

## ITEM 1 – COVER PAGE



### **Form ADV Part 2A – Disclosure Brochure**

Effective: March 11, 2016

This Disclosure Brochure provides information about the qualifications and business practices of Candent Capital, LLC (“Candent”, “Advisor”, “we”, “us” or “our”) and current and prospective clients (“client” or “you”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (415) 742-1681.

Candent is a Registered Investment Advisor with the State of California. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Candent to assist you in determining whether to retain the Advisor.

Additional information about Candent and its advisory persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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#### **Candent Capital, LLC**

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## ITEM 2 – MATERIAL CHANGES FROM PRIOR FORM ADV 2A

The last update of this Disclosure Brochure is March 30, 2015. We encourage you to read this Disclosure Brochure carefully and contact us with any questions.

### MATERIAL CHANGES

Item 8A-Methods of Analysis – We amended this item to disclose our use of data, research, education and analytical tools from Vanguard, Dimensional Fund Advisors (“DFA”) and Blackrock. Although we commonly recommend low cost, passively managed funds from these providers and do not receive direct or indirect compensation that may result in revenue from our recommendations, our use of their resources is presents a potential conflict of interest.

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Form ADV 2 is divided into two parts: Part 2A (the "Brochure") and Part 2B (the "Supplement"). The Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of Candent.

We believe that communication and transparency are the foundation of our relationship. Candent continually strives to provide you with complete and accurate information at all times. We encourage you to read this Brochure and discuss any questions you may have with us. Your feedback is also always welcome.

#### FUTURE CHANGES

From time to time, we may amend this Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete 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 Candent.

At any time, you may view the current Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

To review the firm information for Candent:

- Click Investment Advisor Search in the left navigation menu.
- Select the option for Investment Advisor Firm and enter 165454 (our firm's CRD number) in the field labeled "Firm IARD/CRD Number".
- This will provide access to Form ADV Part 1 and Part 2.
- Item 11 of the ADV Part 1 lists legal and disciplinary questions regarding the Advisor.
- In the left navigation menu, Form ADV Part 2 is located near the bottom.

You may also request a copy of this Brochure at any time, by contacting William Kan at (415) 742-1681.

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## ITEM 4 – ADVISORY SERVICES

### A. INTRODUCTION

William Kan, CFA founded Candent Capital, LLC in August 2012. He is the sole owner of Candent.

Candent is a client-centric firm specializing in providing customized investment advice and financial planning. We offer our services to individuals, high net worth individuals, pensions, profit sharing plans, trusts, estates, charitable organizations and corporations or businesses in California and other states.

You come first. Our focus is to serve the unique financial needs of each of our clients. We aim to provide you with personalized service and care while delivering institutional quality investment management.

Candent is a client-centric practice. We are fee-only and our clients are our only source of revenue. We believe this best aligns our interests with yours. We seek to minimize conflicts of interest. We have policies, for example, not to receive directly or indirectly any compensation, such as commission, that would result in revenue from the sale of securities or investments purchased or sold for you in your account or for which we provided consulting services. We also do not accept referral fees. Even with such policies, we recognize that potential conflicts of interest are inevitable. We encourage you to consider potential conflicts of interest in choosing your advisors.

In providing investment advisory and financial planning services, our decisions and recommendations to you may include the consideration of possible alternative tax and legal consequences incidental to such decisions and recommendations. We do not provide tax, accounting or legal advice. You should consult with your own accountant, attorney and tax advisor to determine the consequences of recommendations and investment actions taken on their behalf.

### B & C. TYPES OF SERVICES OFFERED AND HOW WE TAILOR SERVICES TO CLIENTS

#### **Investment Advisory**

Candent provides customized investment management solutions for its clients. The aim is to help you attain your financial goals by seeking high risk-adjusted returns net of taxes and fees from your investment portfolio.

The process starts with discussions with you to develop a mutual understanding of your current financial situation and your financial goals. From here, we develop an investment strategy to help you reach your goal from where you are today. This involves assessments of your investment time horizon, liquidity needs and investment objective[s] in relation to your risk need, risk capacity and risk tolerance. We recognize that things change. In addition to regular communication, we keep an open door policy so we can understand changes in a timely manner and make adjustments when warranted.

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We specialize in customizing investment advice to reflect your individual circumstances. We use an approach that we believe is more complete and holistic. In addition to your risk tolerance and return objectives, we work with you to integrate other considerations that you may use in your definition of financial success. They include one of your greatest assets - your human capital (i.e., your future earnings potential and its variability), priority of your goals, assets, liabilities, other financial obligations, your capacity to save and invest, your preferences and other factors.

We also work with you to develop solutions that satisfy your social investment needs. Often times, this involves identifying restrictions for investments eligible for inclusion in your portfolio. An example may be restrictions on holding equities of companies believed to be substandard in terms of environment, social and governance issues.

Our investment advisory services include implementation of investment recommendations, monitoring and adjusting to strategies as needed. More specifically, investment management services include:

- **Creation of Investment Policy Statement** -We believe the use of an Investment Policy Statement (IPS) is a best practice commonly reserved for institutional investors that will also serve individual investors well. An IPS can increase investment discipline, clarity and risk control that may prove useful in difficult investment periods when human behavior may result in less prudent actions. The IPS includes specific information on the client's stated goals, time horizon for achieving the goals, financial and tax situation, investment strategies, client risk tolerance and any restrictions imposed by you.
- **Asset Allocation** – We will develop a strategic asset allocation to meet the investment objectives, liquidity needs, time horizon, financial situation and risk capacity, need and tolerance for each client.
- **Portfolio Construction** – We will develop a portfolio to meet your stated goals and objectives. We will seek, when applicable, institutional quality and pricing for investments, which are lower in cost than retail-level pricing.
- **Investment Management and Supervision** – We will provide investment management and ongoing oversight of your portfolio and overall account. Your custodian will send you brokerage statements for your account quarterly or more frequently.

You should review regularly your custodian account statements and compare them to the reports provided by us for accuracy. You may also establish electronic access to the custodian's website so that the client may view these reports and their account activity. Your brokerage statements will include all positions, transactions and fees relating to the client's account[s]. Our reports will contain information on your holdings, asset allocation and performance.

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## Financial Planning & Consulting Services

We provide a variety of financial planning and consulting services to individuals and families. This planning or consulting process may encompass one or more areas of need. They include but are not limited to investment planning, retirement, option exercise, education planning, estate planning, personal savings, education savings and other areas of a client's financial situation. We help people address their financial concerns as related to longevity, death of a spouse, career change and others.

The objective of planning and consulting is to provide a roadmap to reach your financial goals. Depending on your circumstances and resources available to you, it may involve strategies that explore different ways to build and protect assets and income, manage your liabilities, budgeting, asset location and developing good financial habits. One goal of the process is to educate you on your options.

A financial plan developed for or financial consultation rendered to you will usually include recommendations for a course of activity. For example, the plan may recommend that you start or revise your investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

For some financial planning engagements, we will provide a written summary of client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, we may not provide a written summary.

Financial planning and consulting recommendations may pose a potential conflict between you and us. You are not obligated to implement any recommendations made by us or maintain an ongoing relationship with Candent. If you elect to act on any of our recommendations, you are under no obligation to use us to implement them.

We welcome the opportunity to work with your other advisors. If necessary, we may also refer you to an accountant, attorney or other specialist as appropriate for your personal situation. Candent does not accept compensation for client referrals from these professionals. They may also refer clients to us, which is a potential conflict of interest. You should evaluate independently if the professionals that we refer to you best suit your needs.

### D. WRAP FEE PROGRAMS

Candent does not manage or place client assets into a wrap fee program. Investment management services are provided directly by Candent.

### E. ASSETS UNDER MANAGEMENT AS OF DECEMBER 31, 2015

Discretionary Assets:	\$7,794,378
Non-discretionary Assets:	\$330,235

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## ITEM 5 – FEES AND COMPENSATION

The following paragraphs detail the fee structure and compensation methodology for investment management. Each client shall sign an Investment Advisory Agreement that details his or her responsibilities and ours.

### A. FEES FOR ADVISORY SERVICES

#### Investment Advisory

We charge our investment advisory fee quarterly in advance pursuant to the terms of the Investment Advisory Agreement unless indicated otherwise. The calculation of investment advisory fees uses the market value of assets under management at the end of the preceding quarter, **excluding assets held in cash sweep investments at the custodian.**

Investment Advisory Fees range from 1.00% to 0.50% based on the following schedule:

Assets Under Management	Annual Rate
Minimum annual fee: \$5,000	
Up to \$1,000,000	1.00%
\$1,000,001 to \$2,000,000	0.90%
\$2,000,001 to \$3,000,000	0.80%
\$3,000,001 to \$5,000,000	0.70%
Over \$5,000,000	0.50%

Investment advisory fees are negotiable depending on scope and complexity of your situation. Some clients may pay a flat percentage based fee and/or different fees than the fee stated above. Your fees will take into consideration the aggregate balances of assets under our management, your historical relationship with us, your account composition, etc. For example, we may combine account values for you, joint accounts with your spouse, accounts for your minor children and other types of related accounts. Combining account values may increase the asset total, which may result in your paying a reduced advisory fee on the available breakpoints in our fee schedule state above.

If assets are deposited into or withdrawn from your account after the inception of a billing period, and depending upon the timing or size of such withdrawal or deposit, the fee payable with respect to such assets may not necessarily be adjusted or prorated based on the number of days remaining in the billing period. Accounts initiated or terminated during a calendar month will be charged a prorated fee.

**Notice to California clients: The client may be able to attain similar services for a lower fee from other service providers.**

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## **Financial Planning & Consulting Services**

We offer financial planning or consulting services on an hourly or fixed fee basis. The hourly rate ranges from \$200 to \$400 per hour. Fixed fee engagements generally range from \$1,500 to \$8,000, depending on the nature and complexity of a client's circumstances. An estimate of total hours will be determined prior to establishing the advisory relationship.

The minimum cost of a fixed fee engagement is \$1,500. We may negotiate the planning and consulting fee based on the scope and complexity of your situation.

## **B. FEE BILLING**

### **Investment Advisory**

Unless indicated otherwise, we will deduct directly our investment advisory fee from your account with the Custodian. Prior to the deduction, you must provide written authorization permitting us to be paid directly from your accounts with the Custodian as part of the Investment Advisory Agreement and separate account forms provided by the Custodian.

Candent will send an invoice to the Custodian indicating the amount to be deducted from your account(s) every quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the market value of assets under management as of the prior quarter end.

The Custodian will send you a statement, at least quarterly, that reflects the deduction of our investment advisory fee. We will also provide you with a quarterly report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee.

You are responsible for verifying the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility.

## **Financial Planning & Consulting Services**

Candent requires a deposit before planning or consulting services commence unless otherwise indicated. For fixed-fee agreements, the amount is half of the estimated total cost when you sign the agreement. We will invoice the remaining balance that is due upon delivery of the financial plan or consulting service. For hourly fee agreements, the amount is half of the total cost based on the estimated time and hourly rate. The remaining balance based on the actual hours billed and the agreed upon hourly rate is invoiced and due upon delivery of the financial plan or consulting service.

## **C. OTHER FEES AND EXPENSES**

You may incur certain fees or charges imposed by third parties, other than Candent, in connection with investment made on behalf of your account[s]. You are responsible for all custodial and security

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execution fees charged by the Custodian and executing broker-dealer. The investment advisory fee charged by us is separate and distinct from Custodian and execution fees.

In addition, all fees paid to us for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds (Fund) to their shareholders, if applicable. These fees and expenses are described in each Fund's prospectus. Fund fees and expenses will generally be used to pay management fees for the Funds, other Fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. You could invest in these products directly, without our services, but you would not receive the services provided by us. We designed our services, among other things, to assist you in the selection of products or services that we believe are the most appropriate to your financial situation and objectives. Accordingly, you should review both the fees charged by Funds and the fees charged by us to understand fully your total fees.

To the extent that you authorize the use of margin, and margin is thereafter employed by us in the management of your portfolio, the market value of your account and corresponding fee payable by you to Candent may be increased.

We recommend that clients understand the additional principal risks associated with the use of margin before authorization. There may be potential conflicts of interest whereby your decision to employ margin may correspondingly increase the management fee payable to us. Accordingly, the decision as to authorize use of margin is left to your sole discretion.

#### **D. ADVANCE PAYMENT OF FEES AND TERMINATION**

##### **Investment Advisory**

Candent is compensated for its services in advance of the beginning of the quarter that investment advisory services are rendered. You may request to terminate your investment advisory agreement with us, in whole or in part, by providing written notice 10 business days in advance. You shall be responsible for investment advisory fees up to and including the effective date of termination. Your Investment Advisory Agreement with us is non-assignable without your written approval.

##### **Financial Planning & Consulting Services**

In the event that you wish to cancel the financial planning agreement under which any plan is being created, you must notify us in writing and pay the pro rata fee for the time spent on the investment advisory agreement prior to the notification of termination. We will charge you for time expended. Any surplus in the our possession as the result of collecting a deposit at the time of signing the financial planning agreement will be returned to you within five (5) business days that the cancellation is received by us. Either party may terminate a planning or consulting agreement anytime by providing written notice to the other party. You may terminate the financial planning and consulting agreement within

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five (5) days of signing the agreement at no cost to you. After the five-day period, you will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the client. Refunds will be given on a pro-rata basis.

#### **E. COMPENSATION FOR SALES OF SECURITIES**

Candent does not buy or sell securities and does not receive any compensation for securities transactions in any client account, other than the investment advisory fees noted above.

### **ITEM 6 – PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

Candent does not charge performance-based fees for its investment advisory services. Fees are not based on the capital appreciation of the funds or securities held by any client. The fees we charge are as described in Item 5 – Fees and Compensation.

Candent does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its clients.

### **ITEM 7 – TYPES OF CLIENTS**

We may provide investment advisory services to the following types of clients:

- Individuals, Personal Trusts and Estates – private investors, investing their personal assets
- Pension and Profit Sharing Plans – retirement plan sponsors or company plans
- 501(c)(3) Non-Profit Organizations – mission-based, non-profit organizations
- Corporations and Businesses – taxable business entities, investing cash reserves

While we do not require a minimum account size to establish an account, we have a minimum fee requirement of \$5,000 per year per household for our investment advisory services. The minimum fee for fixed fee financial planning or consulting services is \$1,500. We may negotiate fees on a client-by-client basis.

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## ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

### A. METHODS OF ANALYSIS

Candent primarily employs fundamental and quantitative analysis methods in developing investment strategies for its clients. We use research and analysis from numerous sources. They include academic journals, third party research providers, government sources, conferences, financial media, internet, annual reports, regulatory filings and press releases.

Fundamental analysis utilizes top down, macroeconomic and market-based indicators and bottoms up company specific indicators as investment selection criteria. These criteria include ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment candidate. We will look for investments that we are selling at a discount to the market. While this type of analysis helps Candent in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. We monitor these economic indicators to determine if adjustments to strategic allocations are appropriate.

Quantitative analysis utilizes mathematical and statistical modeling, measurement and research to conduct business or financial analysis. This technique helps us evaluate potential investments against other investments and judge the relative attractiveness of investments versus their modeled value. There are no guarantees that this technique will identify investments that will increase in value. Investments that are deemed suitable using quantitative analysis involves risk and may lose value.

Candent uses data, research, education and analytical tools from Vanguard, Dimensional Fund Advisors (“DFA”) and Blackrock to help us serve clients better. We commonly recommend passively managed mutual funds and ETFs from these providers. Although we do not receive compensation for our recommendations nor do we receive commissions from the sale of mutual funds, our use of their resources is a potential conflict of interest.

We use their resources to help us serve and educate our current and prospective clients. Materials from Vanguard, DFA and Blackrock supplement the index data and analytical tools that we license independently. We often use their materials to help us verify studies on investment risk and return and to evaluate financial planning strategies. They also provide on-going education programs and conferences on advanced topics, access to proprietary websites for research and other tools.

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## B. INVESTMENT STRATEGIES

Candent applies an investment philosophy centered around long-term investing and risk control for its clients, as consistent with their financial goals. The primary investment strategy is strategic asset allocation utilizing a core and satellite strategy. The core strategy seeks participation in broad asset market moves in a cost effective manner using passively managed mutual funds, exchange traded funds and low cost actively managed mutual funds. The satellite strategy includes using passive and actively managed mutual and exchange traded funds and other assets that we believe offers opportunities to improve risk-adjusted portfolio returns. Candent may also utilize assets that include U.S. dollar cash instruments, high quality USD denominated bonds and notes, foreign bonds and notes, U.S. common stocks, foreign stocks, commodities and options to meet the needs of its clients.

Risk control will incorporate diversification and tactical asset allocation based on Candent's assessment of macro conditions and fundamentals.

Candent will typically hold all or a portion of a security for more than a year. There may be instances when a security is held for shorter periods for purposes such as rebalancing a portfolio, meeting the cash needs of clients or market conditions. At times, we may also buy and sell positions that are more short-term in nature, depending on the goals of the client and/or the fundamentals of the security, sector or asset class.

Candent evaluates and selects assets for inclusion in client portfolios only after applying their internal due diligence process. We may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Candent may recommend specific positions to increase sector or asset class weightings. We may recommend employing cash positions as a possible hedge against market movement, which may adversely affect the portfolio. Candent may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of client, generating cash to meet client needs, or any risk deemed unacceptable for the client's risk tolerance.

## C. RISK OF LOSS

Investments carry risk, including the risk that an investor may lose a part or all of his or her initial investment. Risk refers to the uncertainty that the actual return the investor realizes could differ from the expected return. Risks may be systematic, referring to factors that affect the returns on all comparable investments and that affect the market as a whole. Systematic risks include market risk, inflation risk, interest rate risk, reinvestment rate risk, liquidity risk, purchasing power risk and exchange rate risk. Unsystematic risks depend on factors that are unique to the specific investment security.

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We will assist clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that you will meet your investment goals. Here are some of the general risks associated with parts of our investment strategy:

**Market Risk:** Securities traded on securities exchanges are subject to demand and supply conditions. Investors could receive less than the original investment amount when they sell a security if the demand for that security has fallen. Prices generally reflect investors' confidence in the economy, interest rates, and many other factors. Investors must be able to tolerate such price movements.

**Income Risk:** Dividends may not be paid if a securities issuer reports an operating loss.

**Short-term purchases** – While we generally purchase securities with the intent to hold them for more than a year, we may on occasion determine to buy or sell securities in a client's account and hold them for less than a year. Some of the risks associated with short-term trading that could affect investment performance are increased commissions and transaction costs to the account and increased tax obligations on the gains in a security's value

**Bond Pricing** – The price of bonds depends in part on the current rate of interest. Rising interest rates decrease the current price of bonds because current purchasers require a competitive yield. As such, decreasing interest rates increase the current value of bonds with associated decrease in bond yield. We may decide to exchange to a lower or higher duration bond or to another asset class due to interest rate risk that could affect investment performance.

**Inflation** - Inflation is the loss of purchasing power through a general rise in prices. For example, if an investment portfolio is designed for current income with a real rate of return of 4% and inflation was to rise to 5% or higher, the account would result in a loss of purchasing power and create a negative real rate of return.

**Price Fluctuation** - Security prices fluctuate (except for cash or cash equivalents) and clients must accept that risk associated with the fluctuations or change to a more appropriate investment portfolio in alignment with their risk tolerance.

**Interest-rate Fluctuation** - Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

**Currency Fluctuation** - Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

**Reinvestment of Dividends** – We may reinvest interest, dividends and capital gains as appropriate to accumulate wealth based on factors such as ongoing cash needs and tax loss harvesting opportunities.

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This is an appropriate strategy for a portfolio designed for capital growth. However, the reinvested earnings could result in a lower or a higher rate of return than was initially projected.

**Business Risk** - These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an utility company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

**Liquidity Risk** - Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, treasury bills are highly liquid, while real estate properties are not.

**Financial Risk** - Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value for the securities issued by such companies.

**Funds with Foreign Asset Holdings** – Any investments in Funds that make foreign investments and are not hedged back to the U.S. Dollar are subject to the uncertainty with changes in the foreign currency value. The client may bear more risk and may earn a substantially higher return or a substantially lower return than projected.

**Margin Trading & Credit Lines Using Pledged Investment Accounts as Collateral** – In some cases, and generally only for short term financing considerations, clients may elect to assume a margin balance or employ other forms of borrowing involving the client's investment account. The client's custodian or bank extending a line of credit may require a percentage of assets under management to be pledged as collateral. Clients risk that in a falling market, the pledged collateral will be insufficient to cover a margin call by their custodian or a call by their bank. Consequently, the client is responsible for all decisions relating to a margin account or a borrowing against their investment portfolio.

**Option Trading** – Certain clients engage in option trading. Option securities are complex derivatives of equity securities that incorporate certain leverage characteristics and as such carry an increased risk of investment loss.

**Publicly Traded REITS** – Real estate investment trusts ("REITs") are companies that own and operate income-producing real estate or related assets. Because these REITS are traded publicly, on national securities exchanges, they are subject to the same general risks as those of stock trading such as market risk and income risk. In addition, investments in REITS may involve: **Concentration Risk** (the value of a REIT's is derived from one or only a few properties); **Liquidity Risk** (a REIT may be relatively less liquid

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compared to funds investing in financial securities such as stocks and bonds); **Leverage Risk** (if a REIT uses debt to finance the acquisition of underlying properties, the assets of the REIT will be used to pay off debtors first); and **Refinancing Risk** (higher refinancing cost or stricter underwriting standards when loans are due for renewal.)

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each client should understand and be willing to bear. We recommend that clients discuss these risks with us. For more information on our investment management services, please contact us at (415) 742-1681.

## ITEM 9 – DISCIPLINARY INFORMATION

There are no legal, regulatory or disciplinary events involving Candent or any of its employees. Candent and its advisory personnel value the trust you place in us. As we advise all clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). To review the firm information contained in ADV Part 1, select the option for Investment Adviser Firm and enter 165454 in the field labeled "Firm IARD/CRD Number". This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions. You may also research the background of William Kan, CFA by selecting the Investment Adviser Representative and entering Mr. Kan's Individual CRD# 2985628 in the field labeled "Individual CRD Number".

## ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

### A. BROKER DEALER AFFILIATION

Neither Candent nor its advisory persons are registered, or have an application pending to register as a broker-dealer.

### B. OTHER AFFILIATIONS

Neither Candent nor its advisory persons are registered, or have an application pending to register, as a futures commission merchant ("FCM"), commodity pool operator ("CPO"), a commodity trading advisor ("CTA"), or an associated person of any such entity.

William Kan is Vice President and Board Member of the Miraloma Improvement Club, a non-profit neighborhood organization dedicated to improving quality of life in Miraloma Park. He does not receive compensation for this role. His responsibilities do not require a significant amount of time over the course of the year.

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William Kan is Secretary and Board Member of Lifeschool, a non-profit organization dedicated to the empowerment of teens with life skills and environmental ethics through wilderness travel, cultural tours and service projects. He does not receive compensation from this role. His responsibilities do not require a significant amount of time over the course of the year.

#### C. OTHER ACTIVITIES – EDUCATIONAL SEMINARS AND PRESENTATIONS

From time to time, Mr. Kan may conduct educational seminars or presentations related to investment management for compensation.

## ITEM 11 – CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

### A. CODE OF ETHICS

Candent has implemented a Code of Ethics that defines our fiduciary commitment to each client. This Code of Ethics applies to all persons associated with Candent. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our client. Candent and its personnel owe a duty of loyalty, fairness and good faith towards each client. It is the obligation of Candent associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include; general ethical principles, reporting personal securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. Candent has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at (415) 742-1681.

Mr. Kan will adhere to the Certified Financial Analyst Institute Code of Ethics & Standards of Professional Conduct.

### B. PERSONAL TRADING WITH MATERIAL INTEREST

Candent allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of clients. We do not act as principal in any transactions. In addition, we do not act as the general partner of a fund, or advice an investment company. Candent does not have a material interest in any securities traded in client accounts.

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### C. PERSONAL TRADING IN SAME SECURITIES AS CLIENTS

Candent allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. We have also adopted written policies and procedures to detect the misuse of material, non-public information. We may have an interest or position in certain securities, which may also be recommended to you.

In addition the Code of Ethics governs Gifts and Entertainment given by and provided to the Advisor, outside employment activities of employees, Employee reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

### D. PERSONAL TRADING AT SAME TIME AS CLIENT

While Candent allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of clients, at no time will Candent or any associated person of Candent transact in any security to the detriment of any client

If a security is bought or sold for clients and employees on the same day, the employee's trades must either be: 1. aggregated with the client transactions, in which case all participants in the transaction participate on an average price basis; or 2. executed at the end of the trade day after all client trades in the subject security for that day are completed. If employee's purchase of the security is not aggregated with client trades, the price received by the employee cannot be more favorable than the price received for the same security for client accounts that day. If the employee and client transactions take place on different days, the employee may pay or receive a different price.

Notice for California residents. Candent represents that all material conflicts of interest that could affect the judgment or ability to provide unbiased advice by the Advisor or its IARs pursuant to CCR Section 260.238(k) have been disclosed.

## ITEM 12 – BROKERAGE PRACTICES

### A. RECOMMENDATION OF TD AMERITRADE AS CUSTODIAN AND EXECUTING BROKER

Candent recommends that clients establish brokerage accounts with TD Ameritrade (TDA), a registered broker-dealer, to maintain custody of clients' assets and to effect trades for their accounts. TDA is independently owned and operated and not affiliated with Candent and does not supervise or otherwise

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monitor our investment management services to our clients. TDA provides us with access to its institutional trading and custody services, which typically are not available to TDA retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a set minimum of the advisor's clients' assets is maintained in accounts at TDA, but are not otherwise contingent upon Candent committing to TDA any specific amount of business (in the form of either assets in custody or trading). TDA's services include brokerage, custody, research and access to mutual funds and other investments that are otherwise generally available only to institution investors or would require a significantly higher minimum initial investment.

TDA also makes available to Candent other products and services that benefit us but may not benefit you. Some of these other products and services assist us in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements); facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts); portfolio management (including rebalancing); provide research, pricing information and other market data; facilitate payment of fees from our clients' accounts; and assist with back-office functions, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of our accounts, including accounts not maintained at TDA. TDA also makes available to us other services intended to help us manage and further develop our business. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. In addition, TDA may make available, arrange and/or pay for these types of services to us by independent third parties. TDA may discount or waive fees it otherwise would charge for some of these services or pay all or a part of the fees of a third-party providing these services to Candent.

Candent's recommendation that clients maintain their assets in accounts at TDA may be based in part on the benefit to us of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by TDA, which may create a potential conflict of interest.

Candent does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services or the administrator for defined contribution accounts. The client will select the broker-dealer or custodian (herein the "custodian") to safeguard client assets and authorize us to direct trades to this custodian as agreed in the Investment Advisory Agreement. Further, we do not have the discretionary authority to negotiate commissions on behalf of our clients on a trade-by-trade basis.

Where we do not exercise discretion over the selection of the custodian, we may recommend the custodian[s] to clients for execution and/or custodial services. Clients are not obligated to use the custodian that we recommend and will not incur any extra fee or cost associated with using a broker not recommended by us. Candent may recommend a custodian based on criteria such as, but not limited

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to, reasonableness of commissions charged to the client, services made available to the client, and location of the custodian's offices. We do not receive research services, other products, or compensation as a result of our recommending a particular broker that may result in the client paying higher commissions than those obtainable through other brokers.

Following are additional details regarding the brokerage practices of the Advisor:

- **Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. Candent does not participate in soft dollar programs sponsored or offered by any broker-dealer.
- **Brokerage Referrals** - Candent does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.
- **Directed Brokerage** - All clients are serviced on a "directed brokerage basis", where Candent will place trades within the established account[s] at the custodian designated by the client. Further, all client accounts are traded within their respective brokerage account[s]. We will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other client accounts (i.e., purchase of a security into one client account from another client's account[s]). In selecting the custodian, Candent will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated custodian.

## B. AGGREGATING AND ALLOCATING TRADES

The primary objective in placing orders for the purchase and sale of securities for client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Candent will execute its transactions through an unaffiliated broker-dealer selected by the client. We may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular client accounts.

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## ITEM 13 – REVIEW OF ACCOUNTS

### A. FREQUENCY OF REVIEWS

Accounts are monitored on a regular and continuous basis by Mr. Kan, Founder of Candent. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the client.

### B. CAUSES FOR REVIEWS

We will review your accounts at least annually in addition to the investment monitoring noted in Item 13.A. You may request to adjust the frequency of your reviews. Accounts may be reviewed because of major changes in economic conditions, known changes in your financial situation, and/or large deposits or withdrawals in your account. We encourage you to notify us if changes occur in your personal financial situation that might adversely affect your investment plan. Additional reviews may be triggered by material market, economic or political events.

### C. REVIEW REPORTS

You will receive brokerage statements directly from your Custodian no less than once a quarter. You may also establish electronic access to the Custodian's website so that the client may view these reports and their account activity. Your brokerage statements will include all positions, transactions and fees relating to the client's account[s]. We may also provide clients with periodic reports regarding their holdings, allocations, and performance.

We advise you to review regularly your custodian account statements and compare them to the reports provided by us for accuracy.

## ITEM 14 - CLIENT REFERRALS AND OTHER COMPENSATION

### A. COMPENSATION RECEIVED BY CANDENT

Candent is a fee-only advisory firm, who, in all circumstances, is compensated solely by the client. Apart from those circumstances discussed in Item 10 - Other Financial Industry Activities and Affiliations, Candent does not receive commissions or other compensation from product sponsors or broker dealer. Candent may refer clients to various third-parties to provide certain financial services necessary to meet the goals of its clients. Likewise, Candent may receive referrals of new clients from a third-party.

### B. CLIENT REFERRALS FROM SOLICITORS

Candent does not engage paid solicitors for client referrals.

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## ITEM 15 – CUSTODY

Candent does not accept or maintain custody of any client accounts. All clients must place their assets with a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct Candent to utilize that custodian for the client's security transactions. We encourage clients to review their statements provided by the account custodian. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

## ITEM 16 – INVESTMENT DISCRETION

Candent generally has discretion over the selection and amount of securities to be bought or sold in your accounts without obtaining your prior consent or approval transaction-by-transaction. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the client and agreed to by Candent. Discretionary authority will only be authorized upon full disclosure to you. The granting of such authority will be evidenced by your execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by us will be in accordance with each client's investment objectives and goals.

## ITEM 17 – VOTING CLIENT SECURITIES

Candent does not accept proxy-voting responsibility for any client. You will receive proxy statements directly from the Custodian. We will assist you in answering questions relating to proxies, however, you retain the sole responsibility for proxy decisions and voting.

## ITEM 18 – FINANCIAL INFORMATION

Neither Candent, nor its management has any adverse financial situations that would reasonably impair the ability of us to meet all obligations to its clients. Neither Candent, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. We are not required to deliver a balance sheet along with this Brochure because we do not collect advance fees for services to be performed six months or more in advance.

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## ITEM 19 – REQUIREMENTS FOR STATE REGISTERED ADVISORS

### A. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE OF PRINCIPAL OFFICER

The Founder of Candent is William Kan, CFA. Information regarding the formal education and background of Mr. Kan is included in Item 2 of Part 2B.

### B. OTHER BUSINESS ACTIVITIES OF PRINCIPAL OFFICER

From time to time, Mr. Kan may conduct educational seminars or presentations related to investment management for compensation.

### C. PERFORMANCE FEE CALCULATIONS

Candent does not charge performance-based fees for its investment advisory services. The fees charged by Candent are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any client.

### D. DISCIPLINARY INFORMATION

There are no legal, civil or disciplinary events to disclose regarding Candent or Mr. Kan. Neither Candent nor Mr. Kan has ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Candent or Mr. Kan.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Candent or William Kan.

### E. MATERIAL RELATIONSHIPS WITH ISSUERS OF SECURITIES

Neither Candent nor Mr. Kan has any relationships or arrangements with issuers of securities.

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## **Form ADV Part 2B – Brochure Supplement**

for

**William Kan, CFA**

**Managing Member and Chief Compliance Officer**

**Effective: March 11, 2016**

This Brochure Supplement provides information about the background and qualifications of William Kan, CFA, CFA (CRD# 2985628) in addition to the information contained in the Candent Capital, LLC (“Candent” or the “Advisor” - CRD #165454) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you any questions about the contents of the Candent Disclosure Brochure or this Brochure Supplement, please contact us at (415) 742-1681.

Additional information about Mr. Kan is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## Item 2 – Educational Background and Business Experience

The Founder of Candent is William Kan, CFA. Mr. Kan, born in 1966, is a dedicated Portfolio Manager for Client accounts of Candent. Mr. Kan earned a Masters of Business Administration from Columbia University in 1992. Mr. Kan earned a Bachelor of Arts from Rutgers University in 1988. Mr. Kan is a Chartered Financial Analyst designation holder from the CFA Institute.

### Chartered Financial Analyst (“CFA”)

The Chartered Financial Analyst (“CFA”) charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charterholders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Additional information regarding Mr. Kan’s employment history is included below.

### Employment History:

Founder & Managing Member, Candent Capital, LLC	08/2012 to Present
Financial Advisor, Merrill Lynch	02/2010 to 05/2012
Senior Director, Merrill Lynch	06/1993 to 04/2009

## Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Kan. Mr. Kan has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Kan.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Kan.

However, we do encourage you to independently view the background of Mr. Kan on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter 2985628 in the field labeled “Individual CRD Number”

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## Item 4 – Other Business Activities

### **Educational Seminars and Presentations**

From time to time, Mr. Kan may conduct educational seminars or presentations related to investment management for compensation.

## Item 5 – Additional Compensation

As noted in Item 4, Mr. Kan may receive additional compensation related to educational seminars.

## Item 6 – Supervision

Mr. Kan serves as the Founder and Chief Compliance Officer of Candent. Mr. Kan can be reached at (415) 742-1681.

Candent has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Candent. Further, Candent is subject to regulatory oversight by various agencies. These agencies require registration by Candent and its employees. As a registered entity, Candent is subject to examinations by regulators, which may be announced or unannounced. Candent is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Item 7 – Requirements for State Registered Advisors

There are no legal, civil or disciplinary events to disclose regarding Candent or Mr. Kan. Neither Candent nor Mr. Kan has ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Candent or Mr. Kan.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Candent or Mr. Kan.

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## PRIVACY POLICY

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Effective: March 31, 2015.

### **Our Commitment to You**

Candent Capital, LLC ("Candent") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. Candent (also referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

Candent does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and proper business purposes in connection with the servicing and management of our relationship with you as discussed below.

### **CANDENT CAPITAL, LLC WEBSITE PRIVACY POLICY**

#### ***WHAT INFORMATION DO WE COLLECT FROM YOU?***

This policy applies to information collected from or submitted to the Candent website ("Website"). We do not collect any personally identifiable information about visitors viewing publicly available areas of our Website. For example, your name, address, phone numbers, Social Security number or email addresses are not collected when you view our Website. We will collect names, emails or phone numbers of visitors that choose to email Candent or interact with Candent via our Website. Examples of such interaction include posting questions to Candent or leaving comments on the Website. The information enables us to respond to correspondence and to verify the sender.

Candent may collect names, emails, phone numbers and other forms of personal identifiable information for visitors to private portions of our Website that includes access to websites and applications from third party providers and require users to provide their personal login ids and passwords authorized by Candent. Depending on the third party provider website or application, this information may be anonymous or it may be associated with you.

We may collect information that your browser or device typically sends to our servers when you visit our Website. For example, your browser or device may tell us your IP address (which may tell us your general location), when and the type of browser and device you used to reach our Website. Your browser may also tell us information about the page that led you to our Website and the search terms you entered into a search engine that led you to our website.

Candent may collect information about how you use our Website by using cookies and similar technologies that send small amounts of data to your computer from our web server and stored on the storage media of your computer. This data anonymously identifies you as a unique user of our Website and helps us with the ongoing maintenance of our Website. This technology may not provide us with information regarding your name, address, phone number or email address or any other personally identifiable information.

### ***HOW WE MAY USE INFORMATION THAT WE MAY COLLECT***

We do not share any information collected from the publically available sections of our website with anyone outside of Candent. Candent reserves the right to disclose any information that we collect when required to comply with a valid subpoena, court order or as otherwise permitted or required by law. For visitors that submit their email addresses or other personally identifiable information to us requesting correspondence with Candent, we do not use such information for any purposes other than correspondence and will not disclose such information outside of Candent.

### ***OTHER THIRD PARTY WEBSITES***

Our Website may contain for your convenience links to public websites controlled and maintained by third parties. Such websites do not require personal login ids and passwords authorized by Candent. We do not have any control over the content of public third party websites. Candent assumes no liability or responsibility for such sites, the content contained in them or the manner in which these sites collect or use information. This Website Privacy Policy does not govern the use of information collected by outside public third party websites that were not authorized by Candent.

## **CANDENT CAPITAL, LLC PRIVACY POLICY**

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Privacy Policy.

### **Why you need to know?**

Registered Investment Advisors (“RIAs”) share some of your personal information. Federal and State laws give you the right to limit some of this sharing. Federal and State laws require RIAs to disclose how we collect, share, and protect your personal information.

### **What information do we collect from you?**

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

**What sources do we collect information from in addition to you?**

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

**How we share your information?**

RIAs do need to share personal information regarding its clients to effectively implement the RIA’s services. In the section below, we list some reasons we may share your personal information.

Basis for sharing	Sharing	Limitations
<p><b>Servicing our Clients</b></p> <p>We may share non-public personal information with non-affiliated third parties (such as brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed services to you consistent with applicable law, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Processing transactions;</li> <li>• General account maintenance;</li> <li>• Responding to regulators or legal investigations; and</li> <li>• Credit reporting, etc.</li> </ul>	<p>Candent may share this information.</p>	<p>Clients cannot limit the Advisors ability to share.</p>
<p><b>Administrators</b></p> <p>We may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.</p>	<p>Candent may share this information.</p>	<p>Clients cannot limit the Advisors ability to share.</p>

<p><b>Marketing Purposes</b></p> <p>Candent does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Candent or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b></p>	<p>Candent does not share personal information.</p>	<p>Clients cannot limit the Advisors ability to share.</p>
<p><b>Authorized Users</b></p> <p>In addition, your non-public personal information may also be disclosed to you and persons we believe to be your authorized agent or representative.</p>	<p>Candent does share personal information.</p>	<p>Clients can limit the Advisors ability to share.</p>
<p><b>Information About Former Clients</b></p> <p>Candent does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.</p>	<p>Candent does not share personal information regarding former clients</p>	<p>Clients can limit the Advisors ability to share.</p>

<p><b>How do we protect your information?</b></p>
<p>To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic safeguards. These include computer safeguards such as passwords, secured files and buildings.</p>
<p>Our employees are advised about Candent's need to respect the confidentiality of each client's non-public personal information. We train our employees on their responsibilities.</p>
<p>We require third parties that assist in providing our services to you to protect the personal information they receive. This includes contractual language in our third party agreements.</p>

<p><b>Changes to our Privacy Policy.</b></p>
<p>We will send you notice of our Privacy Policy annually for as long as you maintain an ongoing relationship with us.</p>
<p>Periodically we may revise our Privacy Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.</p>

**State specific regulations**

California	In response to a California law, to be conservative, we assume accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties except as permitted by California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws.
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**Questions:** You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (415) 742-1681.