

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

**for**

**Brandon P. Fink, CFP®  
Senior Vice President**

**Effective: September 17, 2021**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Brandon P. Fink CFP®, (CRD# 6122967) in addition to the information contained in the Claro Advisors LLC (“Claro” or the “Advisor”, CRD# 160294) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Claro Disclosure Brochure or this Brochure Supplement, please contact us at (800) 604-2838 or by email at [info@claroadvisors.com](mailto:info@claroadvisors.com).

Additional information about Mr. Fink is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6122967.

## Item 2 – Educational Background and Business Experience

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Brandon P. Fink CFP®, born in 1991, is dedicated to advising Clients of Claro as a Senior Vice President. Mr. Fink earned a degree in Business Management from Boston University in 2013. Additional information regarding Mr. Fink's employment history is included below.

### Employment History:

Senior Vice President, Claro Advisors LLC	09/2021 to Present
Financial Professional, Equitable Advisors	08/2013 to 09/2021

### CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

The CERTIFIED FINANCIAL PLANNER™, CFP®, and federally registered CFP® (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by CERTIFIED FINANCIAL PLANNER™ Board of Standards, Inc. (“CFP® Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 87,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real-world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP®.

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Fink.*** Mr. Fink 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. Fink.

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. Fink.*

However, we do encourage you to independently view the background of Mr. Fink on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6122967.

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#### **Item 4 – Other Business Activities**

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##### Insurance Agency Affiliations

Mr. Fink is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Fink's role with Claro. As an insurance professional, Mr. Fink will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Fink is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Fink or the Advisor. Mr. Fink spends approximately 10% of his time per month in this capacity.

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#### **Item 5 – Additional Compensation**

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Mr. Fink has additional business activities where compensation is received that are detailed in Item 4 above.

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#### **Item 6 – Supervision**

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Mr. Fink serves as a Senior Vice President of Claro and is supervised by Jennifer Street, the Chief Compliance Officer. Ms. Street can be reached at (800) 604-2838.

Claro has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Claro. Further, Claro is subject to regulatory oversight by various agencies. These agencies require registration by Claro and its Supervised Persons. As a registered entity, Claro is subject to examinations by regulators, which may be announced or unannounced. Claro 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.