

Item 1: Cover Page



Scaled Finance LLC

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Form ADV Part 2A – Firm Brochure

Dated February 8, 2024

This Brochure provides information about the qualifications and business practices of Scaled Finance LLC (“SF”). If you have any questions about the contents of this Brochure, please contact us at Kevin.Estes@ScaledFinance.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Scaled Finance LLC also is available on the SEC’s website at www.adviserinfo.sec.gov, which can be found using the firm’s identification number, 321728.

Scaled Finance LLC is a Registered Investment Adviser. Registration does not imply any level of skill or training.

Item 2: Material Changes

The last annual update of this Brochure was filed on January 30, 2023. Since then, the following changes have been made:

- The Advisor has updated its hourly rate to \$250 unless limited by regulation or an existing Client agreement.
- The Advisor has notice filed with the state of Texas.
- The Advisor has updated social media address to: <https://www.facebook.com/ScaledFinance/> and <https://www.linkedin.com/company/scaled-finance-llc/>

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 securities regulators. Either 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 Scaled Finance, LLC.

Item 3: Table of Contents

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Item 4: Advisory Business

Description of Advisory Firm

Scaled Finance LLC is a Registered Investment Adviser principally located in the state of Washington. Scaled Finance LLC became registered in 2022. Kevin Estes is the principal owner.

As used in this brochure, the words "SF", "we", "our firm", "Advisor" and "us" refer to Scaled Finance 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

SF is a fee-only firm, meaning the only compensation we receive is from our Clients for our services. We offer hourly financial planning. From time to time, SF recommends third-party professionals such as attorneys, accountants, tax advisors, insurance agents, or other financial professionals. Clients are never obligated to utilize any third-party professional we recommend. SF is not affiliated with nor does SF receive any compensation from third-party professionals we may recommend.

Financial Planning Services

Financial planning involves 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 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 some or all of the following areas of concern. The Client and SF will work together to select specific areas to cover. These areas may include, but are not limited to, the following:

- **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.
- **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.
- **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 the 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.

Financial Planning Services are offered on a Project-Based basis.

Project-Based Financial Planning. We provide project-based financial planning services on a limited scope one-time engagement. Project-Based Financial Planning is available for Clients looking to address specific questions or issues. The Client may choose from one or more of the above topics to cover or other areas as requested and agreed to by SF. For Project-Based Financial Planning, the Client will be ultimately responsible for the implementation of the financial plan. Clients have the option to purchase investment products that the Adviser recommends through other brokers or agents that are not affiliated with the Adviser or investment adviser representative.

Client Tailored Services and Client Imposed Restrictions

We tailor the delivery of our services to meet the individual needs of our Clients. We consult with Clients initially and on an ongoing basis, through the duration of their engagement with us, to determine risk tolerance, time horizon and other factors that may impact the Clients' investment and/or planning needs.

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 SF in writing. SF will notify Clients if they are unable to accommodate any requests.

Retirement Account Advice

When SF provides investment advice to Clients regarding Client's retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with Client's interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours.

Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

As an investment adviser registered under the Securities Act of Washington and other applicable federal and state securities laws, SF owes the Client a fiduciary duty to put the Client's interest first which includes, but is not limited to, a duty of care, loyalty, obedience, and utmost good faith.

Wrap Fee Programs

We do not participate in wrap fee programs.

Assets Under Management

As of December 31, 2023, SF has \$0 in discretionary and \$0 in non-discretionary assets under management.

Item 5: Fees and Compensation

Please note, unless a Client has received this brochure at least 48 hours prior to signing an Advisory Contract, the Advisory Contract may be terminated by the Client within five (5) business days of signing the Advisory Contract without penalty.

How we are paid depends on the type of advisory services we perform. Below is a brief description of our fees, however, you should review your executed Advisory Contract for more detailed information regarding the exact fees you will be paying. No increase to the agreed-upon advisory fees outlined in the Advisory Contract shall occur without prior Client written consent.

Project-Based Financial Planning

We charge an hourly fee for Project-Based Financial Planning. Our hourly rate is \$250 unless limited by regulation or an existing Client agreement. Fees are negotiable and the final agreed upon fee will be outlined in your Advisory Contract. SF collects a portion of the fee to be collected in advance with the remainder due upon completion of the services. If the service that is provided does not meet the required hourly threshold, the amount due will be reduced according to the service that was completed and any unearned fee will be refunded to the Client. Fees may be paid by electronic funds transfer and debit/credit card, and are due upon completion of the services. SF will not bill an amount above \$500, six months or more in advance of rendering the services.

Fee Payment

For Financial Planning service, fees are paid by electronic funds transfer (EFT) or check. We use an independent third party payment processor in which the Client can securely input their banking information and pay their fee. We do not have access to the Client's banking information at any time. The Client will be provided with their own secure portal in order to make payments.

Other Types of Fees and Expenses

When implementing an investment recommendation, the Client may incur additional fees such as brokerage commissions, transaction fees, and other related costs and expenses. Clients may incur certain charges imposed by broker-dealers, 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. For more information, refer to Item 12 of ADV Part 2A.

Clients may incur fees from third-party professionals such as accountants and attorneys that SF may recommend, upon Client request. Such fees are separate and distinct from SF's advisory fees.

Terminations and Refunds

For Project-Based Financial Planning services, this service is not an ongoing engagement, thus upon receipt of the final fees, the Advisory Contract will automatically be terminated. Clients may terminate at any time provided written notice. Fees will be due for the amount of work completed up to the date of termination, and any completed portions of any documents will be provided to the Client.

Sale of Securities or Other Investment Products

Neither the Advisor nor its supervised persons 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 services to individuals and high net-worth individuals.

We do not have a minimum account size requirement.

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

Below is a brief description of our methods of analysis and primary investment strategies.

Methods of Analysis

Modern Portfolio Theory (MPT)

The underlying principles of MPT are:

- Investors are risk averse. The only acceptable risk is that which is adequately compensated by an expected return. Risk and investment return are related and an increase in risk requires an increased expected return.
- Markets are efficient. The same market information is available to all investors at the same time. The market prices every security fairly based upon this equal availability of information.
- The design of the portfolio as a whole is more important than the selection of any particular security. The appropriate allocation of capital among asset classes will have far more influence on long-term portfolio performance than the selection of individual securities.
- Investing for the long-term (preferably longer than ten years) becomes critical to investment success because it allows the long-term characteristics of the asset classes to surface.
- Increasing diversification of the portfolio with lower correlated asset class positions can decrease portfolio risk. Correlation is the statistical term for the extent to which two asset classes move in tandem or opposition to one another.

Mutual Fund and/or ETF Analysis: We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in other funds in the Client's portfolio. In addition, we monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the Client may purchase the same security, increasing the risk to the Client if that security were to fall in

value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the fund or ETF less suitable for the Client's portfolio.

Investment Strategies

Asset Allocation

In implementing our Clients' investment strategy, we begin by attempting to identify an appropriate ratio of equities, fixed income, and cash (i.e. "asset allocation") suitable to the Client's investment goals and risk tolerance.

A risk of asset allocation is that the Client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of equities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the Client's goals. We attempt to closely monitor our asset allocation models and make changes periodically to keep in line with the target risk tolerance model.

Passive Investment Management

We primarily practice passive investment management. Passive investing involves building portfolios that are composed of various distinct asset classes. The asset classes are weighted in a manner to achieve the 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.

Low Cost Portfolios

Recommend low cost diversified portfolios tailored to each Client based on their goal horizon(s) with consideration given to the acceptance of the Client employer's restricted stock units, options, or discounted purchases as part of their compensation.

Material Risks Involved

SF does not provide investment management. However, investment recommendations may be made as part of the financial planning services. All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear.

Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

Commercial Paper is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default.

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 factors such 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.

Bank Obligations including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

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.

Options and other derivatives carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

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) 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 the Clients invest.

Mutual Funds 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).

Item 9: Disciplinary Information

Criminal or Civil Actions

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

Administrative Enforcement Proceedings

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

Self-Regulatory Organization Enforcement Proceedings

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

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer Affiliation

Neither SF nor its management persons is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Other Affiliations

Neither SF nor its management persons is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

Related Persons

SF provides online educational content concerning areas related to personal finance offered in the form of YouTube videos, online courses, or other downloadable material.

Outside of this, neither SF nor its management persons have any relationship or arrangement with any related parties.

Recommendations or Selections of Other Investment Advisers

SF does not recommend or select other investment advisers for our Clients.

Item 11: 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, including, but not limited to a duty of care, loyalty, obedience, and the utmost good faith. 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 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.

Code of Ethics Description

This Code of Ethics does not attempt to identify all possible conflicts of interest, and compliance with each of its specific provisions will not shield our firm or its access persons from liability for misconduct that violates a fiduciary duty to our Clients. A summary of the Code of Ethics' Principles is outlined below.

- **Integrity** – Access persons shall offer and provide professional services with integrity.
- **Objectivity** – Access persons shall be objective in providing professional services to Clients.
- **Competence** – Access 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** – Access 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** – Access 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** – Access persons conduct in all matters shall reflect the credit of the profession.
- **Diligence** – Access 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

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 SF 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, SF will never engage in trading that operates to the Client’s disadvantage if representatives of SF buy or sell securities at or around the same time as Clients. The Adviser and related persons do not have any material financial interest in recommendations made to Clients.

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

Our firm, its access persons, 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, our Code of Ethics may require that we restrict or prohibit access to persons’ transactions in specific reportable securities. Any exceptions or trading pre-clearance must be approved by SF’s Chief Compliance Officer in advance of the transaction in an account. SF maintains a copy of access persons’ personal securities transactions as required.

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

The Adviser does not buy or sell securities for Client accounts, but from time to time our firm, its access persons, or its related persons may buy or sell securities that the firm recommends to Clients. To address this conflict, it is our policy that neither our firm or access persons shall have priority over Clients’ accounts in the purchase or sale of securities.

Item 12: Brokerage Practices

Factors Used to Select Custodians and/or Broker-Dealers

SF does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to the Client 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 do not have any soft-dollar arrangements with broker-dealers whereby soft-dollar credits, used to purchase products and services, are earned directly in proportion to the amount of commissions paid by a Client.

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

As a fee-only financial planner who does not offer Investment Management Services, we do not have a concern over which broker-dealers a Client may choose in order to implement our investment recommendations.

Aggregating (Block) Trading for Multiple Client Accounts

Some Registered Investment Advisers execute Client accounts on an aggregated basis as a way to lower expenses. As a fee-only financial planner who does not offer Investment Management Services, we do not execute trades on behalf of Clients. As a result, it is up to the Client to negotiate their own trading costs with their broker-dealer.

Item 13: Review of Accounts

Periodic Reviews

Kevin Estes, Owner, CCO, Founder, and Financial Planner of SF, will work with Clients to obtain current information regarding their assets and investment holdings and will review this information as part of our financial planning services. SF does not provide specific reports to Clients, other than financial plans.

Triggers of Reviews

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 per Client's needs.

Review Reports

SF does not provide written performance or holdings reports to Investment Management Clients outside of what is provided directly by their custodian as part of their account statements.

Pursuant to WAC 460-24A 106(1)(b)(ii) and WAC 460-24A-135: Each time the Adviser charges an advisory fee, the Adviser will provide an invoice to the Client that contains the fee(s), the formula used to calculate the fee(s), the fee calculation itself, the time period covered by the fee(s) and if applicable, the amount of assets under

management the fee is based on and the name of the custodian(s). If the Adviser charges performance compensation, the invoice will also include the Client's cumulative net investment gain (or loss) and the amount of cumulative net investment gain over which the Adviser will receive performance compensation.

Item 14: Client Referrals and Other Compensation

Compensation Received by Scaled Finance LLC

SF is a fee-only firm that is compensated solely by its Clients. SF does not receive commissions or other sales-related compensation. Except as mentioned in Item 12 above, we do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our Clients.

Client Referrals from Solicitors

SF does not, directly or indirectly, compensate any person who is not advisory personnel for Client referrals.

Item 15: Custody

SF does not accept custody of Client funds. Because we may accept advisory fee payment by electronic funds transfer, we urge you to compare the account statements you receive from your bank or other financial institution with invoices you receive from the SF.

Item 16: Investment Discretion

We do not provide Investment Management Services, and therefore do not exercise discretion.

Item 17: Voting Client Securities

SF does not do not provide Investment Management Services, and therefore does not exercise discretion. 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

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to our Clients, nor have we been the subject of any bankruptcy proceeding. We do not have custody of Client funds or securities, except as disclosed in Item 15 above, or require or solicit prepayment of more than \$500 in fees six months or more in advance.

Item 19: Requirements for State-Registered Advisers

Principal Officers

Kevin Estes serves as SF's sole principal. Information about Kevin Estes's education, business background, and outside business activities can be found on his ADV Part 2B, Brochure Supplement attached to this Brochure.

Outside Business

All outside business information, if applicable, of SF is disclosed in Item 10 of this Brochure.

Performance-Based Fees

Neither SF nor Kevin Estes is compensated by performance-based fees.

Material Disciplinary Disclosures

No management person at SF has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Material Relationships That Management Persons Have With Issuers of Securities

Neither SF nor Kevin Estes has any relationship or arrangement with issuers of securities.

Form ADV Part 2B – Kevin Estes



Scaled Finance LLC

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Bellevue, WA 98006

Form ADV Part 2B – Brochure Supplement

Dated February 8, 2024

For

Kevin Estes CRD 7551280

Owner, Chief Compliance Officer, Founder, and Financial Planner

This brochure supplement provides information about Kevin Estes that supplements the Scaled Finance LLC (“SF”) brochure. A copy of that brochure precedes this supplement. Please contact Kevin Estes if the SF brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Kevin Estes is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the identification number 7551280

Item 2: Educational Background and Business Experience

Kevin Estes

Born: 1981

Educational Background

- 01/2022, Boston University, Financial Planning Certificate
- 05/2012, University of Notre Dame, Master of Business Administration (MBA)
- 06/2003, University of California, Los Angeles (UCLA),
B.A. Economics with Specialization in Computing, B.A. Political Science

Business Experience

- 04/2022 – Present, Scaled Finance LLC, Owner, CCO, Founder, and Financial Planner
- 04/2013 – 04/2022, T-Mobile US, Inc, Sr. Finance Manager
- 06/2012 – 03/2013, Amazon Vendor Services, Inc., Sr. Vendor Manager
- 08/2010 – 05/2012, University of Notre Dame, Student

Professional Designation(s)

Item 3: Disciplinary Information

Kevin Estes 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

Kevin Estes is not involved with outside business activities.

Item 5: Additional Compensation

Kevin Estes does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through SF.

Item 6: Supervision

Kevin Estes, as Chief Compliance Officer of SF, supervises the advisory activities of our firm. Kevin Estes will be supervising his own activities; no one else will be supervising him. Kevin Estes is bound by the firm's policies and procedures and Code of Ethics. Clients may contact Kevin Estes at the phone number on this brochure supplement.

Item 7: Requirements for State Registered Advisers

Kevin Estes has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.