



## **Disclosure Brochure**

**(Form ADV, Part 2A)**

### **Finsie Finance, LLC**

**3234 Upper Lock Avenue, Belmont, CA 94002**

[www.finsie.com](http://www.finsie.com)

March 31, 2023

### **Item 1 – Cover Page**

This Disclosure Brochure provides information about the qualifications and business practices of Finsie Finance, LLC (“Finsie”). If you have any questions about the contents of this brochure, please contact us at 650-262-1863 or [Legal@Finsie.com](mailto:Legal@Finsie.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.

Finsie is registered with the United States Securities and Exchange Commission (“SEC”) as a registered investment adviser. Registration as an investment adviser does not imply any level of skill or training.

Additional information about Finsie is also available on the SEC’s [Investment Adviser Public Disclosure website](#) by conducting a Firm search using our CRD No. 313047.

## Item 2 – Material Changes

We initially provide you with a copy of our Disclosure Brochure when we enter into an agreement with you. On an annual basis, we will provide you with a Summary of Material Changes within 120 days of our fiscal year-end. In the alternative, we may choose to provide you with a complete copy of our brochure.

Since our last annual amendment, dated March 23, 2022, we have made the following material change:

- **Item 14, Client Referrals and Other Compensation**, was revised to clarify further potential conflicts arising from client referral arrangements.

We have made other changes that were editorial in nature (e.g., to correct typographical or grammatical errors, to adjust formatting, or to provide additional information or clarifications) that we do not consider material changes.

You may obtain a current copy of our Disclosure Brochure from our [website](#) or from the SEC's [Investment Adviser Public Disclosure website](#) by conducting a Firm search using our CRD No. 313047.

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## Item 4 – Advisory Business

Finsie Finance, LLC (“Finsie”) is a Delaware corporation established in February 2021. Finsie is registered with the United States Securities and Exchange Commission (“SEC”) as a registered investment adviser.

Finsie is wholly owned by Finsie, Co, a Delaware corporation formed in July 2020. Matthew D. Stewart, holding more than a 25% ownership interest in Finsie, Co, is an indirect owner of Finsie.

We are a financial technology company designed to help you find and retain a financial adviser appropriate to your needs. You can use our free web-based tools to identify your needs and filter the list of available financial advisers to find those who provide the services you need.

To use our service, you will need to complete a detailed online form of approximately 10–20 questions (the number may vary depending on the responses you provide). The form requests information such as your age, location, marital status, family information, income, assets, and liabilities. In addition, we seek information on what types of services you need. This information is used to filter the list of financial professionals to present you with those suitable for you. For example, financial professionals are required to be registered to provide services in specific jurisdictions, so your zip code is used to match you with financial professionals who are properly registered and accepting new clients in your location.

In addition, the information you provide will help narrow the field of financial professionals to those who have experience with your particular needs. For example, if you have children under 15, we may suggest financial professionals who provide planning for college funding. If you are over 50, we may suggest financial professionals who offer retirement planning. If you have non-mortgage debt, we may direct you to someone who provides budgeting assistance.

Therefore, it is important that you provide complete and accurate information to be directed to appropriate financial professionals. Our goal and our duty as a registered investment adviser is to present you with financial professionals who are best suited to fulfill your specific needs. If you are unhappy with the service you are receiving from your financial professional, or if your needs change over time, we encourage you to revisit the initial questionnaire and receive updated recommendations.

To help ensure you receive quality advisory services, we perform pre-screening of the financial professionals who participate in our program. All financial professionals are required to have the appropriate qualifications to provide the services listed. Financial professionals may be (1) registered as a sole-proprietor registered investment adviser (RIA), (2) registered as an investment adviser representative (IAR) of an RIA, or (3) hold the CERTIFIED FINANCIAL PLANNER™ (CFP®) designation.<sup>1</sup>

We seek financial professionals who have a consumer-first business practice. Ideally, they are fee-only registered investment advisers. Registered investment advisers are required to act in your best interest and not put their interest ahead of yours.

“Fee-only” means that they are only compensated by their clients who receive their services. They do not accept commissions for selling products, which can present a conflict of interest.

Our pre-screening process includes the following:

- We review the financial professional’s record on [FINRA’s BrokerCheck website](#), [SEC’s Investment Adviser Public Disclosure website](#), and/or the [CFP Board’s website](#), as appropriate. These resources provide important information about the individual’s qualifications, as well as any disciplinary disclosures.
- We conduct a thorough interview with the financial professional to discuss their background, their business model, and the services they provide. This is to ensure that they align with our consumer-first philosophy.
- We assess the fees charged by the financial professional to ensure they are within a reasonable range for the services performed.

On an ongoing basis, we perform annual assessments of the financial professionals, using the same pre-screening methods outlined above, to verify they continue to

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<sup>1</sup> The CFP® is a professional certification granted by the Certified Financial Planner Board of Standards, Inc. (“CFP Board”). To attain the right to use the CFP® designation, an individual must fulfill the CFP Board’s requirements to complete a course of education, to successfully pass an examination, to meet a level of experience, and to agree to be bound by the CFP Board’s [Code of Ethics and Standards of Conduct](#). To retain the right to continue to use the designation, individuals must fulfill continuing education requirements. Further information may be obtained from the CFP Board’s [website](#).

meet our requirements. We survey our users to assess their satisfaction with the services they receive from their financial professionals. In addition, by providing consumer reviews, our users aid us in monitoring the ongoing performance of financial professionals and consumer satisfaction with the services they provide.

Although we impose certain standards upon financial professionals to be included in our program, you are responsible for performing your own research on the qualifications and backgrounds of the financial advisers and making the final selection. We recommend that you review the disclosure documents for each adviser available on our website (e.g., Form ADV Parts 2A and 2B, Form CRS, etc.) and perform a background check on any firm or individual you are considering by using the SEC's [Investment Adviser Public Disclosure website](#).

Furthermore, we are not responsible for the accuracy or completeness of the services provided by the financial professional. We do not participate in the delivery of services to you or provide advice regarding specific investments.

Our services are provided solely online through our interactive website. Other than providing technical support on the use of our website, we do not provide any in-person or telephone consultations with users.

We do not manage any assets on either a discretionary or non-discretionary basis.

## **Item 5 – Fees and Compensation**

Our service is free to users. We are compensated by financial advisers for the referral of clients. When you are matched with a financial adviser through our website, we receive 30% of the advisory fees that you pay to the financial adviser for a period of at least one year from the date of your engagement with the financial adviser. Per our terms and conditions, financial advisers may only charge you their standard fee for services and may not charge a higher fee than non-referred clients would be charged.

Each financial advisor's fees and billing practices are more specifically described in their respective disclosure documents. You may incur certain charges imposed by custodians, broker-dealers, and other third parties, such as transfer or wire fees, deferred sales charges, other fees, and taxes.

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

Because we do not manage assets, we do not charge any performance-based fees or perform any side-by-side management of accounts.

**Item 7 – Types of Clients**

Our service is available to individuals, including high-net-worth individuals. We do not impose any minimum level of wealth or account size to use our service.

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

Because we do not manage assets, we do not perform any analysis of investments or investment strategies.

You should be aware that all investments involve risks that you should be prepared to bear. Past performance does not guarantee future results. Finsie cannot ensure that a client's financial goals will be attained through the recommended financial advisor. We encourage you to review your financial adviser's disclosure documents carefully for information regarding specific risks associated with the financial adviser's investment strategies.

**Item 9 – Disciplinary Information**

Finsie and its associated persons do not have any criminal or civil actions, administrative proceedings, or self-regulatory organization proceedings to disclose.

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

Finsie and its associated persons are not registered and do not have pending applications to register as a broker-dealer, a broker-dealer representative, a futures commission merchant, a commodity pool operator, a commodity trading advisor, or an associated person of any of the foregoing entities.

Because we receive compensation for referring you to a financial adviser, there is a conflict of interest for us to recommend a specific investment adviser. However, we mitigate this conflict of interest by providing you with the tools to make a fair and fully-informed decision about choosing your financial adviser. Our fee share is the

same regardless of which financial adviser you choose, and you are always free to choose an adviser from another source.

Finsie and its associated persons do not engage in any other business activities that present a material conflict of interest to our clients.

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

We have adopted a code of ethics pursuant to Rule 204A-1 that establishes standards of conduct for our firm and our associated persons. This code of ethics covers topics such as personal trading policies, insider trading, and conflicts of interest. You may obtain a copy of our code of ethics by contacting us using the contact information shown on the cover page.

We do not recommend securities to clients or execute transactions for client accounts.

### **Item 12 – Brokerage Practices**

We do not execute transactions in client accounts or recommend broker-dealers to you. We do not receive any soft dollar benefits. Please refer to your financial adviser's disclosure brochure for more information on their brokerage practices.

### **Item 13 – Review of Accounts**

Because we do not directly provide any discretionary or non-discretionary investment management, we do not provide ongoing review or monitoring of your investment accounts.

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

Other than the compensation from your financial adviser described in Item 5 above, we do not receive any economic benefit directly or indirectly from any third party for the advice you receive.

We have client referral arrangements with third parties who refer potential clients to our service (collectively, "Promoters"). In some cases, these arrangements require us to compensate the third parties for the referral. Compensation may include sharing



a portion of the fees we receive from financial advisers, payment per mention (in the case of social influencers), or a payment per user referred. If you were referred to our site by a third party where a compensation arrangement exists, we will provide you with information regarding the compensation as required by regulations. These arrangements present an incentive for a third party to refer you to Finsie. You are not charged any fee or incur additional costs for being referred to us.

### **Item 15 – Custody**

We do not have custody of any client assets at any time. Please review your financial adviser's disclosure brochure regarding its policies regarding custody.

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

We do not have discretion over client accounts at any time.

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

We do not accept voting authority for client securities, and we do not participate in class actions on behalf of users. Please refer to your financial adviser's disclosure brochure regarding policies on proxy voting and class actions.

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

We do not charge you a fee to use our services. Therefore, we are not required to provide a balance sheet in this disclosure brochure.

Finsie and its management personnel have not filed for bankruptcy and do not have any financial condition that is likely to reasonably impair our ability to provide the services outlined in this disclosure brochure.