

Form ADV Part 3 – Client Relationship Summary

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Item 1: Introduction

Candor Financial LLC is an investment adviser registered with the Securities and Exchange Commission offering advisory accounts and services. Brokerage and investment advisory services and fees differ, and it is important that you understand the differences. This document gives you a summary of the types of services and fees we offer. Please visit www.investor.gov/CRS for free, simple tools to research firms and financial professionals, as well as educational materials about broker-dealers, investment advisers, and investing.

Item 2: Relationships and Services

Questions to ask us: Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

What investment services and advice can you provide me? Our firm primarily offers the following investment advisory services to retail clients: trading plan management, portfolio management via a wrap fee program.

Our firm operates as a “robo-advisor”, providing automated advisory services solely online without a particular advisor with whom the client interacts with. Candor’s investment advisory personnel oversee the technical systems and investment algorithms but do not perform individual reviews of client accounts.

Our firm has discretionary management without any material limitations. We do not limit the types of investments that we recommend. Our firm does not have a minimum account size. Please also see our Form ADV Part 2A (“Brochure”), specifically Items 4 & 7.

These conversation starters are available on our website at <https://candor.co/documents/form-crs.pdf>.

Item 3: Fees, Costs, Conflicts, and Standard of Conduct

Questions to ask us: Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how

much will be invested for me? How might your conflicts of interest affect me, and how will you address them?

What fees will I pay? We charge a flat fee up to \$1,000 for establishing automated trading plans. Upon disposition of these assets, clients have the option to invest their proceeds with us. If they do, we charge 1% of assets under management and waive the trading plan fee. Our fees are debited from the client's account at the custodian. Fees are paid annually in advance. You pay our fees even if you do not have any transactions and the advisory fee paid to us generally does not vary based on the type of investments selected. Please also see Items 4, 5, 6, 7 & 8 of our [Brochure](#).

Some investments (e.g., mutual funds, variable annuities, etc.) impose additional fees (e.g., transactional fees and product-level fees) that reduce the value of your investment over time. The same goes for any additional fees you pay to a custodian. For the wrap fee program, you will not typically pay additional transaction fees and thus our advisory fee is higher than if you paid transaction fees separately. **You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.** Please also see our [Brochure](#) for additional details.

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?: *When we act as your investment adviser*, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means (see heading immediately below). You should be aware that conflicts of interest can exist even in risk profiles and asset allocations powered by algorithms. Specifically, the advice you receive depends largely on the digital advice and our investment approach, as well as the underlying assumptions and financial products our algorithm uses. We have a conflict in that we benefit from the services we provide to you because of the advisory fee we receive from you. This compensation may vary and we are incentivized to charge the maximum fee to you.

How do your financial professionals make money? Primarily, we and our financial professionals receive cash compensation from the advisory services we provide to you because of the advisory fees we receive from you. This compensation may vary based on different factors, such as those listed above in this Item. Because we manage your portfolio in a wrap fee program, we have an incentive to limit trading in your account and to favor asset types that do not have a transaction fee in order to minimize trading expenses that we would have to normally pay out of our management fee. Please also see Item 10 of our [Brochure](#) for additional details.

Item 4: Disciplinary History

Questions to ask us: As a financial professional, do you have any disciplinary history? For what type of conduct?

Do you or your financial professionals have legal or disciplinary history? No, we do not have legal and disciplinary events. Visit <https://www.investor.gov/> for a free, simple search tool to research us and our financial professionals.

Item 5: Additional Information

Questions to ask us: Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?

For additional information on our advisory services, **see our [Brochure](#) available at <https://adviserinfo.sec.gov/firm/summary/314173> and any individual brochure supplement** your representative provides. If you have any questions, need additional information, or want another copy of this Client Relationship Summary, then please contact us at hello@candor.co.

Exhibit A – Material Changes to Client Relationship Summary

Candor Financial LLC last updated this Client Relationship Summary on June 28, 2021. The following changes were made:

- Clarified the nature of investment account reviews