

## Plan Confidence – Direct to Consumer

### Plan Confidence Corporation

IARD # 283781

**February 8, 2024**

Kevin T. Clark, RF<sup>TM</sup>, Chief Executive Officer and Chief Compliance Officer  
Plan Confidence Corporation

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This brochure provides information about the qualifications and business practices of Plan Confidence Corporation. If you have any questions about the contents of this brochure, please contact us by phone at 312-373-0772 or e-mail at [support@planconfidence.com](mailto:support@planconfidence.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”), or by any state securities authority.

“Registration does not imply a certain level of skill or training.”

Additional information about Plan Confidence Corporation also is available on the SEC's website at:  
[www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

#### Item 2 Material Changes

Plan Confidence Corporation’s (PLAN CONFIDENCE CORPORATION) initial Form ADV Part 2A Disclosure Brochure registration became effective on May 16, 2016.

We have recently made the following changes since our last Form ADV Fiscal Year-Ending filings on March 7, 2023:

- ITEM #1 – Address Changed
- ITEM #4 – Changed SEC Registration back to “Internet Only”
- ITEM #4 – Eliminated the “**Do It For Me Discretionary Services**” for new clients
- ITEM #4 – Eliminated the ERISA 3(21)(a)(i) Fiduciary language for discretionary services
- ITEM #5 – Changed pricing schedule from “tiered” pricing to flat rate of \$29 for advice only
- ITEM #5 – Changed pricing schedule from “tiered” pricing to 5bps per month for Trading services
- ITEM #5 – Eliminated Price schedule for Discretionary services
- ITEM #12 – removed language regarding brokerage practices for the Discretionary services
- ITEM #16 - removed language regarding having discretion

For a complete review of Plan Confidence Corporation’s services, activities and disclosures please review the following Form ADV Part 2A Disclosure Brochure content.

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

<b>Item 1</b>	<b>Cover Page .....</b>	<b>page 1</b>
<b>Item 2</b>	<b>Material Changes.....</b>	<b>page 1</b>
<b>Item 3</b>	<b>Table of Contents.....</b>	<b>page 2</b>
<b>Item 4</b>	<b>Advisory Business.....</b>	<b>page 3</b>
<b>Item 5</b>	<b>Fees and Compensation.....</b>	<b>page 4</b>
<b>Item 6</b>	<b>Performance Based Fees and Side-By-Side Management.....</b>	<b>page 5</b>
<b>Item 7</b>	<b>Types of Clients .....</b>	<b>page 5</b>
<b>Item 8</b>	<b>Methods of Analysis, Investment Strategies and Risk of Loss.....</b>	<b>page 5</b>
<b>Item 9</b>	<b>Disciplinary Information.....</b>	<b>page 7</b>
<b>Item 10</b>	<b>Other Financial Industry Activities and Affiliations.....</b>	<b>page 7</b>
<b>Item 11</b>	<b>Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....</b>	<b>page 7</b>
<b>Item 12</b>	<b>Brokerage Practices .....</b>	<b>page 8</b>
<b>Item 13</b>	<b>Review of Accounts.....</b>	<b>page 8</b>
<b>Item 14</b>	<b>Client Referrals and Other Compensation.....</b>	<b>page 8</b>
<b>Item 15</b>	<b>Custody.....</b>	<b>page 8</b>
<b>Item 16</b>	<b>Investment Discretion.....</b>	<b>page 8</b>
<b>Item 17</b>	<b>Voting Client Securities.....</b>	<b>page 9</b>
<b>Item 18</b>	<b>Financial Information.....</b>	<b>page 9</b>
	<b>Disclosure Brochure Supplement.....</b>	<b>page 10</b>
	<b>Privacy Policy.....</b>	<b>page 12</b>

#### **Item 4 Advisory Business**

PLAN CONFIDENCE CORPORATION has been an “internet only” investment adviser registered with the United States Securities and Exchange Commission (“SEC”) since May 2016. In March 2022, PLAN CONFIDENCE CORPORATION transitioned its registration to being registered as a “Multi State” Investment Adviser with the SEC. PLAN CONFIDENCE CORPORATION is notice filed in the state of Florida and in other states as required by state rules and regulations. In August of 2023, PLAN CONFIDENCE CORPORATION changed back to an “Internet Only” adviser registered with the SEC. PLAN CONFIDENCE CORPORATION is a Corporation and was incorporated in the state of Delaware in 2016. Kevin T. Clark, RF<sup>TM</sup>, is the Chief Executive Officer (“CEO”) and Mark Reddark is the Chief Technology Officer (“CTO”) of PLAN CONFIDENCE CORPORATION. As of March 1, 2022, Kevin Clark owns 66% of PLAN CONFIDENCE CORPORATION, Mark Reddick owns 19% of PLAN CONFIDENCE CORPORATION and other parties own the remaining 15% interest.

#### **Plan Confidence<sup>TM</sup>**

##### **Investment Advice Services**

Plan Confidence<sup>TM</sup> is an online investment advice service created by PLAN CONFIDENCE CORPORATION. Plan Confidence<sup>TM</sup> allows a client (also referred to as “participant”) to receive illustrative asset allocation models that utilize the available investment options within a client’s universe of investment options available in their plan(s). Each client will be provided an asset allocation model designed for a client’s unique risk profile. Client’s risk profile may be selected using multiple factors which include, but are not limited to, client’s age, assets outside of client’s universe of investment option, expected time to retire, selected Morningstar Categories, and risk tolerance. Client may change their asset allocation model at any time for any reason.

Plan Confidence<sup>TM</sup> services do not analyze, recommend, advise on or provide discretionary trading on any individual securities, Target Date funds, Asset Allocation funds or company stock investment options.

##### **Plan Confidence Corporation offers three levels of Investment Advice Services:**

**“Do It Yourself Non-Discretionary Services”** – Personalized investment advice with the use of any available investment strategy offered through Plan Confidence Corporation. Advice will be uploaded to the participant’s dashboard and an email and/or “push” notification will be sent to the participant. It is the participant’s responsibility to log in to their plan sponsor/custodian website and make any and all changes to their account. Assets may be held at any custodian.

**“Do It For Me Non-Discretionary Services”** – Personalized investment advice with the use of any available investment strategy offered through Plan Confidence Corporation. Advice will be uploaded to the client’s dashboard and an email and/or “push” notification will be sent to the client. The client will notify PLAN CONFIDENCE CORPORATION they would like their account traded at their plan sponsor/custodian by “clicking” the “Please Trade My Account” button. Plan Confidence Corporation will utilize the services of a third-party Order Management System (Pontera, formerly known as Feex) to complete the trades. Pontera uses proprietary technology to place the recommended changes on the client’s plan sponsor/custodian website. Pontera provides Plan Confidence Corporation with a platform to view and upload trades for our clients at any custodian. The Username and Password for the client’s account will be stored at Pontera and used to execute the trades. At no time will Plan Confidence Corporation have access to the Username and/or Password and at no time will Plan Confidence have any direct communication with the custodian or custody of the client’s assets. Assets may be held at any custodian. However, our clients will need to have an active Username and Password and be approved for online trading at your custodian to utilize this service.

### **Additional PLAN CONFIDENCE CORPORATION Advisory Services Disclosures**

Amazon Web Services (AWS), a comprehensive web services provider, is utilized by PLAN CONFIDENCE CORPORATION to provide Plan Confidence™ hosting services to clients. AWS centralizes security to protect sensitive data and prevent data loss by hosting data in a cloud environment, not on individual devices, which reduces the risk of intrusion through insecure devices or network connections. The environment provided by AWS includes web servers, encrypted databases, secure document storage and daily database backups. Access to the PLAN CONFIDENCE AWS account is secured by limited functionality with strong passwords and multi-factor authentication as provided by AWS.

PLAN CONFIDENCE CORPORATION does not participate in any wrap fee program as a portfolio manager.

**ERISA FIDUCIARY STATUS:** PLAN CONFIDENCE CORPORATION is an ERISA Section 3(21) (a) (ii) Limited Services Fiduciary that makes recommendations to plan clients contributing to Qualified Retirement Plans, Plan accounts and/or other qualified retirement accounts through the Plan Confidence™ services while providing non-discretionary advice and trading services.

#### **Assets Under Management**

As of December 31, 2023 PLAN CONFIDENCE CORPORATION has \$31,000 in discretionary and \$0 in non-discretionary assets under management.

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

##### **Plan Confidence™ Services Fee and Fee Authorization**

**Plan Confidence “Do It Yourself Non-Discretionary Services” Monthly Account Asset Based Services Fee Schedule (BASE FEE)– \$29.00 per month per account.**

**Plan Confidence “Do It For Me Non-Discretionary Services” Monthly Account Asset Based Services Fee Schedule - \$29.00 Base Fee PLUS 5 basis points per month of the account value (rounded to the nearest \$5 increment) Trading Fee**

**EXAMPLE: \$100,000 account value**  
                  **\$29.00 – Base Fee**  
+   **\$50.00 – Trading Fee (\$100,000 x .0005)**  
                  **\$79.00 per month (rounded to \$80)**

**The trading fee is updated quarterly based off your account value.**

All fees above may be negotiable.

#### **Fee Authorization-**

A recurring fee is paid in advance for **Plan Confidence™** services per each account serviced by PLAN CONFIDENCE CORPORATION. Client authorizes the recurring monthly fee through their plan, employer, plan sponsor or Stripe, Inc. (“Stripe”), a third-party online payment processor. Stripe developed a secure online payment service to accept credit and debit card payments from clients. Stripe is not a bank, custodian or a money services business (“MSB”). Stripe does not offer banking, custodial or MSB services as defined by the United States

Department of Treasury. In addition, Stripe does not assume any liability for Plan Confidence services purchased using Stripe's online payment service.

#### **Additional Compensation Disclosures**

Plan Confidence™ Agreement Termination- Client may terminate Plan Confidence™ agreement and services by revoking their recurring monthly fee authorization through Stripe by “clicking” the cancel button on the client's dashboard. Plan Confidence™ agreements may also be terminated by either party, at any time, effective upon receipt of written or electronic notice to the other party. The fees for these services do not include payment for other professional services.

#### **General Compensation Conflicts Compliance Oversight Policies**

**PLAN CONFIDENCE CORPORATION Obligations** – PLAN CONFIDENCE CORPORATION and its employees, associates and investment adviser representatives (“IAR”) are subject to the following specific obligations when dealing with clients:

- The duty to have a reasonable, independent basis for its investment advice;
- The duty to ensure that investment advice is suitable to meeting the client's individual objectives, needs, and circumstances and a duty to be loyal to clients.

Kevin T. Clark, RFTM, the Chief Executive Officer (CEO) and Chief Compliance Officer (CCO) of PLAN CONFIDENCE CORPORATION, is responsible for supervising PLAN CONFIDENCE CORPORATION's investment adviser services and programming the software to deliver the advice. The main reports and documents the software reviews are client Profiles, the fund lineup available in a plan, and Morningstar Reports.

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

PLAN CONFIDENCE CORPORATION does not conduct any performance-based fee advisory business or activities.

#### **Item 7 Types of Clients**

PLAN CONFIDENCE CORPORATION generally provides investment advice to the following clients:

- Individuals
- Businesses and Business Owners
- Defined Contribution Plans (401k, 403b, 457, SIMPLE, etc.) and Plan Participants
- Other Retirement Plans and Plan Participants

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

##### **Methods of Analysis –**

Plan Confidence uses a proprietary scoring methodology created to review the available investment options for each client. A client may select any given model available or may complete a questionnaire that reviews the risk tolerance, age, other available assets and other information necessary to be recommended to an Asset Allocation Model.

##### **Investment Strategies –**

- A. Asset Allocation Model Selection** - is the implementation of an investment strategy that attempts to balance risk versus reward by adjusting the percentage of each asset in an investment portfolio according to the investor's risk tolerance, goals and investment time frame. The client will also state whether they prefer a **Strategic Asset Allocation – based on Modern Portfolio Theory**; or a **Semi-Tactical Asset Allocation – based on Momentum Investing**.

**I. Strategic Asset Allocation – based on Modern Portfolio Theory**

**Strategic Asset Allocation** - A portfolio strategy that involves setting target allocations for various asset classes, and periodically rebalancing the portfolio allocations when they deviate significantly from the initial settings due to differing returns from various assets or a change in the overall asset classes for the model.

**Modern Portfolio Theory** (MPT) is a mathematical framework for assembling a portfolio of assets such that the expected return is maximized for a given level of risk, defined as variance. Its key insight is that an asset's risk and return should not be assessed by itself, but by how it contributes to a portfolio's overall risk and return. The Strategic Asset Allocation Models will be reviewed no less than quarterly.

If the client chooses a strategic model, they will have the option of choosing which Asset Allocation Categories they prefer not to receive any recommendations on. Once this process has been completed, the appropriate asset allocation model will be “overlaid” over their available investment options and the final output will display the recommended percentage of each investment to use. Proxy investments will be assigned for any missing asset categories. The client will be notified when and why a proxy is being used in their recommendations.

- a. MPT Models
  - i. A variety of MPT “models” will be uploaded into PC database
  - ii. The model(s) provided will best “mirror” a Nationally Recognized Investment Management firm
  - iii. 5 models will be available (Income, Conservative, Moderate, Aggressive and 100% Equity)
  - iv. Each model will be reviewed by Kevin T Clark, RFTM prior to use
- b. Investment Management Firm(s) models will be reviewed Quarterly (Jan, Apr, Jul, Oct) for “rebalance” advice

**II. Tactical Asset Allocation – based on Momentum Investing**

**Tactical Asset Allocation** (TAA) is a dynamic investment strategy that actively adjusts a portfolio's asset allocation. The goal of a TAA strategy is to improve the risk-adjusted returns of passive management investing.

**Momentum Investing** is a system of buying securities that have had high returns over the past three to twelve months, and selling those that have had poor returns over the same period. The Tactical Asset Allocation Models will be reviewed daily.

- a. 4 Models will be available (Conservative, Moderate, Aggressive and 100% Equity)
- b. The S&P 500 Category will be reviewed as an overall proxy for equity portions of the model
- c. The PIMCO Total Return (PTTRX) will be reviewed as an overall proxy for the fixed income equity portions of the model
- d. The S&P 500 index and PTTRX (via [www.stockcharts.com](http://www.stockcharts.com)) will be reviewed for “buy”, “hold” and “sell” signals and the volatility index (VIX) (via [www.cnbc.com](http://www.cnbc.com)) will be reviewed each day the NYSE is open for business.

- e. (when necessary) Model Changes uploaded will go “live” the following trading day at 9am EST.

**B. Investment Strategies for Future Dollars** (money that has not been added to the account yet). A **Dollar Cost Averaging Methodology** (DCA) will be used. DCA is the technique of buying a fixed dollar amount of a particular investment on a regular schedule, regardless of the share price. More shares are purchased when prices are low, and fewer shares are bought when prices are high.

- a. Reviewed Monthly
- b. One to Three Morningstar Asset Classes selected – Asset Class(es) selected that are expected to be losing momentum and believed to remain flat or decrease in value over the next 30-60 days.

**Risk of Loss** – There are risks inherent in all financial decisions and transactions. PLAN CONFIDENCE CORPORATION cannot guarantee the current or future performance of investment recommendations, client accounts performance, or the success of any investment decision or strategy that PLAN CONFIDENCE CORPORATION may recommend to a client.

#### **Item 9 Disciplinary Information**

PLAN CONFIDENCE CORPORATION has no disciplinary information history to disclose. PLAN CONFIDENCE CORPORATION IARs have no disciplinary information history to disclose.

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

PLAN CONFIDENCE CORPORATION is not registered as a broker-dealer, futures commission merchant, commodity pool operator or commodity trading advisor and will not become registered in any of these capacities.

No PLAN CONFIDENCE CORPORATION IAR is an associate of a futures commission merchant, commodity pool operator or commodity trading advisor. PLAN CONFIDENCE CORPORATION's IARs will not become registered or associated in any of these capacities.

No PLAN CONFIDENCE CORPORATION IAR is currently licensed as a representative or affiliated with a broker-dealer, or another a registered investment adviser.

No PLAN CONFIDENCE CORPORATION IAR is currently licensed as an insurance agent or affiliated with an insurance agency or insurance company.

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

PLAN CONFIDENCE CORPORATION adopted the following "Code of Ethics" governing the conduct of personal securities trading by persons associated with it (Associates). The purpose of this Code of Ethics is to foster compliance with applicable federal and state statutes and regulatory requirements and to eliminate transactions suspected of being in conflict with the best interests of PLAN CONFIDENCE CORPORATION's clients.

- PLAN CONFIDENCE CORPORATION does not recommend individual securities to clients in which PLAN CONFIDENCE CORPORATION or Associates have a material financial interest.
- PLAN CONFIDENCE CORPORATION does not recommend individual securities to clients or buys or sells individual securities for client accounts.

**Conflicts of Interest** – PLAN CONFIDENCE CORPORATION must disclose any potential or actual conflicts of interest when dealing with clients. PLAN CONFIDENCE CORPORATION mitigates its conflicts by doing the following:

- Not entering into any revenue sharing with any financial institution to influence the recommendation of their funds and/or products
- Not charging any commissions or variable fees
- Only charging fees that may be paid via credit card, debit card, ACH transaction or paid by an employer retirement plan

**PLAN CONFIDENCE CORPORATION Obligations** – PLAN CONFIDENCE CORPORATION and its investment adviser representatives are subject to the following specific obligations when dealing with clients:

- The duty to have a reasonable, independent basis for its investment advice; and
- The duty to ensure that investment advice is suitable to meeting the client’s individual objectives, needs, and circumstances based on client’s risk profile; and a duty to be loyal to the client.

If you have any questions regarding PLAN CONFIDENCE CORPORATION’s Code of Ethics please contact PLAN CONFIDENCE CORPORATION by e-mail at [support@planconfidence.com](mailto:support@planconfidence.com).

## **Item 12 Brokerage Practices**

For our “Do It Yourself Non-Discretionary Service” and “Do it For Me Non-Discretionary Services” we do not select, direct or recommend broker-dealers or custodians for client plans, accounts or transactions. PLAN CONFIDENCE CORPORATION does not determine the reasonableness of broker-dealer or custodian compensation. It is up to the client to choose the broker-dealer and/or custodian.

PLAN CONFIDENCE CORPORATION does not receive any research or soft dollar benefits from broker-dealers, custodians or other third parties.

## **Item 13 Review of Accounts**

PLAN CONFIDENCE CORPORATION will “rescore” all accounts any time a client provides us a new fund line up and, at a minimum, twice per year. The Strategic Asset Allocation Models will be reviewed no less than quarterly. The Semi-Tactical Asset Allocation will be reviewed every day the United States New York Stock Exchange is open for normal business. Clients will be notified via email as a primary source of communication to log in to their active Plan Confidence account to review. Clients may also download the iOS (Apple) and/or the Android (Google) app from the Plan Confidence website or the iTunes Store (Apple) or Google Play Store (Google).

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

**Promoters** - Plan Confidence compensates Promoters for referring investment advisory clients to Plan Confidence. Promoters receive 50% (or more) of the Plan Confidence™ services fee clients pay Plan Confidence (minus the fees charged to Plan Confidence from Stripe, Inc and Pontera). Promoters are independent contractors and not affiliated with Plan Confidence. These Promoter relationships do not increase the Plan Confidence™ services fee that clients pay Plan Confidence. Promoter Agreements entered into between Plan Confidence and Promoters will at all times be in compliance with the rules and regulations under 17 CFR Section 275.206(4)-1. Plan Confidence shall be solely responsible for providing Plan Confidence™ services advice on the account(s) that clients establish with Plan Confidence.

## **Item 15 Custody**

PLAN CONFIDENCE CORPORATION has limited custody of client assets solely due to our ability to receive a recurring monthly fee (for all accounts). Clients receive account statements from the custodians or debit/credit card providers that fee is paid. Clients should carefully review those statements with the statements from PLAN CONFIDENCE CORPORATION.

## **Item 16 Investment Discretion**



PLAN CONFIDENCE CORPORATION has no discretionary authority over client accounts if using the “Do It Yourself Non-Discretionary Services,” or “Do It For Me Non- Discretionary Services”.

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

PLAN CONFIDENCE CORPORATION will not exercise proxy-voting authority over the securities held in client accounts or Qualified Retirement Plans. The obligation to vote client proxies shall at all times rest with the clients.

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

Since PLAN CONFIDENCE CORPORATION has no financial situations which may impair our ability to conduct business PLAN CONFIDENCE CORPORATION has no financial information to report.

## **Disclosure Brochure Supplement (DBS)**

February 8, 2024

### **DBS Item 1 Cover Page**

**Kevin T. Clark, RF<sup>TM</sup>, CEO and CCO**  
**PLAN CONFIDENCE CORPORATION**  
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This Disclosure Brochure Supplement provides information about Kevin Clark, RF<sup>TM</sup> that supplements the PLAN CONFIDENCE CORPORATION Disclosure Brochure referenced above. If you have any questions about the contents of the PLAN CONFIDENCE CORPORATION Disclosure Brochure and Disclosure Brochure Supplement, please contact Kevin Clark, RF<sup>TM</sup> by phone at 312-373-0772 or e-mail at [support@PlanConfidence.com](mailto:support@PlanConfidence.com). Additional information about Kevin Clark, RF<sup>TM</sup> is available on the SEC's website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### **DBS Item 2 Educational Background and Business Experience**

- **Year of Birth: 1973**
- **Education: Beloit College – Beloit WI, Bachelor of Arts, Pre-Law/Sociology, August 1991 – May 1995**
- **Business Background over the last five years:**
  - PLAN CONFIDENCE CORPORATION, Investment Adviser, President & CCO, March 2016 to present
- **Professional Designations and Professional Licenses**
  - Uniform Combined State Law Examination, Series 65, September 1998
  - Registered Fiduciary (RF<sup>TM</sup>) - The RF<sup>TM</sup> certification is granted by Dalbar, Inc and identifies financial professionals that have achieved pertinent academic qualifications and licenses, learned required practices, have passed a background check, completed a certification test and continue ongoing education. January 2016. DALBAR, Inc. is the financial community's leading independent expert for evaluating, auditing and rating business practices, customer performance, product quality and service.

### **DBS Item 3 Disciplinary Information**

- Kevin Clark, RF<sup>TM</sup> has no disciplinary information history to disclose.

**DBS Item 4 Other Business Activities**

- **Broker-Dealer and Other Investment Adviser** - No current affiliations.
- **Insurance** - No current affiliations.
- **Other** - No current affiliations.

**DBS Item 5 Additional Compensation**

Kevin Clark, RF<sup>TM</sup> has no other additional compensation.

**DBS Item 6 Supervision**

Kevin Clark, RF<sup>TM</sup> is the Chief Compliance Officer and Supervisor for PLAN CONFIDENCE CORPORATION. You may contact him by e-mail at: [kevin@planconfidence.com](mailto:kevin@planconfidence.com).