



Linden Financial Consultants, LLC  
140 Allens Creek Road, Suite 3  
Rochester, NY 14618  
(585) 721-4066  
[www.lindenfinancialconsultants.com](http://www.lindenfinancialconsultants.com)

Form ADV Part 2  
1 January 2025

This Form ADV Part 2 advisory services brochure provides information about the qualifications and business practices of Linden Financial Consultants, LLC. If you have any questions about the contents of this document, please contact Katharine (Kitty) P Bressington, Managing Member and Chief Compliance Officer, at (585) 721-4066.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or any state securities administrator. Additional information on Linden Financial Consultants, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Click on the "Investment Adviser Search" link and then search for "Investment Adviser Form" using the firm's IARD number, which is 168676.

While the firm may be registered with the State of New York, registration in itself does not imply an endorsement by any regulatory authority, nor does it imply a certain level of skill or training on the part of the firm or its associated personnel.

## Item 2 – Material Changes

Linden Financial Consultants, LLC filed its initial ADV Part 2 advisory brochure in August 2013.

On January 1<sup>st</sup>, 2023, Linden Financial Consultants, LLC added John Hughes as an associate advisor.

On August 1<sup>st</sup>, 2024, Linden Financial Consultants, LLC moved their offices to 140 Allens Creek Rd, Ste 3, Rochester NY 14618.

Clients should review the document in its entirety and are encouraged to ask questions at any time prior to or throughout the engagement.

For future filings, this section of the brochure may address only those material changes that have occurred since the firm's last annual update.

The firm may, at any time, update this document and either send a copy of its updated brochure or provide a summary of material changes to its brochure and offer to send an electronic or hard copy form of the updated brochure. Clients are also able to download this brochure from the SEC's Website: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) or may contact our firm at (585) 721-4066 to request a copy at any time.

## Table of Contents

Material Changes.....	Page 2
Advisory Business (Item 4) .....	Page 4
Fees and Compensation (Item 5) .....	Page 7
Performance-Based Fees (Item 6).....	Page 8
Types of Clients (Item 7).....	Page 8
Methods of Analysis, Investment Strategies and Risk of Loss (Item 8).....	Page 8
Disciplinary Information (Item 9) .....	Page 10
Other Financial Industry Activities and Affiliations (Item 10) .....	Page 10
Code of Ethics, Participation or Interest in Client transactions & Personal trading (Item 11) .....	Page 10
Brokerage Practices (Item 12) .....	Page 11
Review of Accounts (Item 13).....	Page 11
Client Referrals and Other Compensation (Item 14).....	Page 12
Custody (Item 15) .....	Page 12
Investment Discretion (Item 16) .....	Page 13
Voting Client Securities (Item 17).....	Page 13
Financial Information (Item 18).....	Page 13
Requirements for State-Registered Advisors (Item 19) .....	Page 14
Requirement for State-Registered Advisors: Arbitration Awards / Sanctions / Financial Matters Professional Designations .....	Page 17
Privacy, Security & Confidentiality Policy.....	Page 18

### Important Information

Throughout this document, Linden Financial Consultants, LLC shall also be referred to as “LFC,” the “firm,” “our,” “we,” or “us.” These terms are used for the reader’s ease of use while reviewing the brochure and are not meant to imply that LFC is larger than it actually may be at the time of publication. The client or prospective client may be also referred to as “you,” “your,” etc., and refers to a client engagement involving of a single person as well as two or more persons. The term “advisor” and “adviser” are used interchangeably except where accuracy in identification is necessary (i.e., Internet address, etc.).

This brochure contains 19 pages and should not be considered complete without all pages.

## ***Advisory Business (Item 4)***

### *About our firm*

Linden Financial Consultants, LLC (LFC) was formed in May 2013 as a New York limited liability company; it is neither a subsidiary of nor does it control another entity. In addition to the 2013 registration as an investment advisor in the State of New York, LFC and its associates may register or meet certain exemptions to registration in other jurisdictions in which it conducts investment advisory business.

LFC provides fee-only hourly as-needed financial planning and investment consulting services which may include advice on asset allocation and investment selection. LFC does not maintain any client assets under management. LFC requires no income or asset minimums as a prerequisite for engagement.

LFC performs these services in a manner believed to be in the best interest of the client, putting the client first. This commitment differs from other types of firms that may not be held to as strong a standard and may not be required, under current legislation, to place clients' interest ahead of their own.

### *Description of Advisor Services Offered*

LFC traditionally begins by holding an initial interview to identify the scope of services for the client's engagement and to determine if LFC's planning philosophies will be a good match for those needs. During or prior to the first meeting, a current ADV Part 2A advisory brochure will be provided along with the firm's privacy policy. LFC will also ensure any material conflicts of interest that could be reasonably expected to impair the rendering of unbiased and objective advice are disclosed.

Upon engaging Linden Financial Consultants, LLC for its services, depending on the scope of the engagement, a client may be asked to provide current copies of pertinent documents based on LFC's proprietary document checklist.

It is important that the information and financial statements provided are accurate. The firm is not required to verify any information provided by the client or by the client's other professionals which will then be used in the financial planning or investment advisory process. Each client is advised to promptly notify LFC if there is any change during the client engagement.

### *Financial Planning and Investment Consultation Services*

LFC's primary function is to provide objective fee-only financial consulting services to individuals. The process involves collecting pertinent data, conducting personal interviews with the client, preparing an analysis of the financial data, and presenting a summary of the significant observations and suggestions regarding financial planning areas. The following are general examples, which may change from case to case.

#### *CASH FLOW ANALYSIS*

A review of income and expenses along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed available income. Advice may be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. Suggestions may be made with respect to appropriate cash reserves for emergencies and other financial goals, and a review of accounts for such reserves, plus strategies to save targeted amounts.

### *RETIREMENT NEEDS PLANNING*

Retirement planning services typically include projections of the likelihood of achieving financial independence. For situations where projections show less than the desired results, the analysis may include illustrating the impact of altering certain variables (i.e., working longer, saving more, and/or spending less). If a client is near retirement or already retired, advice may be given on distribution strategies to help minimize the likelihood of running out of money or having to alter spending patterns during retirement years.

### *EDUCATION FUNDING*

College funding advice may include projecting the amount that may be needed to achieve post-secondary education funding goals, along with savings strategies and the “pros-and-cons” of the various college savings vehicles that are currently available. Linden Financial Consultants, LLC (LFC) generally requests that Retirement Needs Planning be completed either prior to or in conjunction with Education Funding.

### *INSURANCE COVERAGE ANALYSIS*

A risk management review includes an analysis of the client’s exposure to major risks such as premature death, disability, property and casualty losses, or how to handle potential long-term care expenses.

### *ESTATE PLANNING*

Reviewing a client’s current estate plan includes a review of their wills, powers of attorney, trusts and other related documents, particularly as related to the client’s investments.

LFC recommends that the client consults with a qualified attorney when they initiate, update, or complete estate planning activities. Upon request, LFC may provide contact information for attorneys who specialize in estate planning. From time-to-time and upon request, LFC will participate in meetings or phone calls between a client and their attorney.

### *DIVORCE PLANNING*

Working in conjunction with a mediator or attorney, LFC’s services may include: Counseling regarding pre-filing documentation and budget development; Education on the divorce process and court system; Maintenance and Child Support guidelines and calculations; Analysis of financial position, including assessment regarding omissions, misstatements and undisclosed income or assets by spouse; Review and Analysis of any proposed settlement with regards to its short-term and long-term financial impacts.

If several or all of the services described are provided together through a broad-based plan, the total time needed to complete these services may be less than the time it would take to complete each service separately because of the efficiency gained by combining more than one service.

### *INVESTMENT CONSULTATION SERVICES*

Linden Financial Consultants, LLC (LFC) Investment Consultation Services are billed on an hourly basis. Discussion may involve providing information on the types of investment vehicles available, the design of a portfolio specifically tailored to the client’s goals and objectives, and general asset allocation philosophies. This investment advice can either be part of a financial planning analysis or on its own.

### *Investment Account Restrictions*

As instructed by the client, LFC will endeavour to accommodate any reasonable restrictions requested for the designing of a portfolio. For example, a client may prefer to avoid or require certain types of holdings (e.g., “ESG” holdings, etc.) in their account.

It remains the clients’ responsibility to promptly notify LFC if there is any change in their financial situation and/or investment objectives for the purpose of reviewing, evaluating or revising previous account restrictions or firm investment suggestions.

Clients are also reminded that restricting investments to particular assets or asset classes may minimize diversification and potentially increase portfolio volatility.

### *SERVICE DELIVERY*

Clients are encouraged to schedule regular appointments to review their concerns or investments, and it is the client’s responsibility to initiate these reviews and to re-engage LFC for those services (at the current hourly rates).

In all instances involving financial planning and investment consultation services, clients retain full discretion over all implementation decisions and are free to accept or reject any suggestions made by LFC. Unless otherwise stated, upon completion of the presentation or delivery of advice, the financial planning and investment consultation engagement is typically concluded.

### *Wrap Fee Programs*

As a matter of policy and practice, LFC does not sponsor or serve as a portfolio manager in any investment program involving wrap fees.

### *Client Assets Under Management*

LFC does not directly manage client investments and therefore has no reportable assets under management.

### *General Information*

LFC does not provide legal or accounting services. With the client’s consent, LFC may work with other professional advisors to assist with coordination and implementation of accepted strategies. The client should be aware that these other advisors will charge separately for their services and these fees will be in addition to Linden Financial Consultants, LLC’s (LFC) own advisory fees.

LFC will use its best judgment and good faith effort in rendering its services; it cannot, however, warrant or guarantee any particular level of account performance or that a client’s account will be profitable over time. Past performance is not indicative of future results.

Except as may otherwise be provided by law, LFC will not be liable to the client, heirs, assignees for any loss an account may suffer by reason of an investment decision made or other action taken or omitted in good faith by LFC with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; any act or failure to act by a service provider maintaining an account. Federal and state securities laws impose liabilities under certain circumstances on persons who act in good faith and, therefore, nothing contained in this document shall constitute a waiver of any rights that a client may have under federal and state securities laws.

## ***Fees and Compensation (Item 5)***

### *Method of Compensation and Fee Schedule*

The services to be provided and their respective fees will be outlined in an engagement agreement. LFC may choose to discount their published fees but those fees are not negotiable.

LFC reserves the right to waive or reduce certain fees based on unique individual circumstances, special arrangements, or pre-existing relationships. LFC also reserves the right to decline services to any prospective client for any non-discriminatory reason.

LFC strives to offer fees that are fair and reasonable in light of the experience of the firm and the services to be rendered, however, similar services may be available from other providers and potentially at a lower fee.

### *HOURLY FEES*

When a client engages LFC for services, the rate is \$250 per hour, billed in 10-minute increments after the first hour, and a partial increment (i.e., seven minutes, etc.) will be treated as a whole increment.

### *Client Payment of Fees*

Fees are due upon receipt of LFC's invoice and LFC does not collect fees in excess of \$500 and six months or more in advance.

Payments may be made by credit cards, check or cashier's draft from a US-based bank.

Interest at 10% per year may be assessed on LFC's delivered services balances that are more than 60 days past due. Further, LFC reserves the right to suspend services once an account is deemed as past due.

### *Additional Client Fees*

Any transactional or service fees (sometimes termed brokerage fees) assessed by a selected service provider (i.e., a custodian), individual retirement account fees, qualified retirement plan, and/or account termination fees will be borne by the account holder. Fees paid by client of Linden Financial Consultants, LLC (LFC) clients for advisory services are separate from any transactional charges a client may pay, as well as those for mutual funds, exchange-traded funds (ETFs), exchange-traded notes (ETNs), or other investments of this type.

### *Termination of Services*

Either party may terminate the agreement in writing, at any time. Should a client verbally notify Linden Financial Consultants, LLC (LFC) of the termination and, if in three business days following this notification LFC has not received a notice in writing, LFC will make a written notice of the termination in the client's records and send a termination notice as a substitute. LFC will return any prepaid fees reduced by an amount equal to the hourly rate for time charges already incurred in the preparation of the financial or investment allocation plan.

LFC will not be responsible for future allocations or investment advice upon receipt of a termination notice.

### *External Compensation for the Sale of Securities to Clients*

LFC is engaged in fee-only services and does not charge or receive a commission or mark-up on any securities transactions, nor will the firm or an associate be paid a commission on a purchase of a securities investment that it recommends.

LFC does not receive “trailer” or SEC Rule 12b-1 fees from a suggested investment company. Fees charged by issuers are detailed in prospectuses or product descriptions and clients are encouraged to read these documents before investing. A client will always have the option to purchase the suggested or similar investments through their own service provider.

### ***Performance-Based Fees (Item 6)***

LFC does not accept performance-based fees nor does it participate in programs or assets that include performance-based fees because of the conflict of interest this type of fee structure poses.

### ***Types of Clients (Item 7)***

LFC provides fee-only advice to individuals, couples, families, trusts, estates, foundations and charitable organizations, as well as businesses of various scale.

It is necessary that a client provides an adequate level of information and supporting documentation throughout the term of the engagement.

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

#### *METHODS OF ANALYSIS*

When engaged to provide investment advice, Linden Financial Consultants, LLC (LFC) will first gather information about the client’s personal financial situation to clarify the client’s specific needs, objectives, goals and tolerance for (and capacity to bear) risk.

LFC’s suggestions may be drawn from sources that include materials from economists and other industry professionals, financial periodicals, corporate rating services, company press releases, annual reports, prospectuses and regulatory filings.

LFC does not provide suggestions regarding specific stocks or individual bond issues.

#### *INVESTMENT STRATEGIES*

LFC recognizes that each client’s needs and goals are different, therefore, suggested investment strategies, asset allocation and underlying investment vehicles vary based on the client’s personal financial situation. LFC will discuss with the client how, in LFC’s best judgment, to meet their objectives while at the same time seeking a prudent level of risk exposure.

It should be noted that LFC believes the appropriate allocation across diverse investment categories (i.e., stock vs. bond, foreign vs. domestic, large cap. vs. small cap., high quality vs. high yield, index vs. actively traded, etc.) is the primary determinant of portfolio returns and is critical to the long-term success of a client’s financial objectives and goals.

LFC typically employs a fundamental, long-term, buy-and-hold philosophy in regard to investment advice. Investments typically involve low-cost, no-load mutual fund investments and ETFs. LFC recommends portfolios be periodically adjusted by rebalancing; annually or as needed by investor-specific needs or market conditions.



## *Risk of Loss*

### *INVESTMENT STRATEGY RISKS*

While LFC believes that strategies and investment suggestions are designed to produce the appropriate potential return for the given level of risk, LFC cannot guarantee that an investment objective or planning goal will be achieved. As an investor, the client must be able to bear the risk of loss that is associated with their account, which may include the loss of some of investment principal. Examples of risks include:

*ETF and Mutual Fund Risk* – ETF's and mutual funds may carry additional expenses based on their operating expenses. The risk of owning these types of holdings also reflects the risks of their underlying securities.

*Financial Risk* – Borrowing to finance a business operation increases profitability risk because the company must meet the terms of its obligations in good times and bad. The inability to meet loan obligations may result in bankruptcy and/or a declining market value. Various forms of fixed income instruments, such as bonds, money market funds, bond funds, and certificates of deposit, may be affected by various forms of risk, including:

CREDIT RISK – The potential risk that an issuer would be unable to pay scheduled interest or repay principal at maturity or when periodically due, sometimes referred to as “default risk.”

DURATION RISK – Duration is a measure of a bond's volatility, expressed in years to be repaid by its internal cash flow (interest payments). Bonds with longer durations carry more risk and have higher price volatility than bonds with shorter durations.

INTEREST RATE RISK – The risk that the value of a fixed income holding will decrease due to an increase in interest rates.

LIQUIDITY RISK – The inability to readily buy or sell an investment for a price close to the true underlying value of the asset due to a lack of buyers or sellers.

REINVESTMENT RISK – With declining interest rates, investors may have to reinvest interest income or principal at a lower rate.

*Fundamental Analysis* – The risk involved in employing fundamental analysis is that the information obtained may be incorrect which may result in unfavorable performance.

*Index Investing* – ETF's and indexed mutual funds have the potential to be affected by “active risk” or “tracking error risk;” a deviation from a stated benchmark (index).

*Industry Risk* – There is always a certain level of industry-specific risk that is inherent in each company or issuer; that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. This is also referred to as an unsystematic risk.

*Inflation Risk* – When any type of inflation is present, a dollar today will not buy as much as a dollar next year because purchasing power is eroding at the rate of inflation.

*Management Risk* – An investment with a firm varies with the success and failure of its investment strategies, research, analysis and determination of its portfolio.

*Market Risk* – When the stock market as a whole or an industry as a whole falls, it can cause the prices of individual stocks to fall indiscriminately. This is also called systematic risk.

*Research Data Risk* – When research and analyses are based on commercially available software, rating services, general market and financial information, or due diligence reviews, a firm is relying on the accuracy and validity of the information or capabilities provided by selected vendors, rating services, market data, and the issuers themselves. While Linden Financial Consultants, LLC (LFC) makes every effort to determine the accuracy of the information received, LFC cannot predict the outcome of events or actions taken or not taken, or the validity of all information researched or provided.

### ***Disciplinary Information (Item 9)***

Neither the firm nor any member of its management has been involved in a material criminal or civil action in a domestic, foreign or military jurisdiction, an administrative enforcement action, or self-regulatory organization proceedings.

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

LFC policies require the firm and any associated person to conduct business activities in a manner that avoids conflicts of interest between the firm and its clients, or that may be contrary to law. LFC will provide disclosure to each client prior to and throughout the term of an engagement regarding any conflicts of interest which might reasonably compromise our impartiality or independence.

Advisors affiliated with LFC are members of the Garrett Planning Network (Garrett), an organization that assists financial planners in fee-only financial planning practices. LFC pays a monthly membership fee to Garrett for extensive services that include training, compliance, and operational support.

### ***Material Relationships Maintained by this advisory Business and Conflicts of Interest***

Neither LFC nor its associates have a material relationship with any of the following types of entities:

- ❖ Banking or thrift institution;
- ❖ Accountant or accounting firm;
- ❖ Insurance company or agency;
- ❖ Investment company or other pooled investment vehicle.

Upon request, Linden Financial Consultants, LLC (LFC) may provide referrals to various professionals, such as a tax preparer or attorney. While these referrals are based on LFC's best information, the firm does not guarantee the quality or adequacy of the work provided by these referred professionals. LFC does not have an agreement with or receive fees from these professionals for these informal referrals. Any fees charged by these other entities for their services are completely separate from fees charged by LFC.

### ***Suggestion or Selection of Other Investment Advisors and Conflicts of Interest***

It is not LFC's practice to provide a recommendation to an unaffiliated registered investment advisor.

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

#### ***Code of Ethics Description***

LFC accepts the obligation not only to comply with all applicable laws and regulations but also to act in an ethical and professionally responsible manner in all professional services and activities.

LFC holds itself to a fiduciary standard, which means that the firm and its associates will act in the utmost good faith; performing in a manner believed to be in the best interest of clients.

### *Investment Suggestions Involving a Material Financial Interest and Conflicts of Interest*

Neither LFC nor its associates are authorized to recommend to a client involving any security in which the firm or a “related person” (e.g., associate, an immediate family member, etc.) has a material financial interest.

An associate is prohibited from borrowing from or lending to a client unless the client is an approved financial institution.

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

The firm’s related persons may buy or sell securities that are the same as, similar to, or different from, those suggested by LFC to clients for their accounts. A recommendation made to one client may be different in nature or in timing from a recommendation made to a different client; clients often have different objectives and risk tolerances. At no time, however, will the firm or a related person receive preferential treatment over a client.

### **Brokerage Practices (Item 12)**

#### *Factors Used to Select Broker-Dealers for Client Transactions*

Linden Financial Consultants, LLC (LFC) generally suggests that clients use a low-cost brokerage account maintained by a qualified custodian (generally a broker/dealer, mutual fund transfer agent, bank or trust company) that is frequently reviewed by their respective industry regulatory authority.

#### *Best Execution*

In light of the nature of LFC’s fee-only advisory services, the firm does not believe that it is obligated to conduct “best execution” assessments of client transactions under current guidelines.

#### *Directed Brokerage*

A client is free to use any particular service provider to execute some or all of the suggested transactions and is responsible for negotiating the terms and/or arrangements for each account. LFC does not maintain custody of a client’s assets and is not obligated to conduct due diligence on or seek better execution services or prices from the selected service provider.

### **Review of Accounts (Item 13)**

It is important that a client keeps LFC informed of significant changes that may call for an update to any previously completed financial and investment plans. Events such as change or loss of a job, change in marital status, an unplanned windfall or health event, birth or adoption of a child or grandchild, or the purchase or sale of a home or business can have a large impact on overall circumstances, needs and goals.

LFC recommends periodic financial check-ups or reviews on an annual basis whenever practical, assessed at the current fee rate.

#### *Content and Frequency of Client Reports*

Clients should receive account statements sent directly from mutual fund companies, transfer agents, custodians or brokerage companies where their investments are held. LFC urges clients to carefully review these statements for accuracy and clarity, and to ask questions when something is not clear.

LFC does not provide ongoing performance reporting.

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

### *Economic benefit from External Sources and Potential Conflicts of Interest*

LFC may receive economic benefit from service providers in the form of various products and services they make available that typically may not be made available to a “retail investor.” These benefits may include the following products and services (provided either without cost or at a discount):

- ✂ Receipt of duplicate client statement and confirmations;
- ✂ Research related products and tools;
- ✂ Resource information related to capital markets and various investments;
- ✂ Discounts on marketing, research, technology, and practice management products or services provided by third-party providers.

Some of the noted products and services made available by service providers may benefit Linden Financial Consultants, LLC (LFC) and may not directly benefit a client account, and certain research and other previously referenced services may qualify as “brokerage and research services” under Section 28(e) of the Securities Exchange Act of 1934. The availability of these services from service providers benefits LFC because LFC does not have to produce or purchase them. Therefore, there may be an appearance of a conflict of interest since the firm may appear to have an incentive to select or recommend a particular service provider as a custodian based on our firm’s interest in receiving these benefits.

### *Advisory Firm Payments for Client Referrals*

LFC does not engage in solicitation activities as defined by New York statute.

A firm associate may hold individual memberships or serve on boards or committees of professional industry associations. Generally, participation in any of these entities requires membership fees to be paid, adherence to ethical guidelines, as well as in meeting experiential and educational requirements.

A benefit that these professional associations may provide to the investing public is the availability of online search tools that allow interested parties (prospective clients) to search for individual participants within a selected state or region. These passive websites may provide means for interested persons to contact a participant via electronic mail or other contact mechanism, in order to interview the participating member. A portion of these participant’s membership fees may be used so that their name will be listed on some or all of these entities’ websites (or other listings).

Prospective clients locating Linden Financial Consultants, LLC (LFC) or an associate via these methods are not actively marketed by the noted associations. Clients who find LFC in this way do not pay more for their services than clients referred to LFC in another fashion, such as by another client. LFC does not pay these entities for prospective client referrals, nor is there a fee-sharing arrangement reflective of a solicitor’s engagement.

## **Custody (Item 15)**

A client’s assets will be maintained by an unaffiliated, qualified custodian, such as a bank, broker/dealer, mutual fund companies, or transfer agent and are not held by our firm or any associate. In keeping with this policy involving client funds or securities, LFC:

- Prohibits any associate from having authority to directly withdraw securities or cash assets from a client account;
- Does not accept or forward client securities (i.e., stock certificates) erroneously delivered to the firm; and

- Will not authorize an associate to have knowledge of a client's account access information (i.e., online 401(k), brokerage or financial institution accounts).

### ***Investment Discretion (Item 16)***

LFC will not take discretionary authority over any client account.

### ***Voting Client Securities (Item 17)***

#### *Proxy Voting*

Investors who own shares of company stock and mutual fund shares possess the right to provide input on matters of corporate policy through voter proxies issued by the company or investment. LFC does not vote proxies on behalf of a client, however, LFC may provide clarification regarding the issues relating to the proxy so that the client is able to make an informed voting decision.

#### *Other Corporate Actions*

LFC does not offer guidance on or have the power, authority, responsibility, or obligation to take any action with regard to any claim or potential claim in any bankruptcy proceedings, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise or monitor class action or other litigation involving client assets.

#### *Receipt of materials*

A client may receive proxies or other similar solicitations sent directly from their selected custodian or transfer agent. Should Linden Financial Consultants, LLC (LFC) receive a duplicate copy, note that LFC does not forward these or any correspondence relating to the voting of said securities, class action litigation, or other corporate actions.

### ***Financial Information (Item 18)***

#### *Balance Sheet*

LFC will not take physical custody of a client's assets and does not collect fees in advance of work performed.

Neither Linden Financial Consultants, LLC nor Ms. Katharine P Bressington serves as general partner for a partnership in which the firm's advisory clients are partners of the partnership.

Due to the nature of LFC's services and operational practices, an audited balance sheet is not required nor included in this brochure.

#### *Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients*

The firm and its management do not have a financial condition likely to impair its ability to meet client commitments.

#### *Bankruptcy Petitions during the Past 10 Years*

The firm and its management have not been the subject of a bankruptcy petition.

## **Requirements for State-Registered Advisors (Item 19)**

### *Principal Executive Offices and Management Persons*

Managing Member / President / Chief Compliance Officer / Investment Advisor Representative

Katharine P Bressington, CFP® CDFP® (born 1964)

### *Educational Background and Business Experience*

Regulatory guidance required disclosure of relevant post-secondary education and professional training for each principal executive and investment advisory representative through the firms' advisory brochure or brochure supplement, as well as their business experience for at least the past five years.

#### *EDUCATIONAL BACKGROUND*

CERTIFIED FINANCIAL PLANNER™ Professional, CFP®, Certified Financial Planner Boards of Standards, Inc.  
CFP Board-Registered Educational Program, Medaille College, Buffalo, NY

Certified Divorce Financial Analyst®, Institute for Divorce Financial Analysts, Durham, NC

Bachelor of Arts Rutgers College, Rutgers University, New Brunswick NJ

#### *Business Experience*

Linden Financial Consultants, LLC (2013 – Present)

Rochester, NY

Managing Member / President / Chief Compliance Officer / Investment Advisor Representative

#### *Other Business Activities*

Ms. Bressington is not registered as a registered representative of a broker/dealer or associated person of a futures commission merchant, commodity pool operator, or commodity trading advisor. She does not receive commissions, bonuses or other compensation based on the sale of securities, including that as a registered representative of a broker/dealer or the distribution or service ("trail") fees from the sale of mutual funds.

Ms. Bressington is a notary.

Ms. Bressington serves as Managing Director for the Foundation for Women's Financial Education, a not-for-profit organization.

#### *Additional Compensation*

Ms. Bressington is not compensated for advisory services involving performance-based fees. She is not a senior executive of or insider to an issuer of a security. Firm policy prohibits an associated person from accepting or receiving additional economic benefit, for providing advisory services to its clients.

#### *Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons*

Ms. Bressington does not have material disclosures related to an award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, OR an award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding, involving any of the following:

- i. An investment or an investment related business or activity;
- ii. Fraud, false statement(s), or omissions;
- iii. Theft, embezzlement, or other wrongful taking of property;
- iv. Bribery, forgery, counterfeiting, or extortion; or
- v. Dishonest, unfair, or unethical practices.

*Material Relationships Maintained by this Advisory Business or Management Persons with Issuers of Securities*

Neither the firm nor Ms. Bressington has a material relationship with an issuer of securities.

*Supervision*

Ms. Bressington serves in multiple capacities with the firm, such as its Managing Member, President, Chief Compliance Officer, and Investment Advisor Representative. Linden Financial Consultants, LLC recognizes that the combined nature of organizational duties may create a potential conflict of interest; however, we employ policies and procedures to ensure what we believe to be appropriate recordkeeping and supervision.

*Requirements for State-Registered Advisors: Arbitration Awards / Sanctions / Financial Matters*

There have been neither arbitration awards nor any sanctions or other matter where Ms. Bressington has been found liable in any civil, self-regulatory or administrative proceeding. Further, Ms. Bressington has not been the subject of a bankruptcy petition.

\*\*\*\*\*

*Associate Advisor / Investment Advisor Representative*

Jonathan Hughes (born 1978)

*Educational Background and Business Experience*

*EDUCATIONAL BACKGROUND*

Bachelor of Science in Applied Mathematics, Rochester Institute of Technology

*Business Experience*

Linden Financial Consultants, LLC (2021 – Present)  
Rochester, NY  
Associate Advisor

SPSMedical Supply Corp. (2012-2019)  
Rochester, NY  
General Manager

*Other Business Activities*

Mr. Hughes is not engaged in any investment related business or occupation other than with Linden Financial Consultants, LLC

*Additional Compensation*

Mr. Hughes is not compensated for advisory services involving performance-based fees. He is not a senior executive of nor insider to an issuer of a security. Firm policy prohibits an associated person from accepting or receiving additional economic benefit, for providing advisory services to its clients.

*Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons*

Mr. Hughes does not have material disclosures related to an award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, OR an award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding, involving any of the following:

- i. An investment or an investment related business or activity;
- ii. Fraud, false statement(s), or omissions;

- iii. Theft, embezzlement, or other wrongful taking of property;
- iv. Bribery, forgery, counterfeiting, or extortion; or
- v. Dishonest, unfair, or unethical practices.

*Material Relationships Maintained by this Advisory Business or Management Persons with Issuers of Securities*

Neither the firm nor Mr. Hughes has a material relationship with an issuer of securities.

*Supervision*

As a representative of Linden Financial Consultants, LLC, Mr. Hughes is supervised by Ms. Bressington, the firm’s Chief Compliance Officer. Ms. Bressington is responsible for ensuring that Mr. Hughes adheres to all required regulations regarding the activities of an Investment Advisor Representative, as well as all policies and procedures outlined in the firm’s Code of Ethics and compliance manuals.

Questions relative to our firm, services, or this ADV Part 2A may be made at (585) 721-4066. Additional information about the firm, other advisory firms, or associated investment advisor representatives is available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). A search of this site for firms or their associated personnel can be accomplished by name or a unique firm identifier, known as an IARD number. The IARD number for Linden Financial Consultants, LLC is 168676. The business and disciplinary history of an investment advisory firm and its representatives may also be obtained by calling New York Investment Protection Bureau/investment Advisory Unit at (212) 416-8285.

\*\*\*\*\*

*Professional Designations*

Certified Financial Planners (CRP®) are licensed by the CFP® Board to use the CFP® mark. The following are the CFP® certification requirements as of January 1, 2011, and may not be the qualifications in place when the credential was obtained:

- Bachelor’s degree from an accredited college or university,
- Completion of the financial planning education requirements set by the CFP® Board ([www.cfp.net](http://www.cfp.net)),
- Successful completion of the 10-hour CFP® Certification Exam,
- Three-year qualifying full-time work experience, and
- Successfully passed the Candidate Fitness Standards and background check.

Certified Divorce Financial Analysts (CDFA®) are licensed through the Institute for Divorce Financial Analysts. The following are the requirements as of January 1, 2016, and may not be the qualifications in place when the credential was obtained:

- Currently working in the financial services, accounting, or family law profession,
- Three years’ experience in the financial services, accounting, or family law profession,
- Completion of the education requirements set by the institute for Divorce Financial Analysts ([www.institutedfa.com](http://www.institutedfa.com)),
- Successful completion of the CDFA® Certification Exam



## Linden Financial Consultants, LLC

### Privacy, Security and Confidentiality Policy

Linden Financial Consultants, LLC (LFC) has an obligation to all of its clients to treat their information with the utmost care, both for financial reasons and to ensure the privacy, security and confidentiality given to LFC. This privacy policy applies to “consumers” who are current or former clients of LFC.

LFC has in place the following measures to ensure that privacy, security, and confidentiality are not breached by outside access or unauthorized personnel.

#### Organization-Collected Information

LFC obtains information regarding Clients only from the Client and any Advisor with whom the Client has a working relationship and where the Client has provided an appropriately signed Release of Information. LFC does not use the services of a Credit Reporting Agency or any other outside organization.

#### Disclosed Information

LFC will only collect information to help better understand a client’s financial situation and provide appropriate suggestions. This information includes, but is not limited to, the Client’s name, address, contact information, date of birth, annual income, net worth, investment net worth, investment goals and objectives and any other information that is pertinent to the development of Client investment plans, strategies, and Investment Policy Statement, if requested.

#### Parties with whom Information is shared

Upon receipt of an official request, LFC may need to disclose information related to current or previous clients. Information provided is shared only with LFC attorneys and accountants or any Federal or State Regulatory Agency or as otherwise prescribed by law or court order.

#### Policies & Procedures

LFC may be required to disclose or report personal information in certain circumstances where the firm believes in good faith that disclosure is required by law or regulation, such as during the normal course of a compliance examination, authentication checks and risk control measures or audits. The policy for disclosing this information to others is as follows:

- Any information and documents provided to LFC about the Client, their family, their financial circumstances and financial objectives will be kept strictly confidential. LFC attorneys and accountants who may need to review the firm’s files must keep this information confidential and insofar as LFC may be required by law or regulation to disclose such information to federal and state regulatory authorities or as may be required by court order.
- LFC will not sell personal information to anyone, ever. LFC protects the security and confidentiality of the data collected and will not disclose personal information to third parties except in the noted limited situations.
- LFC restricts access to physical and electronic files to authorized personnel only (LFC personnel and Designated Independent Contractors). Only those staff members or Designated Independent Contractors that must have access to personal Client information have the means to view that information.

- Linden Financial Consultants, LLC (LFC) does not obtain personal Client information from sources other than those mentioned.
- LFC will provide an initial notification of the Privacy, Security and Confidentiality Policy to every Client. Subsequently, LFC will send a copy of that policy to Clients annually.
- LFC maintains physical, electronic and organizational safeguards to protect client's personal information. The firm conducts ongoing reviews to protect personal information and makes every effort to keep client information accurate and up to date. If a client identifies an inaccuracy in their personal information or needs to make a change to the information being maintained, please contact the firm so that can be updated.

Outside of these exceptions LFC will not share client personal information with third parties unless specifically asked to do so.

### Right to Opt Out

LFC will provide notice of changes in the firm's information sharing practices. If, at any time in the future, it is necessary to disclose any of a client's personal information in a way that is inconsistent with this policy, LFC will provide advance notice of the change so that each client has the opportunity to opt out of such disclosure.

Opt out rights typically do not apply to disclosure of confidential information in the following circumstances:

- When the Client has consented to, and not revoked, the disclosure;
- For resolving Client disputes or inquiries;
- Persons holding legal or beneficial interests relating to the Client;
- Persons acting in a fiduciary or representative capacity on behalf of the Client;
- To provide information to regulatory agencies assessing LFC's compliance or to its attorneys, accountants, and auditors;
- In connection with a proposed or actual sale or merger of LFC.

### Privacy Policy and Breach Procedures

LFC respects the personal privacy of all its clients, both current and former. All personal information exchanged between the Client and LFC will be treated as confidential and will not be disclosed to anyone, unless specifically authorized by the Client or as required by law. As part of firm policy, LFC will maintain physical, electronic and procedural safeguards to comply with federal standards to guard client non-public personal information ("NPI").

Consumer report information and records will be disposed of in a manner to prevent unauthorized access or use. Procedures include the following:

- All employees will be trained in proper disposal procedures;
- Secure removal of trash involving consumer report information;
- Paper information will be burned, pulverized, or shredded so that it cannot be practicably read or reconstructed;
- Electronic information will be destroyed or erased so that the information cannot be practicably read or reconstructed.

Privacy breaches have the potential to cause adverse impact to the firm, business partners and Clients. In order to respond to a data breach in an efficient, appropriate manner, LFC has established breach response procedures. The firm's principal will respond to the loss of LFC.

The table below provides a basis for the protection of data elements. These elements are separated into three classifications with unique handling requirements and associated risks: Public, Sensitive, and Confidential.

Data Classification	Risk Level	Description	Data Element Examples
Public	Low	Data to which the public has access to and does not expose an individual to any risk with its publication and distribution. Authorized third parties may circulate such information outside of the organization	Name, address and other information commonly found; Published marketing materials may also be classified as public.
Sensitive	Moderate	Content and data, for internal use, which is comprised of enough proprietary information as to make it imprudent to release to the public.	Strategic planning information and employee contact information.
Confidential	High	“Internal Use” content and data accessible only to defined groups of the employee population. This data’s unauthorized disclosure may adversely impact the company, business partners and/or Clients. Unauthorized disclosure may lead to regulatory or legal implications	For reference, Client driver’s license number, passport number, and social security numbers are not maintained by LFC.

As part of assessing the breach, LFC will consider the type of data that was compromised and all of the circumstances of the data loss, including:

- Level of difficulty for unauthorized persons to access LFC;
- Means in which the loss occurred, including whether the incident might be the result of illegal activity, or is likely to result in illegal activity;
- Number of individuals possibly impacted.

Once the level of risk has been identified, the next step is to implement the response. Assuming that LFC has made the decision to provide notice to those at risk, LFC will incorporate the following elements into the notification process:

- Timing of Notification: The notice will be provided in a timely, yet appropriate manner.
- Coordination with Ongoing Investigations: Under certain circumstances, law enforcement may need a temporary delay to ensure that a criminal investigation can be conducted effectively.
- Method of Notification: Given the serious security and privacy concerns raised by data breaches, notification to affected individuals should be issued in a controlled manner by authorized parties. LFC should consider the best method of notification given the type of breach and number of impacted individuals, as well as its regulatory obligation.
- Content of Notification: The notice should be clear and concise and use easy-to-understand language. The following items are to be considered for inclusion in the notice:
  - Brief description of what occurred;
  - Brief description of what LFC is doing to investigate the breach, mitigate loss, and protect against further breaches;
  - Key contacts and procedures for additional questions or to learn more information;
  - Steps individuals should take to protect themselves from the risk of identity theft including steps to take advantage of any credit monitoring or other service LFC or its vendor may intend to offer.