

## Confidential Planning I, LLC

### Part 2A of Form ADV: Firm Brochure

March 28, 2019

Confidential Planning I, LLC.  
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SEC File Number: 801-69184  
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This brochure provides information about the qualifications and business practices of Confidential Planning I, LLC. If you have any questions about the contents of this brochure, please contact us at (315) 234 -1016 and/or email [compliance@cpcfs.com](mailto:compliance@cpcfs.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.

Current copies of this brochure are available online at:

[www.cpcfs.com/about/disclosures](http://www.cpcfs.com/about/disclosures)

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 Confidential Planning I, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2: Material Changes**

There have been no material changes since the last annual amendment brochure submitted March 18, 2018.

## **Item 3: Table of Contents**

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## **Item 4: Advisory Business**

Confidential Planning I, LLC is a registered investment advisory firm, organized as a limited liability company under the laws of New York State. Our fiscal year ends in the month of December each year.

Confidential Planning I, LLC is 100 % owned by Pinnacle Holding Company, LLC which is organized as a limited liability company.

### **Confidential Planning I, LLC**

Confidential Planning I, LLC is a registered investment advisory firm focused on bringing single provider 403(b) retirement plans to educators and employees of schools, hospitals and not-for-profit (501c) organizations. The IARs may offer Plan Sponsors with customized investment advisory services, diversified investment menus, consulting, reporting, and participant educational programs.

### **Retirement Services Program**

The Retirement Services program offer IARs two options of assisting Plan Sponsors with some or all of the following; customized investment advisory services, diversified investment menus, consulting and reporting, and participant educational programs.

### **Investment Advisory Services**

Confidential Planning I, LLC has a relationship with Benefit Plans Administrators in Utica, NY and PenServ Plan Services in West Columbia, SC, to provide recordkeeping services and third-party-administration services. Through the SmartChoice and MultiChoice programs, the IAR provides investment advisory service and assist Plan Sponsors with developing a customized investment plan to fit the needs of individual plan participants. Confidential Planning I, LLC and the IAR may use a variety of mutual fund company shares (including no-load and load-waived mutual funds). Each plan will consist of a diversified mix of investment options to assist plan participants of the plan in meeting their individual needs. The mix and weightings of investments will be based on the available plan options and each plan participant's risk profile, investment objectives, and individual preferences. Each plan and plan participants will have the opportunity to meet with the IAR at periodic educational sessions and the plan will have the opportunity to review the assets in the plan periodically with the IAR. Plan participants will have the ability to either generate online account statements through the TPA's website, or receive account statements from the recordkeeping agent, showing account activity, positions, and asset values held in the account no less frequently than quarterly. Additionally, participants can make changes to their investment allocation on an ad-hoc basis, in accordance with the terms of the respective plan documents. The assets of each plan account will be held at a qualified custodian.

### **Minimum Account Size**

There is no minimum account size requirement.

Confidential Planning I, LLC provide continuous and regular supervisory or management services to securities portfolios. As of December 2018, there are 16 non-discretionary accounts representing \$29,636,000 of assets under management.

## **Item 5: Fees and Compensation**

### **Fee Schedule:**

The maximum annual asset fee charged will be 125 basis points for advisory services. The IAR has the discretion to discount fees. Management fees are separate and distinct from other fees that might apply, including transaction fees, underlying mutual fund fees and expenses paid to the fund by shareholders of the fund as outlined in each fund's prospectus, and custodian fees. The Sub-TA fees and other forms of

revenue sharing Fees received by the plan's administrator or qualified custodian from the fund companies will be used to directly offset the plan's administrative costs. Administrative costs that remain after the application of the fees are paid by the plan in accordance with the arrangement between the plan and the qualified custodian. Any fees remaining will be credited to the plan in accordance with the arrangement between the plan and the plan's administrator. The IAR does not participate in the fees.

Fees are negotiable on a case by case basis and can be paid by either the employer or the employee. IARs have the ability to discount fees. Management fees are separate and distinct from other fees that might apply, including transaction fees, underlying mutual fund fees and expenses paid to the fund by shareholders of the fund as outlined in each fund's prospectus, and custodian fees.

## **Item 6: Account Requirements and Types of Clients**

Confidential Planning I, LLC generally provides investment advice to

- 403(B) Retirement Plans and their participants

There are no account minimums.

## **Item 7: Methods of Analysis, Investment Strategies and Risk of Loss**

Confidential Planning I, LLC's security analysis methods include:

- Charting
- Fundamental
- Technical
- Cyclical

Confidential Planning I, LLC's main source of information include:

- Financial newspapers and magazines
- Research materials prepared by others
- Annual reports, prospectuses, filings with the Securities and Exchange Commission
- Company press releases

Confidential Planning I, LLC's investment strategies used to implement any investment advice given to clients include:

- Long-term purchases (securities held at least a year)
- Short-term purchases (securities sold within a year)

Investing in securities involves risk of loss that clients should be prepared to bear. In the case of a primary trading investing strategy, frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

## **Item 8: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of Confidential Planning I, LLC or the integrity of our management.

## **Item 9: Other Financial Industry Activities and Affiliations**

Confidential Planning I, LLC is registered as a SEC investment advisory firm focused on bringing single provider 403(b) retirement plans to educators and employees of schools, hospitals and not-for-profit (501c) organizations.

Confidential Planning I, LLC is related to Pinnacle Investments, LLC. Pinnacle Investments, LLC is dually registered as a securities broker-dealer and investment advisor. Pinnacle Investments, LLC's SEC File number is:801-67860 and its CRD number is: 142910

Pinnacle Investments, LLC has arrangements that are material to its advisory business or clients with a related person who is an investment company and is also a general partner in a partnership in which clients are solicited to invest. These arrangements and partnerships are disclosed as follows:

## **OTHER BUSINESS ACTIVITIES AND AFFILIATIONS**

### Pinnacle Holding Company, LLC

Pinnacle Holding Company, LLC is the parent company of 1) Pinnacle Investments, LLC, 2) Confidential Planning I, LLC and 3) Pinnacle Capital Management, LLC. 4) Confidential Planning Corporation. Pinnacle Investments, LLC is affiliated with Pinnacle Advisors, LLC. Pinnacle Advisors, LLC is an SEC-registered investment advisor. The advisory services provided by Pinnacle Advisors, LLC are separate and distinct from the advisory services provided by Pinnacle Investments, LLC, or any other subsidiary of Pinnacle Holding Company, LLC.

### Pinnacle Capital Management, LLC

Pinnacle Capital Management (PCM) is a boutique investment management firm providing services to individual investors, corporations, pension funds, foundations, endowments, labor unions, insurance companies, healthcare organizations and governments. PCM specializes in managing equity, balanced and fixed income portfolios by identifying undervalued securities of well-known companies.

#### *Sub-Advisory Services*

PCM provides portfolio management services in the Pinnacle Investments' Pinnacle Capital Management Separately Managed Account Program (hereinafter "PCM SMAP"). PCM SMAP is an advisory program where Pinnacle Investments, LLC (hereinafter "PI") is the advisor and program sponsor, and PCM is the sub-advisor responsible for portfolio management services. As part of its portfolio management services, depending on the version of the PCM SMAP agreement, PCM may vote proxies on behalf of participants.

PCM is compensated by PI for providing portfolio management services for clients participating in the advisory program. The participants in PCM SMAP are clients of PI and not advisory clients of PCM. PI is responsible for assisting clients in understanding the advisory program in light of the client's investment objectives and financial situation; initially and on an ongoing basis. PI is also responsible for client communication, portfolio reviews, client services, account maintenance, and communicating client portfolio strategy changes to PCM. PCM manages client portfolios in accordance with the portfolio strategy selected on the PCM SMAP agreement with full trading discretion, subject to written restrictions, and does not act in any other capacity.

#### *Sub-Advisory Services Fees*

PCM is compensated by PI as a sub-advisor for providing portfolio management services for clients participating in PCM SMAP. Generally, PI compensates PCM 0.65% of assets under management in the program annually. In certain circumstances, PI may compensate PCM at an alternative amount based on a mutually agreed upon fee for a particular PCM SMAP agreement. This may amount may be more or less than 0.65% annually.

### Pinnacle Advisors, LLC

Pinnacle Advisors, LLC is a SEC-registered investment advisor and is affiliated with Pinnacle Investments, LLC. The affiliate CRD Number is 142910 and the affiliate Investment Adviser SEC File Number is 801-67860.

### **Item 10: Brokerage Practices**

Confidential Planning I, LLC does not receive research or other products or services other than execution from a broker-dealer or a third party in connection with client securities transactions, sometimes called “soft dollars”.

Confidential Planning I, LLC and Pinnacle Investments, LLC are related companies. Confidential Planning I, LLC’s employees’, working in an RIA capacity, may enroll clients in its related company’s Advisory programs and direct clients to its related companies

Confidential Planning I, does not have the ability to aggregate the purchase or sale of securities for various client accounts.

### **Item 11: Review of Accounts**

At Confidential Planning I, LLC, all accounts are reviewed at least annually.

### **Item 12: Client Referrals and Other Compensation**

Confidential Planning I, LLC (or related persons) does not compensate for client referrals nor does it receive economic benefits, such as sales awards or other prizes, for providing investment advice or other advisory services to our clients.

### **Item 13: Custody**

Confidential Planning I, LLC does not have custody of our client’s accounts. Account statements will be sent directly to plan participants from the qualified 403(B) custodian and/or record keeper. These statements should be carefully reviewed by the plan participants.

### **Item 14: Investment Discretion**

Confidential Planning I, LLC does not provide advice on a discretionary basis.

### **Item 15: Voting Client Securities**

Client's participating in the advisory programs of Confidential Planning I, LLC may or may not receive company proxies on their holdings depending on whether they have authorized the Advisor to vote proxies on their behalf. Confidential Planning I, LLC is not, and has not, been authorized by any clients to vote proxies on their behalf and does not vote client securities.

### **Item 18: Financial Information**

In certain circumstances, registered investment advisors are required to provide clients with material financial information or disclosures about their financial condition. Information is considered material if there is a substantial likelihood that a reasonable investor would consider it important to an investment decision, or if it would alter the total mix of available information about the company.

Confidential Planning I, LLC has no material financial information or disclosures about their financial condition that a reasonable investor would consider important to an investment decision.