

**Firm Brochure**  
(Part 2A of Form ADV)

**STANLEY F. GREEN, LLC**  
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This brochure provides information about the qualifications and business practices of Stanley F. Green, LLC. If you have any questions about the contents of this brochure, please contact us at: 415-640-1711, or by email at: [stgreen@comcast.net](mailto:stgreen@comcast.net). 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 Stanley F. Green, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

September 30, 2013

## **Item 2 -- Material Changes**

### **Annual Update**

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

### **Material Changes since the Last Update**

As of September 30, 2013, Stanley F. Green has joined the investment advisory firm Brouwer & Janachowski LLC as an Executive Vice President and will be dually registered until December 31, 2013. Mr. Green is in the process of assigning his SFG LLC client contracts (with affiliated assets) to Brouwer & Janachowski LLC and will begin to provide advisory services as an employee of Brouwer & Janachowski LLC, beginning September 30, 2013. Mr. Green will continue to assign any remaining client contracts through December 31, 2013. Any client that does not transfer their assets to Brouwer & Janachowski LLC, by December 31, 2013 will have their contracts terminated with SFG LLC and have their accounts transferred to the Charles Schwab retail platform. SFG LLC will be withdrawing its SEC registration (Form ADV-W) no later than December 31, 2013.

### **Full Brochure Available**

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at 415-640-1711 or by email to [stgreen@comcast.net](mailto:stgreen@comcast.net).

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## **Item 4 -- Advisory Business and Services**

### **Introduction**

Stanley F. Green, LLC, SFG LLC was organized in 2005 and is wholly owned by Stanley F. Green. Stanley F. Green, LLC, provides its Clients with financial planning and investment advisory services. These are defined as giving continuous advice to a Client and/or making investments for a Client based on the Client's individual needs. Based on personal discussions and data gathering, the Client's goals, stage in life, financial resources, tax situation, and capacity and tolerance for risk are evaluated. This information is used to develop a personal investment policy for the Client, and to develop and manage the Client's investment portfolio based on that policy.

Stanley F. Green, LLC, is strictly a fee-only advisory firm. It does not sell investment products such as annuities, insurance, stocks, bonds, mutual funds limited partnerships or any other commissioned financial product. It is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder's fees are accepted.

As of September 30, 2013, Stanley F. Green has joined the investment advisory firm Brouwer & Janachowski LLC as an Executive Vice President and will be dually registered until December 31, 2013. Mr. Green is in the process of assigning his SFG LLC client contracts (with affiliated assets) to Brouwer & Janachowski LLC and will begin to provide advisory services as an employee of Brouwer & Janachowski LLC, beginning September 30, 2013. Mr. Green will continue to assign any remaining client contracts through December 31, 2013. Any client that does not transfer their assets to Brouwer & Janachowski LLC, by December 31, 2013 will have their contracts terminated with SFG LLC and have their accounts transferred to the Charles Schwab retail platform. SFG LLC will be withdrawing its SEC registration (Form ADV-W) no later than December 31, 2013.

### **Background Information on Stanley F. Green**

Stanley F. Green is, and expects to remain, the sole employee of Stanley F. Green, LLC, and is self-supervised. His phone number is: 415-640-1711 and his email address is stan@sgreeninvest.com

His educational and business background are as follows:

#### **Educational Background:**

Date of birth: May 13, 1945

University of Rochester, 1967, Bachelor of Science, Mechanical & Aerospace Sciences

University of California, 1968, Master of Engineering, Mechanical Engineering

#### **Business Experience:**

PaineWebber (now UBS), 1976-2000, Senior Vice President, Investments

Morgan Stanley, 2000-2005, Senior Vice President, Investments

Disciplinary Information: none

Other Business Activities: Brouwer & Janachowski LLC, September, 2013 – Present, Executive Vice President

Additional Compensation: Mr. Green will be receiving a salary from Brouwer & Janachowski LLC

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

## Financial Planning

Stanley F. Green is a Certified Financial Planner™ Professional and uses the designation, CFP®. Depending on the needs and interests of the Client, Green may provide informal financial planning advice for no fee.

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 62,000 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, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

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

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

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”).

## Investment Management

As of September 30, 2013, Stanley F. Green, LLC, manages \$5,000,000 of client assets on a discretionary basis and \$0 of client assets on a non-discretionary basis.

Investment portfolio construction is based first on asset allocation, and second on selection of investment vehicles to fulfill the asset allocation. Investment selections typically include mutual funds and exchange-traded index funds (ETFs), including enhanced-index funds, as well as individual stocks and bonds. Bonds may include corporate bonds, government and government-agency bonds, and municipal bonds. Other investment vehicles may be used, including certificates of deposit, money market funds, hedge funds, structured products, exchange-traded notes, annuities, options, warrants, convertible securities, limited partnership units, annuities and other insurance products, and the use of separate account managers; although the business is currently based primarily on ETFs, mutual funds, and individual stocks and bonds.

SFG LLC intends to allocate investment management assets of its client accounts primarily among various ETFs and mutual funds on a discretionary basis, in accordance with the investment objectives of the Client, as discussed above. Unless the Client directs otherwise, SFG LLC shall generally recommend that Charles Schwab & Co. serve as the broker-dealer/custodian for client investment management assets.

SFG LLC provides remaining Clients with verbal reports as needed, discussing portfolio value and contents and investment performance.

Depending on the complexity and depth of interest or need, SFG LLC may suggest the Client also consult with other professionals unrelated to SFG LLC, including other financial planners, estate planning attorneys, tax accountants and insurance agents. SFG LLC receives no compensation from any such consultations.

Initial Public Offerings (IPOs) are not available through Stanley F. Green, LLC.

### Tailored Relationship

The goals and objectives for each client are documented in our client relationship management system. Investment Policy Statements are created that spell out the stated goals and objectives. Individual, personalized portfolios are created. Client may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned to others without written Client consent.

### Primary Types of Agreements

#### **Investment Management Agreement**

The Investment Management Agreement (IMA) sets forth the basis for establishing investment portfolios. It includes a statement of the services Stanley F. Green, LLC, provides in connection with managing portfolios; whether Green has discretion to choose investments without prior client consent; the requirement of the Client to provide a signed Investment Policy Statement (see immediately below); the investment management fee schedule; ERISA requirement, if applicable; how the Agreement is terminated; custody of assets; arbitration procedures; and other conditions.

#### **Investment Policy Statement**

In order for Stanley F. Green, LLC, to properly design, produce and monitor portfolios, an Investment Policy Statement (IPS) must be completed. The IPS provides background information

about the Client, including a discussion of existing assets, income and sources of income, family composition, employment, etc. It specifies the Client investment objectives and tolerance of risk, and how Client funds will be allocated among classes of investments to achieve or attempt to achieve those objectives. It explains how performance measurement is provided. It provides a basis for continuous communication between Stanley F. Green, LLC, and the client.

### **Termination of Agreement**

A Client may terminate any agreement at any time by notifying Stanley F. Green, LLC, in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, Stanley F. Green, LLC, will refund any unearned portion of the advance payment.

Stanley F. Green, LLC, may terminate any agreements at any time by notifying the client in writing. If the client made an advance payment, Stanley F. Green, LLC, will refund any unearned portion of the advance payment.

As of September 30, 2013, Stanley F. Green has joined the investment advisory firm Brouwer & Janachowski LLC as an Executive Vice President and will be dually registered until December 31, 2013. Mr. Green is in the process of assigning his SFG LLC client contracts (with affiliated assets) to Brouwer & Janachowski LLC and will begin to provide advisory services as an employee of Brouwer & Janachowski LLC, beginning September 30, 2013. Mr. Green will continue to assign any remaining client contracts through December 31, 2013. Any client that does not transfer their assets to Brouwer & Janachowski LLC, by December 31, 2013 will have their contracts terminated with SFG LLC and have their accounts transferred to the Charles Schwab retail platform. SFG LLC will be withdrawing its SEC registration (Form ADV-W) no later than December 31, 2013.

### **Item 5 -- Fees and Compensation**

#### **Description**

Stanley F. Green, LLC, bases its investment management fees on a percentage of assets under management, or, occasionally, hourly charges. Other advisors may charge higher or lower fees. Fees are negotiable.

The annual Investment Management Agreement fee is based on the following Fee Schedule:

- 0.92% on the first \$500,000;
- 0.70% on the next \$500,000 (from 500,001 to 1,000,000); and
- 0.45% on the next \$1,000,000 (from \$1,000,001 to \$2,000,000); and
- 0.35% on assets above \$2,000,000.

The minimum annual fee is \$4,600 and is negotiable. Current client relationships may exist where the fees are higher or lower than the fee schedule above. Stanley F. Green, LLC, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

Investment management fees are billed quarterly, in advance, meaning that we invoice you before the three-month billing period has begun. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.



Under certain circumstances family members of clients (usually parents/grandparents/children) can be combined and treated as one Client for purposes of the Fee Schedule.

Although the Investment Management Agreement is an ongoing agreement and adjustments may be required periodically, the length of service to the client is at the client's discretion. The client or SFG LLC may terminate an Agreement by written notice to the other party. At termination, fees will be refunded on a pro rata basis for the portion of the quarter not completed. The portfolio value at the completion of the prior full billing quarter is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

#### Fees Charged by Others

Custodians who hold your investment assets may charge custodial fees and transaction fees on purchases or sales of certain exchange-traded funds, mutual funds and other securities. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security. Custodians may offer check-writing capabilities for your account and may charge for printing checks, for wire transfers of money, for changing legal title of accounts or assets, or for other services. These charges are usually also nominal.

Mutual funds and Exchange-traded funds (ETFs) generally charge a management and/or other fee for their services as investment managers. These fees are often called an expense ratio. For example, an expense ratio of 0.50 means that the fund company charges 0.5% of your assets for their services. These fees are in addition to the fees paid by you to Stanley F. Green, LLC.

Performance figures quoted by fund companies in various publications are typically after their fees have been deducted.

#### Past Due Accounts and Termination of Agreement

Stanley F. Green, LLC reserves the right to stop work on any account that is more than 30 days overdue for payment of fees.

### **Item 6 -- Performance-Based Fees**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Stanley F. Green, LLC, does not use a performance-based fee structure because of a potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

### **Item 7 -- Types of Clients**

Stanley F. Green, LLC, generally provides investment advice to individuals, families, trusts, estates and charitable organizations.

Client relationships vary in scope and length of service.

Stanley F. Green, LLC, has the discretion to waive the account minimum of \$500,000. For example, accounts of less than \$500,000 may be set up when the client and the advisor anticipate the client will add funds to the accounts bringing the total to \$500,000 within a reasonable time. Other exceptions will apply to employees of Stanley F. Green, LLC, and their relatives, clients who had a long-term professional relationship prior to Stanley F. Green becoming an independent Advisor, and certain other clients.

Clients with assets below the minimum account size may pay a higher percentage rate on their annual fees than the fees paid by clients with greater assets under management.

## **Item 8 -- Methods of Analysis, Investment Strategies and Risk of Loss**

### **Method of Analysis**

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Other sources of information that Stanley F. Green, LLC, may use include Morningstar Principia mutual fund information, Morningstar Principia stock information, Charles Schwab & Company's "SchwabLink" service, Thomson Financial and the World Wide Web.

### **Investment Strategies**

The primary investment strategy used on client accounts is strategic asset allocation. Portfolios are globally diversified to control the risk associated with traditional domestic markets. We use passively-managed index and exchange-traded funds as the core investments. Many such funds will individually hold hundreds or even thousands of individual stocks or bonds. We believe diversification like this reduces overall risk of loss. We also believe market timing is of dubious value, so we typically hold investments long term. In very unusual economic conditions, we may depart from purely buying and holding. When one or more investments do particularly well or poorly relative to other investments held, we typically rebalance to re-set the portfolio to the desired mix. We examine portfolio balance quarterly for essentially all portfolios.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement that documents their objectives and their desired investment strategy.

Other rarely-used strategies may include trading inverse exchange-traded or mutual funds (which generally move opposite to the direction of traditional funds), margin transactions, and option writing (including covered options, uncovered options or spreading strategies). We will use new, recently issued securities (but not Initial Public Offerings) if they offer additional diversification or other merit and are appropriate to our clients' portfolios.

### **Risk of Loss**

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause securities prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange-rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

## **Item 9 -- Disciplinary Information**

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

## **Item 10 -- Other Financial Industry Activities and Affiliations**

### **Financial Industry Activities**

Stanley F. Green, LLC, is registered with the SEC (Securities & Exchange Commission) and is registered in the State of California, which is its principal place of business.

### **Affiliations**

Stanley F. Green, LLC, has no arrangements or affiliations that are material to its advisory business or its clients.

## **Item 11 -- Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

### **Code of Ethics**

The employees of Stanley F. Green, LLC, have committed to a Code of Ethics. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

The Stanley F. Green, LLC, Code of Ethics describes the firm's high standard of business conduct and fiduciary duty to its clients. It includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition on rumor-mongering, restrictions on the acceptance of

significant gifts and the reporting of certain gifts and business entertainment items, and personal trading procedures, among other things.

#### Participation or Interest in Client Transactions

Stanley F. Green, LLC, and its employees may buy or sell securities that are also held by clients. In accordance with the Code of Ethics, employees may not trade their own securities ahead of (before) client trades because the employee trade may move the price of the security up or down, negatively affecting the Client.

#### Personal Trading

The Chief Compliance Officer of Stanley F. Green, LLC, is Stanley F. Green. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, or trades in securities not held by clients, the trades do not affect the securities markets or company clients.

#### Compliance Officer and Manual

Stanley F. Green, as Chief Compliance Officer, is responsible for and reviews all procedures implemented by the firm to assure that the operations of Stanley F. Green, LLC, are ethical and in compliance with applicable law. Stanley F. Green, LLC, has a Compliance Manual which provides internal policies and procedures that the firm follows. Stanley F. Green, LLC, undergoes rigorous annual reviews of its procedures and may use outside compliance consultants or other services to conduct these reviews and assure compliance.

### **Item 12 -- Brokerage Practices**

#### Selecting Brokerage Firms

Stanley F. Green, LLC, does not have any affiliation with product sales firms. Specific custodian recommendations are made to Clients based on their need for such services. Stanley F. Green, LLC, recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

Stanley F. Green, LLC, recommends discount brokerage firms such as Charles Schwab & Co., Inc. and uses interfaces with Schwab to facilitate securities trading for clients.

Stanley F. Green, LLC, does not receive fees or commissions from Schwab or any other firm.

#### Best Execution

Stanley F. Green, LLC, reviews the execution of trades at each custodian each quarter. The review is documented in records of Stanley F. Green, LLC. Commissions and markups charged by the custodians are also reviewed on a quarterly basis. Stanley F. Green, LLC, does not receive any portion of the commissions or markups.

#### Soft Dollars

Soft dollars refer to benefits or compensation that may be received by an advisory firm when it chooses a custodial firm. Stanley F. Green, LLC, has no soft dollar arrangements with Charles Schwab & Co., Inc. or any other custodial firm. However, SFG LLC has an arrangement with Charles Schwab & Co., Inc. whereby SFG LLC receives services which include brokerage, custodial, administrative support, recordkeeping, and related services, which are intended to support our firm in conducting business and in serving the best interests of our clients, but that may also benefit our firm.

#### Order Aggregation

Most trades are executed individually for each account. On occasion, for example, when a new security is chosen to be placed in many portfolios, orders will be aggregated so that all appropriate portfolios will purchase the security at the same time and price. Similarly, if a decision is made to sell a security from many or all accounts, orders will be aggregated to provide a uniform price for all sellers.

### **Item 13 -- Review of Accounts**

#### Periodic Reviews

Account reviews are performed quarterly by Stanley F. Green. Account reviews may be performed more frequently, when market conditions dictate.

#### Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, client deposits or withdrawals, and changes in a client's own situation.

#### Regular Reports

Clients receive periodic communications on at least a semi-annual basis.

### **Item 14 -- Client Referrals and Other Compensation**

#### Incoming Referrals

Stanley F. Green, LLC, has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, personal friends and other similar sources. The firm does not compensate referring parties for these referrals.

#### Referrals Out

Stanley F. Green, LLC, does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

### **Item 15 -- Custody**

#### Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to the reports provided by Stanley F. Green, LLC.

### **Item 16 -- Investment Discretion**

#### Discretionary Authority for Trading

Stanley F. Green, LLC, accepts discretionary authority to manage securities accounts on behalf of clients. Stanley F. Green, LLC, has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold and when. However, Stanley F. Green, LLC, consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has *not* been given.

The client approves the custodian to be used and the commission rates paid to the custodian. Stanley F. Green, LLC, does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy that you have approved in writing.

### **Limited Power of Attorney**

A limited power of attorney is a trading authorization for the purpose of authorizing discretionary authority for trading. You sign a limited power of attorney so that we may execute the trades that you have approved.

### **Item 17 -- Voting Client Securities**

#### **Proxy Voting**

Stanley F. Green, LLC, does not vote proxies on securities. Clients are expected to vote their own proxies.

When assistance on voting proxies is requested, Stanley F. Green, LLC, will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

### **Item 18 -- Financial Information**

#### **Financial Condition**

Stanley F. Green, LLC, does not have any financial impairment that would preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because Stanley F. Green, LLC, does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$1,200 per client and six months or more in advance.

### **Additional Disclosures**

#### **Business Continuity Plan**

SFG LLC has a business continuity plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

#### **Information Security**

SFG LLC maintains an Information Security Program to reduce the risk that Client's personal and confidential information may be breached.