

**FORM ADV PART 2A**

Item 1 – Cover Page

**Confidant Financial Solutions, LLC**  
**10345 Oxford Mill Circle**  
**Johns Creek, GA 30022**  
**P: 678-983-5883**

**August 2015**

**This brochure provides information about the qualifications and business practices of Confidant Financial Solutions, LLC. If you have any questions about the contents of this Brochure, please contact us at (678) 983-5883 and/or [Bob@confidantfs.com](mailto:Bob@confidantfs.com). The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.**

**Additional information about Confidant Financial Solutions, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Confidant Financial Solutions, LLC is 281048.**

**Any references to Confidant Financial Solutions, LLC as a registered investment adviser or its related persons as registered advisory representatives does not imply a certain level of skill or training.**

## **Item 2 - MATERIAL CHANGES**

At least annually, this section will discuss only specific material changes that are made to the Brochure and provide you with a summary of such changes. Additionally, reference to the date of the last annual update to this Brochure will be provided.

The material changes discussed above are only those changes that have been made to this brochure since the firm's last annual update of the brochure. The date of the last annual update of the brochure was July 2015

In the past, we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent brochures within 120 days of the close of our fiscal year, which is December 31st. We may further provide other ongoing disclosure information about material changes as necessary.

Additionally, we will further provide you with a new brochure as necessary based on change or new information, at any time, without charge.

Our brochure may be requested free of charge by contacting Robert Robinson at (678) 983-5883 and/or [Bob@confidantfs.com](mailto:Bob@confidantfs.com). Additional information about Confidant Financial Solutions, LLC is also available via the SEC's website [www.adviser.sec.gov](http://www.adviser.sec.gov). The website also provides information about any persons affiliated with Confidant Financial Solutions, LLC who are registered, or are required to be registered, as investment adviser representatives of Confidant Financial Solutions, LLC.

Item 3 - **TABLE OF CONTENTS**

Item 1 – COVER PAGE	Cover Page
Item 2 - MATERIAL CHANGES .....	2
Item 3 - TABLE OF CONTENTS .....	3
Item 4 - ADVISORY BUSINESS .....	4
Asset Management Services .....	4
Financial Planning Services.....	5
General Information .....	6
Item 5 - FEES AND COMPENSATION .....	7
Asset Management Services .....	7
Financial Planning Services.....	8
Item 6 - PERFORMANCE-BASED FEES AND SIDE BY SIDE MANAGEMENT .....	9
Item 7 - TYPES OF CLIENTS .....	9
Item 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS .....	9
Item 9 - DISCIPLINARY INFORMATION .....	11
Item 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS .....	11
Item 11 - CODE OF ETHICS, PARTICIPATION OF INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING .....	12
Item 12 - BROKERAGE PRACTICES .....	13
Item 13 - REVIEW OF ACCOUNTS .....	16
Item 14 - CLIENT REFERRALS AND OTHER COMPENSATION .....	17
Item 15 - CUSTODY .....	17
Item 16 - INVESTMENT DISCRETION .....	17
Item 17 - VOTING CLIENT SECURITIES .....	18
Item 18 - FINANCIAL INFORMATION .....	18
Brochure Supplements	

#### **Item 4 - ADVISORY BUSINESS**

Confidant Financial Solutions, LLC is an investment advisory firm offering a variety of advisory services customized to your individual needs.

- A. Confidant Financial Solutions, LLC was established in July 2015. Robert Robinson is the Managing Member and sole owner. Additional business information about Robert Robinson is disclosed in the Supplemental Brochure (i.e. Form ADV Part 2B).
- B. Confidant Financial Solutions, LLC offers the following advisory services. Each of the services is more fully described below.
- Asset Management
  - Financial Planning
  - Retirement Planning

#### **Asset Management Services**

Upon Confidant Financial Solutions, LLC completing its analysis of your situation, Confidant Financial Solutions, LLC will determine an asset allocation customized to your financial goals, objectives and risk tolerance. Confidant Financial Solutions, LLC has designed various model portfolios. After evaluating your information gathered by Confidant Financial Solutions, LLC, Confidant Financial Solutions, LLC will determine which of its model portfolios would be most suitable for you. From there, Confidant Financial Solutions, LLC customizes your portfolio allocation taking into consideration your limitations or restrictions, the market and economy at the time and your financial situation, goals and objectives.

Confidant Financial Solutions, LLC will schedule a meeting with you and present the recommended portfolio allocation. Upon your approval, Confidant Financial Solutions, LLC will implement the portfolio allocation. Confidant Financial Solutions, LLC will provide continuous and ongoing management of your account. Unless otherwise expressly requested by you, Confidant Financial Solutions, LLC will manage the account and will make changes to the allocation as deemed appropriate by Confidant Financial Solutions, LLC. Confidant Financial Solutions, LLC will determine the securities to be purchased and sold in the account and will alter the securities holdings from time to time, without prior consultation with you. Confidant Financial Solutions, LLC may actively trade securities and hold such holdings for periods of 30 days or less or maintain positions for longer or shorter term periods. Discretionary authority will be granted by you to Confidant Financial Solutions, LLC by execution of the Asset Management agreement.

If you elect to have your accounts managed on a nondiscretionary basis, no changes will be made to the allocation of your account without prior consultation with you and your expressed agreement. There are risks with a nondiscretionary managed portfolio. The most significant risk is it will prevent Confidant Financial Solutions, LLC from conducting transactions and managing the account in an efficient and expeditious way.

## Confidant Financial Solutions, LLC

Confidant Financial Solutions, LLC primarily uses nine (9) exchange traded funds (“ETFs”). The ETFs are selected to reflect the nine Morningstar style boxes and are weighted equally for core US Equity allocations. However, managed accounts are not exclusively limited to ETFs and may include mutual funds, stocks, and bonds which are typically transferred or requested by you.

Confidant expects to rebalance on a regular basis and will review accounts quarterly to determine if rebalancing is necessary. Transactions in the account, account reallocations and rebalancing may trigger a taxable event, with the exception of IRA accounts, 403(b) accounts and other qualified retirement accounts.

**Unless otherwise requested by you, trade confirmations will be suppressed and will be reported to you in a Trade Confirmation Report on a quarterly basis.**

### Financial Planning Services

Confidant Financial Solutions, LLC offers broad-based and modular financial planning services. Financial planning services will typically involve providing a variety of services, principally advisory in nature, to clients regarding the management of their financial resources based upon an analysis of the client’s individual needs. Confidant Financial Solutions, LLC may use financial planning software to assist in determine the client’s current financial position and define and quantify long term goals and objectives. We utilize Money Guide Pro Financial Planning Software to prepare financial planning services. The financial planning software will run hypothetical scenarios based on variables to assist a client to determine a course of action. In no way can any program or software predict future results. It is a tool to enable analysis based on historical information to review possibilities that could occur if historical events repeat.

A financial plan will analyze the following areas:

- **Personal:** family records, budgeting, personal liability, estate information and financial goals
- **Tax and Cash Flow:** Income tax and spending analysis and planning for past, current, and future years. Confidant Financial Solutions, LLC will illustrate the impact of various investments on your current income tax and future liability.
- **Death and Disability:** Cash needs at death, income needs of the surviving dependents, estate planning and disability income analysis
- **Retirement:** Analysis of current strategies and investment plans to help you work toward retirement goals
- **Investments:** Analysis of investment alternatives and their potential effect on a client’s portfolio.
- **Estate Planning:** Advice with respect to property ownership, distribution strategies, disposition of business interest, estate tax reduction, and tax payment techniques as well as discussion of gifts, trusts, etc. Further, a review of death and disability issues will be examined. Tax consequences and their implications are identified and evaluated.

## Confidant Financial Solutions, LLC

Confidant Financial Solutions, LLC will schedule a meeting with you and present the analysis of your situation and recommendations for steps to be taken to assist you to work toward your financial goals.

Plans are based on your financial situation at the time and are based on financial information disclosed by you to Confidant Financial Solutions, LLC. You are advised that certain assumptions may be made with respect to interest and inflation rates and use of past trends and performance of the market and economy. However, past performance is in no way an indication of future performance. Confidant Financial Solutions, LLC cannot offer any guarantees or promises that your financial goals and objectives will be met. Further, you must continue to review the plan and update the plan based upon changes in your financial situation, goals, or objectives or changes in the economy. Should your financial situation or investment goals or objectives change, you must notify Confidant Financial Solutions, LLC promptly of the changes. The advice offered by Confidant Financial Solutions, LLC may be limited and is not meant to be comprehensive. Therefore, you may need to seek the services of other professionals such as an insurance professional, attorney and/or accountant.

### **General Information**

You are advised the investment recommendations and advice offered by Confidant Financial Solutions, LLC are not legal advice or accounting advice. You should coordinate and discuss the impact of financial advice with your attorney and/or accountant. You are advised that it is necessary to inform Confidant Financial Solutions, LLC promptly with respect to any changes in your financial situation and investment goals and objectives. Failure to notify Confidant Financial Solutions, LLC of any such changes could result in investment recommendations not meeting your needs.

C. Confidant Financial Solutions, LLC tailors the advisory services it offers to your individual needs. You may impose restrictions and/or limitations on the investing in certain securities or types of securities. Confidant Financial Solutions, LLC will complete a fact finder or data gathering questionnaire to assist Confidant Financial Solutions, LLC with obtaining information about your financial situation and history. Additionally, Confidant Financial Solutions, LLC will meet with you and conduct an interview and data gathering session to continue the due diligence process which will include assessing your financial goals and objectives.. The information gathered by Confidant Financial Solutions, LLC will assist Confidant Financial Solutions, LLC to provide you with the requested services and customize the services to your financial situation. Depending on the services you have requested, Confidant Financial Solutions, LLC will gather various financial information and history from you including, but not limited to:

- Retirement and financial goals
- Investment objectives
- Investment horizon
- Financial needs
- Cash flow analysis
- Cost of living needs
- Education needs
- Savings tendencies

## Confidant Financial Solutions, LLC

- Other applicable financial information required by Confidant Financial Solutions, LLC in order to provide the investment advisory services requested.
- D. Confidant Financial Solutions, LLC does not participate in a wrap fee program. Therefore, clients will be charged an advisory fee by Confidant Financial Solutions, LLC and will pay applicable transaction charges. Confidant Financial does not share in the transaction charges.
- E. This is a new filing for an investment adviser. As of the date of this filing there are no assets under management.

### Item 5 - FEES AND COMPENSATION

#### Asset Management Services

- A. Fees are negotiable and are not based on a share of capital gains upon or capital appreciation of the funds or any portion of the funds.

You may make additions to the Account or withdrawals from the Account, provided the Account continues to meet minimum account size requirements. Fee adjustments will be made for inflows and outflows of \$10,000 or more (Note, inflows and outflows will not be aggregated. Adjustments are based on inflows and outflows occurring at one time). There will be no fee adjustments for inflows and outflows occurring in the account during a calendar quarter of less than \$10,000. No fee adjustments will be made for Account appreciation or depreciation.

Account Size	Annual Fee
First \$99,999	2.00%
Next \$400,000	1.50%
Values over \$500,000	1.00%

Confidant Financial Solutions, LLC aggregates or households all of your managed accounts together to determine your quarterly fee. For example, if you have four managed accounts with an average month-end value as of the just completed calendar quarter of: \$101,569.40, \$55,498.46, \$675,879.50, and \$74,301.12 with a total value of \$907,248.48, your fee will be calculated as follows.

$$\begin{aligned} \$99,999 \times 2.00\% &= \$1,999.98 \\ \$400,000 \times 1.50\% &= \$6,000.00 \\ \$907,248.48 \times 1.00\% &= \underline{\$4,072.49} \\ \$12,072.47 / 4 &= \$3,018.11 \text{ quarterly fee} \end{aligned}$$

Confidant Financial Solutions, LLC may change the above fee schedule upon 30-days prior written notice to you.

- B. Advisory fees will generally be collected directly from your account, provided you have given Confidant Financial Solutions, LLC written authorization. You will be provided with an account statement reflecting the deduction of the advisory fee direct from the account

## Confidant Financial Solutions, LLC

custodian. If the Account does not contain sufficient funds to pay advisory fees, Confidant Financial Solutions, LLC has limited authority to sell or redeem securities in sufficient amounts to pay advisory fees. You may reimburse the account for advisory fees paid to Confidant Financial Solutions, LLC, except for ERISA and IRA accounts.

- C. In addition to the advisory fees above, you will pay transaction fees for securities transactions executed in your account in accordance with the custodian's transaction fee schedule. Additionally, you may pay fees for custodial services, account maintenance fees, transaction fees, and other fees associated with maintaining the Account. Such fees are not charged by Confidant Financial Solutions, LLC and are charged by the product, broker/dealer or account custodian. Confidant Financial Solutions, LLC does not share in any portion of such fees. Additionally, you may pay your proportionate share of the fund's management and administrative fees and sales charges as well as the mutual fund adviser's fee of any mutual fund they purchase. Such advisory fees are not shared with Confidant Financial Solutions, LLC and are compensation to the fund-manager.

Additionally, broker/dealers offer a limited number of mutual funds and potentially exchanged traded funds with no transactions fees. However, the shares must be held for a required period of time or a redemption fee will assessed and charged to the client.

- D. Advisory fees will be charged in advance of each calendar quarter. The quarterly advisory fee will be based on the average month end value of the Account for each of the three months in the calendar quarter. Fees for partial periods will be prorated. The initial quarterly fee will be calculated based on the inception value of the account and pro-rated portion based on the number of days remaining in the calendar quarter. Inception value will be determined upon all expected deposits and account transfers are completed.

### Termination Provisions

You may terminate investment advisory services obtained from Confidant Financial Solutions, LLC, without penalty, upon written notice within five (5) business days after entering into the Asset Management agreement with Confidant Financial Solutions, LLC. You will be responsible for any fees and charges incurred from third parties as a result of maintaining the Account such as transaction fees for any securities transactions executed and Account maintenance or custodial fees. Thereafter, you may terminate services upon written notice delivered to Confidant Financial Solutions, LLC. Should you terminate investment advisory services during calendar quarter, you will be issued a pro-rated refund of the advisory fee from the date of termination to the end of the calendar quarter.

### **Financial Planning Services**

Fees for planning services are strictly for planning services. Therefore, you may pay fees and/or commissions for additional services obtained such as asset management or products purchased such as securities or insurance.

Fees for planning services are charged at the rate of \$200 per hour. Fees are negotiable. Fees will be invoiced upon completion of the work or at the end of each month as invoiced.

## Confidant Financial Solutions, LLC

### Termination Provisions

You may terminate advisory services obtained from Confidant Financial Solutions, LLC, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with Confidant Financial Solutions, LLC. Thereafter, you may terminate investment advisory services with 30-days written notice to Confidant Financial Solutions, LLC. You will be responsible for any time spent by Confidant Financial Solutions, LLC.

### **Item 6 - PERFORMANCE-BASED FEES AND SIDE BY SIDE MANAGEMENT**

This section is not applicable to Confidant Financial Solutions, LLC since Confidant Financial Solutions, LLC does not charge performance based fees.

### **Item 7 - TYPES OF CLIENTS**

Confidant Financial Solutions, LLC's services are geared toward both high net worth individuals (i.e. clients with a net worth of \$2,000,000, exclusive of primary residence, or has \$1,000,000 under management with Confidant Financial Solutions, LLC) and other than high net worth.

### **Item 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

- A. Confidant Financial Solutions, LLC conducts technical and fundamental analysis. Fundamental analysis generally involves looking at economic and financial factors. Technical analysis generally involves studying trends and movements in a security's price, trading volume, and other market-related factors in an attempt to discern patterns. Confidant Financial Solutions, LLC uses Morningstar as a tool to analyze investments

Confidant Financial Solutions, LLC investment management philosophy is long term (i.e. purchases of securities held at least a year). However, Confidant Financial Solutions, LLC will monitor portfolio holdings and if there are concern factors, Confidant Financial Solutions, LLC may determine to not continue to maintain the position in your portfolio. Factors that may result in a change include but are not limited to, economic factors, management changes with the security, tax law changes, objective change, and news or press releases.

- B. Confidant Financial Solutions, LLC emphasizes that investment returns, particularly over shorter time periods, can be highly volatile and are dependent on a wide variety of factors. Thus, our investment management services are generally suitable only for long-term investment objectives or strategies, rather than for short-term trading purposes. Neither diversification nor asset allocation assure a profit or protect you against a loss, and there is no guarantee that your investment objectives will be achieved.

Investing in securities involves risk of loss, including the potential loss of principal. Therefore, your participation in any of the management programs offered by Confidant Financial

## Confidant Financial Solutions, LLC

Solutions, LLC will require you to be prepared to bear the risk of loss and fluctuating performance.

Confidant Financial Solutions, LLC does not represent, warrant or imply that the services or methods of analysis used by Confidant Financial Solutions, LLC can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to major market corrections or crashes. Past performance is no indication of future performance. No guarantees can be offered that your goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by Confidant Financial Solutions, LLC will provide a better return than other investment strategies.

- C. Confidant Financial Solutions, LLC primarily uses exchange traded funds (ETFs). ETFs are professionally managed pooled vehicles that invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities or any combination thereof. ETFs trade on an auctionable market. Therefore, there is more price fluctuation with ETFs than with mutual funds since ETFs trade throughout the day, whereas mutual funds are priced once a day. Also, since most ETFs only mirror a market index, such as the S&P 500, they won't outperform the index. While ETFs generally provide diversification, risks can be significantly increased for funds concentrated in a particular sector of the market, or that primarily invest in small cap or speculative companies, use leverage (i.e. borrow money) to a significant degree, or concentrate in a particular type of security rather than balancing the fund with different types of securities.

Long-term purchases – Using a long-term purchase strategy generally assumes the Financial Markets will go up in the long-term which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall Financial Markets advance. Purchasing investments long-term may create an opportunity cost - “locking-up” assets that may be better utilized in the short-term in other investments.

Fundamental and technical analysis does not attempt to anticipate market movements. This represents a potential risk, as the price of a security can move up or down along with the overall market, regardless of the economic and financial factors considered in evaluating the security. The success of this strategy depends in large part on the ability to accurately assess the fundamental value of securities. An accurate assessment of fundamental value deepens on a complex analysis of a number of financial and legal factors. No assurance can be given that we can assess the nature and magnitude of all material factors having a bearing on the value of securities.

The business of investing in securities is highly competitive and the identification of attractive investment opportunities is difficult and involves a high degree of uncertainty. These are some of the primary risks associated with the way we recommend investments to you, please do not hesitate to contact us to discuss these risks and others in more detail. No investment strategy can avoid loss. Investing in securities involves risk of loss that you need to be prepared to bear.

## Item 9 - DISCIPLINARY INFORMATION

Investment Advisers must disclose any legal or disciplinary events that would be material to your evaluation of Confidant Financial Solutions, LLC or the integrity of our services. At a minimum, Investment Advisers must disclose events involving:

- A. A criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which your firm or a *management person*
  - 1. was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any *felony*; (b) a *misdemeanor* that involved investments or an *investment-related* business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
  - 2. is the named subject of a pending criminal *proceeding* that involves an *investment-related* business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
  - 3. was *found* to have been involved in a violation of an *investment-related* statute or regulation; or
  - 4. was the subject of any *order*, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, your firm or a *management person* from engaging in any *investment-related* activity, or from violating any *investment-related* statute, rule, or *order*.
- B. An administrative *proceeding* before the SEC, any other federal regulatory agency, any state regulatory agency, or any *foreign financial regulatory authority* in which your firm or a *management person*
  - 1. was *found* to have caused an *investment-related* business to lose its authorization to do business; or
  - 2. was *found* to have been involved in a violation of an *investment-related* statute or regulation and was the subject of an *order* by the agency or authority
    - (a) denying, suspending, or revoking the authorization of your firm or a *management person* to act in an *investment-related* business;
    - (b) barring or suspending your firm’s or a *management person’s* association with an *investment-related* business;
    - (c) otherwise significantly limiting your firm’s or a *management person’s* *investment-related* activities; or
    - (d) imposing a civil money penalty of more than \$2,500 on your firm or a *management person*.
- C. A *self-regulatory organization (SRO) proceeding* in which your firm or a *management person*
  - 1. was *found* to have caused an *investment-related* business to lose its authorization to do business; or
  - 2. was *found* to have been involved in a violation of the *SRO’s* rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; (ii) otherwise significantly limited from *investment-related* activities; or (iii) fined more than \$2,500.

There is no reportable disciplinary information required for Confidant Financial Solutions, LLC or its management persons that is material to your evaluation of Confidant Financial Solutions, LLC, its business or its management persons.

## Item 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Robert Robinson is a licensed insurance agent and offers various insurance products. Clients are under no obligation to purchase insurance products through Robert Robinson. Further, clients are encouraged to speak to other insurance professionals for quotes on products. However, if a client purchases an insurance product through Robert, he will earn a commission. It is a conflict of interest to offer insurance products and earn a commission. As already stated, to mitigate this conflict of interest, clients are encouraged to shop other products.

Confidant Financial Solutions, LLC and its management persons are not actively engaged in any other business other than as disclosed above. Confidant Financial Solutions, LLC is not and does not

have a related person who is a: registered representative of a broker/dealer, futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities. Further, Confidant Financial Solutions, LLC is not and does not have a related person who is: broker/dealer or other similar type of broker or dealer; investment company or other pooled investment vehicle, other investment adviser or financial planner; futures commission merchant or commodity pool operator; banking or thrift institution; accountant or accounting firm; lawyer or law firm; insurance company; pension consultant; real estate broker or dealer; or sponsor or syndicator of a limited partnership.

<b>Item 11 - CODE OF ETHICS, PARTICIPATION OF INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING</b>
--

**Code Of Ethics**

- A. Confidant Financial Solutions, LLC has a fiduciary duty to you to act in your best interest and always place your interests first and foremost. Confidant Financial Solutions, LLC takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as Confidant Financial Solutions, LLC's policies and procedures. Further, Confidant Financial Solutions, LLC strives to handle your non-public information in such a way as to protect information from falling into hands that have no business reason to know such information and provides you with Confidant Financial Solutions, LLC's Privacy Policy. As such, Confidant Financial Solutions, LLC maintains a code of ethics for its Advisory Representatives, supervised persons and staff. The Code of Ethics contains provisions for standards of business conduct in order to comply with federal securities laws, personal securities reporting requirements, pre-approval procedures for certain transactions, code violations reporting requirements, and safeguarding of material non-public information about your transactions. Further, Confidant Financial Solutions, LLC's Code of Ethics establishes Confidant Financial Solutions, LLC's expectation for business conduct. A copy of our Code of Ethics will be provided to you upon request.
- B. Neither Confidant Financial Solutions, LLC nor its associated persons recommend clients buy or sell securities in which we have a material financial interest.
- C. Confidant Financial Solutions, LLC and its associated persons may buy or sell securities identical to those securities recommended to you. Therefore, Confidant Financial Solutions, LLC and/or its associated persons may have an interest or position in certain securities that are also recommended and bought or sold to you. Confidant Financial Solutions, LLC and its associated persons will not put their interests before your interest. Confidant Financial Solutions, LLC and its associated persons may not trade ahead of you or trade in such a way to obtain a better price for themselves than for you or other clients.
- D. Confidant Financial Solutions, LLC is required to maintain a list of all securities holdings for its associated persons and develop procedures to supervise the trading activities of associated persons who have knowledge of your transactions and their related family accounts at least quarterly. Further, associated persons are prohibited from trading on non-public information or sharing such information.

<b>Item 12 - BROKERAGE PRACTICES</b>
--------------------------------------

Confidant Financial Solutions, LLC does not maintain custody of your assets, although we may be deemed to have custody of your assets if you give us authority to withdraw our advisory fee directly from your managed account. Your assets must be maintained in an account at a qualified custodian. Generally, a qualified custodian is a broker/dealer or bank. Confidant Financial Solutions, LLC has entered into a relationship with Schwab Institutional division of Charles Schwab & Co., Inc. ("Schwab"), a registered broker/dealer, member SIPC, to offer clients brokerage and custodial services. Additionally, Schwab provides Confidant Financial Solutions, LLC with the ability to manage your account and provides us with reporting information about the transactions and holdings in your managed account. Confidant Financial Solutions, LLC is independently owned and operated and not affiliated with Schwab.

Schwab will act solely as a broker/dealer and not as an investment adviser to you. It will have no discretion over your account and will act solely on instructions it receives from Confidant Financial Solutions, LLC or you. Schwab has no responsibility for our services and undertakes no duty to you to monitor our management of your account or other services we provide to you. Schwab will hold your assets in a brokerage account and buy and sell securities and execute other transactions when Confidant Financial Solutions, LLC or you instruct them to. To establish an account with Schwab you will be required to enter into an account agreement directly with Schwab. We do not open an account for you.

Not all investment advisers require you to maintain accounts at a specific broker/dealer. You may maintain accounts at another broker/dealer. However, the services provided by Confidant Financial Solutions, LLC will be limited to only advice and will not include implementation. If you select another brokerage firm for custodial and/or brokerage services you will not be able to receive asset management services from Confidant Financial Solutions, LLC.

*How We Select Brokers/Custodians*

In initially selecting Schwab, Confidant Financial Solutions, LLC conducted due diligence. Confidant Financial Solutions, LLC's evaluation and criteria includes:

- Ability to service you
- Staying power as a company
- Industry reputation
- Ability to report to you and to Confidant Financial Solutions, LLC
- Availability of an efficient trading platform
- Products and services available
- Technology resources
- Educational resources
- Execution capability
- Financial responsibility and viability
- Confidentiality and security of your information
- Responsiveness

- Other factors that may bear on the overall evaluation of best price and execution

There is an incentive for Confidant Financial Solutions, LLC and the Advisory Representatives to recommend a broker/dealer over another based on the array of products and services that will be received rather than your best interest. Therefore, clients may pay commissions higher than those charged by other broker/dealers in return for the products and services received by Confidant Financial Solutions, LLC and/or its Advisory Representatives. The products and services Confidant Financial Solutions, LLC and its Advisory Representatives receive from the broker/dealer or account custodian will be used to benefit all clients including those clients who elect to maintain their accounts elsewhere.

#### *Your Brokerage and Custody Costs*

For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. In addition to commissions rates, Schwab charges you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We have determined that having Schwab execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above.

#### *Products and Services Available to Us From Schwab*

Schwab Advisor Services™ (formerly called Schwab Institutional®) is Schwab's business serving independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage—trading, custody, reporting, and related services—many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business.

#### *Services That Benefit You.*

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

#### *Services That May Not Directly Benefit You.*

Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

## Confidant Financial Solutions, LLC

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

### *Services That Generally Benefit Only Us.*

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits, such as occasional business entertainment of our personnel.

From time-to-time Confidant Financial Solutions, LLC may make an error in submitting a trade order on your behalf. When this occurs, Confidant Financial Solutions, LLC may place a correcting trade with the broker-dealer which has custody of your account. If an investment gain results from the correcting trade, the gain will remain in your account unless the same error involved other client account(s) that should have received the gain, it is not permissible for you to retain the gain, or we confer with you and you decide to forego the gain (e.g., due to tax reasons). If the gain does not remain in your account and Charles Schwab & Co. Inc. ("Schwab") is the custodian, Schwab will donate the amount of any gain \$100 and over to charity. If a loss occurs greater than \$100, Confidant Financial Solutions, LLC will pay for the loss. Schwab will maintain the loss or gain (if such gain is not retained in your account) if it is under \$100 to minimize and offset its administrative time and expense. Generally, if related trade errors result in both gains and losses in your account, they may be netted.

### Research and Other Soft Dollar Benefits

Schwab has agreed to provide Confidant Financial Solutions, LLC with a \$10,000 technology benefit to help Confidant Financial Solutions, LLC offset its start-up technology costs. This is a one-time benefit. This is considered a conflict of interest for Confidant Financial Solutions, LLC to select Schwab over other custodians. To mitigate this conflict, Confidant Financial Solutions, LLC had conducted its due diligence to select a broker/dealer and custodian prior to knowledge of any benefit. Further, Confidant Financial Solutions, LLC has a fiduciary duty to act in the best interest of clients when recommending a custodian. Clients are free to select among any broker/dealer or custodian. However, if another broker/dealer and custodian is selected the services Confidant Financial Solutions, LLC can provide may be limited and costs to the client may be higher. The technology benefit received by Confidant Financial Solutions, LLC will be utilized for all advisory clients including clients who may not maintain an account with Schwab. The receipt of soft dollars is a benefit to Confidant Financial Solutions, LLC because Confidant Financial Solutions, LLC does

## Confidant Financial Solutions, LLC

not have to directly pay for the technology. Confidant Financial Solutions, LLC has an incentive to recommend Schwab as a custodian and broker based on Confidant Financial Solutions, LLC's interest in receiving the technology benefit, rather than our clients' interest to receive the most favorable execution. Confidant Financial Solutions, LLC uses the soft dollars exclusively to pay for technology. Schwab has agreed to provide Confidant Financial Solutions, LLC with the benefit without conditions as to the amount of business directed through Schwab.

### Aggregated or Bunched Transactions

Confidant Financial Solutions, LLC may aggregate ("bunch") transactions in the same security on behalf of more than one client in an effort to strive for best execution and to possibly reduce the price per share and/or other costs to clients. However, aggregated or bunched orders will not reduce the transaction costs to participating clients. Confidant Financial Solutions, LLC conducts aggregated transactions in a manner designed to ensure that no participating client is favored over another client. Participating clients will obtain the average price per share for the security executed that day. To the extent the aggregated order is not filled in its entirety and when possible, securities purchased or sold in an aggregated transaction will be allocated on a random basis. Under certain circumstances, the amount of securities may be increased or decreased to avoid holding odd-lot or a small number of shares for particular clients.

## **Item 13 - REVIEW OF ACCOUNTS**

- A. Reviews are conducted by Robert Robinson, Member and Advisory Representative.

### Asset Management Account Reviews

You will be invited to participate in at least an annual review or as otherwise agreed. You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. Confidant Financial Solutions, LLC will monitor for changes or shifts in the economy, changes to the management and structure of a mutual fund or company in which your assets are invested, and market shifts and corrections.

### Financial and Retirement Planning Services

You will not receive regular reviews. Reviews will be conducted upon client request. Confidant Financial Solutions, LLC recommends you have at least an annual review and update to any plans. However, the time and frequency of the reviews is solely your decision. Other than the initial plan or analysis, there will be no other reports issued.

- B. It is important that you notify us promptly of any changes to your financial goals, objectives or financial situation as such changes may require us to review the portfolio allocation and/or the financial plan and make recommendations for changes or change the allocation of the managed account.
- C. You will be provided statements at least quarterly direct from the account custodian. Additionally, you will receive confirmations of all transactions occurring direct from the account custodian. **Unless otherwise requested by you, trade confirmations will be suppressed and will be reported to you in a Trade Confirmation Report on a quarterly basis.** Confidant Financial Solutions, LLC will provide you with a quarterly consolidated

## Confidant Financial Solutions, LLC

report of your managed account. You should compare the report with statements received direct from the account custodian. Should there be any discrepancy the account custodian's report will prevail.

### **Item 14 - CLIENT REFERRALS AND OTHER COMPENSATION**

- A. Please refer to Item 12 disclosures discussing the benefits Confidant Financial Solutions, LLC receives from Schwab. Confidant Financial Solutions, LLC does not receive an economic benefit from someone who is not a client as a result of providing investment advice or other advisory services to clients.
- B. Confidant Financial Solutions, LLC does not directly or indirectly compensate any person who is not a supervised person of Confidant Financial Solutions, LLC for referrals.

### **Item 15 - CUSTODY**

With the exception of deduction of Confidant Financial Solutions, LLC's advisory fees from your accounts, Confidant Financial Solutions, LLC does not take custody of your funds or securities. Clients will receive account statements direct from the broker/dealer or account custodian reflecting the deduction of Confidant Financial Solutions, LLC's advisory fee. Clients should carefully review statements received from the broker/dealer or account custodian. Further, clients should compare any written report received from Confidant Financial Solutions, LLC with statements received direct from the broker/dealer or account custodian. Should there be any discrepancy the account custodian's report will prevail.

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct your account custodian to deduct our advisory fees directly from your account or if you grant us authority to move your money to another person's account. Your account custodian maintains actual custody of your assets. You will receive account statements directly from your account custodian at least quarterly. They will be sent to the email or postal mailing address you provided. You should carefully review those statements promptly when you receive them.

### **Item 16 - INVESTMENT DISCRETION**

You may grant Confidant Financial Solutions, LLC authorization to manage your account on a discretionary basis. Discretionary authority will give Confidant Financial Solutions, LLC the authority to buy, sell, exchange and convert securities in your managed accounts. You will grant such authority to Confidant Financial Solutions, LLC by execution of the Asset Management agreement. You may terminate discretionary authorization at any time upon receipt of written notice by Confidant Financial Solutions, LLC.

## Confidant Financial Solutions, LLC

Discretionary authority will be limited to Confidant Financial Solutions, LLC having the authority to determine the securities to be bought or sold for a client's account and the amount of securities to be bought or sold for a client's account.

Additionally, you are advised that:

- 1) You may set parameters with respect to when account should be rebalanced and set trading restrictions or limitations;
- 2) Your written consent is required to establish any mutual fund, variable annuity, or brokerage account;
- 3) With the exception of deduction of Confidant Financial Solutions, LLC's advisory fees from the account, if you have authorized automatic deductions, Confidant Financial Solutions, LLC will not have the ability to withdraw your funds or securities from the account.

### **Item 17 - VOTING CLIENT SECURITIES**

Confidant Financial Solutions, LLC does not vote your securities. Unless you suppress proxies, securities proxies will be sent directly to you by the account custodian or transfer agent. You may contact Confidant Financial Solutions, LLC about questions you may have an opinions on how to vote the proxies. However, the voting and how you vote the proxies is solely your decision.

### **Item 18 - FINANCIAL INFORMATION**

- A. Confidant Financial Solutions, LLC will not require you to prepay more than \$1,200 and six or more months in advance of receiving the advisory service.
- B. As stated above, Confidant Financial Solutions, LLC has discretionary authority over client accounts; however that authority does not extend to the withdrawal of any client assets, with the exception of deduction of Confidant Financial Solutions, LLC's advisory fees from your accounts. We are financially stable. There is no financial condition that is likely to impair our ability to meet our contract actual commitment to you or any other client.
- C. Neither Confidant Financial Solutions, LLC nor any of its Advisory Representatives has ever been the subject of a bankruptcy petition.