

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

**Benedetti Financial, Inc.**

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This brochure provides information about the qualifications and business practices of Benedetti Financial, Inc. If you have any questions about the contents of this brochure, please contact us at (805) 922-4881 or [trentb@benedetticpa.com](mailto:trentb@benedetticpa.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.

Registration with the SEC or with any state securities authority does not imply a certain level of skill or training.

Additional information about Benedetti Financial, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 134598.

## **Item 2    Material Changes**

This Firm Brochure, dated March 2023, provides you with a summary of Benedetti Financial, Inc.'s advisory services and fees, professionals, certain business practices and policies, as well as actual or potential conflicts of interest, among other things. This Item is used to provide our clients with a summary of new and/or updated information; we will inform of the revision(s) based on the nature of the information as follows.

### **1. Annual Update:**

We are required to update certain information at least annually, within 90 days of our firm's fiscal year end (FYE) of December 31. We will provide you with either a summary of the revised information with an offer to deliver the full revised Brochure within 120 days of our FYE or we will provide you with our revised Brochure that will include a summary of those changes in this Item.

### **2. Material Changes:**

There have been no material changes to this Disclosure Brochure since our last annual required filing in March 2022.

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## **Item 4    Advisory Business**

Benedetti Financial, Inc. (also referred to as Benedetti Financial in this brochure) is a state-registered investment adviser with its principal place of business located in CA. Benedetti Financial, Inc. began conducting business in 2001 as a sole proprietorship under the name Trent J. Benedetti. In October 2016 the firm changed its organization structure to a corporation.

Listed below are the firm's principal shareholders (i.e., those individuals and/or entities controlling 25% or more of this company).

- Trent J. Benedetti is the 100% owner of Benedetti Financial, Inc.

Benedetti Financial will utilize a variety of money managers and will in conjunction with the client identify the manager that best suits the client's needs and financial circumstances.

Benedetti Financial also may perform a portfolio "MRI" service. Magnetic Resonance Imaging (MRI): An analogy used to describe looking deeply into the holdings of a client's portfolio during analysis.

Benedetti Financial offers the following advisory services to our clients:

### **INVESTMENT SUPERVISORY SERVICES ("ISS") INDIVIDUAL PORTFOLIO MANAGEMENT**

Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy and create and manage a portfolio based on that policy. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background.

We manage these advisory accounts on a discretionary basis. Account supervision is guided by the client's stated objectives (i.e., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations.

Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company and will generally include advice regarding the following securities:

- Exchange-listed securities
- Securities traded over-the-counter
- Foreign issuers
- Warrants
- Corporate debt securities (other than commercial paper)

- Commercial paper
- Certificates of deposit
- Municipal securities
- Variable life insurance
- Variable annuities
- Mutual fund shares
- United States governmental securities
- Options contracts on securities
- Options contracts on commodities
- Interests in partnerships investing in real estate
- Interests in partnerships investing in oil and gas interests
- Unit Investment Trusts & Structured Products

Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

## **FINANCIAL PLANNING**

We provide financial planning services. Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. Through the financial planning process, all questions, information and analysis are considered as they impact and are impacted by the entire financial and life situation of the client. Clients purchasing this service receive a written report which provides the client with a detailed financial plan designed to assist the client achieve his or her financial goals and objectives.

In general, the financial plan can address any or all of the following areas:

- **PERSONAL:** We review family records, budgeting, personal liability, estate information and financial goals.
- **TAX & CASH FLOW:** We analyze the client's income tax and spending and planning for past, current and future years; then illustrate the impact of various investments on the client's current income tax and future tax liability.
- **INVESTMENTS:** We analyze investment alternatives and their effect on the client's portfolio.
- **INSURANCE:** We review existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.
- **RETIREMENT:** We analyze current strategies and investment plans to help the client achieve his or her retirement goals.

- **DEATH & DISABILITY:** We review the client's cash needs at death, income needs of surviving dependents, estate planning and disability income.
- **ESTATE:** We assist the client in assessing and developing long-term strategies, including as appropriate, living trusts, wills, review estate tax, powers of attorney, asset protection plans, nursing homes, Medicaid and elder law.

We gather required information through in-depth personal interviews. Information gathered includes the client's current financial status, tax status, future goals, returns objectives and attitudes towards risk. We carefully review documents supplied by the client, including a questionnaire completed by the client, and prepare a written report. Should the client choose to implement the recommendations contained in the plan, we suggest the client work closely with his/her attorney, accountant, insurance agent, and/or stockbroker. Implementation of financial plan recommendations is entirely at the client's discretion.

We also provide general non-securities advice on topics that may include tax and budgetary planning, estate planning and business planning.

- Exchange-listed securities
- Securities traded over-the-counter
- Foreign issuers
- Warrants
- Corporate debt securities (other than commercial paper)
- Commercial paper
- Certificates of deposit
- Municipal securities
- Variable life insurance
- Variable annuities
- Mutual fund shares
- United States governmental securities
- Options contracts on securities
- Options contracts on commodities
- Interests in partnerships investing in real estate
- Interests in partnerships investing in oil and gas interests
- Unit Investment Trusts & Structured Products

Typically the financial plan is presented to the client within six months of the contract date, provided that all information needed to prepare the financial plan has been promptly provided.

Financial Planning recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. All recommendations are of a generic nature.

### **ADVISORY REFERRAL SERVICES**

Benedetti Financial has developed relationships with various independent registered

investment advisers to provide asset management services to our clients. Based on a client's individual circumstances and needs, we will assist the client in determining which independent adviser's portfolio management services are appropriate for that client. Factors considered in making this determination, including account size, risk tolerance, and a client's investment experience, are discussed during our consultation with the client.

Benedetti Financial will meet with the client on a regular basis, or as determined by the client, to review the account. We will, when needed, suggest changes in the client's portfolio ("rebalancing"), to more effectively address each client's goals.

Any rebalancing of the portfolio is done quarterly in most instances, and will be reviewed and implemented by the independent investment adviser. At the time of conducting the advisory solicitation-Benedetti Financial will ensure that all federal and/or state specific requirements governing solicitation activities are met.

### **CONSULTING SERVICES**

Clients can also receive investment advice on a more focused basis. This may include advice on only an isolated area(s) of concern such as estate planning, retirement planning, or any other specific topic. We also provide specific consultation and administrative services regarding investment and financial concerns of the client.

Consulting recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. All recommendations are of a generic nature.

### **SEMINARS/WEBINARS**

Benedetti Financial provides seminars/webinars in areas such as financial planning, retirement planning, estate planning and other related topics. Seminars/webinars are always offered on an impersonal basis and do not focus on the individual needs of participants.

### **AMOUNT OF MANAGED ASSETS**

As of 12/31/2022, we were actively managing \$2,635,557 of clients' assets on a discretionary basis.

## **Item 5 Fees and Compensation**

### **INVESTMENT SUPERVISORY SERVICES ("ISS") INDIVIDUAL PORTFOLIO MANAGEMENT FEES**

Our annual fees for Investment Supervisory Services are based upon a percentage of assets

under management and generally range from 0.50% to 1.50%. The fees are billed quarterly or monthly, forward or in arrears, depending on the platform chosen and the billing procedures of the money manager

The annualized fee for Investment Supervisory Services are charged as a percentage of assets under management, according to the following schedule:

	Portfolio Value	Annual Percentage
Growth Portfolios (equities)	First \$100,000	1.50%
Growth Portfolios (equities)	Over \$100,000	1.00%
Balanced Portfolios (equities and debt)	First \$100,000	1.50%
Balanced Portfolios (equities and debt)	Over \$100,000	1.00%
Income Portfolios (debt and preferred)	First \$100,000	0.75%
Income Portfolios (debt and preferred)	Over \$100,000	0.50%

**Limited Negotiability of Advisory Fees:** Although Benedetti Financial has established the aforementioned fee schedule(s), we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs are considered in determining the fee schedule. These include the complexity of the client, assets to be placed under management, anticipated future additional assets; related accounts; portfolio style, account composition, and reports, among other factors. The specific annual fee schedule is identified in the contract between the adviser and each client.

We may group certain related client accounts for the purposes of achieving the minimum account size requirements and determining the annualized fee.

Discounts, not generally available to our advisory clients, may be offered to family members and friends of associated persons of our firm.

### **ADVISORY REFERRAL SERVICES FEES**

We do not enter into an advisory agreement with any client nor do we charge a fee to any client for referrals to another Adviser(s). Our fees for such referrals are paid by the referred Adviser(s). Client advisory fees are not increased in any way as a result of our referral of any clients to another Adviser(s). We typically receive 100% of the advisory management fee paid



by the client to that Adviser.

Clients will receive a separate disclosure document describing the fee paid to us by such Adviser(s). Clients should refer to that Adviser's disclosure document for information regarding its fees, billing practices, minimum required investments and termination of advisory agreements.

### **FINANCIAL PLANNING FEES**

Benedetti Financial's Financial Planning fee is determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering into a contract with any client.

Our Financial Planning fees are calculated and charged on an hourly basis, ranging from \$50 to \$250 per hour. Although the length of time it will take to provide a Financial Plan will depend on each client's personal situation, we will provide an estimate for the total hours at the start of the advisory relationship.

Our Financial Planning fees are calculated and charged on a fixed fee basis, typically ranging from \$250 to \$5,000, depending on the specific arrangement reached with the client.

We may request a retainer upon completion of our initial fact-finding session with the client. However, advance payment will never exceed \$500 for work that will not be completed within six months. The balance is due upon completion of the plan.

***Financial Planning Fee Offset:*** Benedetti Financial reserves the discretion to reduce or waive the hourly fee and/or the minimum fixed fee if a financial planning client chooses to engage us for our Portfolio Management Services.

The client is billed in arrears on a monthly basis as earned.

### **CONSULTING SERVICES FEES**

Benedetti Financial's Consulting Services fee is determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering into a contract with any client.

Our Consulting Services fees are calculated and charged on an hourly basis, ranging from \$50 to \$250 per hour. An estimate for the total hours is determined at the start of the advisory relationship.

Our Consulting Services fees are calculated and charged on a fixed fee basis, typically ranging from \$250 to \$5,000, subject to the specific arrangement reached with the client.

The client is billed in arrears on a monthly basis as earned.

Management personnel and other related persons of our firm are licensed as insurance agents or brokers. In their separate capacity(ies), these individuals are able to implement investment recommendations for advisory clients for separate and typical compensation (i.e., commissions or other sales-related forms of compensation). This presents a conflict of

interest to the extent that these individuals recommend that a client invest in an insurance product which results in a commission being paid to the individuals. Clients are not under any obligation to engage these individuals when considering implementation of advisory recommendations. The implementation of any or all recommendations is solely at the discretion of the client.

### **Seminars/Webinars**

Seminars/Webinars are provided to clients and prospects without charge

### **GENERAL INFORMATION**

***Termination of the Advisory Relationship:*** A client agreement may be canceled at any time, by either party, for any reason upon receipt of 5 days written notice. As disclosed above, certain fees are paid in advance of services provided. Upon termination of any account, any prepaid, unearned fees will be promptly refunded.

***Mutual Fund Fees:*** All fees paid to Benedetti Financial for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

***Wrap Fee Programs and Separately Managed Account Fees:*** Clients participating in separately managed account programs may be charged various program fees in addition to the advisory fee charged by our firm. Such fees may include the investment advisory fees of the independent advisers, which may be charged as part of a wrap fee arrangement. In a wrap fee arrangement, clients pay a single fee for advisory, brokerage and custodial services. Client's portfolio transactions may be executed without commission charge in a wrap fee arrangement. In evaluating such an arrangement, the client should also consider that, depending upon the level of the wrap fee charged by the broker-dealer, the amount of portfolio activity in the client's account, and other factors, the wrap fee may or may not exceed the aggregate cost of such services if they were to be provided separately. We will review with clients any separate program fees that may be charged to clients.

***Additional Fees and Expenses:*** In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transactions for the client's account(s). Please refer

to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

**ERISA Accounts:** Benedetti Financial is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, Benedetti Financial may only charge fees for investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b-1 fees, or conversely, investment advice about products for which our firm and/or our related persons receive commissions or 12b-1 fees, however, only when such fees are used to offset Benedetti Financial's advisory fees.

**Advisory Fees in General:** Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

**Limited Prepayment of Fees:** Under no circumstances do we require or solicit payment of fees in excess of \$500 more than six months in advance of services rendered.

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

Benedetti Financial does not charge performance-based fees.

## **Item 7 Types of Clients**

Benedetti Financial provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals)
- High net worth individuals
- Pension and profit sharing plans (other than plan participants)
- Plan participants of pension and profit sharing plans
- Charitable organizations
- Corporations or other businesses not listed above

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

### **METHODS OF ANALYSIS**

We use the following methods of analysis in formulating our investment advice and/or

managing client assets:

**Fundamental Analysis.** We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

**Asset Allocation.** Rather than focusing primarily on securities selection, we attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

**Risks for all forms of analysis.** Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

## **INVESTMENT STRATEGIES**

We use the following strategy(ies) in managing client accounts, provided that such strategy(ies) are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

**Long-term purchases.** We purchase securities with the idea of holding them in the client's account for a year or longer. Typically we employ this strategy when:

- we believe the securities to be currently undervalued, and/or
- we want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

We employ the use of sub-advisers ("outside managers"). Our analysis of outside managers involve the examination of the experience, expertise, investment philosophies, and past

performance of the outside managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's underlying holdings, strategies, concentrations and leverage as part of our overall periodic risk assessment. Additionally, as part of our due-diligence process, we survey the manager's compliance and business enterprise risks. A risk of investing with an outside manager who has been successful in the past is that he/she may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in an outside manager's portfolio. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

**Risk of Loss.** Securities investments are not guaranteed and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk.

### **Material Risks Involved**

**All investing strategies involve risk and may result in a loss of your original investment.** 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:** The Adviser's investment strategies and/or investment techniques may not work as intended.

**Small and Medium Cap 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.

**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 securities' claim on the issuer's assets & finances.

**Inflation:** Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your 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:** In most cases, Commercial Paper is 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.

**Investment Companies Risk:** 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). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their 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. The Adviser has no control over the risks taken by the underlying funds in which clients invest.

**Principal Protected Structured Products/Notes:** For investors who fear the risk of being "in the market," but are equally concerned about the opportunity cost associated with being "out of the market," principal protected structured products may offer a timely solution.

Principal protected investments provide investors with 100% principal protection when held to maturity, plus an additional amount based on the return of an underlying asset. Principal protected structured products come in a variety of structures that can help investors manage portfolio risk while maintaining appropriate exposure to the market.

These securities may be appropriate for more conservative investors seeking market exposure without risking their principal investment. Principal protection and payment at maturity is subject to the credit risk of the issuer. In addition, investors may experience a loss if sold prior to maturity.

## **Item 9 Disciplinary Information**

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no reportable disciplinary events to disclose.

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

Our firm and our related persons are not engaged in other financial industry activities and have no other industry affiliations.

Management personnel of our firm are also partners in the accounting firm of Benedetti & Associates, CPA, Inc., where they are individually licensed and practicing Certified Public Accountants providing accounting services for separate and typical compensation.

Benedetti & Associates, CPA, Inc. typically recommends Benedetti Financial to accounting clients in need of advisory services. Conversely, Benedetti Financial typically recommends Benedetti & Associates, CPA, Inc. to advisory clients in need of accounting services.

Accounting services provided by Benedetti & Associates, CPA, Inc. are separate and distinct from our advisory services, and are provided for separate and typical compensation. There are no referral fee arrangements between our firms for these recommendations. No Benedetti Financial client is obligated to use Benedetti & Associates, CPA, Inc. for any accounting services and conversely, no accounting client is obligated to use the advisory services provided by us. Benedetti & Associates, CPA, Inc.'s accounting services do not include the authority to sign checks or otherwise disburse funds on any of our advisory client's behalf.

These individuals will spend the majority of their time on their accounting practice.

Management personnel of our firm, in their individual capacities, are agents for various insurance companies. As such, these individuals are able to receive separate, yet customary commission compensation resulting from implementing product transactions on behalf of advisory clients. Clients, however, are not under any obligation to engage these individuals when considering implementation of advisory recommendations. The implementation of any or all recommendations is solely at the discretion of the client.

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

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

Benedetti Financial and our personnel owe a duty of loyalty, fairness and good faith towards

our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and recordkeeping provisions.

Benedetti Financial's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. Request a copy by email sent to [trentb@benedetticpa.com](mailto:trentb@benedetticpa.com), or by calling us at (805) 922-4881.

Benedetti Financial and individuals associated with our firm are prohibited from engaging in principal transactions.

Benedetti Financial and individuals associated with our firm are prohibited from engaging in agency cross transactions.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client.

It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts.

We may aggregate our employee trades with client transactions where possible and when compliant with our duty to seek best execution for our clients. In these instances, participating clients will receive an average share price and transaction costs will be shared equally and on a pro-rata basis. In the instances where there is a partial fill of a particular batched order, we will allocate all purchases pro-rata, with each account paying the average price. Our employee accounts will be excluded in the pro-rata allocation.

As these situations represent actual or potential conflicts of interest to our clients, we have established the following policies and procedures for implementing our firm's Code of Ethics,



to ensure our firm complies with its regulatory obligations and provides our clients and potential clients with full and fair disclosure of such conflicts of interest:

1. No principal or employee of our firm may put his or her own interest above the interest of an advisory client.
2. No principal or employee of our firm may buy or sell securities for their personal portfolio(s) where their decision is a result of information received as a result of his or her employment unless the information is also available to the investing public.
3. It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account. This prevents such employees from benefiting from transactions placed on behalf of advisory accounts.
4. Our firm requires prior approval for any IPO or private placement investments by related persons of the firm.
5. We maintain a list of all reportable securities holdings for our firm and anyone associated with this advisory practice that has access to advisory recommendations ("access person"). These holdings are reviewed on a regular basis by our firm's Chief Compliance Officer or his/her designee.
6. We have established procedures for the maintenance of all required books and records.
7. All clients are fully informed that related persons may receive separate commission compensation when effecting transactions during the implementation process.
8. Clients can decline to implement any advice rendered, except in situations where our firm is granted discretionary authority.
9. All of our principals and employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
10. We require delivery and acknowledgement of the Code of Ethics by each supervised person of our firm.
11. We have established policies requiring the reporting of Code of Ethics violations to our senior management.
12. Any individual who violates any of the above restrictions may be subject to termination.

As disclosed in the preceding section of this Brochure (Item 10), related persons of our firm are separately licensed as an insurance agent/broker of various insurance companies. Please refer to Item 10 for a detailed explanation of these relationships and important conflict of interest disclosures.

## **Item 12 Brokerage Practices**

Benedetti Financial requires that clients provide us with written authority to determine the broker-dealer to use and the commission costs that will be charged to our clients for these transactions.

Clients must include any limitations on this discretionary authority in this written authority statement. Clients may change/amend these limitations as required. Such amendments must be provided to us in writing.

As a matter of policy and practice, Benedetti Financial does not generally block client trades and, therefore, we implement client transactions separately for each account. Consequently, certain client trades may be executed before others, at a different price and/or commission rate. Additionally, our clients may not receive volume discounts available to advisers who block client trades.

Benedetti Financial may require that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. ("Schwab"), a FINRA registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although we require that clients establish accounts at Schwab, it is the client's decision to custody assets with Schwab. Benedetti Financial is independently owned and operated and not affiliated with Schwab.

Schwab provides Benedetti Financial with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Schwab Institutional. These services are not contingent upon our firm committing to Schwab any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For our client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab Institutional also makes available to our firm other products and services that benefit Benedetti Financial but may not directly benefit our clients' accounts. Many of these products and services may be used to service all or some substantial number of our client accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist us in managing and administering our clients' accounts include software and other technology that

- i. provide access to client account data (such as trade confirmations and account statements);
- ii. facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- iii. provide research, pricing and other market data;
- iv. facilitate payment of our fees from clients' accounts; and
- v. assist with back-office functions, recordkeeping and client reporting.

Schwab Institutional also offers other services intended to help us manage and further develop our business enterprise. These services may include:

- i. compliance, legal and business consulting;
- ii. publications and conferences on practice management and business succession; and
- iii. access to employee benefits providers, human capital consultants and insurance providers.

Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to Benedetti Financial. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to our firm. Schwab Institutional may also provide other benefits such as educational events or occasional business entertainment of our personnel. In evaluating whether to recommend or require that clients custody their assets at Schwab, we may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors we consider and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

Benedetti Financial has an arrangement with National Financial Services LLC and Fidelity Brokerage Services LLC (collectively, and together with all affiliates, "Fidelity") through which Fidelity provides our firm with "institutional platform services." The institutional platform services include, among others, brokerage, custody, and other related services. Fidelity's institutional platform services that assist us in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Fidelity also offers other services intended to help our firm manage and further develop its advisory practice. Such services include, but are not limited to, performance reporting, financial planning, contact management systems, third party research, publications, access to educational conferences, roundtables and webinars, practice management resources, access to consultants and other third party service providers who provide a wide array of business related services and technology with whom Benedetti Financial may contract directly.

Benedetti Financial is independently operated and owned and is not affiliated with Fidelity.

Fidelity generally does not charge its advisor clients separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Fidelity or that settle into Fidelity accounts (i.e., transactions fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Fidelity provides access to many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges.

As a result of receiving such services for no additional cost, we may have an incentive to continue to use or expand the use of Fidelity's services. We examined this potential conflict of interest when we chose to enter into the relationship with Fidelity and have determined that the relationship is in the best interests of Benedetti Financial's clients and satisfies our client obligations, including our duty to seek best execution. A client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where we determine in good faith that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, while Benedetti Financial will seek competitive rates, to the benefit of all clients, we may not necessarily obtain the lowest possible commission rates for specific client account transactions.

## **Item 13    Review of Accounts**

### **INVESTMENT SUPERVISORY SERVICES ("ISS") INDIVIDUAL PORTFOLIO MANAGEMENT**

**REVIEWS:** While the underlying securities within Individual Portfolio Management Services accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

These accounts are reviewed by: Trent J. Benedetti, Investment Adviser Representative

**REPORTS:** In addition to the monthly statements and confirmations of transactions that clients receive from their broker-dealer, we provide reports summarizing account performance, balances and holdings upon request by the client.

### **FINANCIAL PLANNING SERVICES**

**REVIEWS:** While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for Financial Planning clients unless otherwise contracted for.

**REPORTS:** Financial Planning clients will receive a completed financial plan. Additional reports will not typically be provided unless otherwise contracted for.

### **CONSULTING SERVICES**

**REVIEWS:** While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for Consulting Services clients unless otherwise contracted for. Such reviews will be conducted by the client's account representative.

**REPORTS:** Consulting Services clients will not typically receive reports due to the nature of the service.

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

It is Benedetti Financial's policy to engage solicitors or to pay related or non-related persons for referring potential clients to our firm. When a client is referred to us by a referring party, the referring party provides the client with a copy of our Disclosure Brochure as required by the Investment Advisers Act of 1940. The client also will complete a Solicitor's Disclosure Statement document. If the referring party is an unaffiliated registered investment advisor firm, then the client will also receive a copy of the referring party's Form ADV Part 2 Disclosure Brochure. If a referred client enters into an investment advisory agreement with Benedetti Financial, a referral fee is paid to the referring party. The referral relationship will not result in clients being charged any fees over and above the normal advisory fees charged for the advisory services provided.

### **OTHER COMPENSATION**

Our firm and/or our officers and representatives are eligible to receive incentive awards (including prizes such as trips or bonuses) for recommending certain types of insurance policies.

While we endeavor at all times to put the interest of our clients first as part of our fiduciary duty, the possibility of receiving incentive awards creates a conflict of interest, and may affect the judgment of these individuals when making recommendations.

## **Item 15 Custody**

We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm directly debits advisory fees from client accounts.

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

In addition to the periodic statements that clients receive directly from their custodians, we also send account statements directly to our clients upon request. We urge our clients to carefully compare the information provided on these statements to ensure that all account transactions, holdings and values are correct and current.

Our firm does not have actual or constructive custody of client accounts.

## **Item 16 Investment Discretion**

Clients may hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission.

Our discretionary authority includes the ability to do the following without contacting the client:

- determine the security to buy or sell; and/or
- determine the amount of the security to buy or sell

Clients give us discretionary authority when they sign a discretionary agreement with our firm, and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

## **Item 17 Voting Client Securities**

We vote proxies for all discretionary client accounts; however, you always have the right to vote proxies yourself. You can exercise this right by instructing us in writing to not vote proxies in your account.

We will vote proxies in the best interests of its clients and in accordance with our established policies and procedures. Our firm will retain all proxy voting books and records for the requisite period of time, including a copy of each proxy statement received, a record of each vote cast, a copy of any document created by us that was material to making a decision how to vote proxies, and a copy of each written client request for information on how the adviser voted proxies. If our firm has a conflict of interest in voting a particular action, we will notify the client of the conflict and retain an independent third-party to cast a vote.

Clients may obtain a copy of our complete proxy voting policies and procedures by contacting Benedetti Financial by telephone, email, or in writing. Clients may request, in writing,

information on how proxies for his/her shares were voted. If any client requests a copy of our complete proxy policies and procedures or how we voted proxies for his/her account(s), we will promptly provide such information to the client.

We will neither advise nor act on behalf of the client in legal proceedings involving companies whose securities are held in the client's account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. If desired, clients may direct us to transmit copies of class action notices to the client or a third party. Upon such direction, we will make commercially reasonable efforts to forward such notices in a timely manner.

With respect to ERISA accounts, we will vote proxies unless the plan documents specifically reserve the plan sponsor's right to vote proxies. To direct us to vote a proxy in a particular manner, clients should contact Benedetti Financial by telephone, email, or in writing.

You can instruct us to vote proxies according to particular criteria (for example, to always vote with management, or to vote for or against a proposal to allow a so-called "poison pill" defense against a possible takeover). These requests must be made in writing. You can also instruct us on how to cast your vote in a particular proxy contest by contacting us by telephone, email, or in writing.

## **Item 18 Financial Information**

As an advisory firm that maintains discretionary authority for client accounts, we are also required to disclose any financial condition that is reasonable likely to impair our ability to meet our contractual obligations. Benedetti Financial has no additional financial circumstances to report.

Under no circumstances do we require or solicit payment of fees in excess of \$500 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

Benedetti Financial has not been the subject of a bankruptcy petition at any time during the past ten years.

## **Item 19 Requirements for State-Registered Advisers**

The following individuals are the principal executive officers and management persons of Benedetti Financial, Inc.:

Trent J. Benedetti, Owner

We are required to disclose all material facts regarding certain legal or disciplinary events pertaining to arbitration awards or other civil, regulatory or administrative proceedings in

which our firm or management personnel were found liable or against whom an award was granted.

Our firm and our management personnel have no reportable disciplinary events to disclose.

As previously disclosed in "Other Financial Industry Activities and Affiliations" (Item 10), neither Benedetti Financial, Inc. nor our management personnel have a relationship or arrangement with any issuer of securities.

## **Educational Background and Business Experience**

**Full Legal Name:** Trent J. Benedetti      **Born:** 1955

### **Education**

- California Polytechnic State University, Pomona; Bachelor of Science, Accounting; 1981

### **Business Experience**

- Benedetti & Associates, CPA, Inc.; Certified Public Accountant; from 10/2000 to Present
- Benedetti Financial, Inc.; Owner and Certified Financial Planner; from 08/2001 to Present

### **Designations**

Trent J. Benedetti has earned the following designation(s) and is in good standing with the granting authority:

- Insurance Agent; 1981

Agents must complete pre-licensing and ongoing education requirements, along with passing the Insurance Agent Law Exam. Additionally, agents are held to a high ethical standard, which is regulated by the State Insurance Commissioner.

- Investment Advisor; 1993

Advisors must complete pre-licensing and ongoing education requirements, along with passing the Series 65 Investment Advisor Law Exam. Advisors are considered fiduciaries and are held to a high ethical standard, regulated by FINRA.

- Certified Financial Planner™; 1999

The program is administered by the Certified Financial Planner Board of Standards Inc. Those with the CFP® designation have demonstrated competency in all areas of finance related to financial planning. Candidates complete studies on over 100 topics, including stocks, bonds, taxes, insurance, retirement planning and estate planning. In addition to passing the CFP® certification exam, candidates must also complete qualifying work experience,



agree to adhere to the CFP Board's code of ethics and professional responsibility and financial planning standards and complete 30 hours of continuing education every two years.

- **Certified Public Accountant; 2000**

In order to become a CPA in the United States, the candidate must sit for and pass the Uniform Certified Public Accountant Examination, which is set by the American Institute of Certified Public Accountants and administered by the National Association of State Boards of Accountancy. Eligibility to sit for the Uniform CPA Exam is determined by individual State Boards of Accountancy. Typically the requirement is a U.S. bachelors degree which includes a minimum number of qualifying credit hours in accounting and business administration with an additional 1 year study. All CPA candidates must pass the Uniform CPA Examination to qualify for a CPA certificate and license (i.e., permit to practice) to practice public accounting. CPAs are required to take continuing education courses in order to renew their license. Requirements vary by state. The vast majority of states require 120 hours of CPE every 3 years with a minimum of 20 hours per calendar year. The requirement can be fulfilled through attending live seminars, webcast seminars, or through self-study (textbooks, videos, online courses, all of which require a test to receive credit). As part of the CPE requirement, most states require their CPAs to take an ethics course during every renewal period. Ethics requirements vary by state, and the courses range from 2–8 hours

## **Disciplinary Information**

Trent J. Benedetti has no reportable disciplinary history.

## **Other Business Activities**

### **A. Investment-Related Activities**

Trent J. Benedetti is also engaged in the following investment-related activities:

#### **Another investment adviser or financial planner**

Along with being an investment adviser, Trent J. Benedetti is a Certified Financial Planner. As a result, there is a potential conflict of interest. This is disclosed in previous sections.

#### **Insurance company or agency**

Trent J. Benedetti is licensed to sell health insurance and life insurance products. As a result of such sales activities, there is a potential conflict of interest. This is disclosed in previous sections.

**Other investment-related business**

Trent J. Benedetti may receive commissions, bonuses or other compensation on the sale of certain types of insurance or other investment products.

**Requirements for State-Registered Advisers****A. Additional Disciplinary History**

Trent J. Benedetti has no additional reportable disciplinary history.

**B. Bankruptcy History**

Trent J. Benedetti has not been the subject of a bankruptcy petition.

**Part 2B of Form ADV: *Brochure Supplement***

Christie L. Benedetti

Benedetti Financial, Inc.  
2151 S. College Dr., Ste. 101  
Santa Maria, CA 93455  
(805) 922-4881

March 2023

This brochure supplement provides information about Christie L. Benedetti, that supplements the Benedetti Financial, Inc. brochure. You should have received a copy of that brochure. Please contact Trent J. Benedetti (805) 922-4881 if you did not receive Benedetti Financial's brochure or if you have any questions about the contents of this supplement.

Additional information about Christie L. Benedetti is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

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

**Full Legal Name:** Christie L. Benedetti      **Born:** 1981

### **Education**

- California Polytechnic State University, San Luis Obispo; Bachelor of Science, Social Sciences; 2005

### **Business Experience**

- Benedetti Financial; Investment Advisor Representative; from 04/2014 to Present
- Christie Benedetti; Insurance Agent; from 08/2007 to Present
- Benedetti & Associates, CPA, Inc.; Administrative Supervisor; from 02/2006 to 05/2018

### **Designations**

Christie L. Benedetti has earned the following designation(s) and is in good standing with the granting authority:

- Insurance Agent; 2007  
Agents must complete prelicensing and ongoing education requirements, along with passing the Insurance Agent Law Exam. Additionally, agents are held to a high ethical standard, regulated by the State Insurance Commissioner.
- Investment Advisor Representative; 2014  
Agents must complete prelicensing and ongoing education requirements, along with passing the Series 65 Investment Advisor Law Exam. Advisors are considered fiduciaries and are held to a high ethical standard, regulated by FINRA.

## **Item 3 Disciplinary Information**

Christie L. Benedetti has no reportable disciplinary history.

## **Item 4 Other Business Activities**

### **A. Investment-Related Activities**

1. Christie L. Benedetti is also engaged in the following investment-related activities:

#### **Insurance company or agency**

Christie L. Benedetti is licensed to sell health insurance and life insurance products. As a result of such life insurance sales activities, there is a

potential conflict of interest. She may receive commissions, bonuses or other compensation on the sale of such life insurance.

**B. Non Investment-Related Activities**

Christie L. Benedetti is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his or her time.

**Item 5 Additional Compensation**

Christie L. Benedetti does not receive any economic benefit from a non-advisory client for the provision of advisory services.

**Item 6 Supervision**

**Supervisor:** Trent J. Benedetti

**Title:** Investment Advisor Representative

**Phone Number:** (805) 922-4881

**Item 7 Requirements for State-Registered Advisers**

**A. Additional Disciplinary History**

Christie L. Benedetti has no additional reportable disciplinary history.

**B. Bankruptcy History**

Christie L. Benedetti has not been the subject of a bankruptcy petition.

# **Benedetti Financial Incorporated**

## **Business Continuity Plan (BCP)**

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### **I. Emergency Contact Persons**

Our firm's two emergency contact persons are:

<b>Name</b>	<b>Title or Relationship to Firm<sup>1</sup></b>	<b>Mailing Address</b>	<b>Email Address</b>	<b>Phone Number</b>	<b>Fax Number</b>
Trent Benedetti	President	2722 Santa Barbara Dr., Santa Maria, CA 93455	<a href="mailto:trentb@benedetticpa.com">trentb@benedetticpa.com</a>	805-478-3035	805-922-7953
Christie Benedetti	Vice President	598 N. Greenhill Rd., Mt. Juliet, TN 37122	<a href="mailto:christieb@benedettifinancial.com">christieb@benedettifinancial.com</a>	615-636-3047	none

### **II. Firm Policy**

Our BCP's primary objectives are to continue providing services to our customers, protect the health and safety of our employees, and fulfill our legal and regulatory obligations. In the event that we determine we are unable to continue our business we will assure customers prompt access to their funds and securities.

#### **A. Significant Business Disruptions (SBDs)**

An SBD may affect only our firm (*e.g.*, a fire in our office building or cyber event) or may be widespread affecting several firms or the operation of the securities markets (*e.g.*, a terrorist attack, a natural disaster or a pandemic). Our response will vary depending on the severity of the SBD, which may include greater reliance on other organizations and systems, especially on the capabilities of our clearing firm.

#### **B. Plan Approval and Annual Reviews**

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Trent Benedetti, a registered principal and member of senior management, is responsible for approving the plan and for conducting the required annual review.

### C. Plan Location and Access

Consistent with FINRA Rule 4511 (General Requirements), our firm will maintain copies of its BCP, any modifications that have been made to the BCP and the annual reviews for inspection, and the BCP will be made available promptly upon request to FINRA staff. The BCP is also available to all employees on our Common Files Network Foler – Benedetti Financial, Inc – Business Continuity Plan

## III. Business Description

Our firm conducts business in equity securities, fixed income securities, and derivatives for institutional clients. We do not engage in any private placements. We do not perform any type of clearing function or hold customer funds or securities. After an order is taken from a client by our firm, it is entered if we are the trading advisor, OR the order is sent to our co-advisory firm for execution, clearance and settlement. Our co-advisory firm also maintains our customers' accounts and can grant customers access to them.

Our co-advisory firms are:

Efficient Advisors, LLC  
408 4th Ave. #3  
Mason, OH 45040  
(888) 320-6250  
[www.efficientadvisors.com](http://www.efficientadvisors.com)

Matson Money, Inc.  
5955 Deerfield Blvd.  
Mason, OH 45040  
(513) 204-8000  
[www.matsonmoney.com](http://www.matsonmoney.com)

## IV. Office Locations

*Our firm has offices located in Location Santa Maria, CA and Mt. Juliet, TN*

### A. Office Location: Santa Maria, CA

Our Santa Maria, CA Office is located at 2151 S. College Dr., Ste. 101, Santa Maria, CA 93455. Its main phone number is (805) 922-4881 and the main person of contact is Trent Benedetti, [trentb@benedetticpa.com](mailto:trentb@benedetticpa.com), (805) 478-3035. This Office meets in-person with clients. In the event the Santa Maria, CA Office is inaccessible or staff is working remotely due to an SBD, mail will be directed or forwarded to an alternate location or back-up location.

## **B. Office Location: Mt. Juliet, TN**

Our Mt. Juliet, TN Office is located at 598 N. Greenhill Rd., Mt. Juliet, TN 37122. Its main phone number is (615) 636-3047 and the main person of contact is Christie Benedetti, [christieb@benedettifinancial.com](mailto:christieb@benedettifinancial.com), (615) 636-3047. This is a Virtual Office and meets with clients by appointment at an agreed-upon local location or online. In the event the Santa Maria, CA Office is inaccessible or staff is working remotely due to an SBD, mail will be directed or forwarded to an alternate location or back-up location.

## **V. Alternate Physical Location(s) of Employees**

In the event of an SBD impacting our ability to operate in a location, staff in the affected office(s) will move to our back-up location at 2722 Santa Barbara Dr., Santa Maria, CA 93455.

If the back-up location is unavailable or infeasible (*e.g.*, due to the inability to employ social distancing during a pandemic), staff may temporarily work from a remote location (*e.g.*, staff may work from home because of health and safety reasons during a pandemic). In this event, we will maintain a list of employee contact information.

## **VI. Customers' Access to Funds and Securities**

Our firm does not maintain custody of customers' funds or securities. The Client Custodians, maintains custody of customers' funds or securities. If telephone or internet service is available during an SBD, our registered persons will take customer orders or instructions (including instructions to transfer customer accounts in the event our firm determines that it is unable to continue its business) and contact our Custodians on their behalf. If registered persons are unable to service customers' orders or instructions, our firm will post on our website and send an email to customers notifying customers that they may access their funds and securities by contacting the listed Custodian on their account statement.

## **VII. Data Back-Up and Recovery**

Our firm maintains its primary or original books and records in either electronic or paper form at our Santa Maria, CA Office Location. Trent Benedetti is responsible for the maintenance of these books and records.

In the event of an SBD that causes the loss of our primary or original paper books and records, we will physically recover paper copies of them from our back-up site. For the loss of our primary or original electronic books and records, we will obtain electronic copies of them from our back-up site or physically recover the electronic storage media Network back-up and Cloud. If our primary site is inoperable, we will continue operations from our back-up site or an alternate location.

## **VIII. Financial and Operational Assessments**

### **A. Operational Risk**



In the event of an SBD, we will identify whether there are any limitations on our ability to communicate with our customers, employees, critical business constituents, critical banks, critical counter-parties and regulators. Depending on the limitations, we will employ alternate modes of communication, including our website, phone or email, to communicate with customers, employees, critical business constituents, critical banks, critical counter-parties and regulators. If registered persons are unable to service customers, our firm will post on our website or send an email to customers notifying customers that they may access their funds and securities by contacting the Custodian listed on their account statement.

## **B. Financial and Credit Risk**

In the event of an SBD impacting our financial position, we will determine the value and liquidity of our investments and other assets to evaluate our ability to continue to fund our operations and remain in capital compliance. We will contact our clearing firm, critical banks and investors to apprise them of our financial status. If we determine that we may be unable to meet our obligations to those counter-parties or otherwise continue to fund our operations, we will request additional financing from our bank or other credit sources to fulfill our obligations to our customers and clients. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take appropriate steps.

## **IX. Mission Critical Systems**

Our firm's "mission critical systems" are those that ensure prompt and accurate processing of securities transactions, including order taking, maintenance of customer accounts, and sending of the order to our co-advisor, or entering the order if client is directly traded under Benedetti Financial.

Our Custodians and Co-Advisory Firms back up our records on their back-up systems as well. They represent that they operate a back-up operating facility in a geographically separate area with the capability to conduct the same volume of business as the primary site. They also confirmed the effectiveness of the back-up arrangements to recover from a wide scale disruption.

### **A. Our Firm's Mission Critical Systems**

#### **1. Order Taking**

Currently, our firm receives orders from customers via written and verbal request. During an SBD, we will continue to take orders through any of these methods that are available and reliable. As communications permit, we will inform our customers what alternative methods are available for sending orders. Customers will be informed of alternatives by phone, email or posting on the firm's website. If necessary, we will advise our customers to place orders directly with their account Custodian.

## **2. Order Entry**

Currently, our firm places customer orders through Charles Schwab, if a client of our direct trading platform. If a client is under our Co-advisory relationship, we send orders directly to the co-advisor via email request.

In the event of an SBD impacting order entry, we will enter and send orders to our co-Advisory firm by the fastest alternative means available.

## **3. Order Execution**

We currently execute orders by online advisor site, phone call, or email. In the event of an SBD, we would find the most effective execution process available.

## **X. Alternate Communications Between the Firm and Customers, Employees and Regulators**

### **A. Customers**

the event of an SBD, we will identify whether there are any limitations on our ability to communicate with customers. Depending on the limitations, we will employ alternate modes of communication, including our website, phone or email, to communicate with customers. When an alternate mode of communication is used we will consider any increased risk of cybersecurity events stemming from the alternate mode.

### **B. Employees**

In the event of an SBD, we will identify whether there are any limitations on our ability to communicate with employees. Depending on the limitations, we will employ alternate modes of communication, including our website, phone or email, to communicate with employees. When an alternate mode of communication is used we will consider any increased risk of cybersecurity events stemming from the alternate mode.

### **C. Regulators**

We are currently regulated by FINRA.

In the event of an SBD, we will identify whether there are any limitations on our ability to communicate with regulators. Depending on the limitations, we will employ alternative modes of communication, including our website, phone or email, to communicate with regulators. When an alternate mode of communication is used we will consider any increased risk of cybersecurity events stemming from the alternate mode.

## **XI. Regulatory Reporting**

Our firm is subject to regulation by: FINRA. We fulfill our regulatory reporting obligations using electronic means and the FINRA Gateway].

In the event of an SBD, we will identify whether there are any limitations on our ability to fulfill our regulatory reporting obligations. Depending on the limitations, we will employ alternate modes of communication, including our website, phone or email, to communicate with regulators in fulfilling our regulatory reporting obligations. In the event we are unable to fulfill a regulatory reporting obligation in a timely manner we will notify our regulator at:

## **XII. Disclosure of Business Continuity Plan to Customers**

We post the BCP on our website and mail it to customers upon request.

## **XIII. Updates and Annual Review**

Our firm will update this plan whenever we have a material change to our operations, structure, business or location or to those of our clearing firm. In addition, our firm will review this BCP annually to determine whether any modification are necessary due to changes in our operations, structure, business or location or those of our clearing firm.

## **XIV. Senior Manager Approval**

I have approved this Business Continuity Plan as reasonably designed to enable our firm to meet its obligations to customers in the event of an SBD.

Signed:

T. J. Benoit

Title:

President

Date:

6/9/2023