



# Form ADV Part 2A

## Firm Brochure

Dated February 4, 2025

This brochure provides information about the qualifications and business practices of Confide Financial Planning & Investments, LLC. If you have any questions about the contents of this brochure, please contact us at 805-267-9540. 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.

Confide Financial Planning & Investments, LLC is registered as an Investment Adviser with the State of California. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about Confide Financial Planning & Investments, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and can be found using the firm's identification number, 326192.

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## Item 2 | Material Changes

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This Item provides a summary of any material changes that were made to this Brochure that reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators.

Confide Financial Planning & Investments, LLC may, at any time, update this Brochure and either send clients a copy or offer to send clients a copy (either by electronic means such as email or client portal, or in hard copy form). Pursuant to rules and regulations we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business fiscal year.

### Material Changes:

**Item 4:** Corporate Retirement Plan Services have been added as an offered service.

**Item 5:** The fee schedule for investment management and financial planning for new clients has been updated. A fee schedule has been added for Retirement Plan Management and Pension Consulting Services.

**Item 7:** The types of clients for whom CONFIDE may provide financial services has been updated.

At any time, you may also view a current Brochure for Confide Financial Planning & Investments, LLC on the SEC's public disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Alternatively, you can always request a copy of the most recent Brochure free of charge by contacting us at:

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## Item 4 | **Advisory Business**

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### Description of Advisory Firm

Confide Financial Planning & Investments, LLC (hereinafter “CONFIDE”, “we”, “us”, “our”) is an independent, fee-only comprehensive financial planning and investment management firm registered as an Investment Adviser with the state of California. CONFIDE was founded in March 2023 by Kristin J. Short, PhD as the founding principal of the firm. CONFIDE is a fiduciary and is legally obligated to act in our client’s best interest and to fully disclose and mitigate all conflicts of interest. As of December 31, 2024, CONFIDE has approximately \$6,287,785 in assets under management, all of which is managed on a discretionary basis. CONFIDE does not currently manage any assets on a non-discretionary basis.

### Types of Advisory Services

#### Investment Management Services

CONFIDE provides customized investment advisory solutions for its ongoing comprehensive financial planning clients. This is achieved through continuous personal interaction, while providing discretionary investment management and related advisory services. We work closely with each client to identify their investment goals and objectives, as well as risk tolerance, time horizon, and financial situation to create a portfolio strategy. We create an Investment Policy Statement (IPS) that outlines the client’s current financial situation and the investment portfolio recommended for the client. CONFIDE constructs investment portfolios consisting of low-cost, diversified mutual funds and/or exchange-traded funds (“ETFs”) with low holdings turnover. We may use model portfolios if the model matches your financial goals and investment objectives. We may also utilize individual stocks, bonds, or alternative investments to meet the needs of our clients. CONFIDE may retain a client’s legacy investments based on portfolio fit and/or tax considerations.

CONFIDE requests discretionary authority from its clients. Discretionary authority means that the client grants CONFIDE a standing authorization to select investments and execute trades on the client’s behalf without obtaining permission prior to each individual action. Clients may impose reasonable restrictions on investing in certain securities, types of securities or industry sectors. Fees pertaining to this service are outlined in Item 5 of this brochure.

At no additional fee and at the Client’s election, CONFIDE also provides the Client with a financial plan. Clients will be taken through establishing their goals and values around money. Clients will be required to provide pertinent information to help complete the following areas of analysis: net worth, cash flow, insurance, credit scores/reports, employee benefits, retirement planning, investments, college planning, and estate planning. Once the Client’s information is reviewed, their plan will be built and analyzed, and then the findings, analysis and potential changes to their current situation will be reviewed with the Client. Clients will receive a detailed financial plan designed to help achieve Client’s stated financial goals and

objectives. The plan and the Client's financial situation and goals will be monitored throughout the year.

## Financial Planning

CONFIDE offers ongoing, comprehensive, and project-based financial plans that are tailored to each client. Financial planning involves working with CONFIDE to engage in a thorough review and analysis of the client's current financial situation to develop a personalized financial plan.

Financial Plans are customized to each client scenario, and may include:

- Net Worth Analysis
- Goal Development
- Retirement Planning
- Employee Benefits Review
- Risk Management & Insurance
- Tax Planning & Optimization
- Saving & Investment Planning
- Human Capital Planning
- Cash Flow Planning
- Debt Management
- Student Loan Repayment & Forgiveness
- Education Funding
- Estate & Legacy Planning
- Business Planning

These services are based on fixed or hourly fees, and the final fee structure will be documenting in your Planning Agreement.

For hourly financial planning engagements, CONFIDE will discuss the financial planning topics to be covered during the engagement prior to providing an estimate of the number of hours required to complete the engagement. Project-based engagements are initiated in the same manner. For ongoing financial planning engagements, CONFIDE will work with the Client over an extended period. This process commences with the collection of data to assess the financial planning needs of the Client. At the conclusion of a financial planning engagement, CONFIDE provides the Client with a written completed financial plan and meets with the Client to discuss the action steps associated with its implementation.

For clients engaging in project-based planning, CONFIDE will support with the implementation of recommendations only to the extent that it is outlined in the project agreement. For clients engaging in ongoing financial planning, CONFIDE will monitor the plan on an ongoing basis and personally guide clients through all steps of implementation with regular check-ins, a formal annual review meeting, and anytime access to the custodial platform. Additional meetings may be scheduled as needed depending on the client's individual needs and situation, or as requested by the client. Additionally, clients engaging in ongoing financial planning may engage in plan updates annually or in response to major life events or changes to the client's financial situation.

Clients engaging in project-based financial planning process may request plan updates by establishing a subsequent project agreement. Fees pertaining to financial planning services are outlined in Item 5 of this brochure.

## Hourly Financial Planning

An hourly service is available for clients who have only a limited scope of what they would like addressed or reviewed, without having CONFIDE provide ongoing comprehensive financial planning and investment management. Hourly planning is used to advise in a more limited capacity on a variety of financial topics.

**Project-Based Consulting:** Project-based engagements may cover topics such as retirement planning, student loans, investment advice, risk management, college savings, cash flow, debt management, work benefits, and estate and incapacity planning. The scope of a project-based plan will be defined prior to beginning any work. Examples include, but are not limited to:

- Investments Tune Up: one-time fund selection and rebalancing recommendations of retirement and/or employer investment accounts.
- Student Loans: repayment plan selection, forgiveness strategy, consolidation assistance, private refinancing analysis.
- Budgeting: goal setting, assessment of cash flow, debt management strategies.

**Ongoing Retainer:** Hourly services may also be contracted on an ongoing basis for situations in which an ongoing relationship is most suitable, but where the scope of service is more limited than the comprehensive financial planning service offering.

Fees pertaining to hourly planning may be charged on a one-time basis or as a monthly fee. Fees are outlined in Item 5 of this brochure.

## Corporate Retirement Plan Services

CONFIDE offers corporate retirement plans services as a 3(38)-investment fiduciary for 401(k), pension, profit-sharing plans, and other employee benefit plans. Generally, such services consist of assisting employer plan sponsors or plan named fiduciaries in establishing, monitoring, and reviewing their company's participant-directed retirement plan, as well as assisting employer plan sponsors or plan named fiduciaries in buying and selling securities within the Plan on a discretionary basis. These services may include, but are not limited to:

- Identifying investment objectives and restrictions
  - Providing guidance on various asset classes and investment options
  - Recommending money managers to manage plan assets to achieve objectives
  - Monitoring performance of money managers and investment options and offering ongoing recommendations
- Recommending other service providers, such as custodians, administrators, and broker-dealers
- Creating a written pension consulting plan

These services are based on the goals, objectives, demographics, time horizon, and/or risk tolerance of the plan and its participants.

In providing retirement plan services, our firm does not provide any advisory services with

respect to the following types of assets: employer securities, real estate (excluding real estate funds and publicly-traded REITs), participant loans, non-publicly traded securities or assets, other illiquid investments, or brokerage window programs (collectively, “Excluded Assets”). Certain plans and/or clients that we may provide services to are regulated under the Employee Retirement Income Securities Act of 1974 (“ERISA”). We will provide employee benefit plan services to the plan sponsor and/or fiduciaries as described above for the fees set forth in Item 5 of this brochure. We are not subject to any disqualifications under Section 411 of ERISA. In performing fiduciary services, we are acting as an “investment manager” as defined in section 3(38) of ERISA pursuant to section 402(c)(3) of ERISA.

## Written Acknowledgement of Fiduciary Status Pertaining to Retirement Accounts

When CONFIDE provides investment advice to clients regarding ERISA retirement accounts or individual retirement accounts (“IRAs”), CONFIDE is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act (“ERISA”) and/or the Internal Revenue Code (“IRC”), as applicable, which are laws governing retirement accounts. When deemed to be in the client’s best interest, CONFIDE will provide investment advice to a client regarding a distribution from an ERISA retirement account or to roll over the assets to an IRA, or recommend a similar transaction including rollovers from one ERISA sponsored Plan to another, one IRA to another IRA, or from one type of account to another account. Such a recommendation creates a conflict of interest if CONFIDE will earn a new (or increase its current) advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by CONFIDE. As your fiduciary, we must:

- Meet a professional standard of care when making investment recommendations;
- Never put our financial interests ahead of yours when making recommendations;
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

## Client Tailored Services and Client Imposed Restrictions

CONFIDE offers the same suite of services to all our clients. However, specific client financial plans and their implementation are dependent upon the client’s unique goals and objectives, and the client’s Investment Policy Statement (IPS) which outlines the client’s current situation (e.g. income, tax levels, and risk tolerance levels) and is used to construct a client-specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

## Wrap Fee Programs

We do not participate in wrap fee programs.

## CCR Section 260.235.2 Disclosure

For clients who receive our financial planning services, we must state when a conflict exists between the interests of our firm and the interests of our client. The client is under no obligation to act upon our recommendation. If the client elects to act on any of the recommendations, the client is under no obligation to affect the transaction through our firm. Clients have the option to purchase investment products that we recommend through other brokers or agents that are not affiliated with CONFIDE.

CONFIDE has no discretionary assets and non-discretionary assets as of the date of this brochure.



# Item 5 | Fees and Compensation

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Please note, unless a client has received the firm’s disclosure brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below.

## Investment Management and Financial Planning Services (Full-Service Management)

Below is a brief description of our fees; however, you should review your executed Advisory Agreement for more detailed information regarding the exact fees you will be paying. No increase to the agreed-upon advisory fees outlined in the Advisory agreement shall occur without prior Client consent.

CONFIDE bases its fee on the market value of assets under its management and is negotiable. The fee is calculated according to the following standard fee schedule:

ASSETS UNDER MANAGEMENT	FEE SCHEDULE
First \$3,000,000	0.85%
Next \$7,000,000	0.50%
All assets above \$10,000,000	0.15%

Fees are paid monthly in arrears and are calculated based upon the market value of assets being managed by CONFIDE on the last trading day of the month. The advisory fee is a blended fee. Advisory fees are directly debited from client accounts, or the client may choose to pay by electronic funds transfer through AdvicePay.

For example, the monthly fees for a client with assets under management of \$4,500,000 would be calculated as follows:

$$((\$3,000,000 \times 0.85\%) + (\$1,500,000 \times 0.50\%)) / 12 = \$2,750$$

In the example above, the client’s blended (or weighted) fee equals 0.73%.

Although CONFIDE does not have a minimum investment portfolio requirement, we may implement a minimum annual fee of \$7,200, paid monthly in arrears at the rate of \$600 per month. This minimum fee reflects the comprehensive nature of CONFIDE’s financial planning, investment management, and ongoing advice, as well as the time and skill required to develop, implement, monitor, and adjust each Client’s financial plan and investment portfolio. In cases where the minimum fee exceeds 2% of portfolio assets, the fee will be paid using electronic funds transfer (EFT) via AdvicePay. At its discretion, CONFIDE may waive its minimum fee.

In addition, legacy clients may pay legacy fee rates at CONFIDE's discretion. These fee rates may differ from CONFIDE's standard fee rates. Accordingly, a number of current CONFIDE clients have fee schedules that differ from the standard fee schedule and/or minimum fee.

The fee is to be mutually agreed upon with the client prior to CONFIDE starting work on the client's financial plan. All fees will be evaluated on an annual basis, on the anniversary date of the original client advisory agreement. No increase to the annual fee shall be effective without agreement from the client by signing a new agreement or amending their current advisory agreement.

Accounts initiated or terminated during a billing cycle will be charged a prorated fee based on the amount of days in the month the accounts are under CONFIDE's management. An account may be terminated with written notice at least 14 calendar days in advance. Since fees are paid in arrears, no refund will be needed upon termination of the account.

### **Project-Based Planning/Hourly Planning**

Financial planning services may be assessed at a fixed-fee or hourly rate for project-based financial planning. Hourly rates range from \$200 per hour to \$400 per hour based on staff expertise and planning complexity. Fees are negotiable and the final agreed upon fee will be documented in your Planning Agreement.

Prior to beginning any work, CONFIDE and the client will mutually agree upon the total fee for the project, as well as determine the timeline for the engagement. Project-based planning agreements must include a minimum of one (1) hour of work. The total fee for a comprehensive financial plan typically ranges from \$3,000 to \$6,000 based on complexity. At the time of signing the project-based agreement, half of the agreed upon fee (50%) is due and payable prior to CONFIDE beginning the work. The remaining half (50%) of the total agreed upon fee is due at the completion of the engagement, as indicated by the engagement end date on the Consulting Agreement. Client may pay by credit card, debit credit or electronic funds transfer through AdvicePay.

On rare occasions, ongoing project-based planning may be offered. Prior to beginning any work, CONFIDE and the client will mutually agree upon the total ongoing monthly fee based on the scope of services. Ongoing planning must include a minimum of one (1) hour per month. Fees are paid monthly in arrears and may be paid by credit card, debit credit, or electronic funds transfer through AdvicePay. Automatic recurring payments must be established via AdvicePay prior to CONFIDE beginning the work.

### **Retirement Plan Management and Pension Consulting Services**

CONFIDE's fee is based on a percentage of assets under management and is negotiable. The annualized fees for retirement plan investment consulting services are based on the following fee schedule.

ASSETS UNDER MANAGEMENT	FEE SCHEDULE
First \$5,000,000	0.50%
Next \$10,000,000	0.35%
All assets above \$15,000,000	0.20%

The annual advisory fee is paid quarterly in arrears based on the value of the Client's account(s) as of the last day of the billing period. The advisory fee is a blended fee. For example, the quarterly fees for a client with assets under management of \$14,000,000 will be calculated as follows:

$$((\$5,000,000 \times 0.50\%) + (\$9,000,000 \times 0.35\%)) / 4 = \$14,125$$

This does not include fees to other parties, such as record keepers, custodians, or third-party administrators. CONFIDE relies on the valuation as provided by Client's custodian in determining assets under management. Our advisory fee is prorated for any partial billing periods occurring during the engagement, including the initial and terminating billing periods.

CONFIDE charges a minimum fee of \$5,000 per year for corporate retirement plan management and pension consulting services.

### Payment of Retirement Plan Management and Pension Consulting Services Fees

Retirement plan management and pension consulting services fees are withdrawn directly from the plan's accounts with the plan sponsor's written authorization. The plan sponsor can also choose to pay the advisory fee using electronic funds transfer (EFT) from the Client's banking account. Fees are paid quarterly in arrears.

### Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for client's transactions and determining the reasonableness of their compensation (e.g., commissions). We do not accept compensation for the sale of securities or other

investment products including asset-based sales charges or service fees from the sale of mutual funds.

### CCR Section 260.238(j) Disclosure

Please note, lower fees for comparable services may be available from other source.

## Item 6 | **Performance-Based Fees and Side-by-Side Management**

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We do not offer performance-based fees and do not engage in side-by-side management.

## Item 7 | Types of Clients

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We provide financial planning and portfolio management services to individuals, high net-worth individuals, pension and profit-sharing plans, charitable organizations, corporations, or other businesses, and other investment advisors. CONFIDE also works with business owners/plan sponsors to implement, manage, and monitor retirement plans.

We do not have a minimum account size requirement. For ongoing investment management and financial planning services, CONFIDE has a minimum annual fee of \$6,600. For corporate retirement plan management and pension consulting services, CONFIDE charges a minimum fee of \$5,000 per year.

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

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CONFIDE's investment philosophy is based, in large part, on Modern Portfolio Theory (MPT) and the benefits of seeking broad global diversification through the application of asset allocation. Investment decisions are based on a combination of historical data, peer-reviewed academic research, and analysis of current economic indicators.

### **Modern Portfolio Theory**

The underlying principles of MPT are:

- Investors are risk averse. The only acceptable risk is that which is adequately compensated by an expected return. Risk and investment return are related and an increase in risk requires an increased expected return.
- Markets are efficient. The same market information is available to all investors at the same time. The market prices every security fairly based upon this equal availability of information.
- The design of the portfolio as a whole is more important than the selection of any particular security. The appropriate allocation of capital among asset classes will have far more influence on long-term portfolio performance than the selection of individual securities.
- Investing for the long-term (preferably longer than ten years) becomes critical to investment success because it allows the long-term characteristics of the asset classes to surface.
- Increasing diversification of the portfolio with lower correlated asset class positions can decrease portfolio risk. Correlation is the statistical term for the extent to which two asset classes move in tandem or opposition to one another.

### **Passive Investment Management**

CONFIDE's investment strategy is predominately passive in terms of individual security selection with a focus on asset allocation decisions and impact. Passive investing involves building portfolios that are composed of various distinct asset classes. The asset classes are weighted in a manner to achieve the desired relationship between correlation, risk, and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange-traded funds (ETFs).

Passive investment management is characterized by low portfolio expenses (i.e., the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

CONFIDE employs a long-term investment strategy for its clients, as consistent with their financial goals. We manage all client investment accounts, including all employer-based retirement accounts, as one overall portfolio to allow for the purposes of attaining the

greatest investment growth and tax efficiency. We evaluate investment portfolios for asset location decisions to maximize after-tax investment returns for each client.

## Material Risks Involved

All investing strategies we offer involve risk and may result in a loss of clients' original investment which clients should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Material risks associated with our investment strategies are listed below.

**Market Risk:** Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

**Strategy Risk:** CONFIDE's investment strategies and/or investment techniques may not work as intended.

**Small and Medium Cap Company Risk:** Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

**Turnover Risk:** At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

**Limited Markets:** Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions, we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

**Concentration Risk:** Certain investment strategies focus on particular asset classes, industries, sectors, or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

**Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

**Legal or Legislative Risk:** Legislative changes or court rulings may impact the value of investments or the security owner's claim on the issuer's assets and finances.



**Inflation:** Inflation may erode the buying power of clients' investment portfolios, even if the nominal dollar value of the investments remains the same.

## Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

**Commercial Paper** is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured, the risk to the investor is that the issuer may default.

**Common stocks** may go up and down in price quite dramatically and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

**Corporate Bonds** are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero-coupon bonds which do not pay current interest but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on factors such as interest rates, credit quality and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

**Bank Obligations** including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

**Municipal Bonds** are debt obligations generally issued to obtain funds for various public purposes including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

**Options and other derivatives** carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

**Exchange Traded Fund (“ETF”)** prices may vary significantly from their net asset values due to market conditions. Certain ETFs may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF’s shares may trade at a market price that is above or below its net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF’s shares may be halted if the listing exchange’s officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide “circuit breakers” (which are tied to large decreases in stock prices) halts stock trading generally. Tenon Financial has no control over the risks taken by the underlying funds in which clients invest.

**Mutual Funds** When a client invests in open-end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

*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 CONFIDE.*

## Item 9 | **Disciplinary Information**

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Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of CONFIDE or the integrity of our management.

Neither CONFIDE nor its management have been involved in any criminal or civil actions, administrative proceedings, or self-regulatory organization proceedings.

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

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Neither CONFIDE nor Kristin Short are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Neither CONFIDE nor Kristin Short are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Neither CONFIDE nor Kristin Short have any relationship or arrangement that is material to the advisory business or to its clients.

CONFIDE only receives compensation directly from clients. We do not receive compensation from any outside source. We do not utilize or select other advisors or third-party portfolio managers. All assets are managed by CONFIDE.

### **CCR Section 260.238(k) Disclosure**

All material conflicts of interest are disclosed regarding CONFIDE, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

## Item 11 | Code of Ethics, Participation or Interest in Client Transactions & Personal Trading

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As a fiduciary, CONFIDE and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information which, in turn, places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all our dealings. CONFIDE also electively adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards.

### Code of Ethics Description

This code does not attempt to identify all possible conflicts of interest and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below.

- **Integrity** - Associated persons shall offer and provide professional services with integrity.
- **Objectivity** - Associated persons shall be objective in providing professional services to clients.
- **Competence** - Associated persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- **Fairness** - Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers and shall disclose conflict(s) of interest in providing such services.
- **Confidentiality** - Associated persons shall not disclose confidential client information without the specific consent of the client unless in response to proper legal process, or as required by law.
- **Professionalism** - Associated persons' conduct in all matters shall reflect the credit of the profession.
- **Diligence** - Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any client or prospective Client upon request.

### Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm, its associates nor any related person is authorized to recommend to a client or effect a transaction for a client, involving any security in which our firm or a related person

has a material financial interest such as in the capacity as an underwriter, adviser to the issuer, etc.

### **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

Our firm and its related persons may buy or sell securities similar to, or different from, those we recommend to clients for their accounts. To reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates' transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

### **Trading Securities At/Around the Same Time as Client's Securities**

From time to time, our firm or its related persons may buy or sell securities for themselves at or around the same time as clients. We will not trade non-mutual fund or ETF securities 5 days prior to the same security for clients.

## Item 12 | Brokerage Practices

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### Factors Used to Select Custodians and/or Broker-Dealers

Specific custodian recommendations are made to the client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

### Research and Other Soft-Dollar Benefits

We currently do not receive soft dollar benefits.

### Brokerage for Client Referrals

We receive no referrals from a custodian in exchange for using that custodian.

### Clients Directing Which Broker/Dealer/Custodian to Use

We do recommend a specific custodian for clients to use, however, clients may custody their assets at a custodian of their choice. By allowing clients to direct brokerage, we may be unable to achieve the most favorable execution of client transactions.

### The Custodian and Brokers We Use (Charles Schwab)

We may recommend that our clients use Charles Schwab & Co., Inc. ("Schwab"), a registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use Schwab as custodian broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account as described below (see "Your brokerage and custody costs")

### How we select brokers/custodians

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are overall most advantageous when compared with other available providers and their services. We consider a wide range of factors, including:

- Combination of transaction execution services and asset custody services
- Capability to execute, clear, and settle trades
- Capability to facilitate transfers and payments to and from accounts
- Breadth of available investment products
- Availability of investment research and tools

- Quality of services
- Competitiveness of the price of those services and willingness to negotiate the prices
- Reputation, financial strength, security, and stability
- Prior service to us and our clients
- Availability of other products and services that benefit us, as discussed below (see “Products and services available to us from Schwab”)

**Your brokerage and custody costs:** For our clients’ accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transaction fees.

**Products and services available to us from Schwab:** Schwab Advisor Services™ is Schwab’s business serving independent investment advisory firms like us. They provide our clients and us with access to their institutional brokerage services (trading, custody, reporting and related services), many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business. Schwab’s support services are generally available on an unsolicited basis (we don’t have to request them) and at no charge to us. Following is a more detailed description of Schwab’s support services.

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

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

- provide access to client account data (i.e. duplicate trade confirmations and account statements)
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- provide pricing and other market data
- facilitate payment of our fees from our clients’ accounts
- assist with back-office functions, recordkeeping, and client reporting



**Services that generally benefit only us:** Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession

## **Aggregating (Block) Trading for Multiple Client Accounts**

Generally, we combine multiple orders for shares of the same securities purchased for advisory accounts we manage. This practice is commonly referred to as “block trading”. We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or persons associated with our firm may participate in block trading with client accounts; however, accounts owned by our firm or persons associated with our firm will not be given preferential treatment.

## Item 13 | **Review of Accounts**

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Client accounts are reviewed at least quarterly by Kristin Short, Owner and CCO, based on each client's current financial information, investment policies and risk tolerance level.

Reviews may be triggered by material market, economic or political events, or by changes in the client's financial situation (such as retirement, termination of employment, physical move, or inheritance).

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest. Additionally, each client has access to a personal client vault, which aggregates their investment account(s) in one place for ease of access and monitoring.

Clients are also provided with an initial financial plan containing recommendations on their current financial situation and future goals. After the presentation of the initial financial plan, additional financial planning reports and/or updates are provided on an as-needed basis.

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

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### **Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

CONFIDE does not receive any economic benefit, directly or indirectly from any third party for advice rendered to CONFIDE clients.

### **Compensation to Non-Advisory Personnel for Client Referrals**

CONFIDE does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

## Item 15 | Custody

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CONFIDE uses the constructive/limited custody safeguards under CCR § 260.237(b)(3) with regard to custody of client funds.

CONFIDE has custody of client funds and securities solely as a consequence of its authority to make withdrawals from client accounts to pay its advisory fee.

CONFIDE has written authorization from the client to deduct advisory fees from the account held with the qualified custodian.

Each time a fee is directly deducted from a client account, CONFIDE concurrently:

1. Sends the qualified custodian an invoice or statement of the amount of the fee to be deducted from the client's account; and
2. Sends the client an invoice or statement itemizing the fee. Itemization includes the formula used to calculate the fee, the value of the assets under management on which the fee is based, and the time period covered by the fee.

Clients should receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains client's investment assets. We urge clients to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to them. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## Item 16 | Investment Discretion

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For those client accounts where we provide investment management services, we maintain discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. Investment discretion is explained to clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the client will execute a limited power of attorney, which will grant our firm discretion over the account. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the client.

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

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We do not vote client proxies. Therefore, clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the client's investment assets. The client shall instruct the client's qualified custodian to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets. If the client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

## Item 18 | **Financial Information**

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Registered Investment Advisers are required in this Item to provide certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.

We do not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance.

## Item 19 | Requirements for State-Registered Advisers

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### Kristin Short

Born: 1990

#### Educational Background

- 2020 – Doctor of Philosophy in Financial Planning, University of Georgia
- 2015 – Master of Education, Baylor University
- 2012 – Bachelor of Science, Baylor University

#### Business Experience

- 03/2023 – Present, Confide Financial Planning & Investments, LLC, Owner and CCO
- 05/2021 – 01/2024, Kristin J. Short Consulting, LLC, Managing Member
- 08/2021 – 04/2023, Radix Financial, LLC, Lead Financial Planner & Associate Investment Advisor
- 01/2019 – 03/2020, Elwood & Goetz Wealth Advisory, Financial Planner
- 08/2017 – 05/2019, University of Georgia, Graduate Financial Education & ASPIRE Clinic
- 08/2015 – 05/2017, University of Georgia, Senior Coordinator
- 08/2013 – 05/2015, Baylor University, Counseling Center Outreach
- 06/2012 – 06/2013, Baylor Healthcare System, Clinical Abstractor

#### Professional Designations, License & Exams

CERTIFIED FINANCIAL PLANNER® - CFP Board

Series 65 – Uniform Investment Adviser Law Examination

#### Other Business Activities

Kristin Short is not currently engaged in any other business activities.

CONFIDE is not actively engaged in any other business activities.

#### Performance-Based Fees

Neither CONFIDE nor Kristin Short are compensated for advisory services with performance-based fees.

#### Material Disciplinary Disclosures

Neither CONFIDE nor Kristin Short have ever been involved in an arbitration claim, or been found liable in a civil, self-regulatory organization or administrative proceeding.

#### Material Relationships That Management Persons Have With Issuers of Securities

Neither CONFIDE nor Kristin Short have any relationship or arrangement with issuers of securities.



### **Additional Compensation**

Kristin Short does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through CONFIDE.

### **Supervision**

Kristin Short, as Owner and Chief Compliance Officer of CONFIDE, is responsible for supervision. She may be contacted at the phone number on this brochure supplement.

### **Requirements for State Registered Advisers**

Kristin Short has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

### **Conflicts of Interest**

Pursuant to California Code of Regulations Section 260.238(k) any material conflicts of interest regarding the investment adviser, its representatives or any of its employees are disclosed to the client prior to entering into any investment advisory or financial planning agreement.

### **Business Continuity Plan**

CONFIDE maintains a written business continuity plan that identifies procedures related to an emergency or significant business disruptions including the death of the investment adviser or any of its representatives.



## Form ADV Part 2B

Brochure Supplement

Dated April 23, 2024

**For Kristin Short (7521181)**

Owner and Chief Compliance Officer

This brochure supplement provides information about Kristin Short that supplements the Confide Financial Planning & Investments, LLC ("CONFIDE") brochure. A copy of that brochure precedes this supplement. Please contact Kristin Short if the CONFIDE brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Kristin Short is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and can be found using the identification number, 7521181.

Confide Financial Planning & Investments, LLC  
42 Albion Place, Thousand Oaks, CA 91320  
Phone: 805-267-9540  
[www.confidefinancial.com](http://www.confidefinancial.com)

## Item 2 | Educational Background and Business Experience

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### Kristin Short

Born: 1990

#### Educational Background

- 2020 – Doctor of Philosophy in Financial Planning, University of Georgia
- 2015 – Master of Education, Baylor University
- 2012 – Bachelor of Science, Baylor University

#### Business Experience

- 03/2023 – Present, Confide Financial Planning & Investments, LLC, Owner and CCO
- 05/2021 – 01/2024, Kristin J. Short Consulting, LLC, Managing Member
- 08/2021 – 04/2023, Radix Financial, LLC, Lead Financial Planner & Associate Investment Advisor
- 01/2019 – 03/2020, Elwood & Goetz Wealth Advisory, Financial Planner
- 08/2017 – 05/2019, University of Georgia, Graduate Financial Education & ASPIRE Clinic
- 08/2015 – 05/2017, University of Georgia, Senior Coordinator
- 08/2013 – 05/2015, Baylor University, Counseling Center Outreach
- 06/2012 – 06/2013, Baylor Healthcare System, Clinical Abstractor

#### Professional Designations, License & Exams

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Series 65 – Uniform Investment Adviser Law Examination

## Item 3 | Disciplinary Information

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Kristin Short has never been involved in a criminal or civil action, an administrative proceeding, a self-regulatory organization (SRO) proceeding, or any other hearing or formal adjudication.

## Item 4 | Other Business Activities

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Kristin Short is not currently engaged in any other business activities.

## Item 5 | Additional Compensation

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Kristin Short does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through CONFIDE.

## Item 6 | **Supervision**

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Kristin Short, as Owner and Chief Compliance Officer of CONFIDE, is responsible for supervision and will adhere to the firm's code of ethics and follow applicable federal and state laws. Kristin may be contacted at the phone number on this brochure supplement.

## Item 7 | **Requirements for State Registered Advisers**

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Kristin Short has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.