

Form ADV Part 2A Disclosure Brochure

Safeguard Financial and Insurance Services

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Date of Brochure: March 2012

This brochure provides information about the qualifications and business practices of Safeguard Financial and Insurance Services, conducting advisory business under Game Plan Wealth Advisory ("Safeguard Financial"). If you have any questions about the contents of this brochure, please contact Jason H. Lohe at (925)627-1800 or via email at jasonlohe@safeguardfinancial.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 Safeguard Financial is also available on the Internet at www.adviserinfo.sec.gov. You can view our firm's information on this website by searching for our name Safeguard Financial or our firm CRD number **CRD# 140184**.

*Registration as an investment advisor does not imply a certain level of skill or training.

Item 2 – Material Changes

This item is intended to discuss only material changes to our disclosure brochure since our last annual update. Our last annual update of the brochure was March 2011. Since that version, our brochure has been updated to reflect the fact that our investment advisor representatives are no longer affiliated as registered securities representatives with Cambridge Investment Research, Inc. All references to programs and arrangements through Cambridge have been removed from the brochure. In addition, Jason Lohe's ownership and affiliation with Revolutionary Sports, LLC is described in his Form ADV Part 2B Brochure Supplement.

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Item 4 – Advisory Business

Safeguard Financial and Insurance Services, Inc. (“Safeguard Financial”) is a full service Financial Planning, Investment Advisory and Benefits firm. While we primarily conduct business under the name Safeguard Financial and Insurance Services, Inc., we also market advisory business under the name Game Plan Wealth Advisory.

- Jason H. Lohe is the Chief Executive Officer and Chief Compliance Officer of Safeguard Financial.
- Safeguard Financial has been registered as an investment advisor since September 2006.
- Safeguard Financial and Insurance Services, Inc. was formed as an S-Corporation company under the laws of the State of California.

General Description of Primary Advisory Services

The following are brief descriptions of our primary services. A detailed description of each service is provided in *Item 5 – Fees and Compensation* so that clients and prospective clients can review the description of services and description of fees in a side-by-side manner.

Asset Management Services - We provide advisory services in the form of Asset Management Services. Asset Management Services involve providing with continuous and on-going supervision over client accounts. This means we continuously monitor a client’s account and make trades in client accounts when necessary.

Financial Planning Services – We also provide advisory services in the form of financial planning services. Financial planning services do not involve the active management of client accounts, but instead focuses on a client’s overall financial situation. Financial planning can be described as helping individuals determine and set their long-term financial goals, through investments, tax planning, asset allocation, risk management, retirement planning, and other areas. The role of a financial planner is to find ways to help the client understand his/her overall financial situation and help the client set financial objectives.

Limits Advice to Certain Types of Investments

We provide investment advice on the following types of investments:

- No-Load (i.e. no trading fee) and Load-Waived (i.e. trading fee waived) Mutual Fund Shares
- Exchange-listed securities (i.e. stocks)
- Fixed income securities (i.e. bonds)
- Closed-End Funds
- Exchange Traded Funds (ETFs)
- Warrants
- Corporate debt securities (bonds)
- Commercial paper
- Certificates of deposit
- Municipal securities
- Variable life insurance
- Variable annuities
- United States government securities

- Options contracts on securities
- Interests in partnerships investing in real estate and oil and gas interests
- Managed futures contracts

We do not typically provide advice on securities traded over-the-counter (i.e. stocks), options contracts on commodities, futures contracts on tangibles and intangibles, foreign issues, hedge funds and other types of private (i.e. non-registered) securities.

When providing asset management services, Safeguard Financial typically constructs each client's account holdings using mutual funds and equities to build diversified portfolios. We do not typically attempt to time the market but we may increase cash holdings modestly as deemed appropriate, based on your risk tolerance and our expectations of market behavior. We may modify our investment strategy to accommodate special situations such as low basis stock, stock options, legacy holdings, inheritances, closely held businesses, collectibles, or special tax situations.

(Please refer to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more information.)

Tailor Advisory Services to Individual Needs of Clients

Our services are always provided based on the individual needs of each client. This means, for example, that you are given the ability to impose restrictions on the accounts we manage for you, including specific investment selections and sectors. We work with each client on a one-on-one basis through interviews and questionnaires to determine the client's investment objectives and suitability information.

Client Assets Managed by Safeguard Financial

The amount of clients assets managed by Safeguard Financial totaled \$29,239,070.00 as of December 31, 2011. \$24,203,402.00 is managed on a discretionary basis and \$5,035,668.00 is managed on a non-discretionary basis.

Item 5 – Fees and Compensation

In addition to the information provide in *Item 4 – Advisory Business*, this section provides additional details regarding our firm's services along with descriptions of each service's fees and compensation arrangements.

Asset Management Services and Fees

We offer advice and services tailored to the stated objectives of each individual client. Upon execution of an Investment Advisory Agreement, we will provide asset management services defined as giving continuous investment advice and making investment decisions for the client based on the individual needs of the client. Through this service, Safeguard Financial offers a highly customized and individualized investment program for clients. We actively manage client investment portfolios in accordance with each client's individual needs, objectives and risk tolerance. These accounts may be managed on either a discretionary or non-discretionary basis.

Clients are always responsible for notifying Safeguard Financial of any changes to their financial situation or investment objectives. At least annually, we will contact each client for the specific purpose to determine whether the client's financial situation or investment objectives have changed, or if the client would like to impose and/or modify any reasonable restrictions on the management of their accounts. We are always reasonably available to consult with clients relative to the status of their accounts. A client's beneficial interest in a security does not represent an undivided interest in all the securities held by the

custodian, but rather represents a direct and beneficial interest in the securities which comprise the accounts. A separate account is always maintained for each client with the broker-dealer/custodian and the client retains all rights of ownership to their accounts (e. g. right to withdraw securities or cash, exercise or delegate proxy voting, and receive transaction confirmations).

It is important that you understand that Safeguard Financial manages investments for other clients and may give them advice or take actions for them or for our personal accounts that is different from the advice we provide to you or actions we take for you. We are not obligated to buy, sell or recommend to you any security or other investment that we may buy, sell or recommend for any other clients or for our own accounts.

Conflicts may arise in the allocation of investment opportunities among accounts that we manage. We strive to allocate investment opportunities believed appropriate for your account(s) and other accounts advised by our Firm among such accounts equitably and consistent with the best interests of all accounts involved. However, there can be no assurance that a particular investment opportunity that comes to our attention will be allocated in any particular manner. If we obtain material, non-public information about a security or its issuer that we may not lawfully use or disclose, we have absolutely no obligation to disclose the information to any client or use it for any client's benefit.

Accounts managed through the program are held at Charles Schwab & Company, Inc. ("Schwab") or National Financial Services, LLC through the Fidelity Institutional Wealth Services program ("Fidelity"). Each qualified custodian has different account fees, execution charges and execution capabilities. Clients may pay higher account-related fees and execution charges than if Safeguard Financial had selected another custodian. Please refer to Item 12 for more details regarding our brokerage arrangements.

Clients are charged for Safeguard Financial's asset management services based on a percentage of the assets under management which generally shall not exceed 2.00% per year. A client's fee schedule may be a set or fixed fee (i.e. the percentage shall not fluctuate based on the assets within an account) or a tiered fee schedule. The following tiered fee schedule is a sample fee schedule. A client's specific annual fee arrangement will be described in the Investment Advisory Agreement.

- 2.00% of net assets under management up to \$50,000
- 1.75% of net assets under management between \$50,001 and \$250,000
- 1.50% of net assets under management between \$250,001 and \$1,000,000
- 1.25% of net assets under management between \$1,000,001 and \$2,000,000
- Fee is negotiable on assets above \$2,000,000

The specific fees paid by a client to Safeguard Financial for its services will be calculated in accordance with "Schedule A" of the Investment Advisory Agreement, which may be amended from time to time by Safeguard Financial upon 30 days prior written notice to a client. Fees are generally deducted directly from the client's account. Clients must provide the custodian with written authorization to have fees deducted from the account and paid to Safeguard Financial. Payment of fees may result in the liquidation of client's securities if there is insufficient cash in the account. At our discretion and approval, you may pay fees directly to Safeguard Financial rather than having fees deducted from your account(s). For clients that pay directly, payment is due within ten (10) days after receipt of the billing statement from our firm. The custodian will send account statements, at least quarterly, showing all disbursements for the account including the amount of the advisory fee, if deducted directly from the account. Please refer to Item 15 – Custody for more information.

Annual fees are divided and billed quarterly in advance, with payment due within 10 days from the date of the invoice. A late charge of 1½ percent per month will be charged upon any balance unpaid within one month of the invoice date. The fee will be equal to the agreed upon rate per annum, times the market value of the account, divided by the number of days in the agreed upon year and multiplied by the number of days in the quarter. The market value will be construed to equal the sum of the values of all assets in the account, not adjusted by any margin debit. Fees for partial quarters at the commencement or termination of the Investment Advisory Agreement will be billed or refunded on a pro-rated basis contingent on the number of days the account was open during the quarter. Quarterly fee adjustments for additional assets received into the account during a quarter or for partial withdrawals will also be provided on the above pro rata basis.

For purposes of determining value, securities and other instruments traded on a market for which actual transaction prices are publicly reported shall be valued at the last reported sale price on the principal market in which they are traded (or, if there shall be no sales on such date, then at the mean between the closing bid and asked prices on such date). Other readily marketable securities shall be priced using a pricing service or through quotations from one or more dealers. All other assets shall be valued at fair value by Safeguard Financial whose determination shall be conclusive.

Brokerage commissions and/or transaction ticket fees charged by the custodian will be billed directly to the client. Safeguard Financial and its investment adviser representative will not receive any portion of such commissions or fees from the custodian or client. In addition, clients may incur certain charges imposed by third parties other than Safeguard Financial in connection with investments made through the account, including but not limited to, mutual fund sales loads, 12b-1 fees and surrender charges, variable annuity fees and surrender charges, and IRA and qualified retirement plan fees. Management fees charged by Safeguard Financial are separate and distinct from the fees and expenses charged by investment company securities that may be recommended to clients. A description of these fees and expenses are available in each investment company security's prospectus.

Either party may terminate the agreement for services at any time. If services are terminated within five (5) business days of executing the agreement, services will be terminated without penalty and no fees shall be due. If services are terminated after the initial five day period, the final fee shall be based on the number of days the account was opened during the period. In the event a client terminates services, termination shall be effective from the time Safeguard Financial receives notification or such other time as may be mutually agreed upon, subject to the settlement of transactions in progress and the final payment of advisory fees. The final fee will be calculated as of the termination date. There will be no penalty charge upon termination. In the event Safeguard Financial terminates the relationship, the agreement will be terminated on the fifth day after written notification is delivered to the client or such time as may be mutually agreed upon, also subject to the settlement of transactions in progress and the final payment of advisory fees. The final fee will be calculated as of the termination date. After the calculation of any pro-rata fees that may be due any unearned fees that had been paid in advance will be promptly refunded to the client

Financial Planning Services

Safeguard Financial also provides financial planning services. If you purchase this service, you will typically receive a written financial plan, with a detailed financial plan designed based upon your stated financial goals and objectives. In general, the financial plan will address the following areas of concern:

Personal: Family records, budgeting, personal liability, estate information and financial goals.

Tax and Cash Flow: Income tax and spending analysis and planning for past, current and future years. Safeguard Financial will illustrate the impact of various investments on a client's current income tax and future tax liability.

Death and Disability: Cash needs at death, income needs for surviving dependents, estate planning and disability income analysis.

Retirement: Analysis of current strategies and investment plans to help the client further achieve his or her retirement goals.

Investments: Analysis of investment alternatives and their effect on a client's portfolio.

Safeguard Financial gathers required information through in-depth personal interviews. Information gathered includes your financial status, future goals, and attitudes towards risk. All documents you supply are carefully reviewed by our firm, including a questionnaire you must complete. We do not furnish legal or tax opinions so it is important that you consult with other trusted professionals such as your attorney, tax professional, accountants or insurance professional. You may also need to work with other financial advisors specializing in investment areas we do not cover. We can coordinate our advice and work with your other advisors.

Clients can also receive investment advice on a more limited basis. This may include advice on only an isolated area(s) of concern such as estate planning, retirement planning, or any other specific topic. Safeguard Financial also provides specific consultation and administrative services regarding investment and financial concerns of the client.

Additionally, we are able to provide advice on non-securities matters. Generally, this is in connection with the rendering of estate planning, insurance, and/or annuity advice.

A conflict exists between our interests and your interests when we provide financial planning advice. Therefore, you are under no obligation to act upon our recommendations. If you elect to act on any of our recommendations, you are under no obligation to effect any transactions through Safeguard Financial.

Fees for financial planning will either be flat or hourly. A flat fee will be calculated based upon the extent and complexity of the individual client's personal circumstances, the client's gross income (excluding investment income) and amount of assets under management. Fees for financial planning services typically range between \$3,000 and \$20,000. Fees are agreed upon prior to entering into a contract with any client. One-half of the total fees will be due and payable at the time the client enters into the financial planning agreement, with the balance due and payable at the time the financial plan is delivered to the client. Typically a financial plan will be presented to the client within 90 days of the contract date, provided that all information needed to prepare the financial plan has been promptly provided by the client. The client will not be charged more than \$500 more than 6 months in advance. Fees for specific administrative and consulting services will be billed at an hourly rate of \$200 per hour, depending on the nature and complexity of the client's circumstances. The exact rate will be mutually agreed upon with the client and specified in the financial planning agreement executed by the client, and shall be due and payable as earned.

As noted above, client services include:

- Investment Planning/Investment Policy Statements

- Financial Independence/Retirement Planning
- Capital Needs Analysis (Goal Funding)
- Income Tax Planning
- Estate Planning
- Education Planning
- Risk Management (Life and Disability Insurance)
- Employee Stock Option Planning

The fee also includes the time and activities necessary to work with client's attorney and/or accountant in reaching agreement on solutions, as well as assisting those advisors in implementation of all appropriate documents. Advice given by Safeguard Financial should not be construed as legal or tax advice. Safeguard Financial is not responsible for attorney or account fees charged to client as a result of the above activities.

Clients are encouraged to review their plans on a regular basis, based on individual circumstances.

For California Residents: Subsection (j) of Rule 260.238, California Code of Regulations requires that all investment advisors disclose to their advisory clients that lower fees for comparable services may be available from other sources. Pursuant to California Rule 260.235.2, a conflict exists between the interests of Safeguard Financial or its associated persons and the interest of the client; the client is under no obligation to act upon this registrant's or associated person's recommendations; if the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through the registrant, or associated person when the person is an agent with a licensed broker-dealer or through any associate or affiliate of such person.

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

Item 6 is not applicable to this Disclosure Brochure because Safeguard Financial does not charge or accept performance-based fees. Performance-based fees are fees based on a share of capital gains or capital appreciation of the assets held within a client's account.

Item 7 – Types of Clients

Safeguard Financial generally provides investment advice to the following types of clients:

- Individuals
- High-Net Worth Individuals
- Pensions and profit sharing plans
- Corporations or other businesses
- 501 (c) 3 non-profits.

Note: 501 (c) 3 non-profits include, but are not limited to, charitable, educational and religious organizations.

Minimum Investment Amounts Required

Safeguard Financial has not implemented a required minimum level of account required to participate in our Asset Management services. However, all clients must sign the Firm's contract to receive our services.

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

Methods of Analysis

Safeguard Financial uses the following methods of analysis in formulating investment advice:

Charting - The set of techniques used in technical analysis in which charts are used to plot price movements, volume, settlement prices, open interest, and other indicators, in order to anticipate future price movements. Users of these techniques, called chartists, believe that past trends in these indicators can be used to extrapolate future trends. Charting is likely the most subjective analysis of all since it relies on proper interpretation of candlesticks and chart patterns. The risk of reliance upon candlestick data is that the next day's data can always negate the conclusions reached from prior days' candlesticks. Also, reliance upon chart patterns bears the risk of a certain pattern being negated by a larger, more encompassing pattern that has not shown itself yet.

Cyclical - Analyzes the investments sensitive to business cycles and whose performance is strongly tied to the overall economy. For example, cyclical companies tend to make products or provide services that are in lower demand during downturns in the economy and higher demand during upswings. Examples include the automobile, steel, and housing industries. The stock price of a cyclical company will often rise just before an economic upturn begins, and fall just before a downturn begins. Investors in cyclical stocks try to make the largest gains by buying the stock at the bottom of a business cycle, just before a turnaround begins. While most economists and investors agree that there are cycles in the economy that need to be respected, the duration of such cycles is generally unknown. An investment decision to buy at the bottom of a business cycle may actually turn out to be a trade that occurs before or after the bottom of the cycle. If done before the bottom, then downside price action can result prior to any gains. If done after the bottom, then some upside price action may be missed. Similarly, a sell decision meant to occur at the top of a cycle may result in missed opportunity or unrealized losses.

Fundamental - A method of evaluating a security by attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and individually specific factors (like the financial condition and management of companies). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short). This method of security analysis is considered to be the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security. The risk associated with fundamental analysis is that it is somewhat subjective. While a quantitative approach is possible, fundamental analysis usually entails a qualitative assessment of how market forces interact with one another in their impact on the investment in question. It is possible for those market forces to point in different directions, thus necessitating an interpretation of which forces will be dominant. This interpretation may be wrong, and could therefore lead to an unfavorable investment decision.

Technical - A method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can

suggest future activity. Technical analysts believe that the historical performance of stocks and markets are indications of future performance. Technical analysis is even more subjective than fundamental analysis in that it relies on proper interpretation of a given security's price and trading volume data. A decision might be made based on a historical move in a certain direction that was accompanied by heavy volume; however, that heavy volume may only be heavy relative to past volume for the security in question, but not compared to the future trading volume.

Therefore, there is the risk of a trading decision being made incorrectly, since future trading volume is an unknown. Technical analysis is also done through observation of various market sentiment readings, many of which are quantitative. Market sentiment gauges the relative degree of bullishness and bearishness in a given security, and a contrarian investor utilizes such sentiment advantageously. When most traders are bullish, then there are very few traders left in a position to buy the security in question, so it becomes advantageous to sell it ahead of the crowd. When most traders are bearish, then there are very few traders left in a position to sell the security in question, so it becomes advantageous to buy it ahead of the crowd. The risk in utilization of such sentiment technical measures is that a very bullish reading can always become more bullish, resulting in lost opportunity if the money manager chooses to act upon the bullish signal by selling out of a position. The reverse is also true in that a bearish reading of sentiment can always become more bearish, which may result in a premature purchase of a security.

Investment Strategies

Safeguard Financial uses the following investment strategies when managing client assets and/or providing investment advice:

Long term purchases. Investments held at least a year.

Short term purchases. Investments sold within a year.

Trading. Investments sold within 30 days.

Short sales. A short sale is generally the sale of a stock not owned by the investor. Investors who sell short believe the price of the stock will fall. If the price drops, the investor can buy the stock at the lower price and make a profit. If the price of the stock rises and the investor buys it back later at the higher price, the investor will incur a loss. Short sales require a margin account.

Margin transactions. When an investor buys a stock on margin, the investor pays for part of the purchase and borrows the rest from a brokerage firm. For example, an investor may buy \$5,000 worth of stock in a margin account by paying for \$2,500 and borrowing \$2,500 from a brokerage firm. Clients cannot borrow stock from Safeguard Financial.

Option writing including covered options, uncovered options, or spreading strategies. Options are contracts giving the purchaser the right to buy or sell a security, such as stocks, at a fixed price within a specific period of time.

Tactical asset allocation. Allows for a range of percentages in each asset class (such as Stocks = 40-50%). These are minimum and maximum acceptable percentages that permit the investor to take advantage of market conditions within these parameters. Thus, a minor form of market timing is possible, since the investor can move to the higher end of the range when stocks are expected to do better and to the lower end when the economic outlook is bleak.

Strategic asset allocation. Calls for setting target allocations and then periodically rebalancing the portfolio back to those targets as investment returns skew the original asset allocation percentages. The concept is akin to a “buy and hold” strategy, rather than an active trading approach. Of course, the strategic asset allocation targets may change over time as the client’s goals and needs change and as the time horizon for major events such as retirement and college funding grow shorter.

Use of Primary Method of Analysis or Strategy

In advising retail clients of applicant investing in the Safeguard Financial Program, we use model portfolios of mutual funds, Exchange Traded Funds (ETF’s) and Variable Annuity subaccounts provided by a number of institutional investment strategists and based on the information, research, asset allocation methodology and investment strategists.

Safeguard Financial’s primary methods of analysis or strategy are tactical and strategic asset allocation. Some of the risks involved with using this method are listed below.

Risk of Loss

Past performance is not indicative of future results. Therefore, you should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. You should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, our firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated when investing in securities through our investment management program.

- **Market Risk** – Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- **Equity (stock) market risk** – Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.
- **Company Risk**. When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company’s employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.

- Fixed Income Risk. When investing in bonds, there is the risk that issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- Options Risk. Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- ETF and Mutual Fund Risk – When investing in a an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. Clients will also incur brokerage costs when purchasing ETFs.
- Management Risk – Your investment with our firm varies with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our investment strategies do not produce the expected returns, the value of the investment will decrease.

Item 9 – Disciplinary Information

Item 9 is not applicable to this Disclosure Brochure because there are no legal or disciplinary events that are material to a client's or prospective client's evaluation of our business or integrity.

Item 10 – Other Financial Industry Activities and Affiliations

Safeguard Financial is **not** and/or does **not** have a related company that is a:

1. Broker/dealer, municipal securities dealer, government securities dealer or broker,
2. Investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund),
3. Other investment adviser or financial planner,
4. Futures commission merchant, commodity pool operator, or commodity trading advisor, (5) banking or thrift institution,
5. Accountant or accounting firm,
6. Lawyer or law firm,
7. Pension consultant,
8. Real estate broker or dealer, or
9. Sponsor or syndicator of limited partnerships.

Insurance Activities

While our principal business is providing investment advisory and financial planning services, Safeguard Financial is a licensed insurance brokerage firm doing business under the name Safeguard Benefits and Insurance. In addition, our representatives are independent insurance broker/agents licensed with

various independent insurance companies. Safeguard Financial and its representatives offer insurance, annuity, property, casualty and health insurance products in this capacity. Insurance related activities account for less than 10% of Safeguard Financial and its representative's time. Advisory clients of Safeguard Financial may be solicited insurance products and insurance clients may be solicited advisory services. Clients should be aware that compensation earned through the sale of insurance products is separate and distinct from fees earned through advisory services.

Career Coaching Services

In addition to providing investment advice and insurance services, Safeguard Financial provides career coaching services. Services may be provided by an associated person of Safeguard Financial or by member of Safeguard Financials' Athlete Advisory Board. The Athlete Advisory Board is comprised of former professional athletes and other individuals that have worked or been involved in professional athletics or business development services. Members of the Athlete Advisory Board provide both Safeguard Financial and its clients with career coaching consultation services. Members are sought in order to use their industry based knowledge and experience in providing career coaching services to Safeguard Financials' clients and prospective clients. This service is non-advisory in nature and members of the Athlete Advisory Board are not allowed to provide investment advice or securities recommendations to Safeguard Financials' clients. Members are **not** compensated by Safeguard Financial to sit on the Athlete Advisory Board.

Clients of Safeguard Financial that contract for its career coaching services must execute a non-advisory agreement which shall set forth the terms, conditions, and fees of the services provided. Approximately 10 - 20% of Safeguard Financial and its associated persons' time are devoted to this activity.

Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

Code of Ethics Summary

Safeguard Financial is and shall continue to be in compliance with The Insider Trading and Securities Fraud Enforcement Act of 1988. Safeguard Financial and its associated persons may buy or sell for their personal accounts, investment products identical to those recommended to clients. It is the express policy of Safeguard Financial that all persons employed by Safeguard Financial must place the interests of Safeguard Financials' clients ahead of their own when implementing personal investments.

We have established a Code of Ethics that applies to all of our supervised persons. An investment advisor is considered a fiduciary according to the Investment Advisers Act of 1940. As a fiduciary, it is an investment advisor's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. Thus we have a fiduciary duty to our clients. This fiduciary duty is considered the core underlying principle for our Code of Ethics which also covers our Insider Trading and Personal Securities Transactions Policies and Procedures.

Safeguard Financial requires all of our supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and when changes to the Code of Ethics occur, all supervised persons will sign an acknowledgement that they have read, understand and agree to comply with our Code of Ethics. Safeguard Financial has the responsibility to make sure that the interests of all clients are placed ahead of Safeguard Financials' and our supervised person's own investment interests. Full disclosure of all material facts and potential conflicts of interest will be provided to clients prior to any services being conducted. Safeguard Financial and our supervised persons must conduct business in an honest, ethical and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of

complete loyalty to all clients. This section is intended to provide clients with a summary of Safeguard Financials' code of ethics. A complete copy of our code of ethics may be provided upon request.

Affiliate and Employee Personal Securities Transactions Disclosure

Safeguard Financial and our supervised persons may buy or sell for their personal accounts, investment products identical to those recommended to clients. This creates a potential conflict of interest. It is our express policy that all persons associated in any manner with our firm must place the interests of our clients ahead of their own when implementing personal investments. Safeguard Financial and our supervised persons shall not buy or sell securities for their personal account(s) where their decision is derived, in whole or in part, by information obtained as a result of employment or association with our firm unless the information is also available to the investing public upon reasonable inquiry. In order to minimize this conflict of interest, securities recommended by Safeguard Financial are widely held and publicly traded. As stated above, in the Code of Ethics summary, we have developed policies and procedures designed to control and monitor the personal trading activities of our supervised persons.

Item 12 – Brokerage Practices

Advisor Directed Brokerage Arrangements

Clients wishing to implement Safeguard Financials' financial planning advice are free to select any broker they wish and are so informed. As stated in Item 5 of this brochure, if clients wish to have Safeguard Financials' associated persons implement advice through our asset management program, clients will be required to establish brokerage accounts with Schwab or Fidelity which serve as our clients broker/dealer and qualified custodian (referred to in this section as "Recommended Custodians"). Safeguard Financial is independently owned and operated and not affiliated with the Recommended Custodians.

Please note that not all investment advisors require the use of a specific broker/dealer. Some investment advisors allow clients to select the broker/dealer. However, for compliance and operational efficiency purposes, we have decided to require all clients open accounts through our Recommended Custodians when participating in the Firm's asset management program.

Although we do not receive client referrals from Recommended Custodians nor have we entered into written soft-dollar arrangements with the Recommended Custodians, we do participate in their institutional platforms and therefore are provided access to their institutional trading and custody services, which are typically not available to retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a certain amount of the advisor's clients' assets are maintained in accounts at the Recommended Custodians and is not otherwise contingent upon Safeguard Financial committing to the Recommended Custodians any specific amount of business (assets in custody or trading). The Recommended Custodians' services include brokerage, custody, research and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For Safeguard Financials' clients' accounts maintained in their custody, the Recommended Custodians do not charge separately for custody but are compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through the respective broker/dealer or that settle into their accounts.

Recommended Custodians also make available to Safeguard Financial other products and services that benefit us but may not benefit its clients' accounts. Some of these other products and services assist

Safeguard Financial in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmation and account statements); facilitate trade execution; provide research, pricing information and other market data; facilitate payment of our fees from our clients' accounts; and assist with back-office functions; recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of Safeguard Financials' accounts, including accounts not maintained at the Recommended Custodians. The Recommended Custodians also make available to Safeguard Financial other services intended to help us manage and further develop our business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. In addition, the Recommended Custodians may make available, arrange and/or pay for these types of services rendered to Safeguard Financial by independent third party providing these services us. While as a fiduciary, Safeguard Financial endeavors to act in its clients' best interests, and Safeguard Financials' recommendation that clients maintain their assets in accounts at Recommended Custodians may be based in part on the benefit to Safeguard Financial of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by the recommended broker/dealer, which may create a potential conflict of interest.

Best Execution Disclosure

At least annually, Safeguard Financial will review alternative broker/dealer and custodial platforms in the marketplace to confirm its duty to provide the best execution of client accounts possible, considering all factors. Reviews include a comparison of currently recommended broker/dealers, which involves evaluating criteria such as overall expertise, cost competitiveness and financial condition. The quality of broker/dealers is also reviewed through trade journal evaluations. However, best execution does not simply mean the lowest transaction cost. Therefore, no single criteria will validate nor invalidate a custodian, but rather, all criteria taken together will be used in evaluating the currently utilized broker/dealers.

Handling Trade Errors

Safeguard Financial has implemented procedures designed to prevent trade errors; however, trade errors in client accounts cannot always be avoided. Consistent with its fiduciary duty, it is the policy of Safeguard Financial to correct trade errors in a manner that is in the best interest of the client. In cases where the client causes the trade error, the client will be responsible for any loss resulting from the correction. Depending on the specific circumstances of the trade error, the client may not be able to receive any gains generated as a result of the error correction. In all situations where the client does not cause the trade error, the client will be made whole and any loss resulting from the trade error will be absorbed by Safeguard Financial if the error was caused by the firm. If the error is caused by the broker-dealer, the broker-dealer will be responsible for handling the trade error. If an investment gain results from the correcting trade, the gain will remain in the client's account unless the same error involved other client account(s) that should also receive the gains and it is not permissible for all clients to retain the gain. Safeguard Financial may also confer with a client to determine if the client should forego the gain (e.g., due to tax reasons). Safeguard Financial will never benefit or profit from trade errors.

Block Trading Policy

Transactions implemented by Safeguard Financial for client accounts are generally effected independently, unless we decide to purchase or sell the same securities for several clients at approximately the same time. This process is referred to as aggregating orders, batch trading or block trading and is used by our firm when Safeguard Financial believes such action may prove advantageous to clients. When Safeguard Financial aggregates client orders, the allocation of securities among client

accounts will be done on a fair and equitable basis. Typically, the process of aggregating client orders is done in order to achieve better execution, to negotiate more favorable commission rates or to allocate orders among clients on a more equitable basis in order to avoid differences in prices and transaction fees or other transaction costs that might be obtained when orders are placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among our firm's clients in proportion to the purchase and sale orders placed for each client account on any given day. When Safeguard Financial determines to aggregate client orders for the purchase or sale of securities, including securities in which Safeguard Financial may invest, we will do so in accordance with the parameters set forth in the SEC No-Action Letter, *SMC Capital, Inc.* It should be noted, Safeguard Financial does not receive any additional compensation or remuneration as a result of aggregation.

Item 13 – Review of Accounts

Account Reviews and Reviewers

Managed accounts are reviewed at least monthly. The calendar is the main triggering factor, although more frequent reviews may also be triggered by changes in the client's circumstances, client request, or changes within the market. The underlying portfolios used to manage client accounts and holdings within those portfolios are reviewed on a more frequent basis, typically weekly. Triggering factors for changes to underlying portfolios include the relative valuation changes between asset classes, deviation from management style by fund, or fund closures. Clients will be contacted periodically, but at least quarterly, by Safeguard Financial to discuss the management and performance of their account and changes in their situation which may have an impact on the management of their account.

For clients contracting for financial planning services, such services terminate upon completion of services. No on-going reviews are performed. However, Safeguard Financial recommends clients have their needs reviewed and updated at least annually. Clients contracting with Safeguard Financial for financial planning updates are required to execute a new agreement and pay an additional fee.

Jason Lohe, Alex Chang, and Paul Saad are responsible for providing all investment advice and conducting the on-going review of all accounts.

Statements and Reports

Clients will receive account statements at least quarterly from their qualified custodian.

You are urged to compare the any correspondence provided by Safeguard Financial against the account statements you receive directly from your account custodian.

Item 14 – Client Referrals and Other Compensation

- We do not compensate outside firms or individuals for client referrals.
- Safeguard Financial and its associated persons licensed as insurance agents receive commissions and other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of this compensation may affect the judgment of Safeguard Financials' associated persons when recommending products to its clients. While Safeguard Financials' associated persons endeavor at all time to put the interest of the clients first as a part of Safeguard Financials' fiduciary duty, clients should be aware that the receipt of commission and additional compensation itself creates a conflict of interest, and may affect the judgment of these individuals when making recommendations.

Item 15 – Custody

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment advisor has the ability to access or control client funds or securities, the investment advisor is deemed to have custody and must ensure proper procedures are implemented.

Safeguard Financial is deemed to have custody of client funds and securities whenever we are provided the authority to have fees deducted directly from client accounts. However, this is the only form of custody Safeguard Financial will ever maintain. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody.

We have established procedures to ensure all client funds and securities are held at a qualified custodian (e.g. Charles Schwab and Fidelity) in a separate account for each client under that client's name. Clients or an independent representative of the client will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained. Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. Clients should carefully review those statements and are urged to compare the statements against reports received from Safeguard Financial. When clients have questions about their account statements, they should contact Safeguard Financial or the qualified custodian preparing the statement.

Item 16 – Investment Discretion

Through our asset management services and upon receiving written authorization from a client, Safeguard Financial will maintain trading authorization over client accounts. Upon receiving written authorization from a client, we may implement trades on a **discretionary** basis. When discretionary authority is granted, we will have the authority to determine the type of securities and the amount of securities that can be bought or sold for the client's portfolio without obtaining the client's consent for each transaction. However, it is the policy of Safeguard Financial to consult with the client prior to making significant changes in the account even when discretionary trading authority is granted by the client.

If you decide to grant trading authorization on a **non-discretionary** basis, we will be required to contact you prior to implementing changes in your account. Therefore, you will be contacted and required to accept or reject our investment recommendations including:

- The security being recommended
- The number of shares or units
- Whether to buy or sell

Once the above factors are agreed upon, Safeguard Financial will be responsible for making decisions regarding the timing of buying or selling an investment and the price at which the investment is bought or sold. If your accounts are managed on a non-discretionary basis, you need to know that if you are not able to be reached or are slow to respond to our request, it can have an adverse impact on the timing of trade implementations and we may not achieve the optimal trading price.

All clients have the ability to place reasonable restrictions on the types of investments that may be purchased in an account. Clients may also place reasonable limitations on the discretionary power

granted to our firm so long as the limitations are specifically set forth or included as an attachment to the client agreement.

Item 17 – Voting Client Securities

Safeguard Financial does not perform proxy-voting services on a client's behalf. Clients are instructed to read through the information provided with the proxy-voting documents and to make a determination based on the information provided. Upon request from the client, Safeguard Financial may provide limited clarifications of the issues presented in the proxy voting materials based on our understanding of issues presented in the proxy-voting materials. However, the client will have the ultimate responsibility for making all proxy-voting decisions.

Clients will receive proxies directly from their custodian or transfer agent and such documents will not be delivered by our firm.

Item 18 – Financial Information

This item is not applicable to this brochure. Safeguard Financial does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for our most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, Safeguard Financial has not been the subject of a bankruptcy petition at any time.

CUSTOMER PRIVACY POLICY NOTICE

In November of 1999, Congress enacted the Gramm-Leach-Bliley Act (GLBA). The GLBA requires certain financial institutions, such as investment advisor firms, to protect the privacy of customer information. In situations where a financial institution does disclose customer information to nonaffiliated third parties, other than permitted or required by law, customers must be given the opportunity to opt out or prevent such disclosure. Safeguard Financial and Insurance Services, Inc. conducting advisory business under Game Plan Wealth Advisory ("Safeguard Financial") does not share or disclose customer information to nonaffiliated third parties except as permitted or required by law.

Safeguard Financial is committed to safeguarding the confidential information of its clients. Safeguard Financial holds all personal information provided by clients in the strictest confidence and it is the objective of Safeguard Financial to protect the privacy of all clients. Except as permitted or required by law, Safeguard Financial does not share confidential information about clients with nonaffiliated parties. In the event that there were to be a change in this policy, Safeguard Financial will provide clients with written notice and clients will be provided an opportunity to direct Safeguard Financial as to whether such disclosure is permissible.

To conduct regular business, Safeguard Financial may collect personal information from sources such as:

- Information reported by the client on applications or other forms the client provides to (The Advisor)
- Information about the client's transactions implemented by Safeguard Financial or others
- Information developed as part of financial plans, analyses or investment advisory services

To administer, manage, service, and provide related services for client accounts, it is necessary for Safeguard Financial to provide access to customer information within the firm and to nonaffiliated companies, (optional to include examples of outside firms), with whom Safeguard Financial has entered into agreements with. To provide the utmost service, Safeguard Financial may disclose the information below regarding customers and former customers, as necessary, to companies to perform certain services on Safeguard Financial's behalf.

- Information Safeguard Financial receives from the client on applications (name, social security number, address, assets, etc.)
- Information about the client's transactions with Safeguard Financial or others (account information, payment history, parties to transactions, etc.)
- Information concerning investment advisory account transactions
- Information about a client's financial products and services transaction with Safeguard Financial.

Since Safeguard Financial shares nonpublic information solely to service client accounts, Safeguard Financial does not disclose any nonpublic personal information about Safeguard Financials customers or former customers to anyone, except as permitted by law. However, Safeguard Financial may also provide customer information outside of the firm as required by law, such as to government entities, consumer reporting agencies or other third parties in response to subpoenas. In the event that Safeguard Financial has a change to its customer privacy policy that would allow it to disclose non-public information not covered under applicable law, Safeguard Financial will allow its clients the opportunity to opt out of such disclosure.

Information Required by Part 2B of Form ADV: *Brochure Supplement – Jason H. Lohe*

Item 1 – Cover Page

Jason H. Lohe
Safeguard Financial and Insurance Services
Conducting advisory business under Game Plan Wealth Advisory
2603 Camino Ramon, Suite 200
San Ramon, CA 94583
(925) 627-1800 · www.safeguardfinancial.com

This brochure supplement provides information about Jason Lohe that supplements this Disclosure Brochure. Please contact Safeguard Financial Services if you have any questions about the contents of this supplement. Additional information about Jason Lohe is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Jason Lohe: Born 1974

Educational Background

- San Francisco State University, Bachelor of Science, Management, 1999

Business Background

- 05/2011 to Present CEO and Partner, Revolutionary Sports, LLC
- 03/2010 to Present Senior Consultant, Game Plan Wealth Inc.
- 05/2006 to Present, CEO and Investment Advisory Representative, Safeguard Financial and Insurance Services, Inc.
- 11/2006 to 06/2011, Registered Representative Cambridge Investment Research
- 12/2004 to 11/2006, Securities Agent, FSC Securities Corporation
- 07/2004 to 11/2004, Advent Financial Software
- 04/2004 to 07/2004, Octagon Sports Management
- 06/2003 to 04/2004, Management, Lowdog Sports Managements
- 08/2001 to 06/2003, Financial Advisor, Morgan Stanley
- 03/2000 to 04/2001, Oakland A's Baseball Company

Item 3 – Disciplinary Information

Mr. Lohe has never been subject to a legal or disciplinary event.

Item 4 – Other Business Activities

Mr. Lohe is also a Senior Consultant to Game Plan Wealth Inc. providing advice to athletes concerning their off the court/field/ice marketing activities. Approximately 5% of his time is devoted to this activity. He is also a Partner and CEO of Revolutionary Sports, LLC, a company that provides buy-side and sell-side consulting services for professional sports franchises. Mr. Lohe spends approximately 15% of his time on activities through Revolutionary Sports, LLC.

Although Mr. Lohe may spend a substantial amount of time and/or receive a substantial amount of his income from Game Plan Wealth, Inc. and Revolutionary Sports, LLC, these outside activities are not considered material to the services provided by Safeguard Financial and its clients because they are separate and distinct from the services provided by Safeguard Financial.

Please see Item 10 and Item 19 of this Disclosure Brochure for details regarding the other business activities through Safeguard Financial including our insurance services and Career Coaching Services.

Item 5 – Additional Compensation

Other than the fees detailed in Item 5 of this Disclosure Brochure, Mr. Lohe receives no other compensation related to advisory services provided to clients. Please refer to Item 14 of this Disclosure Brochure for a description of insurance compensation earned.

Item 6 – Supervision

Jason Lohe is the Chief Executive Officer and Chief Compliance Officer of Safeguard Financial and Insurance Services, Inc. and is ultimately responsible for the firm's compliance program including establishing procedures designed to monitor and supervise the activities and services provided by the firm and its supervised persons. Mr. Lohe's phone number is (925)627-1800.

As a part of Mr. Lohe's supervisory responsibilities he will review all transactions, review all correspondence prior to mailing, review all new account paperwork, oversee all marketing/advertising matters conduct annual compliance meetings, review client performance reports and client position reports, review outside business activities and gift and gratuity reports, and review any complaints that may be received.

Information Required by Part 2B of Form ADV: *Brochure Supplement – Paul J. Saad*

Item 1 – Cover Page

Paul J. Saad
Safeguard Financial and Insurance Services
Conducting advisory business under Game Plan Wealth Advisory
2603 Camino Ramon, Suite 200
San Ramon, CA 94583
(925) 627-1800 · www.safeguardfinancial.com

This brochure supplement provides information about Paul J. Saad that supplements this Disclosure Brochure. Please contact Safeguard Financial Services if you have any questions about the contents of this supplement. Additional information about Paul J. Saad is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Paul J. Saad: Born 1965

Educational Background

- University of Western Ontario, Canada, Master of Business Administration, (04/1997)
- McGill University, Canada, Bachelor of Arts, Economics, (06/1988)
- Marianopolis College, Canada, Diplome D'etudes Collegiales, (06/1984)

Business Background

- 06/2009 to Present, Investment Advisory Representative, Safeguard Financial and Insurance Services, Inc.
- 06/2009 to 06/2011, Registered Representative, Cambridge Investment Research, Inc.
- 06/2004 to 05/2009, Financial Advisor, Merrill Lynch & Co., Inc.

Item 3 – Disciplinary Information

Mr. Saad has never been subject to a legal or disciplinary event.

Item 4 – Other Business Activities

Please see Item 10 and Item 19 of this Disclosure Brochure for details regarding the other business activities through Safeguard Financial including our insurance services and Career Coaching Services.

Item 5 – Additional Compensation

Other than the fees detailed in Item 5 of this Disclosure Brochure, Mr. Saad receives no other compensation related to advisory services provided to clients. Please refer to Item 14 of this Disclosure Brochure for a description of insurance compensation earned.

Item 6 – Supervision

Jason Lohe is the Chief Executive Officer and Chief Compliance Officer of Safeguard Financial and Insurance Services, Inc. and is ultimately responsible for the firm's compliance program including establishing procedures designed to monitor and supervise the activities and services provided by the firm and its supervised persons. Mr. Lohe's phone number is (925)627-1800. As a part of Mr. Lohe's supervisory responsibilities he will review all transactions, review all correspondence prior to mailing, review all new account paperwork, oversee all marketing/advertising matters conduct annual compliance

meetings, review client performance reports and client position reports, review outside business activities and gift and gratuity reports, and review any complaints that may be received.

Information Required by Part 2B of Form ADV: *Brochure Supplement – Alex S. Chang*

Item 1 – Cover Page

Alex S. Chang
Safeguard Financial and Insurance Services
Conducting advisory business under Game Plan Wealth Advisory
2603 Camino Ramon, Suite 200
San Ramon, CA 94583
(925) 627-1800 · www.safeguardfinancial.com

This brochure supplement provides information about Alex S. Chang that supplements this Disclosure Brochure. Please contact Safeguard Financial Services if you have any questions about the contents of this supplement. Additional information about Alex S. Chang is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Alex S. Chang: Born 1968

Educational Background

- University of Southern California, Los Angeles, CA, Master of Business Administration, Finance - 1998
- University of California at Berkeley, Berkeley, CA, Bachelor of Science, Business Administration - 1991

Business Background

- 01/2008 to Present, Investment Advisory Representative, Safeguard Financial and Insurance Services, Inc.
- 01/2008 to 06/2011, Registered Representative, Cambridge Investment Research
- 06/2005 to 01/2008, Registered Representative, Morgan Stanley
- 06/2005 to 04/2007, Investment Advisor Representative, Morgan Stanley
- 02/2002 to 06/2005, Registered Representative, Merrill Lynch and Co.

Item 3 – Disciplinary Information

Mr. Chang has never been subject to a legal or disciplinary event.

Item 4 – Other Business Activities

Please see Item 10 and Item 19 of this Disclosure Brochure for details regarding the other business activities through Safeguard Financial including our insurance services and Career Coaching Services.

Item 5 – Additional Compensation

Other than the fees detailed in Item 5 of this Disclosure Brochure, Mr. Chang receives no other compensation related to advisory services provided to clients. Please refer to Item 14 of this Disclosure Brochure for a description of insurance compensation earned.

Item 6 – Supervision

Jason Lohe is the Chief Executive Officer and Chief Compliance Officer of Safeguard Financial and Insurance Services, Inc. and is ultimately responsible for the firm's compliance program including establishing procedures designed to monitor and supervise the activities and services provided by the firm and its supervised persons. Mr. Lohe's phone number is (925)627-1800. As a part of Mr. Lohe's

supervisory responsibilities he will review all transactions, review all correspondence prior to mailing, review all new account paperwork, oversee all marketing/advertising matters conduct annual compliance meetings, review client performance reports and client position reports, review outside business activities and gift and gratuity reports, and review any complaints that may be received.