



Registered Investment Advisor
CRD # 318472

Empower Financial LLC

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Sunnyvale, CA 94086
(408) 905-8414
www.empower.financial

March 2024

Item 1: Cover Page

Form ADV Part 2A – Firm Brochure

This Brochure provides information about the qualifications and business practices of Empower Financial LLC. If you have any questions about the contents of this Brochure, please contact us at (408) 905-8414. 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.

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

Additional information about Empower Financial is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Material Changes

Changes

The following changes have been made to this version of the Firm Brochure:

March 2024

There are no material changes to the document this year.

February 2023

Item 1: The contact phone number has been updated, and is now (408) 905-8414.

Item 19: Item updated to reflect changes in part B (Other Business Activities).

We encourage clients and prospective clients to read this document in its entirety.

Future Changes

From time to time, as required by our state regulator, we may amend this Firm Brochure for routine annual updates and/or to reflect changes in regulations or our business practices. This complete Firm Brochure or a Summary of Material Changes shall be provided to each Client annually and whenever a material change occurs in the business practices of Empower Financial LLC. You may also view the current Firm Brochure online at the SEC's Investment Adviser Public Disclosure website at <http://www.adviserinfo.sec.gov> by searching for our firm name or our CRD number 318472. In addition, you may request a copy of this Firm Brochure at any time, by contacting us at (408) 905-8414.

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Item 4: Advisory Business

Description

Empower Financial LLC (“Empower Financial”, “Firm”, “we”, “us”, or, “our”) is a registered Investment Adviser with the State of California. The Firm was founded in January 2022. Praveen Krishnamurthy (“Principal”) is the principal owner and Chief Compliance Officer (“CCO”) of the Firm.

We provide a range of financial advisory solutions to our clients covering topics such as:

- financial goals and objectives,
- budgeting, cash flow and debt management,
- investment consultation,
- college funding,
- employee benefits,
- retirement planning,
- tax planning,
- risk management (insurance needs), and
- estate planning.

We also provide investment consultation and portfolio design where we:

- determine your risk profile together with you,
- arrive at an appropriate asset allocation (including alternative investments),
- analyze your current portfolio,
- recommend portfolio level changes, and
- when applicable, make detailed trade recommendations.

Empower Financial does not provide asset management services and reports no discretionary or non-discretionary Assets Under Management.

Alternative Investments

Where appropriate, after taking clients’ investment objectives and risk tolerance into consideration, the Firm may make recommendations on alternative investment vehicles which include, but not limited to:

- Real Estate Partnership Investments,
- Private Placements, including private equity and debt,
- Venture Capital,
- Hedge Funds,
- Digital Assets

Due to the differing characteristics and differing business cycles, alternative investments provide a good hedge to investments in stocks and bonds, thus increasing the risk-adjusted return.

Types of Advisory Services

We offer both broad-based, comprehensive financial planning and investment consultation and more targeted, focused advice on select topics. Our clients may engage us for a one-time project which typically lasts between 4 to 12 weeks or on an ongoing basis with periodic reviews of the financial plan. Irrespective of the type of service, clients are always billed hourly.

Initial Meeting

We conduct an initial introductory meeting, which may be done over telephone, with each prospective client to understand your need for financial advice and your current financial situation. We describe our background and services and provide you an opportunity to ask any questions you may have about us or our process. At the end of this meeting or soon after, we will provide you the approximate number of hours the engagement may require and a timeline for the engagement. The number of hours is meant to inform you of the approximate cost of the engagement. There is no charge for this initial meeting.

During or prior to the introductory meeting, we will provide you with our current ADV Part 2 advisory brochure and our privacy policy statement. The Firm will also ensure disclosure of any material conflicts of interest regarding our Firm and its associates that could be reasonably expected to impair the rendering of unbiased and objective advice.

Agreement

Should you wish to engage our Firm for its services, you (the client) and we (Empower Financial) must first enter into a written agreement. Once the agreement is signed, depending on the scope of the engagement, we may require current copies of documents such as the ones listed below, early in the process:

- tax returns,
- insurance policies,
- details of mortgages and other debts,
- pay stubs and W-2s,
- details of retirement plans and benefits provided by your employer,
- wills, codicils and trusts,
- social Security statements,
- up-to-date account statements for retirement and non-retirement accounts and
- completed risk profile questionnaires and other forms provided by our firm.

We use this information to develop your financial plan and to recommend a suitable investment strategy. It is important that the information and financial statements you provide are recent and accurate. We may, but are not obligated to, verify the information you have provided.

Financial Planning and Investment Consultation Services

Our financial planning and investment consultation services may be broad-based or narrowly focused, based on your needs. Please note that if you request narrowly focused advice, your overall financial situation or needs may not be fully addressed due to the limited scope of the engagement.

The following is a more detailed description of the typical services we provide.

Financial Goals and Objectives

We begin all engagements by understanding your near, medium and long-term financial goals and objectives.

Budgeting, Cash Flow and Debt Management

We conduct a review of your income and expenses to determine your current cash flow. For clients with tight cash flows, we look for ways to increase income, reduce expenses and/or reconfigure debt to ease the crunch. For clients with surplus cash flows, we recommend optimal ways to save and invest the excess. We might also recommend budgeting schemes to manage cash flow and/or achieve desired savings goals. We analyze client debts and propose payment strategies based on factors such as the interest rate of the debt, outstanding balances and any income tax implications. We may also recommend what we believe to be an appropriate cash reserve for emergencies and other short-term financial goals, a choice of accounts (such as money market funds) for such reserves and strategies to save the desired amounts.

Investment Consultation

We typically start the investment process by considering your financial goals and risk tolerance to arrive at an appropriate asset allocation in consultation with you. We take a broad view of assets and our recommended portfolio might include alternative investments, in addition to stocks and bonds. We then compare your existing investments against our recommended portfolio and provide an assessment of the positions that are, in our opinion, aligned with the proposed investment strategy and those that need repositioning. We pay special attention to concentrated stock holdings, employee stock plans as well as the tax impact of each sell recommendation.

We may recommend you consolidate selected accounts and/or open additional accounts. We do not have a relationship with any broker-dealer or custodian and are able to handle accounts at most major firms. If needed, we help in the selection of broker-dealers or custodians and opening investment accounts.

When applicable, we provide you with a detailed list of account-specific trades. We do not execute trades on your behalf, either with your approval or on a discretionary basis. Most of

our clients execute the trades by themselves. If needed, we will assist you in executing the trades.

The strategies and types of investments we may recommend are further discussed later in this brochure.

College Funding

We estimate future college costs and provide tax-efficient saving strategies and investment recommendations to meet those costs. Financial aid for students entering college is a specialized field and is not one of our competencies.

Employee Benefits

We review the benefits provided by your employer and provide recommendations on the ones applicable to you. We provide comprehensive advice on all types of stock compensation (ISOs, ESPPs, NSOs and RSUs). We pay special attention to retirement plans, such as 401k plans, ensure our clients fully understand their individual plans and recommend they maximize their contributions depending on their cash flow.

Retirement Planning

For retirement planning, we employ financial planning software and develop projections of the likelihood of achieving your financial goals. For clients where the projections show less than the desired results, we use models to demonstrate the impact of making adjustments to the retirement plan such as working longer, saving more, spending less or taking more risk with investments. If you are near retirement or already retired, we plan for income replacement, tax-aware distribution from your portfolio, Roth conversion and social security strategies.

Tax Planning

We review your recent tax returns and the sources of income and propose strategies to minimize your tax liability. This includes maximizing contributions to tax-deferred accounts, building up Roth balances where applicable, charitable gifting, tax loss harvesting and strategies for stock options.

Risk Management

We analyze your exposure to risks that could have a significant adverse impact on your finances, such as an auto accident, house fire, premature death or long-term disability. We review your current coverage for adequacy and provide recommendations for more robust coverage, when necessary.

Estate Planning

For clients that currently do not have an estate plan in place, we encourage you to start the process and provide a list of estate planning attorneys for your convenience. You are under no obligation to engage an attorney from our list. For clients that currently have an estate plan, we review your plan which may include wills, powers of attorney, trusts and other related documents. Whenever there are changes to tax laws and/or to your life circumstances, we may recommend you meet with the estate planning attorney and update the plan. We review titling and beneficiary designations of your assets and encourage you to complete/update those according to instructions from the attorney. From time-to-time and with your approval, we may participate in meetings or phone calls between you and your attorney. For clients of large estates with potential future estate tax liabilities, we may work with the estate planning attorney on tax minimization strategies.

General Information

Empower Financial does not provide legal or accounting services. With your consent, we may work with your other advisers (attorneys, accountants, etc.) to assist with coordination and implementation of accepted strategies. You should be aware that these other advisers will charge you separately for their services and these fees will be in addition to our advisory fees.

Our firm will use its best judgment and good faith effort in rendering its services. We cannot warrant or guarantee any particular level of investment performance or that your investments will be profitable over time. There is even a possibility of loss of principal. Past performance is not necessarily indicative of future results.

Except as may otherwise be provided by law, our firm will not be liable to the client, heirs, or assignees for any loss an account may suffer by reason of an investment decision made or other action taken or omitted in good faith by our firm with the degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; any loss arising from our adherence to your direction or that of your legal agent; any act or failure to act by a service provider maintaining an account.

Federal and state securities laws impose liabilities under certain circumstances on persons who act in good faith and, therefore, nothing contained in this document shall constitute a waiver of any rights that a client may have under federal and state securities laws.

Client Tailored Services and Client Imposed Restrictions

We offer the same suite of services to all of our clients. However, each client's financial plan and its implementation is dependent upon client-specific circumstances, facts and client-imposed restrictions. We take these factors into account and build clients specific financial plans and portfolio recommendations.

Wrap Fee Programs

We do not participate in wrap fee programs.

Item 5: Fees and Compensation

Please note, unless a client has received the Firm's disclosure brochure at least 48 hours prior to signing the investment advisory contract, the contract may be terminated by the client within five (5) business days of signing, without incurring any advisory fees.

Compensation and Fee Schedule

Empower Financial charges a fee only on an hourly basis for financial planning and investment consultation services. Our only source of compensation is the fees paid by our clients. We do not accept commissions, referral fees or revenue sharing arrangements.

Regardless of the purpose and the nature of the engagement, you will always be billed on an hourly basis. We provide an estimate of the number of hours an engagement is expected to take prior to signing the agreement. Based on the information given by you, we try to provide an accurate estimate of the number of hours an engagement is expected to take. However, an engagement may take more or fewer hours as we progress through the engagement. You will be kept informed of any changes in the estimate.

Hourly Fees

The hourly rate can vary based on a number of factors like the scope and complexity of the engagement, and total annual income of the client.

Hourly fees range from \$100 - \$200 per hour; billed in 15-minute increments (four increments per hour), and a partial increment (i.e., eight minutes, etc.) will be treated as a whole increment. The hourly fee is negotiable and will be agreed upon before the start of any work, generally after the initial meeting.

A one-time, upfront payment for the first hour at the hourly rate is due at the time of signing the client agreement. The remainder of the fees are billed in arrears on an on-going basis as the engagement progresses. All fees are due upon the receipt of the invoice by the client. In the event of early termination by client, payment for the hours already worked is due.

Other Types of Fees and 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.

The section 'Brokerage Practices' further describes the factors that we consider in recommending broker-dealers for client's transactions and determining the reasonableness of their compensation (e.g., commissions).

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.

CCR Section 260.238(j) Disclosure

Please note, lower fees for comparable services may be available from other sources.

Item 6: Performance-Based Fees

Empower Financial does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client). All fees are calculated as described above and are not charged on the basis of income or capital gains or capital appreciation of the funds or any portion of the funds of an advisory client.

Item 7: Types of Clients

We provide financial planning and investment consultation to individuals, high net worth individuals, trusts, estates, retirement plans, as well as small businesses.

Empower Financial does not require minimum income levels, minimum level of assets or other similar conditions for its advisory services. The Firm reserves the right to waive or reduce certain fees based on unique individual circumstances, special arrangements or pre-existing relationships. We also reserve the right to decline services to any prospective client for any non-discriminatory reason.

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

Methods of Analysis

Security analysis primarily involves fundamental analysis. Other methods of analysis may include charting, technical analysis and cyclical analysis. The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the SEC, and company press releases. We also evaluate economic factors such as prevailing interest rates, the state of the economy, and projected future growth of an industry sector.

We make asset allocation and investment policy decisions based on these and other factors. We will discuss with you how, in our best judgment, to meet your objectives while at the same time seeking a prudent level of risk exposure.

Investment Strategies

We recognize that each client's needs and goals are different; subsequently portfolio strategies and underlying investment vehicles may vary. Generally, we ascribe to a Core + Satellite investment strategy which blends passive (or index) and active investing, where low-cost, passive investments are used as the basis or "core" of a portfolio and actively managed investments are added as "satellite" positions. We expect most portfolios to include passive investments while not all portfolios will include satellite positions.

Employing this strategy, the portfolio core holdings are indexed to potentially more efficient asset classes, while outlying selections are often active holdings that are attempting to outperform a particular sector, or a selection of particular positions to increase core diversification, or to improve portfolio performance, or reduce risk during downward trends in the market and during times of uncertainty.

For example, the core of a portfolio may be built with low-cost index funds or ETFs; satellite holdings would include active holdings with unique strategies that are believed capable of adding value beyond a stated benchmark over a full market cycle. Satellite holdings may employ actively managed mutual funds, unique sector or strategy ETFs/ETNs, individual securities such as stocks or bonds, etc., to assist in the over-or-under allocation to specific sectors, regions, assets classes, etc.

Depending on the client's individual investment goals and risk tolerance, satellite positions might include alternative investments mentioned earlier in the brochure. Due to the differing characteristics and differing business cycles, alternative investments provide a good hedge to investments in stocks and bonds, thus increasing the risk-adjusted return.

Risk of Loss

We believe our strategies and investment recommendations are designed to produce the appropriate potential return for the given level of risk; however, we cannot guarantee that an investment objective or planning goal will be achieved. As an investor you must be able to bear the risk of loss that is associated with your account, which may include the loss of some or your entire principal. In general, risks regarding markets may be at the investment strategy level or at the level of the individual positions selected to implement a strategy.

Investment Strategy Risks

Management Risk

The performance of an investment with a firm varies with the success and failure of its investment strategies, research, analysis and determination of its portfolio. If an investment strategy were not to produce expected returns, the value of the investment would decrease.

Market Risk

When the stock market as a whole or an industry as a whole falls, it can cause the prices of individual stocks to fall indiscriminately. This is also called systemic or systematic risk.

Passive Market Strategies Risk

Should a portfolio employ a passive, efficient markets approach, an investor will need to consider the potential risk that the broader allocation may at times generate lower-than-expected returns than a specific asset. And, that the return for an asset class, over a specific time period, is a deviation from the average return for the asset class.

Research Data Risk

When research and analyses are based on commercially available software, rating services, general market and financial information, or due diligence reviews, a firm is relying on the accuracy and validity of the information or capabilities provided by selected vendors, rating services, market data, and the issuers themselves. Therefore, while our firm makes every effort to determine the accuracy of the information received, we cannot predict the outcome of events or actions taken or not taken, or the validity of all information researched or provided which may or may not affect the advice on or investment management of an account.

Socially Conscious Investing Risk

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

Security-Specific Material Risks

Examples of risk associated with specific positions:

Company Risk

When investing in securities, there is always a certain level of company or industry-specific risk that is inherent in each company or issuer. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. This is also referred to as unsystematic risk and can be reduced through appropriate diversification.

ETF/ETN and Mutual Fund Risk

ETFs/ETNs and mutual funds may carry additional expenses based on their share of operating expenses and certain brokerage fees, which may result in the potential duplication of certain fees. The risk of owning these types of holdings also reflect the risks of their underlying securities. ETF/ETNs also may face periods of significant market fluctuations that reduce their liquidity and/or increase their discount to their underlying securities. ETF/ETN liquidity can be complicated to assess, because it is affected by multiple factors, including the liquidity of the underlying securities, as well as the fact that new shares can be created, and existing shares can be repurchased in response to market demand; this ability to manipulate supply and demand can make liquidity difficult to predict.

Fixed Income Risks

Various forms of fixed income instruments, such as bonds, money market funds, bond funds, and certificates of deposit, may be affected by various forms of risk, including:

Credit Risk - Credit risk is a potential risk that an issuer would be unable to pay scheduled interest or repay principal at maturity, sometimes referred to as “default risk.” Credit risk may also occur when an issuer’s ability to make payments of principal and interest when due is interrupted. This may result in a negative impact on all forms of debt instruments, as well as funds or ETF share values that hold these issues. Bondholders are creditors of an issuer and have priority to assets before equity holders (i.e., stockholders) when receiving a payout from liquidation or restructuring. When defaults occur due to bankruptcy, the type of bond held will determine seniority of payment.

Duration Risk - Duration is a measure of a bond’s volatility, expressed in years to be repaid by its internal cash flow (interest payments). Bonds with longer durations carry more risk and have higher price volatility than bonds with shorter durations.

Interest Rate Risk - Risk that the value of the fixed income holding will decrease because of an increase in interest rates.

Liquidity Risk - The inability to readily buy or sell an investment for a price close to the true underlying value of the asset due to a lack of buyers or sellers. While certain types of fixed income are generally liquid (i.e., treasury notes), there are periods of market uncertainty when there are few sellers or buyers for some assets, and this causes sharp and unpredictable price movements. Conversely, when trading volume is high, there is a risk of not being able to purchase a particular issue at the desired price.

Reinvestment Risk – With declining interest rates, investors may have to reinvest interest income or principal at a lower rate.

Index Investing

ETFs and indexed funds have the potential to be affected by “tracking error risk.” Tracking error risk is when the performance of the index fund deviates from the performance of the benchmark. This may be because the fund attempts to mirror the index with a “sample” or “optimize” strategy.

Inflation Risk

When any type of inflation is present, a dollar today will not buy as much as a dollar next year because purchasing power is eroding at the rate of inflation.

QDI Ratios

While many ETFs, ETNs, and index mutual funds are known for their potential tax-efficiency and higher “qualified dividend income” (QDI) percentages, there are asset classes within these investment vehicles or holding periods that may not benefit. Shorter holding periods, as well as commodities and currencies (that may be part of an ETF/ETN or mutual fund portfolio), may be considered “non-qualified” under certain tax code provisions. We consider a holding’s QDI when tax-efficiency is an important aspect of the client’s portfolio.

Item 9: Disciplinary Information

Legal and Disciplinary

The Firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Item 10: Other Financial Industry Activities and Affiliations

No employee of the Firm is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No employee of the Firm is registered, or has an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading adviser.

Empower Financial does not have any related parties. As a result, we do not have a relationship with any related parties.

We only receive compensation directly from clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

Disclosure of Material Conflicts

All material conflicts of interest under CCR Section 260.238(k) are disclosed regarding Empower Financial, 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, Client Transactions and Personal Trading

As a fiduciary, our Firm and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their personal information, which in turn places a high standard on our conduct and integrity. Empower Financial maintains a Code of Ethics that sets forth the standards of conduct expected of advisory personnel. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. We have 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

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield us from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - We shall offer and provide professional services with integrity.
- Objectivity - We shall be objective in providing professional services to clients.
- Competence - We shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which we are engaged.
- Fairness - We shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employees, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - We 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.
- Professionalism - Our conduct in all matters shall reflect credit of the profession.
- Diligence - We shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current. We will provide a copy of our Code of Ethics to any client or prospective client upon request.

Investment Recommendations involving a Material Financial Interest and Conflicts of Interest

Neither our Firm nor any 'related persons' 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, etc.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Our Firm and its 'related persons' may buy or sell securities similar to, or different from, those we recommend to clients for their accounts. A recommendation made to a client may be different in nature or timing from a recommendation made to a different client. However, at no time will Empower Financial or any related persons receive preferential treatment over clients.

Trading Securities At/Around the Same Time as Client's Securities

From time to time, our firm or its 'related persons' may buy or sell securities for themselves at or around the same time as clients. However, at no time will Empower Financial or any related persons receive preferential treatment over clients.

Item 12: Brokerage Practices

Factors Used to Select Custodians and/or Broker-Dealers

Empower Financial does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to clients based on their need for such services. We recommend custodians based on the reputation, the services provided by the firm and the aggregate costs for maintaining accounts and executing transactions. We also take into account client convenience such as proximity to a branch office when recommending a custodian.

Research and 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 asset management services, we do not have a concern over which broker-dealers a client may choose in order to implement our investment recommendations.

Recommended Broker-Dealers

The list of recommended broker-dealers include, but not limited to, Acorns, Betterment, Charles Schwab, E*Trade, Fidelity, Interactive Brokers, M1 Finance, Merrill Edge, TD Ameritrade, Vanguard, and Wealthfront.

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 asset 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

For clients with ongoing engagement agreements, the Principal of the Firm will contact them to obtain current information regarding their assets and investment holdings and will review this information as part of our financial planning and investment consultation services. We do not provide specific reports to clients, other than financial plans.

Item 14: Client Referrals and 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

Empower Financial does not accept custody of client funds.

Item 16: Investment Discretion

Empower Financial does not accept discretionary authority over client accounts. We make recommendations to clients and if they choose to do so, clients are responsible for implementing our recommendations.

Item 17: Voting Client Securities

Empower Financial does not vote client proxies on securities. Therefore, clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the client's investment assets. Clients shall instruct their 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

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of client funds or securities or require or solicit prepayment of more than \$500 in fees per client six months in advance.

Item 19: Requirements for State-Registered Advisers

A: Education and Business Background of Principals

Name: Praveen Krishnamurthy

Formal Education:

- PES Institute of Technology, Bangalore - Bachelor of Engineering (Computer Science)
- State of University New York, Buffalo - Master of Science (Computer Science)

Business Background & Other Work:

- Oracle India Private Limited (2003 - 2004)
- Pagebites, Inc. (2006 - 2010)
- Google, Inc (2010 - 2019)
- Awaaz De Infosystems Private Limited (Independent Consultant) (2020 - 2021)

B: Other Business Activities

Praveen Krishnamurthy does not participate in any other business activity.

C: Performance-Based Fees

Empower Financial is not compensated for advisory services based on the performance of the invested assets.

D: Disciplinary Information

Praveen Krishnamurthy has not been nor is currently the subject of any reportable legal or disciplinary event.

E: Relationships with Issuer of Securities

Praveen Krishnamurthy does not have any relationship or any other arrangement with any issuer of securities.

Business Continuity Plan

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



Registered Investment Advisor
CRD # 318472

Empower Financial LLC

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(408) 905-8414
www.empower.financial

March 2024

Item 1: Cover Page

Form ADV Part 2B – Brochure Supplement

Praveen Krishnamurthy - Individual CRD# 7497107
Principal

This brochure supplement provides information about Praveen Krishnamurthy that supplements the Empower Financial LLC brochure. A copy of that brochure precedes this supplement. Please contact Praveen Krishnamurthy if the brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Praveen Krishnamurthy is available on the SEC's website at www.adviserinfo.sec.gov which can be found using the identification number

Item 2: Education and Business Background

Name: Praveen Krishnamurthy

Formal Education:

- PES Institute of Technology, Bangalore - Bachelor of Engineering (Computer Science)
- State of University New York, Buffalo - Master of Science (Computer Science)

Business Background & Other Work:

- Oracle India Private Limited (2003 - 2004)
- Pagebites, Inc. (2006 - 2010)
- Google, Inc (2010 - 2019)
- Awaaz De Infosystems Private Limited (Independent Consultant) (2020 - 2021)

Item 3: Disciplinary Information

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

Item 4: Other Business Activities

Praveen Krishnamurthy does not participate in any other business activity.

Item 5: Additional Compensation

Praveen Krishnamurthy does not receive any additional compensation from any person, company, or organization, in exchange for providing clients advisory services through Empower Financial.

Item 6: Supervision

Praveen Krishnamurthy, as Principal and Chief Compliance Officer of Empower Financial, is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

Item 7: Requirements for State Registered Advisers

Praveen Krishnamurthy has NOT been involved in any arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or bankruptcy petition.