

Part 2A of Form ADV: Firm Brochure

Form ADV, Part 2A, Item 1

Cover Page

**CHISHOLM FINANCIAL INC.
d/b/a
CHISHOLM FINANCIAL PLANNING & INVESTMENTS**

**3550 Camino Del Rio North, #207
San Diego, CA 92108**

Tel: (619) 784-3114

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**FORM ADV PART 2
FIRM BROCHURE**

This brochure provides information about the qualifications and business practices of Chisholm Financial Planning and Investments. If you have any questions about the contents of this brochure, please contact us at (619) 784-3114. 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 Chisholm Financial Planning and Investments is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Chisholm Financial Planning and Investments is 293233.

Chisholm Financial Planning and Investments is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Material Changes

Chisholm Financial Planning and Investments was established as a new Registered Investment Advisor in October 2018 under the State of California rules and regulations.

There have been no material changes since the last update on January 29, 2019.

Table of Contents

Item 4 Advisory Business..... 4

Item 5 Fees and Compensation..... 5

Item 6 Performance-Based Fees and Side-By-Side Management..... 7

Item 7 Types of Clients..... 7

Item 8 Methods of Analysis, Investment Strategies, and Risk of Loss..... 7

Item 9 Disciplinary Information..... 8

Item 10 Other Financial Industry Activities and Affiliations..... 8

Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading..... 9

Item 12 Brokerage Practices.....10

Item 13 Review of Accounts.....10

Item 14 Client Referrals and Other Compensation.....11

Item 15 Custody.....11

Item 16 Investment Discretion.....11

Item 17 Voting Client Securities.....11

Item 18 Financial Information.....12

Item 19 Requirements for State-Registered Advisers.....12

Business Continuity Plan Disclosure.....12

Advisory Business

Chisholm Financial Planning and Investments is a Registered Investment Adviser based in San Diego, California, and incorporated under the laws of the State of California. Chisholm Financial Planning and Investments is owned by Jennifer Erdmann. Chisholm Financial Planning and Investments is registered with the State of California and is subject to its rules and regulations. Founded in January 2018, Chisholm Financial Planning and Investments provides investment advisory services, which may include, but are not limited to, the review of client investment objectives and goals, recommending asset allocation strategies of managed assets among investment products such as cash, stocks, mutual funds and bonds, annuities, and/or preparing written investment strategies. Our investment advice is tailored to meet our clients' needs and investment objectives. Chisholm Financial Planning and Investments provides financial planning consulting services including, but not limited to, risk assessment/management, investment planning, estate planning, financial organization and financial decision making/negotiation. Additionally, the firm may provide educational workshops.

Chisholm Financial Planning and Investments provides specific financial advice or consulting on an hourly basis or flat rate basis. For financial planning, Chisholm Financial Planning and Investments may prepare a written financial plan based on the Client's individual needs and circumstances. Client agrees to complete a detailed questionnaire that Chisholm Financial Planning and Investments provides, discuss current financial resources and projected needs with Chisholm Financial Planning and Investments, and provide copies of any financial documents Chisholm Financial Planning and Investments may reasonably request as necessary to evaluate your financial circumstances and prepare the financial plan. Financial plans that Chisholm Financial Planning and Investments prepares may be comprehensive or focused on Client's individual needs. Clients should be aware that a financial plan focused on selected areas is more limited than a comprehensive financial plan.

Chisholm Financial Planning and Investments provides investment advisory services through its Investment Advisory Representatives ("IAR") to accounts opened with Chisholm Financial Planning and Investments. During the planning process clients may impose restrictions on investing in certain securities or types of securities by providing a written notification.

Chisholm Financial Planning and Investments provides non-discretionary investment advisory services to its clients and does not provide asset management services. Since the firm does not provide asset management services, Chisholm Financial Planning and Investments does not participate in wrap fee programs. Chisholm Financial Planning and Investments may assist clients in determining the suitability of managed account programs for the client. The IAR is compensated through a comprehensive single fee. Chisholm Financial Planning and Investments and its IAR, as appropriate, will be responsible for the following:

- Performing due diligence
- Recommending strategic asset and style allocations

- Providing research on investment product options, as needed
- Providing client risk profile questionnaire
- Obtaining investment advisory contract from client with required financial, risk tolerance, suitability and investment vehicle selection information
- Performing client suitability check on account documentation, review the investment objectives and evaluate the investment vehicle selections
- Providing Firm Brochure (this document)

Financial planning and consulting recommendations may pose a potential conflict between the interests of the Chisholm Financial Planning and Investments and the interests of the Client. Clients are not obligated to implement any recommendations made by Chisholm Financial Planning and Investments or maintain an ongoing relationship with us. If the Client elects to act on any of the recommendations made by us, the Client is under no obligation to effect the transaction through Chisholm Financial Planning and Investments.

The firm currently does not have any assets under management.

Form ADV, Part 2A, Item 5

Fees and Compensation

The following types of fees will be assessed:

Financial Planning and/or Consulting— Financial planning and/or consulting services are charged in advance through a fixed fee or hourly arrangement as agreed upon between the client and Chisholm Financial Planning and Investments. There will never be an instance where \$500 or more in fees is charged six or more months in advance. Hourly fees are generally charged when the scope of services cannot be determined or if the services are limited to one meeting. Fixed fees are generally quoted to the client for longer term consulting projects. Fees are negotiable and vary depending upon the complexity of the client situation and services to be provided. Hourly fees are \$275 - \$325 per hour. Similar financial planning services may be available elsewhere for a lower cost to the client. Fixed fees for consulting projects range from \$1,800 to \$5,000 per project. An estimate for total hours and charges is determined at the start of the advisory relationship.

Hourly fees are directly billed monthly in arrears. Fixed fees are billed directly half upfront, and half upon completion of the agreed-upon services. Clients may pay by check or credit card. For Clients that pay by credit card, all credit card information will remain secure and confidential, just as with all other firm documents. Clients who wish to terminate the planning process prior to completion may do so with written notice. The client may obtain a refund of a pre-paid fee if the advisory contract is terminated before the end of the billing period by contacting Jennifer Erdmann at (619) 784-3114. Upon receipt of written notification, any earned fee will immediately become due and payable. A client may terminate the advisory agreement without being assessed any fees or expenses within five (5) days of its signing.

Educational Seminars/Workshops - Appropriately trained and registered associated personnel of Chisholm Financial Planning and Investments may provide educational workshops on a periodic basis for the general public or specific groups on topics related to personal finance, investing, retirement planning, etc. These workshops or presentations are educational in nature and do not involve the sale of an investment or insurance product. Such information presented cannot be based on any one person's needs nor does the personnel of Chisholm Financial Planning and Investments provide individual advice to attendees during such sessions. The fee for attending workshops ranges from no charge to \$500 per attendee, depending on the demand, length, topic, materials provided, etc.

Additional Fees and Expenses

Chisholm Financial Planning and Investments only provides financial planning and/or consulting services and does not manage accounts. However, in addition to advisory fees paid to Chisholm Financial Planning and Investments as explained above, clients may pay custodial service, account maintenance, transaction, and other fees associated with maintaining an investment account. These fees vary by broker and/or custodian. Clients should ask Chisholm Financial Planning and Investments for details on transaction fees or other custodial fees specific to their account, as these fees are not included in the advisory fees paid to Chisholm Financial Planning and Investments. Chisholm Financial Planning and Investments does not share any portion of such fees.

Mutual fund companies impose internal fees and expenses on clients. These fees are in addition to the costs associated with maintaining an investment/brokerage account. Complete details of such internal expenses are specified and disclosed in each mutual fund company's prospectus. Clients are strongly advised to review the prospectus(es) prior to investing in such securities.

Mutual funds purchased or sold in broker-dealer accounts may generate transaction fees that would not exist if the purchase or sale were made directly with the mutual fund company. Mutual funds held in broker-dealer accounts also charge management fees. These mutual fund management fees may be more or less than the mutual fund management fees charged if the client held the mutual fund directly with the mutual fund company.

In their capacity of Registered Representative and Investment Advisor Representative with Woodbury Financial Services, Inc., Ms. Erdmann may 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. This compensation is separate and distinct from her role of Investment Advisor Representative with Chisholm Financial Planning and Investments. This presents a conflict of interest and gives Ms. Erdmann an incentive to recommend investment products based on the compensation received, rather than the client's needs. This conflict is mitigated with the fact that Ms. Erdmann has a fiduciary duty to act in the best interest of clients, rather than compensation received. Chisholm Financial Planning and Investments does not have 50% or more of its revenue from advisory clients resulting from commission and other compensation for the sale of investment products we recommend to clients, including asset-based distribution fees from the sale of mutual funds. Clients have the option to purchase investment products that Ms. Erdmann recommends through other brokers or agents that are not affiliated with Chisholm

Financial Planning and Investments. Please see Item 10 “Other Financial Industry Activities and Affiliations” for additional information on their roles with Woodbury Financial Services.

Since Chisholm Financial Planning and Investments does not manage assets, we do not charge advisory fees in addition to commissions or markups.

Please refer to Item 12 “Brokerage Practices” of this brochure for additional information.

Form ADV, Part 2A, Item 6

Performance-Based Fees and Side-By-Side Management

Chisholm Financial Planning and Investments does not charge performance-based fees or participate in side-by-side management. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Performance-based fees are fees that are based on a share of capital gains or appreciation of the assets of a client. Our fees are calculated as described in Fees and Compensation section above, and are not charged on the basis of performance of your advisory account.

Form ADV, Part 2A, Item 7

Types of Clients

Chisholm Financial Planning and Investments offers investment advisory services to individuals. There is no minimum account size to open and maintain an advisory account.

Form ADV, Part 2A, Item 8

Methods of Analysis, Investment Strategies, and Risk of Loss

Chisholm Financial Planning and Investments’ methods of analysis and investment strategies incorporate the client’s needs and investment objectives, time horizon, and risk tolerance. Chisholm Financial Planning and Investments is not bound to a specific investment strategy for making its recommendations, but rather consider the risk tolerance levels pre-determined gathered at the account opening, as well as on an on-going basis. Examples of methodologies that our investment strategies may incorporate include:

Asset Allocation – Asset Allocation is a broad term used to define the process of selecting a mix of asset classes and the efficient allocation of capital to those assets by matching rates of return to a specified and quantifiable tolerance for risk.

Dollar-Cost Averaging – Dollar-cost averaging is the technique of buying a fixed dollar amount of securities at regularly scheduled intervals, regardless of the price per share. This will gradually, over time, decrease the average share price of the security. Dollar-cost averaging lessens the risk of investing a large amount in a single investment at the wrong time.

Technical Analysis – involves studying past price patterns and trends in the financial markets to predict the direction of both the overall market and specific stocks.

Long-Term Purchases – securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

Short-Term Purchases – securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations.

Our strategies and investments may have unique and significant tax implications. Regardless of your account size or other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

Investing in securities involves risk of loss that clients should be prepared to bear. Although we make recommendations in a manner consistent with your risk tolerances, there can be no guarantee that our recommendations will be successful. You should be prepared to bear the risk of loss.

All investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends, and other distributions), and the loss of future earnings. These risks include market risk, interest rate risk, issuer risk, and general economic risk. Regardless of the methods of analysis or strategies suggested for your particular investment goals, you should carefully consider these risks, as they all bear risks.

Form ADV, Part 2A, Item 9

Disciplinary Information

Chisholm Financial Planning and Investments or its Principal Executive Officers have not had any reportable disclosable events in the past ten years, including any criminal or civil actions, administrative proceedings, or self-regulatory organization (SRO) proceedings.

Form ADV, Part 2A, Item 10

Other Financial Industry Activities and Affiliations

Jennifer Erdmann, owner of Chisholm Financial Planning and Investments, is currently a Registered Representative and Investment Advisor Representative with Woodbury Financial Services, Inc., a broker dealer and registered investment advisor. Jennifer Erdmann is also a licensed insurance agent. From time to time, she will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment advisor. Chisholm Financial Planning and Investments always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Chisholm Financial Planning and Investments in their capacity as an insurance agent or Registered Representative.

During the financial planning process with Chisholm Financial Planning and Investments, the Client may be recommended to utilize the asset management services in Ms. Erdmann's capacity as Investment Advisor Representative with Woodbury Financial Services. This may present a conflict of interest because Ms. Erdmann will receive investment advisory fees for asset management through Woodbury Financial Services. Clients are not required to use Ms. Erdmann or Woodbury Financial Services for asset management services.

In addition, Ms. Erdmann also provides legal consulting as a sole proprietor. In her capacity as an Investment Advisor Representative, she may render legal advice for compensation if the need arises. This may present a potential conflict of interest because Ms. Erdmann may recommend she provide legal services because of the compensation received. Chisholm Financial Planning and Investments and its IARs have a fiduciary duty to always act in the best interest of its clients, and not for the benefit of the firm or its IARs. Clients are in no way obligated to utilize Ms. Erdmann for legal services, and Clients may choose any attorney.

Neither Chisholm Financial Planning and Investments nor its representatives are registered as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

Any and all material conflicts of interest have been disclosed in this Brochure.

Form ADV, Part 2A, Item 11

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

Chisholm Financial Planning and Investments' Code of Ethics includes guidelines for professional standards of conduct for our Associated Persons. Our goal is to protect client interests at all times and to demonstrate our commitment to fiduciary duties of honesty, good faith, and fair dealing. All of Chisholm Financial Planning and Investments' Associated Persons are expected to strictly adhere to these guidelines. Persons associated with Chisholm Financial Planning and Investments are also required to report any violations to the Code of Ethics. Additionally, the firm maintains and enforces written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about our clients or client accounts by persons associated with our firm.

Chisholm Financial Planning and Investments and its employees may buy or sell securities that are also held by clients. Since Chisholm Financial Planning and Investments does not execute transactions in client accounts, employees cannot benefit from transactions placed ahead or before transactions placed on behalf of the advisory clients.

The advisor may have an interest or position in a certain security, which may also be recommended to the client. As these situations may present a conflict of interest, the advisor has established the following restrictions in order to ensure its fiduciary responsibilities:

1. A director, officer or employee of the advisor shall not buy or sell a security for their personal portfolio(s) where their decision is substantially derived, in whole or part, by reason of his or her employment, unless the information is also available to the investing

public. No owner/employee of Chisholm Financial Planning and Investments shall prefer their own interest to that of the client.

2. The advisor maintains a list of all securities held by the company and all directors, officers, and employees. These holdings are reviewed on a quarterly basis by the principal of the firm.
3. The advisor requires that all employees must act in accordance with all applicable Federal and State regulations governing registered investment advisors.

Chisholm Financial Planning and Investments' Code of Ethics is available to you upon request. You may obtain a copy of our Code of Ethics by contacting Jennifer Erdmann at (619) 784-3114.

Form ADV, Part 2A, Item 12

Brokerage Practices

Chisholm Financial Planning and Investments does not have any custodial/brokerage arrangements since the firm does not execute transactions. However, since the Investment Advisor Representative of Chisholm Financial Planning and Investments is also a Registered Representative and Investment Advisor Representative of Woodbury Financial Services, Inc., she may recommend Woodbury Financial Services for brokerage or asset management. Clients of Chisholm Financial Planning and Investments are in no way required to use Woodbury Financial Services, Inc. for brokerage or asset management services.

Chisholm Financial Planning and Investments does not have any soft dollar arrangements.

Chisholm Financial Planning and Investments does not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

Chisholm Financial Planning and Investments does not aggregate orders, since the firm does not execute transactions.

Form ADV, Part 2A, Item 13

Review of Accounts

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Jennifer Erdmann, Principal Executive Officer of the firm. There is only one level of review and that is the total review conducted to create the financial plan.

Reviews may also be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

Clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

Form ADV, Part 2A, Item 14

Client Referrals and Other Compensation

Chisholm Financial Planning and Investments does not compensate any individual or firm for client referrals and does not receive compensation for making referrals for other professional services.

Form ADV, Part 2A, Item 15

Custody

Chisholm Financial Planning and Investments does not have physical custody of any client funds and/or securities and does not take custody of client accounts at any time. Chisholm Financial Planning and Investments conducts financial planning and consulting and does not execute transactions or handle funds or securities.

Form ADV, Part 2A, Item 16

Investment Discretion

Chisholm Financial Planning and Investments does not have discretion over customer accounts, nor does the firm execute any trades on behalf of clients. Pursuant to California Code of Regulation Section 260.237.2(f)(1), we are required to disclose that the firm will properly secure the Client's permission prior to effecting securities transactions in Client accounts managed on a non-discretionary basis. However, we do not manage accounts.

Form ADV, Part 2A, Item 17

Voting Client Securities

We do not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of common stock or mutual funds, you are responsible for exercising your right to vote as a shareholder.

In most cases, you will receive proxy materials directly from the account custodian.

Financial Information

Chisholm Financial Planning and Investments is not required to provide financial information to our clients because we do not require or solicit the prepayment of more than \$500 six or more months in advance. Chisholm Financial Planning and Investments does not have any financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients.

Neither Chisholm Financial Planning and Investments nor its Investment Advisor Representatives have been the subject of a bankruptcy petition within the past ten years.

Requirements for State-Registered Advisers

Principal Executive Officers and Management Persons Education and Business Background:

Jennifer Erdmann
Managing Principal and CCO

Business Background:

- Chisholm Financial Planning & Investments, Managing Principal/Chief Compliance Officer, September 2018 - Present
- Woodbury Financial Services, Inc., Registered Representative, December 2016 - Present
- RUZAM, LLC, Investment Advisor Representative, July 2017 - June 2018
- Securities America, Inc, Registered Representative, September 2013 – December 2016
- Securities America Advisors, Inc., Investment Advisor Representative, September 2013 – December 2016
- AXA Advisors, Financial Advisor, April 2010 – September 2013

Educational Background:

- University of California, Santa Barbara, Major: Political Science/History, Graduated: 2006
- California Western School of Law, Juris Doctorate, Graduated: 2009

The Principal Executive Officer and Management person listed has not had any complaints or any events required to be disclosed in this section.

Neither Chisholm Financial Planning and Investments nor any of its Management persons have any relationships or arrangements with any issuers of securities, and no one related to Chisholm Financial Planning and Investments receives or charges performance-based fees.

Chisholm Financial Planning and Investments Business Continuity Disclosure

Chisholm Financial Planning and Investments has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us – If after a significant business disruption, you cannot contact us as you usually do at (619) 784-3114, you should call our alternate number (619) 204-1331. If you cannot access us through either of those means, you should contact your custodial firm, whose contact information is located on your account statement. The custodial firm’s website should also have business continuity information on how it may provide prompt access to funds and securities, enter orders and process other trade-related, cash and security transfer transactions.

Our Business Continuity Plan – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm’s books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our custodial firms back up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our custodial firms that their objectives are to restore their own operations and be able to complete existing transactions and accept new transactions and payments within 24 hours. Your orders and requests for funds and securities could be delayed during this period.

Varying Disruptions – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within 24 hours. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within 48 hours. In either situation, we plan to continue in business, transfer operations to our custodial firm if necessary, and notify you through our customer emergency number, (619) 784-3114. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer’s prompt access to their funds and securities.

For more information – If you have questions about our business continuity planning, you can contact us at (619) 784-3114.