



Kane Financial, LLC

151 West Main Street
Waterville, NY 13480
(315) 801-9028

www.kanefp.com

Form ADV Part 2A – Firm Brochure

Dated: February 27, 2024

This Brochure provides information about the qualifications and business practices of Kane Financial, LLC. If you have any questions about the contents of this Brochure, please contact us at (315) 801-9028. 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.

Kane Financial, LLC is registered as an Investment Adviser with the Securities and Exchange Commission. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about Kane Financial, LLC is available on the SEC's website at www.adviserinfo.sec.gov which can be found using the firm's identification number 291231.

Item 2: Material Changes

Since our last annual amendment filed March 13, 2023, we have made the following material changes:

- We have updated our fee structure for Employee Benefit Plan Services. This does not affect any current clients.
- Due to the merger of TD Ameritrade, Inc. and Charles Schwab & Co., Inc., we have updated Item 12 of our Brochure.

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations, and routine annual updates as required by the securities regulators. Either this complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Kane Financial, LLC.

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Item 4: Advisory Business

Description of Advisory Firm

Kane Financial, LLC is registered as an Investment Adviser with the Securities and Exchange Commission. We are a limited liability company and were founded in November of 2017. Clinton Kane is the principal owner of Kane Financial, LLC.

The following paragraphs describe our services. Please refer to the description of each investment advisory service below for information on how we tailor our advisory services to your individual needs.

As used in this brochure, the words "KF", "we", "our firm", "Advisor" and "us" refer to Kane Financial, LLC and the words "you", "your" and "client" refer to you as either a client or prospective client of our firm.

Types of Advisory Services

Investment Management Services

We are in the business of managing individually tailored investment portfolios. 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 with an asset allocation target and create and manage a portfolio based on that policy and allocation targets. We may also review and discuss a client's prior investment history, as well as family composition and background. Once the portfolio is constructed, we provide regular supervision and rebalancing of the portfolio as changes in market conditions and your circumstances may require.

Account supervision is guided by the stated objectives of the client (e.g., maximum capital appreciation, growth, income, or growth and income), as well as risk tolerance, time horizon, and tax considerations. We manage client accounts on a discretionary basis as further described in Item 16 of this Brochure.

Financial Planning Services

We provide financial planning services to all our investment management clients at no additional charge. For clients who do not engage us for investment management, fees will be billed at our hourly rate as further described in Item 5 of this Brochure.

Financial planning is an 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. The key defining aspect of financial planning is that through the financial planning

process, all questions, information and analysis will be considered as they affect and are affected by the entire financial and life situation of the client. Clients purchasing this service will receive a written or an electronic report, providing the client with a detailed financial plan designed to achieve his or her stated financial goals and objectives.

In general, the financial plan will address any or all the following areas of concern. The client and Advisor will work together to select the specific areas to cover. These areas may include, but are not limited to, the following:

- **Business Planning:** We provide consulting services for clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.
- **Cash Flow and Debt Management:** We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also 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. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.
- **College Savings:** Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren (if appropriate).
- **Employee Benefits Optimization:** We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.
- **Estate Planning:** This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts and other related documents. Our advice also typically includes

ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts.

We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

- **Financial Goals:** We will help clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- **Insurance:** Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.
- **Investment Analysis:** This may involve developing an asset allocation strategy to meet clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.
- **Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments).

If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

- **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses,

or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance (“self-insuring”).

- **Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their “tax efficiency,” with consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

Employee Benefit Plan Services

Our firm provides employee benefit plan services to employer plan sponsors on an ongoing basis. Generally, such services consist of assisting employer plan sponsors in establishing, monitoring and reviewing their company's participant-directed retirement plan. As the needs of the plan sponsor dictate, areas of advising could include: investment options, plan structure and participant education.

In providing employee benefit plan services, our firm does not provide any advisory services with respect to the following types of assets: employer securities, real estate (excluding real estate funds and publicly traded REITS), participant loans, non-publicly traded securities or assets, other illiquid investments, or brokerage window programs (collectively, “Excluded Assets”).

All retirement plan consulting services shall be in compliance with the applicable state laws regulating retirement consulting services. This applies to client accounts that are retirement or other employee benefit plans (“Plan”) governed by the Employee Retirement Income Security Act of 1974, as amended (“ERISA”). If the client accounts are part of a Plan, and our firm accepts appointments to provide services to such accounts, our firm acknowledges its fiduciary standard within the meaning of Section 3(21) or 3(38) of ERISA as designated by the Retirement Plan Consulting Agreement with respect to the provision of services described therein.

After consultation with the plan trustee or administrator, KF recommends a plan custodian based on such factors as the needs and size of the plan, fees associated with use of the Custodian and types of investments available.

Non ERISA 403(b) Plan Services

KF will create and maintain fully diversified asset allocation models invested in pre-selected portfolios of mutual funds, money market funds and exchange traded funds (“ETFs”) for Non-ERISA 403(b) accounts offered through Aspire Financial Services, LLC. Accounts will be managed on a discretionary basis, as further described in Item 16 of this Brochure. Clients will be assigned a target date fund or Model Portfolio or combination thereof based on their risk assessment, investable assets and chosen management strategy. Clients can choose a diversified Model Portfolio or target date fund or combination thereof but may not direct the underlying individual investments (such as mutual funds and ETFs) which comprise the Model Portfolios. The range and types of diversified asset allocation model portfolios may be changed from time to time by Adviser.

Client Tailored Services and Client Imposed Restrictions

We offer the same suite of services to all of our clients. However, specific client investment recommendations and financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client’s current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Clients are able to specify, within reason, any restrictions they would like to place as it pertains to individual securities and/or sectors that will be traded in their account. All such requests must be provided to KF in writing. KF cannot accept requests that prohibit or restrict the purchase of specific securities or types of securities held within mutual funds or exchange-traded funds purchased by KF, where applicable, in the Client’s account(s).

Wrap Fee Programs

We do not participate in wrap fee programs.

Assets under Management

As of December 31, 2023, KF has \$44,356,924 in assets under management, with \$44,269,405 managed on a discretionary basis and \$87,519 managed on a non-discretionary basis.

Item 5: Fees and Compensation

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

Investment Management Services

Our **Standard Advisory Fee** is based on the market value of the assets under management and is calculated as follows:

Account Value	Annual Advisory Fee
\$0 - \$500,000	1.00%
\$500,000 - \$1,000,000	0.75%
\$1,000,000 and Above	0.50%

Fees are paid monthly or quarterly in arrears based on the average daily balance of the account(s). Fees are negotiable. The Standard Advisory Fee is a blended fee calculated by assessing the percentage rates using the predefined levels of assets as shown in the above chart, resulting in a combined weighted fee.

For example, an account with an average daily balance totaling \$2,000,000 would pay an effective fee of 0.6875% with the annual fee of \$13,750. The fee is determined by the following calculation: $((\$500,000 \times 1.00\%) + (\$500,000 \times 0.75\%) + (\$1,000,000 \times 0.50\%))$. The annual fee is then divided by either twelve for monthly fee deduction or by four for quarterly fee deduction. No increase in the annual fee shall be effective without prior Client consent. Accounts initiated or terminated during a calendar billing period will be charged a prorated fee based on the amount of time remaining in the billing period.

Advisory fees are directly debited from client account(s) held at a qualified custodian upon Client's written approval of such arrangement and the periodic submission to the qualified custodian of the amount of advisory fees to be charged to Client's account(s). The Custodian will send an account statement to the Client at least quarterly, identifying

the amount of funds and each security in the account at the end of the period and setting forth all transactions in the account during the period, including the amount of our Standard Advisory Fee. Fees will typically be paid from cash balances or through the liquidation of money market shares held in the Client's account, however, if money market shares or cash value are not available, other investments may be liquidated to pay such fees when due. Clients may also choose to pay by check.

Fee-Based Variable Annuities: For assets held in a Fee-Based Variable Annuity, Adviser charges an annual advisory fee of 0.50%, billed monthly or quarterly in arrears. Fees are calculated based on the ending market value of the account on the last business day of the billing period and multiplying it by 0.50% divided by twelve for monthly fee deduction or by four for quarterly fee deduction.

Accounts initiated or terminated during an interim billing period will be charged a prorated fee based on the amount of time remaining in the billing period. Fees will be directly deducted from the Client's account held at the third-party custodian upon Client's written approval of such arrangement. The custodian will send an account statement to the Client at least quarterly showing the amount of the fee.

An account may be terminated with written notice at least 7 calendar days in advance. Since fees are paid in arrears, no refund will be needed upon termination of the account.

Financial Planning Services

Financial Planning Services is billed at our hourly rate of \$200.00 per hour, depending on complexity. The fee may be negotiable in certain cases and is due at the completion of the engagement. In the event of early termination by a client, any fees for the hours already worked will be prorated and due upon the termination date. Fees for this service may be paid by electronic funds transfer or check. At the commencement of the engagement, an estimate of the number of hours needed to complete the work will be notated in the Financial Planning Agreement.

Employee Benefit Plan Services

Employee Benefit Plan Services are either billed based upon a percentage of assets under management (AUM) according to the following fee schedule or clients will pay a fixed annual fee.

AUM Fee Schedule:

Plan Assets	KF's Fee
All Plan Assets	0.50%

The annual fees are negotiable and are assessed pro rata, in arrears, from the assets in the account on a quarterly basis. Fees are calculated at the end of each calendar quarter using the ending market value of the account on the last business day of the quarter and multiplying it by 0.125%.

No increase in the annual fee shall be effective without prior Client consent. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee based on the amount of time remaining in the billing period.

Fees for this service are deducted directly from the plan assets by the Custodian or the Plan Sponsor may choose to be invoiced directly. This service may be terminated with 7 calendar days' advance notice.

Fixed Fee:

KF may charge a fixed fee per quarter instead of percentage of assets, based on the number of plan participants, investment management services, travel, meeting frequency, and other services. Fixed fees range from \$300 to \$1,000 per quarter billed in arrears.

This fee is negotiable and can be revisited at any time at the discretion of the Advisor and/or plan sponsor. The plan sponsor has the ability to pay this fee from the business or to charge to plan assets on a pro rata basis. The employer may be responsible for paying fees leveraged by the Custodian and Third-Party Administrator (TPA). Prior to commencement of the engagement, KF researches and reviews the fees to be leveraged by the Custodian and Third-Party Administrator as part of services offered and discusses those fees with the plan administrator. This service may be terminated with 7 calendar days' advance notice.

Non ERISA 403(b) Plan Services

Our standard advisory fee is based on the market value of the assets under management and is calculated as follows:

Annual Advisory Fee
0.50%

The annual fees are negotiable and are assessed pro rata, in arrears, from the assets in the account on a quarterly basis. Fees are calculated at the end of each calendar quarter using the ending market value of the account on the last business day of the quarter and multiplying it by 0.125%.

Advisory fees are directly debited from client accounts. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee based on the amount of time

remaining in the billing period. An account may be terminated with written notice at least 7 calendar days in advance. Since fees are paid in arrears, no refund will be needed upon termination of the account.

Other Types of Fees and Expenses

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

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for client's transactions and determining the reasonableness of their compensation (e.g., commissions).

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

Item 6: Performance-Based Fees and Side-By-Side Management

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

Item 7: Types of Clients

We provide financial planning and portfolio management services to individuals, high net-worth individuals, pension and profit sharing plans, and small businesses.

We do not have a minimum account size requirement to open or maintain an account under our management.

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss

Our primary methods of investment analysis and investment strategy is fundamental analysis and passive investment management.

Fundamental analysis involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's

product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Passive Investment Management

We primarily practice passive investment management. Passive investing involves building portfolios that are comprised of various distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange traded funds.

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

In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Academic research indicates most active managers underperform the market.

Material Risks Involved

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

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

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

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

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

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

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

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

Legal or Legislative Risk: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and 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.

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

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

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

Exchange Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below 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 delisted 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 client's invest.

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).

Socially Responsible Investing. KF may utilize various socially conscious investment approaches if a client desires. KF may construct portfolios that utilize mutual funds, ETFs, or individual securities with the purpose of incorporating socially conscious principles into a client's portfolio. These portfolios may sometimes also be customized to reflect the personal values of each individual, family, or organization. This allows KF's clients to invest in a way that aligns with their values. KF may rely on mutual funds and ETFs that incorporate Environmental, Social and Governance ("ESG") research as well as positive and negative screens related to specific business practices to determine the quality of an investment on values-based merits.

Additionally, KF may construct portfolios of individual securities in order to provide clients with a greater degree of control over the socially conscious strategies they are utilizing. KF relies on third-party research when constructing portfolios of individual securities with socially conscious considerations.

Annuity Risk. Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirements or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

Item 9: Disciplinary Information

KF and its management have not been involved in legal or disciplinary events that are material to a client's or prospective client's evaluation of KF or the integrity of its management.

Criminal or Civil Actions

KF and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

KF and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

KF and its management persons have not been involved in any self-regulatory organization (SRO) proceedings.

Item 10: Other Financial Industry Activities and Affiliations

Financial Industry Affiliations

No KF employee is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No KF employee is registered, or has an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

Neither KF or its management persons have any relationship or arrangement with any outside financial industry related parties.

Recommendations or Selections of Other Investment Advisers

KF does not recommend clients to other investment advisers to manage our client's accounts.

Item II: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

Although KF adheres to the CFP® Board of Standards Inc., Clinton Kane does not hold the CFP® designation.

Code of Ethics Description

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

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

- **Professionalism** - Associated persons' conduct in all matters shall reflect credit of the profession.
- **Diligence** - Associated persons shall act diligently in providing professional services.

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

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm, its associates or any related person is authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.

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

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

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

From time to time, our firm or its "related persons" may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of KF to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, KF will never engage in trading that operates to the client's disadvantage if representatives of KF buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

Factors Used to Select Custodians and/or Broker-Dealers

KF does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to clients based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

Research and Other Soft-Dollar Benefits

We currently do not receive soft dollar benefits.

Brokerage for Client Referrals

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

Clients Directing Which Broker/Dealer/Custodian to Use

We do recommend a specific custodian for clients to use, however, clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing clients to choose a specific custodian, we may be unable to achieve the most favorable execution of client transactions and this may cost clients money over using a lower-cost custodian.

The Custodian and Brokers We Use (Schwab)

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like us. They provide our Clients and us with access to their institutional brokerage services (trading, custody, reporting and related services), many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our Clients' accounts, while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. The benefits received by Advisor or its personnel do not depend on the number of brokerage transactions directed to Schwab. As part of its fiduciary duties to Clients, Advisor at all times must put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of Schwab for custody and brokerage services. This conflict of interest is mitigated as Advisor regularly reviews the factors used to select custodians to ensure our recommendation is appropriate. Following is a more detailed description of Schwab's support services:

1. **Services that benefit you.** Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our Clients. Schwab's services described in this paragraph generally benefit you and your account.
2. **Services that may not directly benefit you.** Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our Clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our Clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:
 - provide access to Client account data (such as duplicate trade confirmations and account statements)
 - facilitate trade execution and allocate aggregated trade orders for multiple Client accounts
 - provide pricing and other market data
 - facilitate payment of our fees from our Clients' accounts
 - assist with back-office functions, recordkeeping, and Client reporting
3. **Services that generally benefit only us.** Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:
 - Educational conferences and events
 - Consulting on technology, compliance, legal, and business needs
 - Publications and conferences on practice management and business succession
4. **Your brokerage and custody costs.** For our Clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transaction fees.

Aspire, Vestwell, and Protective Life

KF occasionally uses and recommends other financial companies to help clients meet their goals. These financial companies are only used in certain specific circumstances, as described below.

Employer-Sponsored Retirement Plans - Investments and service providers relative to Plan offerings are limited to only those available through the respective Plans and are determined by the Plan Sponsors. That said, we have an Authorized Advisor arrangement with Aspire Financial Services, LLC (“Aspire”) and Vestwell (custodian through Vestwell Trust Company, LLC and Matrix Trust Company) that allows us to receive your information from their platforms and, if you authorize us, to submit information and investment changes.

Investment Only Variable Annuity - We recommend clients use Protective Life in order to manage low-cost and commission-free variable annuities. These products typically allow us to manage investments or make policy changes with discretion.

Aggregating (Block) Trading for Multiple Client Accounts

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

Item 13: Review of Accounts

Investment Management clients will have their accounts reviewed regularly on a no less than quarterly basis by Clinton Kane, Founder and CCO. The account is reviewed with regards to the client's investment policies and risk tolerance levels.

Events that may trigger a special review would be unusual performance, addition or deletions of client-imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per client's needs.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest. KF does provide regular written reports to Investment Management clients in addition to the statements provided by the Custodian. However, Advisor may provide a performance report upon client's request.

Item 14: Client Referrals and Other Compensation

We do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our clients. Nor do we, directly or indirectly, compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

All accounts are held by an independent Custodian selected by the client. With the exception of KF's ability to debit fees, and the ability to disburse or transfer certain funds to third parties pursuant to Standing Letters of Authorization executed by Clients, KF does not otherwise have custody of the assets in the account.

KF has the ability to directly deduct its advisory fees from client's custodial account. When doing so, (1) the client will provide written authorization to KF, permitting us to be paid directly from the client's accounts held by the custodian, and (2) the Custodian sends quarterly statements to the client showing all disbursements for the custodian account, including the amount of our advisory fees.

KF can establish standing letter of instructions or other similar asset transfer authorization arrangements ("SLOA") with qualified custodians in order for us to disburse funds to accounts as specifically designated by the client. With a SLOA a client

can typically authorize first-party and/or third-party transfers. If transfers are third-party, KF complies with each of the requirements and conditions enumerated below:

1. The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
2. The client authorizes KF, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
3. The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization, and provides a transfer of funds notice to the client promptly after each transfer.
4. The client has the ability to terminate or change the instruction to the client's qualified custodian.
5. KF has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
6. KF maintains records showing that the third party is not a related party of KF or located at the same address as KF.
7. The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

Item 16: Investment Discretion

Investment management and Non ERISA 403(b) plan services clients grant our firm ongoing and continuous discretionary authority to execute our investment recommendations within the client's account held at the Custodian without obtaining the client's prior approval for each specific transaction. In a discretionary arrangement, you authorize us to purchase and sell securities and instruments in your account(s), arrange for delivery and payment in connection with the foregoing, and act on your behalf in all matters necessary or incidental to the handling of the account, including monitoring of your assets. Our discretionary management of your account will be conducted in strict accordance with your investment objectives and suitability.

Employee Benefit Plan services are non-discretionary in nature. The client always makes the ultimate investment decision and we will not take any action with respect to the client's investments without the client's prior consent.

Item 17: Voting Client Securities

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

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

Item 18: Financial Information

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

We do not have custody of client funds or securities or require or solicit prepayment of more than \$1,200 in fees per client six months in advance.

Kane Financial, LLC

151 West Main Street
Waterville, NY 13480
(315) 801-9028

www.kanefp.com

Form ADV Part 2B – Brochure Supplement

Dated: February 27, 2024

For

Clinton P. Kane

Founder, Investment Adviser Representative and Chief Compliance Officer

This brochure supplement provides information about Clinton Kane that supplements the Kane Financial (“KF”) brochure. A copy of that brochure precedes this supplement. Please contact Clinton Kane if the KF brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Clinton Kane is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the identification number 5352683.

Item 2: Educational Background and Business Experience

Clinton P. Kane

Born: 1980

Educational Background

2007 – Business Administration, SUNY IT/POLY

Business Experience

- 11/2017 – Present, Kane Financial, LLC, Founder, IAR, CCO
- 04/2012 – 11/2017, Cadaret, Grant & Co., Financial Adviser
- 03/2012 – 11/2017, Strategic Financial, Investment Adviser Representative
- 05/2009 – 02/2012, Commonwealth Financial Network, Financial Adviser
- 08/2007 – 05/2009, Axa Advisors, Associate

Item 3: Disciplinary Information

Clinton Kane has never been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4: Other Business Activities

Clinton Kane does not have other business activities that are investment-related or provide a substantial source of income or time.

Item 5: Additional Compensation

Clinton Kane does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through KF.

Item 6: Supervision

Clinton Kane, as Chief Compliance Officer of KF, supervises the advisory activities of our firm. Clinton Kane is bound by and will adhere to the firm's policies and procedures and Code of Ethics. Clients may contact Clinton Kane at the phone number on this brochure supplement.