



## **Cordis Financial, LLC**

### **Form ADV Part 2A – Disclosure Brochure**

**Effective: March 12, 2019**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Cordis Financial, LLC (“Cordis Financial” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (612) 268-2620.

Cordis Financial is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Cordis Financial to assist you in determining whether to retain the Advisor.

Additional information about Cordis Financial and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD# 294766.

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## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of Cordis Financial. For convenience, we have combined these documents into a single disclosure document.

Cordis Financial believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. Cordis Financial encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Material Changes

There have been no material changes to this Disclosure Brochure since the last filing and distribution to Clients.

### Future Changes

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

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD# 294766. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (612) 268-2620.

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

Cordis Financial, LLC (“Cordis Financial” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”), which is organized as a Limited Liability Company (“LLC”) under the laws of the State of Minnesota in May 2015 and became a registered investment advisor in May 2018. Cordis Financial is owned and operated by Paul J. Leighton and Ingrid E. Strauss. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Cordis Financial. For information regarding this Disclosure Brochure, please contact Ingrid Strauss (Chief Compliance Officer) at (612) 268-2620.

At Cordis Financial, we embrace the principles of comprehensive Financial Life Planning. However, we recognize this type of engagement is not appropriate or necessary in all circumstances.

### **B. Advisory Services Offered**

Cordis Financial offers investment advisory services to individuals, families, trusts, charitable organizations, businesses and retirement plans (each referred to as a “Client”). Cordis Financial provides individualized services to each Client, which are determined during initial conversations and updated over the course of the relationship as needed or requested by the Client. However, all services offered fall into the Investment Management Services, also known as Asset Management Services, and Financial Planning Services. Customized solutions for Client are achieved through continuous personal contact and interaction while providing discretionary investment management and financial planning services.

Cordis Financial serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

#### Investment Management Services

Cordis Financial works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. Cordis Financial will then construct a portfolio, consisting of primarily of no-load mutual funds. Cordis Financial may also utilize exchange-traded funds (“ETFs”), individual equity securities, individual fixed income securities and other types of investments, as appropriate to meet the needs of each Client. Evaluation of legacy investments will include a review of portfolio fit, tax situation and other considerations.

The Client-specific investment objectives will be set forth in a written Investment Policy Statement describing items such as asset allocation, personal circumstances, goals, liquidity needs, etc. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor. Cordis Financial will construct, implement and monitor the portfolio on a discretionary basis with respect to the Client’s investment policy statement.

At no time will Cordis Financial accept or maintain custody of a Client’s funds or securities, except for the limited authority as outlined in Item 15 - Custody. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the Client investment advisory agreement, please see Item 12 – Brokerage Practices.

#### Financial Planning Services

Financial Planning Services are at the core of the Client relationship with Cordis Financial. Financial planning is an evaluation of a Client’s current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans while also understanding personal values, goals and objectives. Through the financial planning process, all questions, information and analysis are considered as they impact and are impacted by the entire financial and life situation of the Client.

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Cordis Financial will provide financial planning and consulting services to Clients pursuant to a written financial planning agreement. Services are offered in several areas depending on the Client's goals, objectives and financial situation. Generally, such financial planning services will involve a written report which provides the Client with a detailed financial plan to assist the Client in achieving his or her financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to, financial position, tax considerations, employee benefits, investment analysis, insurance analysis, retirement analysis, death and disability considerations, and estate planning.

Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly by the Client.

Financial planning and consulting recommendations may pose a conflict between the interests of the Advisor and the interests of the Client. Implementation of financial planning recommendations is entirely at the Client's discretion. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor. Cordis Financial will work with Clients to implement recommendations and referrals to other professionals may be made where appropriate to meet the Client's needs.

#### Retirement Plan Advisory Services

Cordis provides advisory services to retirement plans (each a "Plan") and the company/sponsor of the Plan (the "Plan Sponsor"). The Advisor's retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan and its Plan Participants. Each engagement is customized to the needs of the Plan and Plan Sponsor. Services generally include:

- Vendor Analysis
- Plan Participant Enrollment and Education Tracking
- Investment Policy Statement ("IPS") Design and Monitoring
- Performance Reporting
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance

These services are provided by Cordis serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of the Advisor's fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement. The Advisor does not provide 3(38) discretionary services to the Plan or the plan Sponsor.

#### **C. Client Account Management**

Prior to engaging Cordis Financial to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – Cordis Financial, in connection with the Client, will develop an investment strategy that seeks to achieve the Client's goals and objectives.
- Portfolio Construction – Cordis Financial will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Cordis Financial will provide investment management and ongoing oversight of the Client's investment portfolio. Cordis Financial will review Client portfolios at least annually.
- Financial Planning – Cordis Financial provides initial and ongoing planning services, to assist Clients in meeting the financial goals.

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#### **D. Wrap Fee Programs**

Cordis Financial does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Cordis Financial.

#### **E. Assets Under Management**

As of February 28, 2019, Cordis Financial manages \$98,683,164 in assets under management, all of which are managed on a discretionary basis. Clients may request more current information at any time by contacting the Advisor.

### **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into one or more written agreements with the Advisor.

#### **A. Fees for Advisory Services**

##### Investment Management Services

Investment advisory fees are paid quarterly, at the end of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of the quarter. Investment advisory fees are based on the following schedule:

<b>Assets Under Management (\$)</b>	<b>Annual Rate (%)</b>
Up to \$500,000	1.50%
\$500,001 to \$1,000,000	1.25%
\$1,000,001 to \$2,000,000	1.00%
\$2,000,001 to \$3,000,000	0.85%
\$3,000,001 to \$5,000,000	0.75%
\$5,000,001 to \$8,000,000	0.60%
\$8,000,001 to \$10,000,000	0.50%
\$10,000,001 and over	Negotiable

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by Cordis Financial will be independently valued by the Custodian. Cordis Financial will not have the authority or responsibility to value portfolio securities.

The Client may make additions or withdrawals from the account[s] at any time, subject to the Advisor's right to terminate an account or the overall relationship. Additions may be in cash or securities provided that the Advisor reserves the right to liquidate any transferred securities or decline to accept particular securities into a Client's account[s]. Clients may withdraw account assets on notice to Cordis Financial, subject to the usual and customary securities settlement procedures. However, withdrawals from the Client's account[s] may impede the Advisor's ability to implement the investment strategy designed for the Client. Clients are advised that when such securities are liquidated, they may be subject to securities transaction fees, short-term redemption fees, and/or tax ramifications. An adjustment will be made in the next billing period to reflect the fee difference.

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

##### Financial Planning Services

Cordis Financial may include financial planning services as part of the overall investment advisory fee or its may be offered separately. Engagements may be offered at a fixed fee engagement fee ranging from \$1,200 to \$20,000. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall

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relationship with the Advisor. An estimate for total costs will be provided prior to establishing the advisory relationship.

#### Retirement Plan Advisory Services

Fees for retirement plan advisory services are charged a quarterly fee, at the end of each calendar quarter, based on percentage of assets in the Plan. Fees may be negotiable depending on the size and complexity of the Plan. Fees are typically billed based on the following schedule:

<b>Assets Under Management (\$)</b>	<b>Annual Rate (%)</b>
Up to \$500,000	1.00%
\$500,001 to \$1,000,000	0.75%
\$1,000,001 to \$3,000,000	0.65%
\$3,000,001 to \$5,000,000	0.50%
\$5,000,001 and over	Negotiable

### **B. Fee Billing**

#### Investment Management Services

Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the end of each calendar quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Cordis Financial at the end each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting advisory fees to be deducted by Cordis Financial directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

#### Financial Planning Services

Financial planning fees are invoiced by the Advisor and are due upon completion of the agreed upon deliverable[s].

#### Retirement Plan Advisory Services

Fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

### **C. Other Fees and Expenses**

All fees paid to Cordis Financial for investment advisory or financial planning services are separate and distinct from any and all other fees and expenses charged by the Custodian, plan administrators, or any other expense associated with the Client's accounts. Investments in mutual funds and ETFs also have an internal expense ratio charged by the product. These fees are described in each mutual fund or ETF prospectus.

Custodians may charge securities transaction fees on purchases or sales of certain mutual funds, ETFs, individual equity securities, individual fixed income securities or other investment. They may also charge for certain services, e.g. wire transfers. See Brokerage Practices in Item 12.

### **D. Advance Payment of Fees and Termination**

#### Investment Management Services

Cordis Financial is compensated for its investment advisory services at the end of the quarter after services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

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### Financial Planning Services

Cordis Financial is compensated for its services upon completion of the engagement deliverable[s]. Either party may terminate the financial planning agreement by providing advance written notice to the other party. The Client may also terminate the financial planning agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be billed for the percentage of the engagement scope completed by the Advisor. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

### Retirement Plan Advisory Services Fees

Cordis is compensated for its retirement plan advisory services at the end of the quarter after services are rendered. Either party may request to terminate their services with Cordis, at any time, by providing advance written notice to the other party. The Client may also terminate the retirement plan advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be responsible for advisory fees up to and including the effective date of termination. The Client's retirement plan services agreement with the Advisor is non-transferable without the Client's written consent.

### **E. Compensation for Sales of Securities**

Cordis Financial does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

## **Item 6 – Performance-Based Fees and Side-By-Side Management**

Cordis Financial does not charge performance-based fees for its investment advisory services. The fees charged by Cordis Financial are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

Cordis Financial does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

## **Item 7 – Types of Clients**

Cordis Financial offers investment advisory services to individuals, high net worth individuals, trusts, charitable organizations, businesses and retirement plans. The amount of each type of Client is available on Cordis Financial's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. Cordis Financial generally does not impose a minimum size for establishing a relationship.

## **Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss**

### **A. Methods of Analysis**

Investing in securities involves risk of loss that clients should be prepared to bear. Past performance is not a guarantee of future returns. The methods of analysis, tools and strategies utilized by Cordis Financial may include any of the following:

*Fundamental Analysis* involves evaluating a security using real data such as company revenues, earnings, return on equity, and profit margins to determine underlying value and potential growth. Fundamental analysis may involve interest rate risk, market risk, business risk, and financial risk.

*Cyclical Analysis* involves analyzing the cycles of the market. Cyclical analysis may involve inflation risk, market risk, and currency risk.

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*Behavioral Finance* proposes psychology-based theories to explain stock market anomalies. It assumes the information structure and the characteristics of market participants systematically influence the investment decisions of individuals as well as the market outcomes.

*Modern Portfolio Theory ("MPT")* assumes investors are risk averse which means when given two assets with the same expected return the investor will choose the less risky one. An investor is only willing to take more risk if the expected return is greater. Therefore, MPT aims to construct a portfolio of investments that has the best possible expected return for the level of risk.

*Asset Allocation* is an investment strategy used to balance risk and return according to a client's investment objective, risk tolerance and investment horizon. It is used to manage portfolio volatility by investment in different asset classes.

*Diversification* is a risk management strategy used to reduce the volatility of a portfolio by investing in different asset classes, different market sectors, and/or different companies.

## **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Cordis Financial will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals. While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's strategies:

### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

### Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a

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mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

## **Item 9 – Disciplinary Information**

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**There are no legal, regulatory or disciplinary events involving Cordis Financial or any of its Supervised Persons.** Cordis Financial values the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 294766.

## **Item 10 – Other Financial Industry Activities and Affiliations**

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The sole business of Cordis Financial and its Advisory Persons is to provide investment advisory services to its Clients. Neither Cordis Financial nor its Advisory Persons are involved in other business endeavors. Cordis Financial does not maintain any affiliations with other firms, other than contracted service providers to assist with the servicing of its Client's accounts.

## **Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

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### **A. Code of Ethics**

Cordis Financial has implemented a Code of Ethics (the "Code") that defines our fiduciary commitment to each Client. This Code applies to all persons associated with Cordis Financial (our "Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Cordis Financial and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Cordis Financial's Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code, please contact us at (612) 268-2620.

### **B. Personal Trading with Material Interest**

Cordis Financial allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Cordis Financial does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. Cordis Financial does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in Same Securities as Clients**

Cordis Financial allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Cordis Financial requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO"). We have also adopted written policies and procedures to detect the misuse of material, non-public information.

#### D. Personal Trading at Same Time as Client

While Cordis Financial allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will Cordis Financial, or any Supervised Person of Cordis Financial, transact in any security to the detriment of any Client.**

### Item 12 – Brokerage Practices

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#### A. Recommendation of Custodian[s]

Cordis Financial does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize Cordis Financial to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, Cordis Financial does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where Cordis Financial does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] to Clients. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a broker not recommended by Cordis Financial. However, if the recommended Custodian is not utilized the Advisor may be limited in the services it can provide to the Client comparable to other Clients. Cordis Financial may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, its reputation, and/or location of the Custodian's offices. Cordis Financial will typically recommend that Clients establish their account[s] at Fidelity Clearing & Custody Solutions and related entities of Fidelity Investments, Inc. (collectively "Fidelity"). Fidelity is a FINRA-registered broker-dealer and member SIPC and will serve as the Client's "qualified custodian". Cordis Financial maintains an institutional relationship with Fidelity whereby the Advisor receives economic benefits from Fidelity. Please see Item 14 below.

Cordis may also recommend that Clients establish accounts directly through mutual funds providers and platforms.

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with the broker-dealer/custodian in exchange for research and other services. **Cordis Financial does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from Fidelity. Please see Item 14 below.**

**2. Brokerage Referrals** - Cordis Financial does not receive any compensation from any third party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where Cordis Financial will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s], unless separately instructed by the Client. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the Custodian, Cordis Financial will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

#### B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Cordis Financial will execute its transactions through the

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Custodian authorized by the Client. Cordis Financial may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Client accounts.

## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by Advisory Persons of Cordis Financial and periodically by the CCO. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify Cordis Financial if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

## **Item 14 - Client Referrals and Other Compensation**

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### **A. Compensation Received by Cordis Financial**

Cordis Financial is a fee-only advisory firm, that is compensated solely by its Clients and not from any investment product. Cordis Financial does not receive commissions from product sponsors or broker-dealers. Cordis Financial may refer Clients to various unaffiliated professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, Cordis Financial may receive non-compensated referrals of new Clients from various third-parties.

#### Participation in Institutional Advisor Platform

Cordis Financial has established an institutional relationship with Fidelity to assist the Advisor in managing Client account[s]. Access to the Fidelity platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Fidelity. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this Custodian over one that does not furnish similar software, systems support, or services.

Additionally, the Advisor has received financial support from Fidelity to assist the Advisor in the launch of its advisory firm. The following benefits are also received from Fidelity: reimbursement to Clients for transfer costs to the platform/custodian; financing services; receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

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## **B. Client Referrals from Solicitors**

Cordis Financial does not engage paid solicitors for Client referrals.

### **Item 15 – Custody**

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All Clients must place their assets with a “qualified custodian”. Clients are required to engage the Custodian to retain their funds and securities and direct Cordis Financial to utilize that Custodian for the Client’s security transactions. Cordis Financial does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor’s fees or authorize transfers on the Client’s behalf. If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements in these cases, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client’s instructions.

Clients should review statements provided by the Custodian and compare to any reports provided by Cordis Financial to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client’s instructions.

### **Item 16 – Investment Discretion**

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Cordis Financial generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Cordis Financial. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client’s execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Cordis Financial will be in accordance with each Client’s investment objectives and goals.

### **Item 17 – Voting Client Securities**

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Cordis Financial does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. If the Client elects to direct proxies to the Advisor, such election does not result in the authority for the Advisor to vote such proxies. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

### **Item 18 – Financial Information**

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Neither Cordis Financial, nor its management, have any adverse financial situations that would reasonably impair the ability of Cordis Financial to meet all obligations to its Clients. Neither Cordis Financial, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. Cordis Financial is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.

## **Form ADV Part 2B – Brochure Supplement**

**for**

**Paul J. Leighton, ChFC®, CLU®  
Partner / Financial Planner**

**Effective: March 12, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Paul J. Leighton, ChFC®, CLU®, (CRD# 1175642) in addition to the information contained in the Cordis Financial, LLC (“Cordis Financial” or the “Advisor”, CRD# 294766) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Cordis Financial Disclosure Brochure or this Brochure Supplement, please contact us at (612) 268-2620.

Additional information about Mr. Leighton is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 1175642.

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## Item 2 – Educational Background and Business Experience

Paul J. Leighton, ChFC®, CLU®, born in 1951, is dedicated to advising Clients of Cordis Financial as a Partner and Financial Planner. Mr. Leighton attended Loras College in 1971. Additional information regarding Mr. Leighton's employment history is included below.

### Employment History:

Partner / Financial Planner, Cordis Financial, LLC [Registered Investment Advisor]	06/2018 to Present
Financial Advisor, Securian Financial Services, Inc. [dba Cordis Financial]	12/1991 to 06/2018
Financial Advisor, CRI Securities, LLC [dba Cordis Financial]	09/1988 to 06/2018
Financial Advisor / Planner, North Star Resource Group	07/1983 to 06/2018

### Chartered Financial Consultant® (ChFC®)

The Chartered Financial Consultant® (ChFC®) program prepares you to meet the advanced financial planning needs of individuals, professionals and small business owners. You'll gain a sustainable advantage in this competitive field with in-depth coverage of the key financial planning disciplines, including insurance, income taxation, retirement planning, investments and estate planning. The ChFC® requires three years of full-time, relevant business experience, nine two-hour course specific proctored exams, and 30 hours of continuing education every two years. Holders of the ChFC® designation must adhere to The American College's Code of Ethics.

#### Program Objectives:

- Function as an ethical, competent and articulate practitioner in the field of financial planning
- Utilize the intellectual tools and framework needed to maintain relevant and current financial planning knowledge and strategies.
- Apply financial planning theory and techniques through the development of case studies and solutions.
- Apply in-depth knowledge in a holistic manner from a variety of disciplines; namely, estate planning, retirement planning or non-qualified deferred compensation.

### The Chartered Life Underwriter (CLU®)

The Chartered Life Underwriter® (CLU®) is a designation of insurance expertise, helping gain a significant advantage in a competitive market. This course of study helps by providing in-depth knowledge on the insurance needs of individuals, business owners and professional clients.

#### Program Learning Objectives:

- Provide guidance to clients on types and amounts of life insurance needed.
- Make recommendations on aspects of risk management, including personal and business uses of a variety of insurance solutions.
- Provide guidance to clients on legal aspects of life insurance contracts and beneficiaries.
- Assist clients in making decisions about estate planning, including proper holding of assets and title to assets, as well as the implications of various wills and trust arrangements on financial, retirement and succession planning issues.
- Provide a holistic and comprehensive approach to addressing the insurance planning needs of their clients.

## Item 3 – Disciplinary Information

***There are no legal, civil or disciplinary events to disclose regarding Mr. Leighton.*** Mr. Leighton has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Leighton.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery,



counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Leighton.***

However, we do encourage you to independently view the background of Mr. Leighton on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 1175642.

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**Item 4 – Other Business Activities**

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Mr. Leighton is dedicated to the investment advisory activities of Cordis Financial's Clients. Mr. Leighton does not have any other business activities.

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**Item 5 – Additional Compensation**

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Mr. Leighton has additional business activities that are detailed in Item 4 above.

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**Item 6 – Supervision**

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Mr. Leighton serves as a Partner and Financial Planner of Cordis Financial and is also supervised by Ms. Ingrid Strauss, the Chief Compliance Officer. Ms. Strauss can be reached at (612) 268-2620.

Cordis Financial has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Cordis Financial. Further, Cordis Financial is subject to regulatory oversight by various agencies. These agencies require registration by Cordis Financial and its Supervised Persons. As a registered entity, Cordis Financial is subject to examinations by regulators, which may be announced or unannounced. Cordis Financial is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## **Form ADV Part 2B – Brochure Supplement**

**for**

**Ingrid E. Strauss, CFP®  
Partner / Financial Planner  
Chief Compliance Officer**

**Effective: March 12, 2019**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Ingrid E. Strauss, CFP®, (CRD# 5245441) in addition to the information contained in the Cordis Financial, LLC ("Cordis Financial" or the "Advisor", CRD# 294766) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Cordis Financial Disclosure Brochure or this Brochure Supplement, please contact us at (612) 268-2620.

Additional information about Ms. Strauss is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 5245441.

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## Item 2 – Educational Background and Business Experience

Ingrid E. Strauss, CFP®, born in 1983, is dedicated to advising Clients of Cordis Financial as a Partner, Financial Planner and the Chief Compliance Officer. Ms. Strauss earned a B.A. from University of Iowa in 2005. Additional information regarding Ms. Strauss's employment history is included below.

### Employment History:

Partner / Financial Planner and Chief Compliance Officer, Cordis Financial, LLC [Registered Investment Advisor]	06/2018 to Present
Financial Advisor, CRI Securities, LLC [dba Cordis Financial]	01/2014 to 06/2018
Registered Representative, Securian Financial Services, Inc. [dba Cordis Financial]	01/2014 to 06/2018
Financial Advisor, U.S. Bancorp Investments, Inc.	03/2010 to 12/2010
Practice Associate, North Star Resource Group	08/2006 to 12/2009

### CERTIFIED FINANCIAL PLANNER™ ("CFP®")

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP® Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

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### Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Ms. Strauss.*** Ms. Strauss has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Strauss. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Strauss.*** However, we do encourage you to independently view the background of Ms. Strauss on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 5245441.

### Item 4 – Other Business Activities

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Ms. Strauss is dedicated to the investment advisory activities of Cordis Financial's Clients. Ms. Strauss does not have any other business activities.

### Item 5 – Additional Compensation

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Ms. Strauss is dedicated to the investment advisory activities of Cordis Financial's Clients. Ms. Strauss does not receive any additional forms of compensation.

### Item 6 – Supervision

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Ms. Strauss serves as a Partner, Financial Planner and Chief Compliance Officer of Cordis Financial. Ms. Strauss can be reached at (612) 268-2620.

Cordis Financial has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Cordis Financial. Further, Cordis Financial is subject to regulatory oversight by various agencies. These agencies require registration by Cordis Financial and its Supervised Persons. As a registered entity, Cordis Financial is subject to examinations by regulators, which may be announced or unannounced. Cordis Financial is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## **Form ADV Part 2B – Brochure Supplement**

**for**

**Jeanna R. Fifer, CFP®  
Financial Planner**

**Effective: March 12, 2019**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Jeanna R. Fifer (CRD# 4849899) in addition to the information contained in the Cordis Financial, LLC ("Cordis Financial" or the "Advisor," CRD# 294766) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Cordis Financial Disclosure Brochure or this Brochure Supplement, please contact us at (612) 268-2620.

Additional information about Ms. Fifer is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 4849899.

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## Item 2 – Educational Background and Business Experience

Jeanna R. Fifer CFP®, born in 1986, is dedicated to advising Clients of Cordis Financial as an Investment Advisor Representative. Ms. Fifer earned a B.A. in Economics from University of Minnesota in 2008. Additional information regarding Ms. Fifer's employment history is included below.

### Employment History:

Financial Planner, Cordis Financial, LLC	06/2018 to Present
Financial Planner, Cahill Financial Advisors, Inc.	04/2012 to 02/2018
Financial Planning Specialist, White Oaks Wealth Advisors, Inc.	05/2008 to 04/2012

### CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP® Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

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### Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Ms. Fifer.*** Ms. Fifer has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Fifer.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Fifer.***

However, we do encourage you to independently view the background of Ms. Fifer on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 4849899.

### Item 4 – Other Business Activities

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Ms. Fifer is dedicated to the investment advisory activities of Cordis Financial's Clients. Ms. Fifer does not have any other business activities.

### Item 5 – Additional Compensation

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Ms. Fifer is dedicated to the investment advisory activities of Cordis Financial's Clients. Ms. Fifer does not receive any additional forms of compensation.

### Item 6 – Supervision

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Ms. Fifer serves as a Financial Planner of Cordis Financial and is supervised by Ms. Ingrid Strauss, the Chief Compliance Officer. Ms. Strauss can be reached at (612) 268-2620.

Cordis Financial has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Cordis Financial. Further, Cordis Financial is subject to regulatory oversight by various agencies. These agencies require registration by Cordis Financial and its Supervised Persons. As a registered entity, Cordis Financial is subject to examinations by regulators, which may be announced or unannounced. Cordis Financial is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## Privacy Policy

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Effective: March 12, 2019

### Our Commitment to You

Cordis Financial, LLC ("Cordis Financial" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Cordis Financial (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you. Cordis Financial does not sell your non-public personal information to anyone. Cordis Financial does not provide non-public personal information to others except for the following circumstances:

- As necessary to provide the service that the Client has requested or authorized, or to maintain and service the Client's account[s];
- As required by regulatory authorities or law enforcement officials who have jurisdiction over Cordis Financial, or as otherwise required by any applicable law; and
- To the extent reasonably necessary to prevent fraud and unauthorized transactions.

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### Type of Information Collected

Cordis Financial retains nonpublic personal information ("NPI") about you from the following sources:

- Personal information such as your social security number, tax identification number[s], date of birth, and account information
- Information you provide to us in paper or digital formats (via email or upload)
- Information we generate (such as financial reports)
- Information collected from necessary third parties (such as your account custodian[s])

### How do we protect your information?

To safeguard your personal information from unauthorized access and use Cordis Financial maintains physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information. We require third parties that assist in providing our services to you to protect the personal information they receive from us.

### How do we share your information?

Cordis Financial may share personal information to effectively implement its services. Some reasons include:

- *Servicing our Clients* - We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting. This information may not be limited.
- *Authorized Users* - Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s) based your requests. You may limit the information shared.

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us. While we may revise this Policy, we will not revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (612) 268-2620.

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