Item 1: Cover Page

Tenon Financial LLC

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https://tenonfinancial.com

Form ADV Part 2A – Firm Brochure

Dated January 13, 2020

This brochure provides information about the qualifications and business practices of Tenon Financial LLC, ("TF"). If you have any questions about the contents of this Brochure, please contact us at 732-902-0066. 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.

Tenon Financial LLC is registered as an Investment Adviser with the State of New Jersey. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about TF is available on the SEC's website at www.adviserinfo.sec.gov, which can be found using the firm's identification number, 305581.

Item 2: Material Changes

Since the first filing of the Form ADV Part 2A on 9-3-19 we have made the following updates:

Email Address - andy@tenonfinancial.com, Website - https://tenonfinancial.com, Twitter - https://twitter.com/tenonfinancial, LinkedIn - https://www.linkedin.com/in/andypanko, Facebook - https://www.facebook.com/tenonfinancial .

Item 4 - removed tax return preparation as a service included within ongoing financial planning.

Item 5 - removed the bifurcation of annual fees so there is no longer a difference in fee between the first year and all subsequent years. Now, the annual fee is the same amount for all years. Furthermore, the maximum annual fee has been increased from $35,000 to $36,000.

Item 15 - removed the following wording: "TF will send a copy of its invoice to the custodian at the same time that it sends the Client a copy." Client fees are deducted directly from Client accounts via the custodian's adviser portal. As such, the custodian is already aware of all fee deductions as they occur. Therefore, Client informational invoices are not required by custodian.

Item 19 - added an additional Outside Business Activity: part-time lecturer for Rutgers University.

In the future, any material changes made during the year will be reported here.

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Item 4: Advisory Business

Description of Advisory Firm

Tenon Financial LLC is registered as an Investment Adviser with the State of New Jersey. We were founded in March of 2019. Andrew Panko is the principal owner of TF. TF currently reports $1,851,497 in discretionary Assets Under Management as of December 31, 2019.

Types of Advisory Services

Investment Management Services (TF manages accounts)

We manage individually tailored investment portfolios. TF provides continuous advice to a Client regarding the investment of Client funds based on the individual needs of the Client. Through personal discussions in which goals and objectives based on a Client's particular circumstances are established, we develop a Client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation targets. We will also review and discuss a Client's prior investment history, as well as family composition and background.

Account supervision is guided by the stated objectives of the Client (e.g., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Fees pertaining to this service are outlined in Item 5 of this brochure.

Ongoing Financial Planning

This service involves working one-on-one with TF over an extended period of time. Clients work with TF to develop and implement their plan. TF will monitor the plan, recommend any changes and ensure the plan is up to date. Fees pertaining to this service are outlined in Item 5 of this brochure.

Upon desiring a comprehensive plan, a Client will be taken through establishing their goals and values around money. They will be required to provide information to help complete the following areas of analysis: net worth, cash flow, insurance, credit scores/reports, employee benefits, retirement planning, insurance, investments, college planning, and estate planning. Once the Client's information is reviewed, their plan will be built and analyzed. Then the findings, analysis and potential changes to their current situation will be reviewed with the Client. Clients subscribing to this service will receive a written or electronic report, providing the Client with a detailed financial plan designed to achieve his or her stated financial goals and objectives. If a follow-up meeting is required, we will meet at the Client's convenience. The plan and the Client's financial situation and goals will be monitored throughout the year and follow-up phone calls and emails will be made to the Client to confirm that any agreed upon action steps have been carried out. On an annual basis, there will be a full review of this plan to ensure its accuracy and ongoing appropriateness. Any needed updates will be implemented at that time.

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

- **Business Planning:** We provide consulting services for Clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with Clients to assess their current situation, identify their objectives, and develop a plan aimed at achieving their goals.

- **Cash Flow and Debt Management**: We will conduct a review of Client's income and expenses to determine their current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed 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 the Client to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review the Client's 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 the Client, as an employee, is taking the maximum advantage possible of their employee benefits. If the Client is 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 the Client's exposure to estate taxes and current estate plan, which may include whether the Client has a will, powers of attorney, trusts, and other related documents. Our advice also typically includes ways for the Client to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. We always recommend that the Client consults with a qualified attorney when the Client initiates, updates, or completes estate planning activities. We may provide the Client with contact information for attorneys who specialize in estate planning when the Client wishes to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between the Client and their attorney with the Client's approval or request.

- **Financial Goals**: We will help Clients identify financial goals and develop a plan to reach them. We will identify what Clients plan to accomplish, what resources will be needed to make it happen, how much time will be needed to reach the goal, and how much the Client should budget for the goals.

- **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 Clients in establishing their own investment accounts 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 Clients' likelihood of achieving their 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 Clients 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 retirement years.

- **Risk Management:** A risk management review includes an analysis of Clients' exposure to major risks that could have a significant adverse impact on their financial pictures. Such risks include 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 Clients' 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 their situations.

  To the extent TF feels the level of tax expertise needed exceeds TF's knowledge and/or abilities, we will recommend that Clients consult with another qualified tax professional before initiating any tax planning strategy. To that end, we may provide Clients with contact information for accountants or attorneys who specialize in this area if Clients wish to hire someone for such purposes. With Clients' approval, we will participate in meetings or phone calls between Clients and their chosen external tax professional.

Social Security Maximization Analysis

TF works with the Client to upload their earnings histories and relevant personal information to a Social Security maximization software. The software then determines the optimal strategy of which Social Security benefits to claim, and at which age to claim them. The Client receives a personalized results report and a one-hour consultation with TF to present the report and answer any related questions the Client may have. However, this analysis does not coordinate with other aspects of the Client's financial lives; the analysis solely recommends the strategy which maximizes the expected total lifetime payments from Social Security. Fees pertaining to this service are outlined in Item 5 of this brochure.

Hourly Engagement

An hourly service is available for Clients who have only a limited scope of what they would like addressed or reviewed, without having TF provide ongoing investment management or ongoing financial planning. Examples include, but are not limited to, creation of a financial plan without any subsequent implementation or monitoring, review of an existing financial plan prepared outside of TF, annuity contract analysis, pension plan analysis, investment account review, traditional IRA to Roth IRA conversion assistance, rental property cash flow analysis, etc. Fees pertaining to this service are outlined in Item 5 of this brochure.

Client Tailored Services and Client Imposed Restrictions

We offer the same suite of services to all of our Clients. However, specific Client financial plans and their implementation are dependent upon the Client's unique goals and objectives, and the Client's investment policy statement which outlines the Client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a Client-specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Wrap Fee Programs

We do not participate in wrap fee programs.

Item 5: Fees and Compensation

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

TF charges fees across three different service offerings:

1. **Ongoing Financial Planning and Investment Management**

Our fee is based on a flat fee range and is calculated as follows:

The annual fees are negotiable, prorated and paid in arrears on a quarterly basis. The fee range is flat, ranging from $3,600 to $36,000 annually. The fee is to be mutually agreed upon with the Client prior to TF starting work on the Client's financial plan. The fee determination is based upon the complexity of the Client's financial profile and therefore the resources required to service the Client during the year.

Clients whose annual fees are on the low end of the fee ranges are Clients whose financial profiles have minimal complexity. Typical aspects of a Client with minimal financial complexity include, but are not limited to, the following: single with no children, no ex-spouses or no other dependent persons, a W-2 wage earner as opposed to self-employed, does not own any real estate, does not own any investments besides liquid publicly traded securities and pooled investment vehicles, does not have any particular legacy goals for his or her estate, etc. Clients whose annual fees are on the high end of the fee range are Clients whose financial profiles contain a lot of complexity. Such Clients may include, but are not limited to, business owners, Clients with large holdings of real estate or other less liquid assets, Clients with highly structured legal estates, Clients whose household has multiple different investment accounts, etc.

No increase in the annual fee shall be effective without agreement from the Client by signing a new agreement or amending their current advisory agreement.

Advisory fees can be directly debited from Client accounts, or the Client may choose to pay by check, credit card, debit credit or electronic funds transfer.

Accounts initiated or terminated during a calendar quarter will be charged a prorated fee based on the amount of days in the quarter the accounts are under TF's management. An account may be terminated with written notice at least 14 calendar days in advance. Since fees are paid in arrears, no refund will be needed upon termination of the account.

2. **Social Security Maximization Analysis**

Social Security Maximization Analysis is offered at a flat fee of $350 for a couple, or $300 for an individual. Fees for this service may be paid by electronic funds transfer, check, debit card or credit card.

3. **Financial Planning Hourly Fee**

Hourly Financial Planning engagements are offered at a rate of $300 per hour. This rate is negotiable at TF's discretion based on the complexity of the requested work. Prior to beginning any work, TF and the Client will mutually agree upon the total fee for the engagement. At that point, half of the agreed upon total fee is due and payable prior to TF beginning the work. The remainder of the total agreed upon fee is due at the completion of the engagement. In the event of early termination by the Client, any fees for the hours worked will be due. Fees for this service may be paid by electronic funds transfer, check, debit card or credit card.

Other Types of Fees and Expenses

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

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

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

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

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

Item 7: Types of Clients

We provide financial planning and portfolio management services to individuals 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

Our primary methods of investment analysis are fundamental, technical and cyclical.

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

Technical analysis involves using chart patterns, momentum, volume, and relative strength in an effort to pick sectors that may outperform market indices. However, there is no assurance of accurate forecasts or that trends will develop in the markets we follow. In the past, there have been periods without discernible trends and similar periods will presumably occur in the future. Even where major trends develop, outside factors like government intervention could potentially shorten them.

Furthermore, one limitation of technical analysis is that it requires price movement data, which can translate into price trends sufficient to dictate a market entry or exit decision. In a trendless or erratic market, a technical method may fail to identify trends requiring action. In addition, technical methods may overreact to minor price movements, establishing positions contrary to overall price trends, which may result in losses. Finally, a technical trading method may underperform other trading methods when fundamental factors dominate price moves within a given market.

Cyclical analysis is a type of technical analysis that involves evaluating recurring price patterns and trends based upon business cycles. Economic/business cycles may not be predictable and may have many fluctuations between long-term expansions and contractions. The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

Passive Investment Management

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

Material Risks Involved

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

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

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

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

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

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

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

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

Legal or Legislative Risk: Legislative changes or court rulings may impact the value of investments, or the security owner's claim on the issuer's assets and finances.

Inflation: Inflation may erode the buying power of Clients investment portfolios, even if the nominal dollar value of the investments remains the same.

Risks Associated with Securities

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

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 Fund ("ETF") prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. TF 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

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

Administrative Enforcement Proceedings

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

Self-Regulatory Organization Enforcement Proceedings

TF and its management have not been involved in any legal or disciplinary events with any Self-Regulatory Organizations.

Item 10: Other Financial Industry Activities and Affiliations

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

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

TF does not have any related parties. As a result, we do not have a relationship with any related parties.

TF only receives compensation directly from Clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

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

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

Code of Ethics Description

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

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

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

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm, its associates nor any related person is authorized to recommend to a Client or effect a transaction for a Client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.

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

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

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

From time to time, our firm or its "related persons" may buy or sell securities for themselves at or around the same time as Clients. We will not trade non-mutual fund securities 5 days prior to the same security for Clients.

Item 12: Brokerage Practices

Factors Used to Select Custodians and/or 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.

1. Research and Other Soft-Dollar Benefits

We currently do not receive soft dollar benefits.

2. 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.

3. Clients Directing Which Broker/Dealer/Custodian to Use

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

The Custodian and Brokers We Use (TD Ameritrade)

TF participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade"), member FINRA/SIPC. TD Ameritrade is an independent [and unaffiliated] SEC-registered broker-dealer. TD Ameritrade offers to independent investment Advisors services which include custody of securities, trade execution, clearance, and settlement of transactions. TF receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under Item 14 below.)

Aggregating (Block) Trading for Multiple Client Accounts

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

Item 13: Review of Accounts

Andrew Panko, Owner and CCO of TF, 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. TF does not provide to Clients specific reports, other than financial plans.

Client accounts with the Investment Management Service will be reviewed regularly on a quarterly basis by Andrew Panko, Owner and CCO. The account is reviewed with regards to the Client’s investment policies and risk tolerance levels. Events that may trigger a special review would be unusual performance, additions or deletions of Client imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per Client's needs.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

TF will not provide written reports to Investment Advisory Clients.

Item 14: Client Referrals and Other Compensation

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

As disclosed under Item 12 above, TF participates in TD Ameritrade's institutional customer program and TF may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between TF's participation in the program and the investment advice it gives to its Clients, although TF receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving TF participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to TF by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by TF's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit TF but may not benefit its Client accounts. These products or services may assist TF in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help TF manage and further develop its business enterprise. The benefits received by TF or its personnel through participation in the program do not depend on the number of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to Clients, TF endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits by TF or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the TF's choice of TD Ameritrade for custody and brokerage services.

Item 15: Custody

TF does not accept custody of Client funds except in the instance of withdrawing Client fees.

For Client accounts in which TF directly debits their advisory fee:

i. The custodian will send at least quarterly statements to the Client showing all disbursements for the account, including the amount of the advisory fee.
ii. The Client will provide written authorization to TF, permitting TF's advisory fees to be paid directly from their accounts held by the custodian.

Clients should receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains Client's investment assets. We urge Clients to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to them. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16: Investment Discretion

For those Client accounts where we provide Investment Management Services, we maintain discretion over Client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. Investment discretion is explained to Clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the Client will execute a Limited Power of Attorney, which will grant our firm discretion over the account. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the Client.

Item 17: Voting Client Securities

We do not vote Client proxies.

Item 18: Financial Information

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

We do not have custody of Client funds or securities or require or solicit prepayment of more than $500 in fees per Client six months in advance.

Item 19: Requirements for State-Registered Advisers

Andrew Panko

Born: 1978

Educational Background

- 2004 - Master of Business Administration, Rutgers Business School
- 2000 - Bachelor of Science, University of Delaware

Business Experience

- 03/2019 - Present, Tenon Financial LLC, Owner and CCO
- 11/2018 - Present, Tenon Tax Preparation LLC, Owner and Preparer
- 09/2015 - Present, Nomura Securities International, Executive Director
- 06/2011 - 09/2015, BNP Paribas, Vice President
- 11/2009 - 06/2011, Bank ofAmerica Merrill Lynch, Counterparty Credit Risk Analyst
- 11/2007 - 11/2009, Mizuho Capital Markets Corporation, Market Risk Analyst

Professional Designations, Licensing & Exams

CFP (Certified Financial Planner)®: 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 84,000 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 S*tandards 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® certification.

Other Business Activities

Andrew Panko is currently employed as Owner and Preparer of Tenon Tax Preparation LLC. This activity accounts for approximately 5% of his time.

Andrew Panko is currently a part-time lecturer for the Finance & Economics department of Rutgers University. This activity accounts for approximately 5% of his time.

Performance-Based Fees

TF is not compensated by performance-based fees.

Material Disciplinary Disclosures

No management person at Tenon Financial LLC 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 Tenon Financial LLC, nor Andrew Panko, have any relationship or arrangement with issuers of securities.

Additional Compensation

Andrew Panko does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through TF.

Supervision

Andrew Panko, as Owner and Chief Compliance Officer of TF, is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

Requirements for State Registered Advisers

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

Conflicts of Interest

Pursuant to California Code of Regulations Section 260.238 (k) any material conflicts of interest regarding the investment adviser, its representatives or any of its employees are disclosed to the Client prior to entering into any Advisory or Financial Planning Agreement.

Business Continuity Plan

TF maintains a written Business Continuity Plan that identifies procedures related to an emergency or significant business disruptions, including the death of the investment adviser or any of its representatives.

Tenon Financial LLC

33 Wood Ave South, Suite 600
Iselin, New Jersey, 08830
732-902-0066

https://tenonfinancial.com

Form ADV Part 2B – Brochure Supplement

Dated January 13, 2020

TENON FINANCIAL
RETIREMENT PLANNING & INVESTMENT MANAGEMENT

For

Andrew Panko 5226800

Owner, and Chief Compliance Officer

This brochure supplement provides information about Andrew Panko that supplements the Tenon Financial LLC ("TF") brochure. A copy of that brochure precedes this supplement. Please contact Andrew Panko if the TF brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Andrew Panko is available on the SEC's website at www.adviserinfo.sec.gov which can be found using the identification number 5226800.

Item 2: Educational Background and Business Experience

Andrew Panko

Born: 1978

Educational Background

- 2004 - Master of Business Administration, Rutgers Business School
- 2000 - Bachelor of Science, University of Delaware

Business Experience

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  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® certification.

Item 3: Disciplinary Information

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Item 4: Other Business Activities

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Andrew Panko is currently a part-time lecturer for the Finance & Economics department of Rutgers University. This activity accounts for approximately 5% of his time.

Item 5: Additional Compensation

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Item 6: Supervision

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Item 7: Requirements for State Registered Advisers

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