. Clients may incur certain charges imposed by broker-dealers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer, and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

**We do not provide Investment Management Services, and therefore we do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.**





## item 6

# *performance-based fees + side-by-side management*

**We do not offer performance-based fees  
and do not engage in side-by-side  
management.**



# item 7

## *types of clients*

**We provide financial planning services to individuals, high net-worth individuals and corporations and other businesses.**

*We do not have a minimum account size requirement.*



# item 8

## *methods of analysis, investment strategies, + risk of loss*

When Clients have us complete an Investment Analysis (described in Item 4 of this brochure) as part of their financial plan, our primary methods of investment analysis are described in this section.



# FUNDAMENTAL ANALYSIS

involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that the information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

## MODERN PORTFOLIO THEORY

### THE UNDERLYING PRINCIPLES OF MPT ARE:

- ➔ Investors are risk averse. The only acceptable risk is that which is adequately compensated by an expected return. Risk and investment return are related and an increase in risk requires an increased expected return.
- ➔ Markets are efficient. The same market information is available to all investors at the same time. The market prices every security fairly based upon this equal availability of information.
- ➔ The design of the portfolio as a whole is more important than the selection of any particular security. The appropriate allocation of capital among asset classes will have far more influence on long-term portfolio performance than the selection of individual securities.
- ➔ Investing for the long-term (preferably longer than ten years) becomes critical to investment success because it allows the long-term characteristics of the asset classes to surface.
- ➔ Increasing diversification of the portfolio with lower correlated asset class positions can decrease portfolio risk. Correlation is the statistical term for the extent to which two asset classes move in tandem or opposition to one another.



## *Passive Investment Advice*

**As a fee-only financial planner, we may offer investment advice for Clients as part of the financial planning process.**

When analyzing Clients' portfolios, we will utilize the principles of passive investing. Passive investment advice may include building portfolios that are composed of various distinct asset classes. The asset classes are weighted in a manner to achieve the desired relationship between correlation, risk, and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange-traded funds.

### **In contrast,**

active investing involves a single manager or managers who employ some method, strategy, or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark.

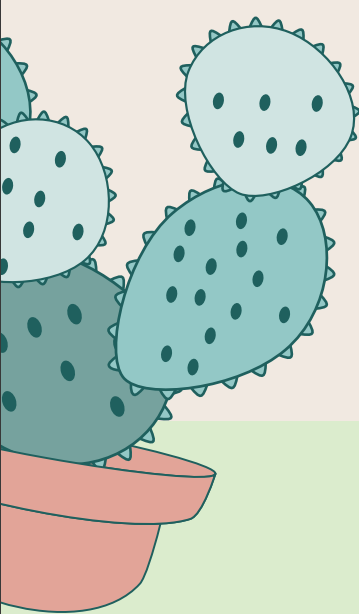
### **Passive investing is characterized by**

low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax-efficient and turn-over inside the portfolio is minimal).



# *SOCIALLY RESPONSIBLE INVESTING*

**WF may utilize various socially conscious investment approaches if a client desires.**



WF may construct portfolios that utilize mutual funds, ETFs, or individual securities with the purpose of incorporating socially conscious principles into a client's portfolio. These portfolios may sometimes also be customized to reflect the personal values of each individual, family, or organization. This allows WF's clients to invest in a way that aligns with their values. WF may rely on mutual funds and ETFs that incorporate Environmental, Social and Governance ("ESG") research as well as positive and negative screens related to specific business practices to determine the quality of an investment on values-based merits.

Additionally, WF may construct portfolios of individual securities in order to provide clients with a greater degree of control over the socially conscious strategies they are utilizing. WF relies on third-party research when constructing portfolios of individual securities with socially conscious considerations.





## ***MARKET RISKS INVOLVED***

WF does not provide investment management, however investment recommendations may be made as part of the financial planning services.



**All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear.**

Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Material risks associated with our investment strategies are listed in the following pages.



### ***MARKET RISK***

Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

### ***STRATEGY RISK***

The Adviser's investment strategies and/or investment techniques may not work as intended.



## ***MARKET RISKS INVOLVED***

### ***SMALL & MEDIUM CAP COMPANY RISK***

Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the Client's portfolio.

### ***TURNOVER RISK***

At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

### ***LIMITED MARKETS***

Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions, we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

### ***CONCENTRATION RISK***

Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions, we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.





## ***MARKET RISKS INVOLVED***

### ***INTEREST RATE RISK***

Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

### ***LEGAL OR LEGISLATIVE RISK:***

Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

### ***INFLATION***

Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.






## RISKS ASSOCIATED WITH SECURITIES

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

### Exchange Traded Funds

Prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks:

-  an ETF's shares may trade at a market price that is above or below their net asset value;
-  the ETF may employ an investment strategy that utilizes high leverage ratios; or
-  trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally.

**The Adviser has no control over the risks taken by the underlying funds in which the Clients invest.**



## RISKS ASSOCIATED WITH SECURITIES

### Mutual Funds

When a Client invests in open-end mutual funds or ETFs, the Client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, many of which may be duplicative.

In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

### Digital Assets

**Investing in digital assets (such as cryptocurrencies) poses significant + unique risks.**

Although some digital assets have had excellent long term returns over the last decade, they also exhibit extreme volatility. Sustained long term performance is not guaranteed. Beyond risks of volatility and performance, digital assets pose several unique risks. Most digital assets are not classified as securities and therefore are not subject to the same regulations and treatment as securities. Digital asset accounts and value balances are not protected by the Federal Deposit Insurance Corporation (FDIC) or Securities Investor Protection Corporation (SIPC). Establishing and maintaining an account at an exchange can be difficult. Exchanges often charge fees as a percentage of each transaction

and/or spreads for matching buyers with sellers. Transferring digital assets can be uniquely difficult and mistakes often cannot be undone. Digital asset wallets can be lost, stolen, damaged, or destroyed, or users can become permanently locked out

of their digital asset wallets. In such a case, recovery of the digital assets is impossible. Taxation is handled differently than with securities such as stocks or ETFs. Regulations and taxation are subject to change at any time. It is even possible that the US

Government may ban possession or ownership of some or all digital assets. Only discretionary capital marked for speculative purposes should be used to invest in digital assets. Investing in digital assets is not suitable or desirable for all Clients.



***RISKS ASSOCIATED WITH SECURITIES***

# **Socially Responsible Investing**

If you request your portfolio to be invested according to socially conscious principles, you should note that returns on investments of this type may be limited and because of this limitation you may not be able to be as well diversified among various asset classes. The number of publicly traded companies that meet socially conscious investment parameters is also lim-

ited, and due to this limitation, there is a probability of similarity or overlap of holdings, especially among socially conscious mutual funds or ETFs. Therefore, there could be a more pronounced positive or negative impact on a socially conscious portfolio, which could be more volatile than a fully diversified portfolio



# item 9

## *disciplinary information*

### CRIMINAL OR CIVIL ACTIONS

WF and its management persons have not been involved in any criminal or civil action.

### ADMINISTRATIVE ENFORCEMENT PROCEEDINGS

WF and its management persons have not been involved in administrative enforcement proceedings.

### SELF-REGULATORY ORGANIZATION ENFORCEMENT PROCEEDINGS

WF and its management persons have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of WF or the integrity of its management.



# item 10

## *other financial industry activities & affiliations*



Neither WF or its management persons is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Neither WF or its management persons is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

Whisper Financial, through its owner, Ginger Ames, also provides tax preparation services. Fees for tax preparation is in addition to and exclusive of our fees disclosed in Item 5 above. A conflict of interest exists in that Whisper Financial representatives may recommend clients utilize our tax services which results in an additional fee to the firm. Clients are never obligated to utilize our tax prep service and can utilize any tax professional of their choosing. Our financial planning services are not contingent on clients utilizing us for tax services. In certain cases, we may waive our tax preparation fees for Ongoing Financial Planning clients.

Whisper Financial also produces financial education courses for a fee. These courses do not provide individualized investment advice. This does not affect financial planning clients of Whisper Financial.

Ginger Ames is contracted out as a financial planner for Blend Financial, Inc. ba Origin Financial. There is no relationship that exists between Whisper Financial and Origin Financial. This arrangement may present a material conflict of interest because Ginger Ames might be incentivized to refer Origin's clients to Whisper Financials' services. Though this is highly unlikely, Whisper Financial will address this conflict of interest by conducting proper due diligence on any prospective clients, and will only accept clients if Whisper Financial's services are truly suitable to the client's needs.





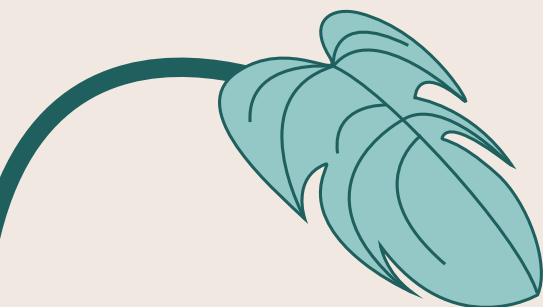
## ***RECOMMENDATIONS OR SELECTIONS OF OTHER INVESTMENT ADVISERS***

**WF does not recommend or select other investment advisers for our clients.**



## ***DISCLOSURE OF MATERIAL CONFLICTS***

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



## item 11

# *code of ethics, participation or interest in client transactions + personal trading*

As a fiduciary, our firm has a duty of utmost good faith to act solely in the best interests of each Client. Our Clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.





# CODE OF ETHICS DESCRIPTION



liability for misconduct that violates a fiduciary duty to our Clients. A summary of the Code of Ethics' Principles is outlined below.

This Code of Ethics does not attempt to identify all possible conflicts of interest, and compliance with each of its specific provisions will not shield our firm or its access persons from

## INTEGRITY

Associated persons shall be objective in providing professional services to Clients.

Associated persons shall be objective in providing professional services to Clients.

## OBJECTIVITY

## COMPETENCE

Associated persons shall provide services to Clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.

Associated persons shall perform professional services in a manner that is fair and reasonable to Clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.

## FAIRNESS

## CONFIDENTIALITY

Associated persons shall not disclose confidential Client information without the specific consent of the Client unless in response to proper legal process, or as required by law.

Associated persons conduct in all matters shall reflect the credit of the profession.

## PROFESSIONALISM

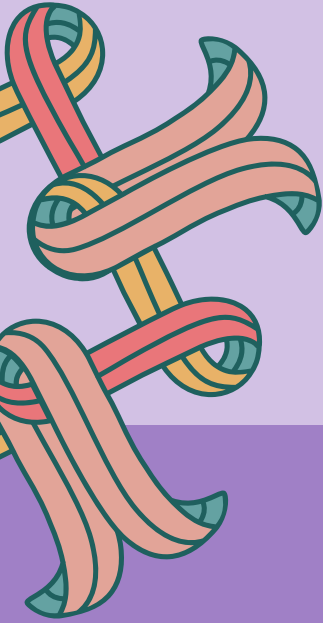
## DILIGENCE

Associated persons shall act diligently in providing professional services.



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





## investment recommendations involving a material financial interest + conflicts of interest

Neither our firm, its access persons, or any related person is authorized to recommend to a Client or effect a transaction for a Client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, principal transaction, among others.

## advisory firm purchase of same securities recommended to clients + conflicts of interest

Our firm and its “related persons” do not invest in the same securities, or related securities, e.g., warrants, options or futures, which we recommend to Clients.

## trading securities at/around the same time as client’s securities

Because our firm and its “related persons” do not invest in the same securities, or related securities, e.g., warrants, options or futures, which we recommend to Clients, we do not trade in securities at or around the same time as Clients.



# item 12

## *brokerage practices*



### *FACTORS USED TO SELECT CUSTODIANS AND/OR BROKER-DEALERS*

Whisper Financial LLC does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to the Client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.



## *RESEARCH + OTHER SOFT-DOLLAR BENEFITS*

We currently do not receive soft dollar benefits.

## *BROKERAGE FOR CLIENT REFERRALS*

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

## *CLIENTS DIRECTING WHICH BROKER / DEALER / CUSTODIAN TO USE*

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

## *AGGREGATING (BLOCK) TRADING FOR MULTIPLE CLIENT ACCOUNTS*

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



# item 13

## *review of accounts*

Ginger Ames, Founder and CCO of WF, will work with Clients to obtain current information regarding their assets and investment holdings and will review this information as part of our financial planning services. WF does not provide specific reports to Clients, other than financial plans.





# item 14

## *client referrals + other compensation*

We do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our Clients. Nor do we, directly or indirectly, compensate any person who is not advisory personnel for Client referrals.





# item 15

## *custody*

***WF DOES  
NOT ACCEPT  
CUSTODY OF  
CLIENT FUNDS.***



# item 16

## *investment discretion*

**We do not provide Investment Management Services, and therefore do not exercise discretion.**





# item 17

## *voting client securities*



We do not vote Client proxies. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the Client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.



# item 18

## *financial information*

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to our Clients, nor have we been the subject of any bankruptcy proceeding. We do not have custody of Client funds or securities, except as disclosed in Item 15 above, or require or solicit prepayment of more than \$500 in fees six months in advance.



# item 19

## *requirements for state- registered advisors*

### ***PRINCIPAL OFFICERS***

Ginger Ames serves as WF's sole principal. Information about Ginger Ames's education, business background, and outside business activities can be found on her *ADV Part 2B, Brochure Supplement* (attached to this Brochure).



## ***OUTSIDE BUSINESS***

All outside business information, if applicable, of WF is disclosed in *Item 10* of this Brochure.



## ***PERFORMANCE-BASED FEES***



Please refer to Item 6 of this brochure.

## ***MATERIAL DISCIPLINARY DISCLOSURES***



No management person at WF has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

## ***MATERIAL RELATIONSHIPS THAT MANAGEMENT PERSONS HAVE WITH ISSUERS OF SECURITIES***



WF nor Ginger Ames have any relationship or arrangement with issuers of securities.

## ***BUSINESS CONTINUITY PLAN***



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





**whisper** FINANCIAL

15975 bottle rock rd, cobb, ca 95426 510-216-3886

## **form adv part 2b**

***BROCHURE SUPPLEMENT***

***OCTOBER 02, 2023***

### **for Ginger Ames** **Founder + Chief Compliance Officer**

This brochure supplement provides information about Ginger Ames that supplements the Whisper Financial LLC ("WF") brochure. A copy of that brochure precedes this supplement. Please contact Ginger Ames if the WF brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Ginger Ames is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number 6769744.

# item 2

## *educational background + business experience*

**GINGER AMES**

born **1982**

**EDUCATIONAL  
BACKGROUND**

**2004** BA in Psychology  
UC BERKELEY





# PROFESSIONAL CERTIFICATIONS

## ENROLLED AGENT

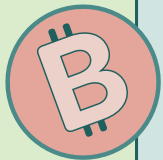
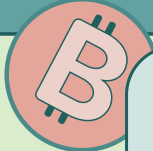
Enrolled agent status is the highest credential the IRS awards. Individuals who obtain this elite status must adhere to ethical standards and complete 72 hours of continuing education courses every three years. Enrolled agents, like attorneys and certified public accountants (CPAs), have unlimited practice rights.

## CERTIFIED FINANCIAL PLANNER®

CFP® professionals are held to strict ethical standards to ensure financial planning recommendations are in your best interest. What's more, a CFP® professional must acquire several years of experience related to delivering financial planning services to clients and pass the comprehensive CFP® Certification Exam before they can use the CFP® designation.

## CERTIFICATE IN BLOCKCHAIN + DIGITAL ASSETS

The Certificate is issued by the Digital Assets Council of Financial Professionals and New York Institute of Finance. DACFP's certificate shows advisors how to incorporate digital assets into practice management and all regulatory, compliance and tax issues. Certificate holders must hold in good standing the DACFP Certificate in Blockchain and Digital Assets®, satisfy DACFP's annual CE requirements and sign the DACFP Code of Ethics each year.



### CDAA

Certified Digital Asset Advisors are educated in both the traditional and digital financial world. Advisors go through in-depth training and education in 5 core aspects of cryptocurrency, blockchain technology, and decentralized finance to provide investors with the highest level of service and education. Financial advisors that have completed the CDAA course and passed the exam have demonstrated competency in understanding how digital assets work, the role they play, the risks that follow, and how they can fit into your financial picture.





## ***RECENT BUSINESS EXPERIENCE***

***OCT 2023 - PRESENT***

Blend Financial Inc. dba Original Financial, Financial Planner

***OCT 2021 - PRESENT***

Whisper Financial LLC, Founder and CCO

***MAY 2019 - PRESENT***

Sublime Feline LLC, Owner

***DEC 2020 - OCT 2021***

Terra Blue Wealth Management, Registered Staff Member

***NOV 2019 - APR 2021***

H&R Block, Tax Professional

***MAR 2017 - AUG 2019***

Ameriprise Financial Services, Inc., Registered Representative



A stylized illustration featuring a hand holding a card. The hand is composed of thick, rounded, colorful segments in shades of pink, orange, and teal, outlined in dark green. The card is a light cream color with the word "whisper" written in a dark green, lowercase, sans-serif font. The background is filled with wavy, horizontal lines in various colors: purple, orange, pink, and light green. The overall style is modern and graphic.

whisper

FINANCIAL