



In Touch Financial Services

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This Brochure provides information about the qualifications and business practices of In Touch Financial Services. If you have any questions about the contents of this Brochure, please contact us at (510) 653-8968. 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.

In Touch Financial Services is a Registered Investment Adviser. 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 that you may use to determine whether to hire or retain them. Additional information about In Touch Financial Services is also available on the SEC's web site at www.adviserinfo.sec.gov.

Item 2 - Material Changes

Since the last annual updating amendment filing in February 8, 2023 we have the following Material changes to disclose:

1. We have amended Item 5 to reflect our current fee schedule;
2. We have amended Item 5 to disclose we now require a minimum account opening balance of \$150,000;
3. We have amended Item 12 to disclose we now only recommend LPL as custodian.

We will ensure that you receive a summary of any material changes to this and subsequent Brochures within 90 days of the close of our business 'fiscal year which is December 31st. We will provide other ongoing disclosure information about material changes as necessary. We will also provide you with a new Brochure, as necessary, based on changes or new information. Currently, our Brochure may be requested at any time, without charge, by contacting Vanessa Ann Donaville at 510-679-1630.

Additional information about In Touch Financial Services is also available via the SEC's web site www.adviserinfo.sec.gov. You can search this site by using a unique identifying number, known as a CRD number. The CRD number for In Touch Financial Services, is 153249. The SEC's web site also provides information about any persons affiliated with In Touch Financial Services who are registered, or are required to be registered, as investment adviser representatives of In Touch Financial Services.

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Item 4 - Advisory Business Introduction

In Touch Financial Services is a Registered Investment Adviser which offers investment advice, securities, insurance, and other financial services to clients. We are registered in California and regulated by the State of California and the SEC.

We provide investment advice through investment adviser representatives (“advisor”) associated with In Touch Financial Services. These individuals are appropriately licensed, qualified, and authorized to provide advisory services on behalf of In Touch Financial Services. In addition, all advisors are required to meet the examination or experience requirements for the state of California. They are required to have a FINRA Series 7 examination for General Securities Representatives or equivalent, at least 2 years’ experience, and at least \$5 million in assets under management. Alternatively, investment advisor representatives must have a CFP® designation, 3 years’ experience, and at least 50 clients. Our advisors must also have educational or industry experience and must meet the standards for all continuing education requirements.

In Touch Financial Services was founded by Vanessa Ann Donaville who serves as a Managing Member and Chief Compliance Officer. We provide portfolio management services to individuals, high net worth individuals, trusts, estates, corporate pension and profit-sharing plans, charitable organizations, corporations, and other small businesses. We are committed to placing clients’ interests first, and believe this adds value to the asset management process. We value long term relationships with our clients whom we regard as strategic partners in our business.

Services

We provide various asset management and financial planning services, with an emphasis on retirement, estate, insurance, and education planning. Our focus is on helping you develop and execute plans that are designed to build and preserve your wealth. We will manage your assets according to your financial goals and objectives. Various management styles and research methods will be used to best manage your assets.

As of December 31, 2023, we provided asset management services for 274 accounts, managing total assets of \$ 49,000,000 on a non-discretionary basis and \$2,000,000 on a discretionary basis. We also had \$10,000,000 in 401K plan assets under advisement.

This amount is managed on a nondiscretionary basis which means, you have not given us the authority to determine the following without your consent:

- Securities to be bought or sold for your account
- Amount of securities to be bought or sold for your account
- Broker- dealer to be used for a purchase or sale of securities for your account
- Commission rates to be paid to a broker or dealer for your securities transaction.

However, all mutual funds purchased will be purchased on a discretionary basis which means you have given us the authority to purchase mutual funds on your account without your prior authorization.

Your account may be rebalanced or reallocated periodically in order to reestablish the targeted percentages of your initial asset allocation. This rebalancing or reallocation will occur on the schedule you have determined with your advisor. You will be responsible for any and all tax consequences resulting from any rebalancing or reallocation of the account. We are not tax professionals and do not give tax advice. However, we will work with your tax professional to assist you with tax planning. You, will have the opportunity to meet with us periodically to review the assets in your account.

1. Financial Planning and Consulting

We provide general financial planning, estate planning, educational planning, pension consulting, retirement planning, and insurance planning. Fee based financial planning is a comprehensive relationship which incorporates many different aspects of your financial status into an overall plan that meets your goals and objectives. You must agree to provide us the information and documentation we request regarding your income, investments, taxes, insurance, estate plan, etc. You must also agree to discuss your investment objectives, needs and goals with us and to keep us informed of any changes.

In performing financial planning services, we typically examine and analyze your overall financial situation, which may include such issues as taxes, insurance needs, overall debt, credit, business planning, retirement savings and current investment program. Our services may focus on all or only one of these services depending upon the scope of the engagement with you.

Your written financial plan will consist of observations, assumptions, strategies and recommendations. You may choose to implement all or any part of the plan through us or a broker dealer of your choice.

If you engage us to perform these services, you will receive a written agreement detailing the services, fees, terms and conditions of the relationship. You will also receive this Brochure. You are under no obligation to implement recommendations through us. You may implement your financial plan through any financial organization of your choice.

We do not verify any information obtained from you, your attorney, accountant or other professionals. We do obtain information from a wide variety of publicly available sources to assist us in the preparation of your plan. However, we do not have any inside private information about any investments that are recommended. All recommendations developed by us are based upon our professional judgment. We cannot guarantee the results of any of our recommendations. You must decide what advice to follow.

We also offer ongoing financial consulting. Ongoing consulting services will be provided on an ongoing basis for a period of time determined between In Touch Financial Services and the client. Some consulting services may result in a written report while others will be handled through ongoing consultations between the Adviser and Client. Ongoing consulting may include but is not restricted to ongoing reviews of portfolios held away from In Touch Financial Services, ongoing reviews of household budgeting and spending, educational savings, etc.

2. Asset Management

With an Asset Management Account, you engage us to assist you in developing a personalized asset allocation program and custom-tailored portfolio designed to meet your investment objectives. Asset

management is the professional management of securities (stocks, bonds and other securities) and assets (e.g., real estate) in order to meet your specified investment goals. The recommended portfolio may include various securities such as mutual funds, exchange traded funds, debt instruments, foreign securities, municipal securities, individual equity securities, and option contracts. We also offer advice on other products such as variable life sub-accounts and variable annuities sub-accounts.

We will meet with you to discuss your financial circumstances, investment goals and objectives, and to determine your risk tolerance. We will recommend an appropriate asset allocation or investment strategy. Our recommendation and ongoing management is based upon your investment goals and objectives, risk tolerance, and the investment portfolio you have selected. We will monitor the account, trade as necessary, and communicate regularly with you. Your circumstances shall be monitored in at least annual account reviews. These reviews will be conducted in person, by telephone conference, and/or via a written inquiry/questionnaire. We will work with you on an ongoing basis to evaluate your asset allocation as well as rebalance your portfolio to keep it in line with your goals as necessary. We will be reasonably available to help you with questions about your account.

Certain assumptions may be made with respect to interest and inflation rates and the use of past trends and performance of the market and economy in determining your asset allocation. However, past performance is not an indication of future performance.

You can expect us to do the following:

- Review your present financial situation
- Monitor and track assets under management
- Provide portfolio statements, periodic rate of return reports, asset allocation statement, rebalanced statements as needed
- Advise on asset selection
- Determine market divisions through asset allocation models
- Provide research and information on performance and fund management changes
- Build a risk management profile for you upon your request or as needed
- Assist you in setting and monitoring goals and objectives
- Provide personal consultations as necessary.

You must notify us promptly when your financial situation, goals, objectives, or needs change.

You shall have the ability to impose reasonable restrictions on the management of your account, including the ability to instruct us not to purchase certain mutual funds, stocks or other securities. These restrictions may be a specific company security, industry sector, asset class, or any other restriction you request.

Under certain conditions, securities from outside accounts may be transferred into your advisory account.

However, we may recommend that you sell any security if we believe that it is not suitable for the current recommended investment strategy. You are responsible for any taxable events in these instances.

Your account can be managed in a tax aware manner; however, we do not provide tax advice or tax management services. You should always consult with your tax advisor for specific tax advice. Certain assumptions may be made with respect to interest and inflation rates and the use of past trends and performance of the market and economy. Past performance is not an indication of future performance.

If you decide to implement our recommendations, we will help you open a custodial account(s). Although we have legacy client accounts with Charles Schwab, we currently use LPL Financial as the custodian for all your accounts. You will enter into a separate custodial agreement with the custodian which gives them permission to allow us to make investment decisions regarding your account. If we are trading mutual funds, we will not obtain your consent prior to placing parameters of the objectives and risk tolerance of your account. If we are purchasing or selling any other investment product, we will always obtain your permission before placing a trade. The custodian is authorized and directed to effect transactions, deliver securities, make payments and do what we instruct. You are notified of any purchases or sales through trade confirmations and statements that are provided by the Custodian. You will at all times maintain full and complete ownership rights to all assets held in your account, including the right to withdraw securities or cash, proxy voting and receiving transaction confirmations.

You will also receive a statement from your custodian containing a description of all the activity in your account, your current positions, cost basis of securities, and current market value. The frequency of the statements will depend on the custodian, but is typically done on a quarterly basis. The statement may be in either printed or electronic form based upon your preferences. On line reporting is also available.

3. Other Services

Our advisors may recommend and sell life, annuities, disability, health, and long-term care insurance. We can also assist you in the selling, exchanging, purchasing, renting, or leasing of real estate.

We are available to provide you with a second opinion regarding your existing portfolio and we can help you help with budgeting, family planning, and establishing financial goals for a fee.

Item 5 - Fees and Compensation

We provide asset management and financial planning services for a fee. The financial planning fee is based on the time it will take to create a customized financial plan for you. The asset management fee is based on the size of your portfolio invested with us. Services similar to those offered by us may be available elsewhere for more or less than the amounts we charge. However, we believe our fees are reasonable considering the fees charged by other investment advisers offering similar services/programs.

Our fees do not include brokerage commissions, transaction fees, and other related costs and expenses charged by custodians, brokers, third party investment companies and other third parties. These include fees charged by managers, 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 funds, money market funds and exchange traded funds also charge internal

management fees, which are disclosed in the fund's prospectus. These fees may include, but are not limited to, a management fee, upfront sales charges, and other fund expenses. All such fees are in addition to our management fee and we receive no additional compensation from these fees and expenses. You should review all fees charged to fully understand the total amount of fees you will pay.

You could invest in a mutual fund directly, without our services. In that case, you would not receive the services provided by us which are designed, among other things, to assist you in determining which mutual fund or funds are most appropriate to your financial condition and objectives. Refer to Item 12 below for information regarding brokerage services.

If you have a margin account, you will pay margin fees that will be referenced on confirmation tickets. We do not receive any portion of these transaction charges.

Either party may terminate the initial agreement at any time by providing written notice to the other party. You will incur charges for advisory or consulting services rendered up to the point of termination. Termination will be effective on the date the termination notice is received by us. Accounts opened or terminated during a calendar quarter will be charged a prorated fee. Refunds will be given on a pro-rated basis within 30 days of cancellation.

1. Financial Planning/Consulting

Our Financial Planning Agreement defines what fees are charged and their frequency. Fees for financial planning services are based upon an hourly rate of up to \$200 per hour. The hourly rate includes all meetings, phone consultations, retirement projections, research and the creation of the initial written financial plan. We may negotiate a flat fee per the schedule shown below. This rate is subject to review and increase on an annual basis.

The following fee schedule applies for financial planning services:

Type of Plan	Fee	Advance Payment
Plan requiring less than 15 hours	\$200.00/hr.	\$300.00
Plan Requiring 15-20 hours	Flat fee of \$3,000.00	\$0.00
Plan Requiring more than 20 hours	Flat fee of \$3,000.00 for the first 20 hours and \$200.00/hr. for additional hours	\$0.00

We will provide you with a detailed invoice of time spent on developing the plan. However, all fees are negotiable at the Adviser's discretion.

We will provide annual reviews of your plan. If any major life changes warrant any changes to the plan, we will charge \$100.00 per hour to update the financial plan accordingly.

In the event that you cancel the financial consultation agreement, you will be responsible for the actual hours spent preparing the financial plan, up to the cancellation date, at the agreed upon hourly rate.

You are free to obtain legal, accounting, and brokerage services from any professional source to

implement our recommendations. We will cooperate with any attorney, accountant, or broker you choose to implement any recommendations.

For ongoing financial consulting, we will charge an annual retainer of \$3000, to include a total of 20 hours of counseling per year from the date of the execution of this agreement.

2. Asset Management Fee Schedule

We have a minimum account opening balance of \$150,000, which may be waived at the Adviser's discretion. The fee charged for asset management is based upon the amount of money you invest. Accounts opened as of April 2023 will be billed quarterly, in advance, based on the daily average balance of the previous quarter. The initial account fee is prorated based on the average balance for the month and is due at the end of the month following the opening of the account. Subsequent account fee payments are based on the previous month's average account balance as of the close of business on the last business day of the previous month. They will be assessed at the beginning of the following month. All account fees will be automatically deducted from the account and will be calculated as follows:

Assets Under Management	Fee
Under \$25,000	Lesser of \$500 or 2.99%*
\$25,000 - \$100,000	2.00%
\$100,001 - \$1,000,000	1.00%
Above \$1,000,000	0.75%

* Accounts under \$16,666.67 shall pay \$2.99%.

In certain circumstances, advisory fees and account minimums may be negotiated. A flat fee may be negotiated as long as it does not exceed the maximum fees set forth above. If a flat fee is negotiated, that fee will be listed in your Advisory Agreement. No increase in the annual fee shall be effective without prior written notification to you.

Your account may also be charged for certain additional assets we manage for you that are not held by the Custodian (i.e. variable annuities, mutual funds, 401(k) s). These fees would be in addition to the advisory fee which is charged on the value of assets in your custodial account.

Certain programs offered by us involve investment in mutual funds. Load and no load mutual funds may pay annual distribution charges, sometimes referred to as "12(b) (1) fees". These 12(b) (1) fees come from fund assets, and thus indirectly your assets. The 12(b) (1) fee, deferred sales charges and other fee arrangements will be disclosed upon your request and are typically described in the applicable fund's prospectus. We do not receive any compensation from these fees.

You are not required to implement our recommendations. You may select any investment professional to implement the recommendations.

3. Other Fees

We may receive the normal commissions and/or other compensation from the sale of insurance, real estate, securities or other products or services recommended in the financial plan.

Item 6 - Performance Based Fee and Side by Side Management

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

Item 7 - Types of Client(s)

We provide portfolio management services to individuals, high net worth individuals, trusts, estates, charitable organizations, open architecture 401(k) plans, corporations, and other small businesses. We require a minimum account balance of \$150,000 to open an account with us. This minimum may be waived at the Adviser's discretion.

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

We look at all aspects of analysis such as fundamental, technical, charting, and cyclical analysis to help cover all bases. We believe each method of analysis has its place in investment selection and investment strategy, and that they complement each other to arrive at a more comprehensive view of investing.

1. Fundamental Analysis

The process filters the potential number of mutual fund managers for their respective investment style. Fundamental analysis serves to answer questions, such as:

- What is the size of the fund?
- Is the money manager or management team consistent in their investment style?
- Is the manager's performance consistent when compared to his peers?
- What is that manager's tenure with the fund?
- Are the internal costs competitive relative to other manager's in that style?

One of the primary objectives of fundamental analysis is to provide current analysis of funds we recommend, whether for selection or de-selection. We use a combination of qualitative and quantitative factors to try and find funds that will perform well in their investment style. We look at both investment performance (relative to the peer group and the market) and modern portfolio statistics (like beta and standard deviation) to analyze the level of risk a manager takes to achieve those returns. When we are examining a fund, we will look at the fund's annual turnover, sector weightings and many other quantitative factors.

The end goal of performing fundamental analysis is to produce short list of funds, with the aim of figuring out what sort of position to take with those funds.

In order to perform this fundamental analysis, we use many resources, such as:

- Morningstar

- Financial newspapers and magazines (e.g. Wall Street Journal, Forbes, etc.)
- Annual reports, prospectuses, filings with the Securities and Exchange Commission
- Research materials prepared by others
- Company press releases
- Corporate rating services
- Company websites
- Inspections of corporate activities

2. Technical/Charting/Cyclical Analysis

This is a means of analyzing a security and forecasting the direction of the prices based on historical market data such as price, volume, and industry trends. A cyclical industry/investment is one that moves with the market such as automobiles, housing, and steel industries. They are prosperous in times of economic growth and stagnate in times of recession. On the other hand, a non-cyclical industry/investment does not move with the markets and tends to be profitable even when the market is not. Examples are drug manufacturing and healthcare companies.

Technical analysis is based on three assumptions:

- the market discounts everything
- price moves in trends
- history repeats itself

Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity. They believe all the information they need about a stock can be found in its charts. A chart is a graphical representation of a series of prices over a set time frame. There are typically four types of charts used:

- line charts
- bar charts
- candlestick charts
- point and figure charts

Technical analysts search for price chart patterns, such as the head and shoulders or double top/bottom reversal patterns, study technical indicators, moving averages, and look for forms such as lines of support, resistance, channels, and more obscure formations such as flags, pennants, and cup and handle patterns.

Technical analysts also widely use various market indicators such as mathematical transformations of price, often including up and down volume, advance/decline data and other inputs. These indicators are used to help determine whether an asset is trending, in what direction and if the trend will continue.

A trend line is a line on a chart to represent the trend in the market or a stock. A channel is one or more parallel trend lines that act as strong areas of support and resistance. Support level is the threshold through which a stock or market seldom goes below/lower than. Resistance level is the threshold that a stock or market seldom goes above/higher-than.

A head and shoulders pattern signals a security is likely to move against its previous trend. It is a reversal pattern. Double tops and double bottoms are formed after a sustained trend and indicates the trend is about to reverse. Flags and pennants are short-term continuation patterns that are formed when there is a sharp price movement followed by a sideways price movement. A cup and handle pattern is one in which the upward trend has pauses a bit and then continues in an upward direction.

A moving average is the average price of a security over a set amount of time. Moving averages help technical traders smooth out some of the day-to-day price movements in price.

The investment strategies we use to implement any investment advice given to you include:

- Long term purchases -securities held at least a year
- Short term purchases - securities sold within a year
- Trading -securities sold within 30 days
- Short Sales
- Margin Securities
- Options Sales

3. Risks

We cannot guarantee our analysis methods will yield a favorable return. In fact, a loss of principle is always a risk. Investing in securities involves a risk of loss that you should be prepared to handle. You need to understand that investment decisions made for your account by us are subject to various market, currency, economics, political and business risks. The investment decisions we make for you will not always be profitable nor can we guarantee any level of performance. For a more comprehensive description of all the risks associated with our strategies, methodology, and products please refer to the glossary under Risks.

Item 9 - Disciplinary Information

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management. We have no information to disclose here about the firm or any of our investment advisors. We adhere to high ethical standards for all advisors and associates. We strive to do what's in your best interests.

Item 10 - Other Financial Industry Activities and Affiliations

Vanessa Ann Donaville is currently working toward completing her CFA® professional designation which

involves a rigorous curriculum and is highly regarded for its high standard of professional education, stringent code of conduct and standards of practice, and ethical requirements that govern professional engagements with clients.

Vanessa Ann Donaville is also a licensed insurance agent/broker in the state of California.

She is also a licensed real-estate broker in the state of California and has passed a real-estate exam in California, taken college-level real estate courses and worked for several years as a real-estate Broker.

As a licensed insurance agent through numerous insurance companies, Vanessa Ann Donaville sells these products and uses 20% of her time doing so. She may offer insurance products and receive normal and customary commissions for those sales. Likewise, she is a real-estate broker and spends approximately 10% of her time, and receives commissions based on sales of real estate or loans made through her brokerage company. These activities may presents conflicts of interest in that recommendations to purchase a specific insurance or real estate product can result in commissions being paid to her as an insurance agent/real-estate broker. Our Code of Ethics prohibits us from placing our own interests ahead of yours. We monitor for any situations where this may occur and violations may result in disciplinary actions up to and including termination.

Lower fees for these services may be available elsewhere. You are under no obligation to implement her recommendations as an insurance agent/real-estate broker. Possible conflicts of interest and compensation are disclosed at the initial meeting.

Item 11 - Code of Ethics

1. General Information

We have adopted a Code of Ethics for all supervised persons of the firm describing its high standards of business conduct, and fiduciary duty to you, our client. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts, the reporting of certain gifts and business entertainment items, and personal securities trading procedures. All supervised persons at In Touch Financial Services must acknowledge the terms of the Code of Ethics annually, or as amended.

We may recommend securities to you that we have purchased for our own accounts. We may trade securities in our account that we have recommended to you as long as we place our orders after your orders. This policy is meant to prevent us from benefiting as a result of transactions placed on behalf of advisory accounts.

We have established the following restrictions in order to ensure our fiduciary responsibilities to you are met:

- We shall not buy or sell securities for our personal portfolio(s) where this decision is substantially derived, in whole or in part, from our role as an Investment Advisory Representative of In Touch Financial Services, unless the information is also available to the investing public on reasonable inquiry. In no case, shall we put our own interests ahead of yours.
- We emphasize your unrestricted right to decline to implement any advice rendered.

However, some securities trade in sufficiently broad markets to permit transactions by clients to be completed without an appreciable impact on the markets of the securities. Under certain circumstances, exceptions may be made to the policies stated above. Records of these trades, including the reasons for the exceptions, will be maintained with our records as required.

In addition, open-end mutual funds and/or investment sub-accounts which may comprise a variable insurance product are purchased or redeemed at a fixed net asset value. Therefore, purchases of mutual funds and/or variable insurance products by an advisor are not likely to have an impact on the prices of the fund in which you invest. These types of transactions are not prohibited by our policies and procedures.

Certain affiliated accounts may trade in the same securities with your accounts on an aggregated basis when consistent with our obligation of best execution. When trades are aggregated, all parties will share the costs in proportion to their investment. We will retain records of the trade order (specifying each participating account) and its allocation. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

You may request a copy of the firm's Code of Ethics by contacting Vanessa Ann Donaville.

2. Responsibility

It is the responsibility of all supervisory personnel to ensure that we conduct business with the highest level of ethical standards and keep our fiduciary duties to you. We must put your interests first and refrain from having outside interests that conflict with your interests.

3. Privacy Statement

We are committed to safeguarding your confidential information and hold all personal information provided to it in the strictest confidence. These records include all personal information that we collect from you or receive from other firms in connection with any of the financial services they provide. We also require other firms with whom we deal with to restrict the use of your information. Our Privacy Policy is available upon request.

4. Prohibited Acts

The following acts are prohibited:

- Employing any device, scheme or artifice to defraud
- Making any untrue statement of a material fact
- Omitting to state a material fact necessary in order to make a statement, in light of the circumstances under which it is made, not misleading
- Engaging in any fraudulent or deceitful act, practice or course of business
- Engaging in any manipulative practices

5. Conflicts of Interest

We have a duty to disclose potential and actual conflicts of interest to you. Gifts (other than de minimis gifts, which are usually defined as having a value under \$100.00) should not be accepted from persons or entities doing business with us.

Vanessa Ann Donaville may employ the same strategy for her personal investment account as she does for her clients. However, she does not place her orders in a way to benefit from the purchase or sale of a security. In these situations, your needs are considered first and the securities in questions are publicly traded and widely held.

We act in a fiduciary capacity. If a conflict of interest arises between us and you, we shall make every effort to resolve the conflict in your favor. Conflicts of interest may also arise in the allocation of investment opportunities among the accounts that we advise. We will seek to allocate investment opportunities according to what we believe is appropriate for each account. We strive to do what is equitable and in the best interest of all the accounts we advise.

6. Use of Disclaimers

We shall not attempt to limit liability for willful misconduct or gross negligence through the use of disclaimers.

7. Suitability

We shall only recommend those investments that we believe are suitable for you based upon your particular situation and circumstances. In addition, you must notify us of any significant changes in your situation or circumstances so that we can respond appropriately.

Item 12 - Brokerage Practices

1. Soft Dollars

We do not receive any soft dollars from broker-dealers or third party money managers. Our Custodian may provide us with certain brokerage and research products and services that qualify as "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934 ("Exchange Act"). These research products and/or services will assist us in our investment decision making process. Such research generally will be used to service all of our clients, but brokerage commissions paid by the client may be used to pay for research that is not used in managing the client's account. The account may pay to a Broker-Dealer a commission greater than another qualified Broker-Dealer might charge to effect the same transaction where we determine in good faith that the commission is reasonable in relation to the value of the brokerage and research services received.

There may other benefits from recommending Our Custodian such as software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Other services may include, but are not limited to, performance reporting, financial planning, contact management systems, third party research, publications, access to educational conferences, roundtables and webinars, practice management resources, access to consultants and other third party service providers who provide a wide array of business related services and technology with whom we may contract directly. We may receive seminar expense reimbursements from product sponsors which may

be based on the sales of products to their clients.

Our advisors, in their capacity as an insurance agent or real estate agent may receive additional compensation for these services. These activities and compensation are separate from the financial planning and asset management services offered through In Touch.

2. Research

We may receive access to product research, services, technology and other educational information to help us operate efficiently, grow our business, and deliver exceptional service to our clients. We may receive some or all of these from Our Custodian. Our clients are not charged for any of these services and the information received may be used to benefit all of our clients.

3. Brokerage for Client Referrals

We do not receive any compensation or incentive for referring you to broker-dealers for brokerage trades. Additional compensation may consist of, but is not limited to, receipt of promotional incentives, sales and marketing allowances, investment research services, bundled statements, compliance.

4. Directed Brokerage

If you elect to implement recommendations through your advisor, we will generally direct you to use Our Custodian as the broker-dealer and custodian. If requested, we will arrange for the execution of securities brokerage transactions for your account through Our Custodian, who we reasonably believe will provide “best execution”. In seeking best execution, the determinative factor is not the lowest possible commission cost but whether the transaction represents the best qualitative execution, taking into consideration the full range of a Broker-Dealer’s services including the value of research provided, execution capability, commission rates, and responsiveness. Therefore, we will seek competitive commission rates, but we may not obtain the lowest possible commission rates for account transactions. We will generally place your trades individually through your accounts unless we decide to purchase or sell the same securities for several clients at approximately the same time. We may, but are not obligated to, combine or aggregate such orders 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. Under this procedure, transaction 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. However, you are under no obligation to implement recommendations through us.

You may direct us to execute your transactions and custody your assets at a specific firm. By directing us to a specific custodian or Broker-Dealer, we may not be able to obtain the most favorable costs or execution. You may pay higher fees or transaction costs. You may also lose any benefits that we have been able to obtain for our other clients such as volume discounts or block trades. You will have the sole responsibility for negotiating the commission rate and other transaction costs with the Broker-Dealer and/or custodian. While you may direct us to a Broker-Dealer and/or custodian for execution of your transactions, you agree that we will not be required to effect any transactions through that directed broker if we reasonably deem doing so may result in a breach of our duties as a fiduciary. By directing brokerage, a disparity may exist between the commissions borne by your account and the commissions borne by our other clients that do not direct brokerage.

Item 13 - Review of Accounts

1. Duty to Supervise

We are responsible for ensuring adequate supervision over the activities of all persons who act on our behalf. Specific duties include:

- Establish procedures that could be reasonably expected to prevent and detect violations of law by our Advisory personnel
- Analyze operations and create a system of controls to ensure compliance with applicable securities laws
- Ensure that all Advisory personnel fully understand the Company's policies and procedures
- Establish a review system designed to provide reasonable assurance that the Company's policies and procedures are effective and being followed

2. Reviews

Vanessa A. Donaville, in her role as Managing Member and Chief Compliance Officer, conducts biannual reviews of new plans for all accounts, followed by annual reviews thereafter. The six-month review aims to refine and strengthen the implementation process, while the annual review allows for adjustments to existing plans or investment strategies in response to significant changes in financial or personal circumstances, as well as shifts in financial goals and objectives.

Clients have the option to request more frequent reviews and establish thresholds for triggering review events. Our monitoring typically includes tracking changes and trends in the economy, alterations to the management and structure of mutual funds or companies where client assets are held, and market fluctuations and corrections. It is important for clients to promptly inform us of any changes to their financial goals, objectives, or financial situation, as such changes may necessitate a review of their portfolio and recommendations for adjustments.

3. Reports

You will be provided with account statements reflecting the transactions occurring in the account from the Custodian. The frequency can vary depending on the custodian. These statements will be written or electronic depending upon what you selected when you opened the account. On-line reporting is also available.

Item 14 - Client Referrals and Other Compensation

We do not currently have any referral agreements with any other advisors. However, we may enter into written agreements to pay referral fees to other persons who are unaffiliated individuals. Prior to entering into any investment advisory agreement with you through these Solicitation agreements, we will determine if the referring party has provided you with a written disclosure document stating that the registered person is being compensated for referring us and the terms of the compensation arrangement. The fees you pay to use for our services will not be affected by any such referral arrangements.

Item 15 - Custody

We do not have physical custody of any accounts or assets. However, we may be deemed to have custody of your accounts if we have the ability to deduct your quarterly fees from the custodian. We generally use Our Custodian as the custodian and/or broker-dealer for all your accounts. Custodians were chosen based upon their reputation and the quality of their trade execution.

You should receive statements from the custodian that holds and maintains your investment assets. The frequency can vary depending upon the activity in your account. We urge you to carefully review such statements and compare this official custodial record to the invoice statements for fees that we may provide to you. If you notice any discrepancies, please contact Vanessa Ann Donaville.

Monthly statements list the total value of the account at the start and end of the month and itemize all transactions and security positions. For taxable accounts, the Custodian will provide you consolidated year-end summary statements including IRS forms 1099 and other tax-related forms, as applicable. We are not allowed to make alterations or amendments to the custodian's statement. This preserves the integrity of the Custodian's statement and provides you with an independent appraisal of the account.

Item 16 - Investment Discretion

We do not usually receive discretionary authority from you to select the type of securities and amount of securities to be bought or sold. Custodians may have discretion over your account. You will be educated about this when you sign the Advisory Agreement which details this in full. We usually only have the ability to rebalance and reallocate your accounts on a quarterly basis, with your permission and cannot decide the following without your consent:

- Securities to be bought or sold for your account
- Amount of securities to be bought or sold for your account
- Broker- dealer to be used for a purchase or sale of securities for your account
- Commission rates to be paid to a broker or dealer for your securities transaction.

However, all mutual funds purchased will be purchased on a discretionary basis which means you have given us the authority to purchase and sell mutual funds in your account without your prior authorization, which is documented in the Investment Advisory Agreement.

Item 17 - Voting Client Securities

As a matter of firm policy and practice, we do not have any authority to and do not vote proxies on behalf of advisory clients. You retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. We may provide advice to you regarding your voting of proxies. We are authorized to instruct the Custodian to forward to the client copies of all proxies and shareholder communications relating to the account assets.

Item 18 - Financial Information

We do not have any financial commitments that would impair our ability to meet any contractual and fiduciary commitments to you, our client. We have also not been the subject of a bankruptcy proceeding.

Item 19 - Requirements for State Registered Advisers

There is one principal of In Touch Financial Services, Vanessa Ann Donaville. Her information is as follows in the Brochure Supplement:

Item 1 – Cover Page



In Touch Financial Services

**Vanessa Ann Donaville
6465 San Pablo
Ave, Suite 1-1
Oakland, CA 94608
October 2023
510-653-8968**

This brochure supplement provides information about Vanessa Ann Donaville and supplements the In Touch Financial Services brochure. You should have received a copy of that brochure. Please contact Vanessa Ann Donaville if you did not receive In Touch Financial Service's brochure or if you have any questions about the contents of this supplement.

Additional information about Vanessa Ann Donaville is available on the SEC's website at www.adviserinfo.sec.gov.

Position

Managing Partner, Owner and CCO

Year of Birth

1961

Item 2 – Educational Background and Business Experience**Education**

B.S. in Business and Marketing

San Francisco State San Francisco, CA

Designations

General Principal Advisor

Business History

2010 – Present Managing Partner, Owner, and CCO of In Touch Financial Services

1995 – 2010 Registered Rep/Investment Advisor Rep. at LPL Financial

Item 3 – Disciplinary History

Vanessa A. Donaville does not have any disciplinary history to disclose.

Item 4 – Other Business Activities

As noted in item 10 “Other Financial Industry Activities and Affiliations” above, Vanessa A. Donaville is a licensed insurance agent/broker in the state of California. As a licensed insurance agent through numerous insurance companies, Vanessa A. Donaville sells these products and uses 20% of her time doing so. She may offer insurance products and receive normal and customary commissions for those sales.

She is also a licensed Real-Estate Broker in the state of California and has passed a real-estate exam in California, taken college-level real estate courses and worked for several years as a real-estate Broker. Vanessa A. Donaville spends approximately 10% of her time as a licensed real-estate broker and receives commissions based on sales of real estate or loans made through her brokerage company. Vanessa is a licensed Mortgage Lending Officer and spends approximately 10% of her time processing loans on behalf of clients.

Item 5 – Additional Compensation

There is no additional compensation awarded Vanessa A. Donaville for providing advisory services, such as sales awards or prizes. She may offer insurance products and receive normal and customary commissions for those sales.

Performance Fees

As indicated in item 6, “Performance Base Fees and Side by Side Management,” we do not charge any performance-based fees.

Other Relationships

Neither the firm nor Vanessa A. Donaville has any relationship with any issuer of securities.

Item 6 – Supervision

Vanessa A. Donaville is the managing member and employee and performs all supervisory duties for In Touch Financial Services. Vanessa may be reached at 510-653-8968.

Item 7 – Requirements for State-Registered Advisers

This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.

- A. Vanessa Donaville has NOT been involved in any of the events listed below.
 - 1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - a. an investment or an investment-related business or activity;
 - b. fraud, false statement(s), or omissions;
 - c. theft, embezzlement, or other wrongful taking of property;
 - d. bribery, forgery, counterfeiting, or extortion; or
 - e. dishonest, unfair, or unethical practices.
 - 2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a. an investment or an investment-related business or activity;
 - b. fraud, false statement(s), or omissions;
 - c. theft, embezzlement, or other wrongful taking of property;
 - d. bribery, forgery, counterfeiting, or extortion; or
 - e. dishonest, unfair, or unethical practices.
- B. Vanessa Donaville has NOT been the subject of a bankruptcy

Item 1 – Cover Page



In Touch Financial Services

6465 San Pablo

Ave, Suite 1-1

510-653-8968

Azure K. Celestine

132 Milkweed Rd

Elgin, SC 29045

acelestine@intouchfinancialservices.com

510-679-1632

This brochure supplement provides information about Azure K. Celestine and supplements the In Touch Financial Services brochure. You should have received a copy of that brochure. Please contact Azure K. Celestine if you did not receive In Touch Financial Service's brochure or if you have any questions about the contents of this supplement.

Additional information about Azure K. Celestine CRD # 4732292 is available on the SEC's website at www.adviserinfo.sec.gov.

Position

Investment Adviser Representative

Year of Birth

1975

Item 2 – Educational Background and Business Experience**Education**

Bachelor Degree

Capella University Minneapolis, MN

Business History

Sep 2023 - Present Investment Adviser Representative with In Touch Financial Services

Dec 2016 - Present Licensed Agent with Azure K. Celestine Insurance LLC

Item 3 – Disciplinary History

Azure Celestine does not have any disciplinary history to disclose.

Item 4 – Other Business Activities

Azure Celestine is also a licensed insurance agent/broker in the state of South Carolina. As a licensed insurance agent through numerous insurance companies, Azure will offer insurance products, for which she will receive normal and customary commissions for those sales. The time spent with insurance sales will vary.

Item 5 – Additional Compensation

There is no additional compensation awarded Azure Celestine for providing advisory services, such as sales awards or prizes. She may offer insurance products and receive normal and customary commissions for those sales.

Performance Fees

As indicated in item 6, "Performance Base Fees and Side by Side Management," we do not charge any performance-based fees.

Other Relationships

Neither the firm nor Azure Celestine has any relationship with any issuer of securities.

Item 6 – Supervision

Vanessa A. Donaville is the managing member and performs all supervisory duties for In Touch Financial Services.

Item 7 – Requirements for State-Registered Advisers

This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.

- C. Azure Celestine has NOT been involved in any of the events listed below.
 - 3. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - a. an investment or an investment-related business or activity;
 - b. fraud, false statement(s), or omissions;
 - c. theft, embezzlement, or other wrongful taking of property;
 - d. bribery, forgery, counterfeiting, or extortion; or
 - e. dishonest, unfair, or unethical practices.
 - 4. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a. an investment or an investment-related business or activity;
 - b. fraud, false statement(s), or omissions;
 - c. theft, embezzlement, or other wrongful taking of property;
 - d. bribery, forgery, counterfeiting, or extortion; or
 - e. dishonest, unfair, or unethical practices.
- D. Azure Celestine has NOT been the subject of a bankruptcy