



## **Archford Capital Strategies, LLC**

### **Form ADV Part 2A – Disclosure Brochure**

**Effective: March 31, 2014**

This Disclosure Brochure provides information about the qualifications and business practices of Archford Capital Strategies, LLC (“Archford”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (618) 416-7086.

Archford is a Registered Investment Advisor with the U.S. Securities and Exchange Commission. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information through Archford to assist you in determining whether to retain the Advisor.

Additional information about Archford and its advisory persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Archford Capital Strategies, LLC**  
**CRD No: 164482**  
**4941 Benchmark Centre Drive, Suite 200**  
**Swansea, IL 62226**  
**Phone: (618) 416-7086 \* Fax: (618) 416-7090**  
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## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of Archford.

Archford believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. Archford encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Material Changes

The general layout of the Form ADV has been revised, and material changes to disclosures are as follows:

Archford has launched a new security offering, Market Participation Structured Product, as described in Item 4 and 5 of this Brochure.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Archford.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

To review the firm information for Archford:

- Click **Investment Advisor Search** in the left navigation menu.
- Select the option for **Firm** and enter **164482** (our firm's CRD number) in the field labeled "Firm Name or CRD# or SEC#" and click "Start Search".
- This will provide access to Form ADV Part 1 and Part 2.
- Item 11 of the Form ADV Part 1 lists legal and disciplinary questions regarding the Advisor.
- In the left navigation menu, Form ADV Part 2 is located near the bottom.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (618) 416-7086.

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### Item 3 – Table of Contents

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<b>Item 1 – Cover Page.....</b>	<b>1</b>
<b>Item 2 – Material Changes.....</b>	<b>2</b>
<b>Item 3 – Table of Contents .....</b>	<b>3</b>
<b>Item 4 – Advisory Services .....</b>	<b>4</b>
A. Firm Information.....	4
B. Advisory Services Offered .....	4
C. Client Account Management.....	6
D. Wrap Fee Programs .....	7
E. Assets Under Management .....	7
<b>Item 5 – Fees and Compensation.....</b>	<b>7</b>
A. Fees for Advisory Services .....	7
B. Fee Billing .....	8
C. Other Fees and Expenses .....	8
D. Advance Payment of Fees and Termination.....	9
E. Compensation for Sales or Recommendations of Securities.....	9
<b>Item 6 – Performance-Based Fees and Side-By-Side Management.....</b>	<b>10</b>
<b>Item 7 – Types of Clients.....</b>	<b>10</b>
<b>Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss .....</b>	<b>10</b>
A. Methods of Analysis .....	10
B. Risk of Loss .....	10
<b>Item 9 – Disciplinary Information .....</b>	<b>13</b>
<b>Item 10 – Other Financial Industry Activities and Affiliations .....</b>	<b>13</b>
<b>Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....</b>	<b>14</b>
A. Code of Ethics.....	14
B. Personal Trading with Material Interest .....	14
C. Personal Trading in Same Securities as Clients.....	14
D. Personal Trading at Same Time as Client .....	15
<b>Item 12 – Brokerage Practices.....</b>	<b>15</b>
A. Recommendation of Custodian[s].....	15
B. Aggregating and Allocating Trades.....	16
<b>Item 13 – Review of Accounts .....</b>	<b>16</b>
A. Frequency of Reviews .....	16
B. Causes for Reviews .....	16
C. Review Reports .....	16
<b>Item 14 - Client Referrals and Other Compensation.....</b>	<b>17</b>
A. Compensation Received by Archford .....	17
B. Client Referrals from Solicitors .....	17
<b>Item 15 – Custody .....</b>	<b>17</b>
<b>Item 16 – Investment Discretion.....</b>	<b>18</b>
<b>Item 17 – Voting Client Securities .....</b>	<b>18</b>
<b>Item 18 – Financial Information .....</b>	<b>18</b>
<b>Form ADV Part 2B – Brochure Supplements.....</b>	<b>19</b>
<b>Privacy Policy .....</b>	<b>36</b>

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

Archford Capital Strategies, LLC (“Archford” or the “Advisor”) is a Registered Investment Advisor with the U.S. Securities and Exchange Commission, which is organized as a Limited Liability Company (LLC) under the laws of the State of Illinois. Archford was founded in March 2013, and is owned and operated by its Principal, James D. Maher, AIF®, CRPC®. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Archford.

### **B. Advisory Services Offered**

Archford offers investment advisory services to individuals, high net worth individuals, trusts, estates, pension and profit sharing plans, charitable organizations, and businesses in Illinois and other states (each referred to as a “Client”). It is the Advisor’s mission to help its Clients incorporate clear, effective and comprehensive strategies designed to not only facilitate their finances, but their lives.

#### Investment Management Services

Archford provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary or non-discretionary investment management and consulting services. Archford works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio allocation. Archford primarily allocates client assets among various independent investment managers (“Independent Managers”), mutual funds, exchange-traded funds (“ETFs”), individual debt and equity securities, and options, as well as the securities components of variable annuities and variable life insurance contracts, in accordance with the investment objectives of its individual clients. In addition, Archford may also recommend that clients who qualify as accredited investors, as defined by Rule 501 of the Securities Act of 1933, invest in privately placed securities, which may include debt, equity and/or interests in pooled investment vehicles (e.g., hedge funds). Where appropriate, the Firm may also provide advice about any type of legacy position or other investment held in client portfolios.

Another offering for Investment Management Services with Archford is through their Market Participation Structured Product (“MPSP”), through Certificates of Deposit or other structured products. Clients pursuing this product offering would sign an Investment Advisory Agreement specifically for the MPSP products and the proceeds of the Client account(s) noted in the agreement are then invested into FDIC insured MPSPs, in accordance with the investment objectives of the Client.

Clients may also engage Archford to advise on certain investment products that are not maintained at their primary custodian, such as variable life insurance and annuity contracts and assets held in employer sponsored retirement plans and qualified tuition plans (i.e., 529 plans). In these situations, Archford directs or recommends the allocation of client assets among the various investment options available with the product. These assets are generally maintained at the underwriting insurance company or the custodian designated by the product’s provider.

Archford’s investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. Archford will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

Archford evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Archford may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Archford may recommend specific positions to increase sector or asset class weightings. The Advisor

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may recommend employing cash positions as a possible hedge against market movement, which may adversely affect the portfolio. Archford may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

**Prior to rendering investment advisory services, Archford will ascertain, in conjunction with the Client, the Client's financial situation, risk tolerance, and investment objective[s].**

Archford will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will Archford accept or maintain custody of a Client's funds or securities, except for authorized deduction of the Advisor's fees. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client Investment Advisory Agreement.

#### Managed Account Programs

Archford may recommend to Clients that all or a portion of their portfolio be implemented by utilizing one or more unaffiliated money managers, or Independent Managers, participating in a managed accounts program at the Client's selected custodian (the "Program Sponsor"). The Client will then enter into a program and investment advisory agreement with the Program Sponsor and the participating money manager[s]. The Advisor will assist and advise the Client in establishing investment objectives for the account, the selection of the money manager[s], and defining any restrictions on the account. Archford will continue to provide oversight of the Client account and ongoing monitoring of the activities of the unaffiliated money managers.

These money managers will develop an investment strategy to meet those objectives by identifying appropriate investments and monitoring such investments. In consideration for such services, the Program Sponsor will charge a program fee that includes the investment advisory fee of the money managers, the administration of the program and trading, clearance and settlement costs. The Program Sponsor will add Archford's Investment Advisory Fee (described below in Item 5) and will deduct the overall fee from the Client account, generally at the start of each calendar quarter. The asset-based program fee is tiered and varies depending on the size of the account, the asset class of the underlying securities and the sub-advisor selected. The overall fee (including the Advisor's Investment Advisory Fee) will not exceed 3% annually.

**Archford does not receive any compensation from these unaffiliated money managers or the Program Sponsor, other than Archford's Investment Advisory Fee (described in Item 5).**

The Client, prior to entering into an agreement with a Program Sponsor, will be provided with the Program Sponsor's Form ADV Part 2 (or a brochure that makes the appropriate disclosures). In addition, Archford and its Client will agree in writing that that selected Program Sponsor will manage the Client's account on a discretionary basis.

#### Financial Planning and Consulting Services

Archford will typically provide a variety of financial planning services to individuals and families, pursuant to a written Financial Planning or Consulting Agreement. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives and financial situation.

Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, education savings and other areas of a Client's financial situation.

A significant part of the Firm's practice is dedicated to advising on and facilitating mergers, acquisitions and divestitures of closely held businesses. In providing these services, Archford leverages its robust network of

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outside professionals, which include attorneys, certified public accountants (CPAs), business valuation specialists, investment bankers and marketing professionals, amongst others. In addition, Archford also has an experienced team of in-house investment professionals, many of whom maintain a number of industry credentials and designations, which include Accredited Investment Fiduciary AIF®, Chartered Financial Analyst® (CFA®), Chartered Retirement Planning Counselor<sup>SM</sup> (CRPC®), Chartered Alternative Investment Analyst (CAIA), and Certified Exit Planning Advisor (CEPA).

While each of these services is available on a stand-alone basis, certain of them may also be rendered in conjunction with investment portfolio management as part of a comprehensive wealth management engagement. In performing these services, Archford is not required to verify any information received from the client or from the client's other professionals (e.g., attorneys, accountants, etc.) and is expressly authorized to rely on such information.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. Archford may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Archford may recommend the services of its Supervised Persons, in their individual capacities as insurance agents or registered representatives of a broker-dealer, and/or other professionals to implement its recommendations. Financial planning and consulting recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to effect the transaction through the Advisor.

### **C. Client Account Management**

Prior to engaging Archford to provide investment advisory services, each Client is required to enter into an Investment Advisory Agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Policy Statement – Archford, in connection with the Client, may develop a statement that summarizes the Client's investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives. An Investment Policy Statement generally includes specific information on the Client's stated goals, time horizon for achieving the goals, investment strategies, Client risk tolerance and any restrictions imposed by the Client.
- Asset Allocation – Archford will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – Archford will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Archford will provide investment management and ongoing oversight of the Client's portfolio and overall account.

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#### **D. Wrap Fee Programs**

Archford does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Archford.

#### **E. Assets Under Management**

As of December 31, 2013, the most recent date for which such calculations are provided pursuant to securities regulations, Archford manages the following assets:

Assets Under Management	Assets
Discretionary Assets	\$277,596,743
Non-Discretionary Assets	--
<b>Total</b>	<b>\$277,596,743</b>

Clients may request more current information at any time by contacting the Advisor.

### **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign an Investment Advisory Agreement that details the responsibilities of Archford and the Client.

#### **A. Fees for Advisory Services**

##### Investment Management Services

Investment Advisory Fees are paid quarterly in advance pursuant to the terms of the Investment Advisory Agreement. Investment Advisory Fees range from 0.75% to 2.00% depending on the size and complexity of the Client relationship. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee. Investment Advisory Fees for the Market Participation Structured Product ("MLSP") are up to 0.25% of the average daily balance of the Client account, payable at the end of each quarter. MLSPs based on Certificates of Deposit(s) will have fees that are capped by the Advisor at the lesser of 0.25% or the available cash in the account generated from the coupon payments of the MLSP(s).

Investment Advisory Fees in the first quarter of service are prorated from the inception date of the account to the end of the first quarter. Fees may be negotiable at the discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by Archford will be independently valued by the designated Custodian. Archford will not have the authority or responsibility to value portfolio securities.

##### Managed Accounts Programs

Fees for Clients participating in managed accounts programs will include Archford's Investment Advisory Fee above plus the Program Sponsors Fee.

##### Selection of Other Advisors

For Clients referred to the Advisor by an unaffiliated investment advisor, the Client's fee will be deducted from the Client's account[s] with the respective manager and a portion of the investment advisory fee will be provided to Archford. Please see Item 14 for additional details.

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#### Financial Planning and Consulting Services

Archford offers financial planning or consulting services on an hourly basis ranging from \$100 to \$500 per hour, which may be negotiable depending on the nature and complexity of each Client's circumstances. An estimate for total hours will be determined prior to establishing the advisory relationship.

Archford also offers financial planning or consulting services on a fixed fee basis, at a cost that is negotiable, on a project-by-project basis depending on the nature and complexity of each Client's circumstances.

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs. The hourly fees are determined after considering many factors, such as the level and scope of the services. Generally, Archford will collect the balance due upon delivery, but may require one-half of the financial planning or consulting fee payable upon execution of the Advisory Agreement and the balance due at the time the financial plan is delivered or the underlying services are rendered to completion, not to exceed six months. If the client engages Archford for additional investment advisory services, Archford may offset all or a portion of its fees for those services based upon the amount paid for the financial planning and/or consulting services.

#### **B. Fee Billing**

##### Investment Management Services

Investment Advisory Fees will be automatically deducted from the Client Account by the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client Account at the respective quarter end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Archford at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the Investment Advisory Fee. In addition, should the Custodian statement not include a fee calculation, the Advisor will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting Archford to be paid directly from their accounts held by the Custodian as part of the Investment Advisory Agreement and separate account forms provided by the Custodian.

##### Managed Accounts Programs

Clients participating in a managed accounts program or referred to unaffiliated money managers or investment advisors will be billed in accordance to the investment advisory agreement with the respective Program Sponsor or advisor. Program Sponsors will add Archford's Investment Advisory Fee and deduct the overall fee from the Client's account[s]. In situations where a Client is referred to an unaffiliated investment advisor, the investment advisor will collect its fee and compensate Archford out of its fee. Details are described in Item 14 below.

#### Financial Planning and Consulting Services

Financial planning and consulting fees are invoiced 50% upon execution of the Financial Planning and Consulting Agreement and 50% upon receipt of the agreed upon deliverable.

#### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than Archford, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer, and fees charged by Independent Managers. The Investment Advisory Fee charged by Archford is separate and distinct from these custodian and execution fees.

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In addition, all fees paid to Archford for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of Archford, but would not receive the services provided by Archford which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Archford to fully understand the total fees to be paid.

#### **D. Advance Payment of Fees and Termination**

##### Investment Management Services

Archford is compensated for its services in advance of the quarter in which investment advisory services are rendered. Clients may request to terminate their Investment Advisory Agreement with Archford, in whole or in part, by providing advance written notice. The Client shall be responsible for Investment Advisory Fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid Investment Advisory Fees from the effective date of termination to the end of the quarter. The Client's Investment Advisory Agreement with the Advisor is non-transferable without the Client's written approval.

##### Managed Accounts Programs

In the event that a Client should wish to terminate their relationship with a managed accounts program or unaffiliated investment advisor, the terms for termination will be set forth in the respective agreements between the Client and those third parties. Archford will assist the Client with the termination and transition as appropriate.

##### Financial Planning and Consulting Services

In the event that a Client should wish to cancel the financial planning agreement under which any plan is being created, the Client shall be billed for services rendered on the planning project times the agreed upon hourly rate. Any surplus in the Advisor's possession as the result of collecting a deposit at the time of signing the financial planning agreement will be returned to the Client within 5 business days of cancellation.

Either party may terminate a planning or consulting agreement at any time by providing written notice to the other party. In addition, the Client may terminate the agreement within five (5) days of signing the Advisor's financial planning or consulting agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Refunds will be given on a pro rata basis.

#### **E. Compensation for Sales or Recommendations of Securities**

Clients can engage certain persons associated with Archford (but not Archford) to render securities brokerage services under a separate commission-based arrangement. Clients are under no obligation to engage such persons and may choose brokers or agents not affiliated with Archford.

Under this arrangement, the Firm's Supervised Persons, in their individual capacities as registered representatives of Purshe Kaplan Sterling Investments, Inc. ("PKS"), may provide securities brokerage services and implement securities transactions under a separate commission based arrangement. Supervised Persons may be entitled to a portion of the brokerage commissions paid to PKS, as well as a share of any ongoing distribution or service (trail) fees from the sale of mutual funds. Archford may also recommend no-load or load-waived funds, where no sales charges are assessed. Prior to effecting any transactions, clients are required to enter into a separate account agreement with PKS. Archford does not receive any portion of the commissions or transactional fees charged by PKS.

A conflict of interest exists to the extent that Archford recommends the purchase of securities where Archford's Supervised Persons receive commissions or other additional compensation as a result of Archford's

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recommendations. Archford has procedures in place to ensure that any recommendations made by such Supervised Persons are in the best interest of clients. For certain accounts covered by the Employee Retirement Income Security Act ("ERISA"), and such others that Archford, in its sole discretion, deems appropriate, Archford may provide its investment advisory services on a fee-offset basis. In this scenario, Archford may offset its fees by an amount equal to the aggregate commissions and 12b-1 fees earned by Archford's Supervised Persons in their individual capacities as registered representatives of PKS.

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

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Archford does not charge performance-based fees for its investment advisory services. The fees charged by Archford are as described in "Item 5 – Fees and Compensation" above and are not based upon the capital appreciation of the funds or securities held by any Client.

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## **Item 7 – Types of Clients**

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Archford provides investment advisory services to the following types of Clients:

- Individuals, Personal Trusts and Estates – private investors, investing their personal assets
- Pension and Profit Sharing Plans – retirement plan sponsors or company plans
- 501(c)(3) Non-Profit Organizations – mission-based, non-profit organizations
- Corporations and Businesses – taxable business entities, investing cash reserves

The relative percentage of each type of Client is available on Archford's Form ADV Part 1. These percentages will change over time.

Archford generally requires a minimum annual fee of \$1,000 to effectively implement its investment process.

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

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### **A. Methods of Analysis**

Archford primarily employs fundamental and technical analysis methods in developing investment strategies for its Clients, while employing an asset allocation strategy loosely based on Modern Portfolio Theory ("MPT"). Research and analysis from Archford is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

As noted above, Archford generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Archford will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Archford may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

### **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Archford will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential

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investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in "Item 13 – Review of Accounts".

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process.

Archford may use margin in Client accounts to manage the timing of purchases and sales, as appropriate. Archford may employ options strategies to hedge or gain additional exposure to a particular asset class or sector. Archford's investment strategy encompasses active trading in concentrated portfolios. Following are some of the risks associated with Options, Margin and Short-Sale transactions:

#### Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

#### Margin Borrowings

The use of short-term margin borrowings may result in certain additional risks to a Client. For example, if securities pledged to brokers to secure a Client's margin accounts decline in value, the Client could be subject to a "margin call", pursuant to which it must either deposit additional funds with the broker or be the subject of mandatory liquidation of the pledged securities to compensate for the decline in value.

#### Short Sales

A short sale involves the sale of a security that the Client does not own in the hope of purchasing the same security at a later date at a lower price. To make delivery to the buyer, the Client must borrow the security and is obligated to return the security to the lender, which is accomplished by a later purchase of the security. The Client realizes a profit or a loss as a result of a short sale if the price of the security decreases or increases respectively between the date of the short sale and the date on which the Client covers its short position, i.e., purchases the security to replace the borrowed security. A short sale involves the theoretically unlimited risk of an increase in the market price of the security that would result in a theoretically unlimited loss.

#### Alternative Investments (Limited Partnerships)

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. Client should only have a portion of their assets in these investments.

#### Independent Managers

Archford may recommend the use of Independent Managers. In these situations, Archford continues to do ongoing due diligence of such managers, but such recommendations rely to a great extent on the Independent Managers' ability to successfully implement their investment strategies. In addition, Archford generally may not

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have the ability to supervise the Independent Managers on a day-to-day basis.

#### Private Collective Investment Vehicles

Archford recommends that certain clients invest in privately placed collective investment vehicles (e.g., hedge funds, private equity funds, etc.). The managers of these vehicles have broad discretion in selecting the investments. There are few limitations on the types of securities or other financial instruments that may be traded and no requirement to diversify. Hedge funds may trade on margin or otherwise leverage positions, thereby potentially increasing the risk to the vehicle. In addition, because the vehicles are not registered as investment companies, there is an absence of regulation. There are numerous other risks in investing in these securities. Clients should consult each fund's private placement memorandum and/or other documents explaining such risks prior to investing.

#### Real Estate Investment Trusts (REITs)

Archford may recommend an investment in, or allocate assets among, various real estate investment trusts ("REITs"), the shares of which exist in the form of either publicly traded or privately placed securities. REITs are collective investment vehicles with portfolios comprised primarily of real estate and mortgage related holdings. Many REITs hold heavy concentrations of investments tied to commercial and/or residential developments, which inherently subject REIT investors to the risks associated with a downturn in the real estate market. Investments linked to certain regions that experience greater volatility in the local real estate market may give rise to large fluctuations in the value of the vehicle's shares. Mortgage related holdings may give rise to additional concerns pertaining to interest rates, inflation, liquidity and counterparty risk.

#### Exchange-Traded Notes (ETNs)

Archford may recommend an investment in, or allocate assets among, various exchange-traded notes ("ETNs"). ETNs are unsecured debt securities that are listed on securities exchanges and transacted at negotiated prices in the secondary market. ETNs are designed to track the performance of a corresponding benchmark. An ETN is essentially a contract between an issuer and the ETN holder, whereby the issuer, upon maturity, agrees to pay an amount relative to the returns of the underlying benchmark. In addition to the risks associated with the specific benchmark, ETN holders are also subject to various counterparty concerns. In this respect, the value of an ETN may be adversely impacted by a downgrade to the issuer's credit rating and/or an unwillingness or inability of the issuer to perform its contractual obligations.

#### Certificates of Deposit (CDs)

Each certificate of deposit ("CD") is a deposit obligation of a depository institution domiciled in the United States or one of its territories (an "Issuer"), the deposits and accounts of which are insured by the Federal Deposit Insurance Corporation (the "FDIC") within the limits described below. Each CD constitutes a direct obligation of the Issuer and is not, either directly or indirectly, an obligation of the Advisor. The Advisor does not guarantee in any way the financial condition of any Issuer or the accuracy of any financial information provided by the Issuer. The CDs of any one Issuer that you may purchase will be eligible for FDIC insurance up to \$250,000 (including principal and accrued interest) for each insurable capacity (e.g., individual, joint, IRA, etc.). For purposes of the \$250,000 federal deposit insurance limit, you must aggregate all deposits that you maintain with the Issuer in the same insurable capacity, including deposits you hold directly with an Issuer and deposits you hold through other intermediaries.

#### Concentrated Portfolios

Concentrated portfolios are an aggressive and highly volatile approach to trading and investing and should be viewed as complementary to a stable, highly predictable investment approach. Concentrated portfolios hold fewer different stocks than a diversified portfolio and are much more likely to experience sudden dramatic price swings. In addition, the rise or drop in price of any given holding in the portfolio is likely to have a larger impact on portfolio performance, than a more broadly diversified portfolio.

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#### Frequent Trading

Frequent trading in securities can result in higher transaction costs in the Client's account[s]. For taxable accounts, frequent trading can also result in taxable transactions each year that would not be present in a buy-and-hold strategy. There are no guarantees that a frequent trading strategy will correctly time purchases and sales of any particular security.

#### Management Through Similarly Managed "Model" Accounts

Archford manages certain accounts through the use of similarly managed "model" portfolios, whereby the firm allocates all or a portion of its clients' assets among various mutual funds and/or securities on a discretionary basis using one or more of its proprietary investment strategies. In managing assets through the use of models, the firm remains in compliance with the safe harbor provisions of Rule 3a-4 of the Investment Company Act of 1940.

The strategy used to manage a model portfolio may involve an above average portfolio turnover that could negatively impact clients' net after tax gains. While the firm seeks to ensure that clients' assets are managed in a manner consistent with their individual financial situations and investment objectives, securities transactions affected pursuant to a model investment strategy are usually done without regard to a client's individual tax ramifications. Clients should contact Archford if they experience a change in their financial situation or if they want to impose reasonable restrictions on the management of their accounts.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. For more information on our investment management services, please contact us at (618) 416-7086.**

#### Item 9 – Disciplinary Information

**There are no legal, regulatory or disciplinary events involving Archford or any of its employees.** Archford and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

To review the firm information contained in Form ADV Part 1, select the option for "Investment Adviser Search", then selecting "Firm" and enter **164482** in the field labeled "Firm Name or CRD# or SEC#". This will provide access to Form ADV Parts 1 and 2. Item 11 of the Form ADV Part 1 lists legal and disciplinary disclosure questions.

#### Item 10 – Other Financial Industry Activities and Affiliations

The sole business of Archford is to provide investment advisory services to its Clients. Neither Archford nor its advisory personnel are involved in other business endeavors. Archford does not maintain any affiliations with other firms, other than contracted service providers to assist with the servicing of its Client's accounts.

#### Broker-Dealer Affiliation

Certain advisory persons of the Advisor are also registered representative of Purshe Kaplan Sterling Investments of Albany, NY ("PKS"). PKS is a registered broker-dealer (CRD# 35747), member FINRA, SIPC. In the advisory person's separate capacity as a registered representative, an advisory person will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by the advisory person. Neither the Advisor nor its advisory persons will earn investment advisory fees in connection with any services implemented in the advisory person's separate capacity as a registered representative where commissions are earned.

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Generally, recommendations made by Archford to its Clients are implemented by an advisory person in their role as an Investment Advisor Representative, not in their role as a Registered Representative. As such, Clients of Archford will only pay advisory fees as described above. In no circumstances will Archford earn an advisory fee and a commission on the same investment. In the event that an advisory person earns a commission on an investment, the advisory fee will be waived by Archford.

#### Insurance Agency Affiliations

Certain advisory persons of the Advisor may serve as insurance agents for various insurance companies. This activity is done separate and apart from the advisory person's role with Archford. As an insurance agent, an advisory person may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by an advisory person or the Advisor.

As noted in Item 4, the Advisor may select unaffiliated money managers to assist with the implementation of a Client's investment strategy. In such arrangements, the Advisor will receive a portion of the investment advisory fees collected by the unaffiliated money managers from the Client. The Advisor will not charge its own investment advisory fee for assets referred to an unaffiliated money manager.

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

#### **A. Code of Ethics**

Archford has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with Archford. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Archford and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Archford associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code of Ethics, please contact us at (618) 416-7086

#### **B. Personal Trading with Material Interest**

Archford allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Archford does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. Archford does not have a material interest in any securities traded in Client accounts.

#### **C. Personal Trading in Same Securities as Clients**

Archford allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, employees of Archford may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Archford requiring reporting of personal securities trades by its employees for review by the employee's supervisor or the CCO. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

In addition the Code of Ethics governs Gifts and Entertainment given by and provided to the Advisor, outside employment activities of employees, Employee reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

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#### **D. Personal Trading at Same Time as Client**

While Archford allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards.

**At no time will Archford, or any associated person of Archford, transact in any security to the detriment of any Client.**

### **Item 12 – Brokerage Practices**

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#### **A. Recommendation of Custodian[s]**

Archford does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services or the administrator for defined contribution accounts. The Client will select the broker-dealer or custodian (herein the "custodian") to safeguard Client assets and authorize Archford to direct trades to this custodian as agreed in the Investment Advisory Agreement. Further, Archford does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where Archford does not exercise discretion over the selection of the custodian, it may recommend the custodian[s] to Clients for execution and/or custodial services. Archford generally recommends that Clients utilize the brokerage and clearing services of Pershing Investment Manager Services ("Pershing"). Clients are not obligated to use the recommended custodian and will not incur any extra fee or cost associated with using a broker not recommended by Archford.

Archford may recommend a custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and location of the custodian's offices. Archford does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other brokers.

Archford may receive from Pershing, without cost to Archford, computer software and related systems support that allows Archford to better monitor Client accounts. Archford may receive software and related support without cost because Archford renders investment management services to Clients that maintain assets on these institutional platforms. The software and related systems support may benefit Archford, but not its Clients directly. In fulfilling its duties to its Clients, Archford endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that Archford's receipt of economic benefits from a broker-dealer creates a conflict of interest since these benefits may influence Archford's choice of broker-dealer over another broker-dealer that does not furnish similar software, systems support, or services.

#### Commissions or Sales Charges for Recommendations of Securities

As detailed in Item 10, certain advisory persons, in their separate, individual capacities, are also registered representatives of PKS and are subject to FINRA Rule 3040 (the "Outside Business Activities Rule"), which restricts registered representatives from conducting securities transactions away from their broker-dealer without written consent. Clients are advised that advisory persons may be limited in their ability to use other broker-dealers.

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **Archford does not participate in soft dollar programs sponsored or offered by any broker-dealer.**

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**2. Brokerage Referrals** - Archford does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.

**3. Directed Brokerage** - All Clients are serviced on a “directed brokerage basis”, where Archford will place trades within the established account[s] at the custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor’s own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client’s account[s]). In selecting the custodian, Archford will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated custodian.

## **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Archford will execute its transactions through an unaffiliated broker-dealer selected by the Client. Archford may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Accounts are monitored on a regular and continuous basis by Ms. Winters, Chief Compliance Officer of Archford. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client’s request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client’s financial situation, and/or large deposits or withdrawals in the Client’s account. The Client is encouraged to notify Archford if changes occur in the Client’s personal financial situation that might adversely affect the Client’s investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the trustee or custodian. These brokerage statements are sent directly from the custodian to the Client. The Client may also establish electronic access to the custodian’s website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client’s account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

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

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### **A. Compensation Received by Archford**

Archford is a fee-only advisory firm, who, in all circumstances, is compensated solely by the Client. Archford does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. Archford may refer Clients to various third parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, Archford may receive referrals of new Clients from a third-party.

#### Managed Accounts

Archford may refer Clients to unaffiliated money managers, as detailed in Item 4. In such arrangements, Archford has a potential conflict of interest in that Archford will receive a portion of the unaffiliated money manager's fee collected from the Client for the referral of the Client and the ongoing relationship management support provided by Archford. To mitigate this conflict of interest, Archford will not charge investment advisory fees on assets referred to an unaffiliated manager under such arrangements.

#### Participation in Institutional Advisor Platform

Archford has established an institutional relationship with Pershing to assist the Advisor in managing Client account[s]. Access to the [Custodian] Institutional platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Pershing. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Additionally, the Advisor may receive the following benefits from Pershing: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information. Details of this custodian relationship are included in Item 12 above.

Archford may also be provided with access to tools and technology by investment and insurance product providers at no cost or reduced cost to Archford. While there is no requirement to use the investment or insurance products offered by these entities, Archford may have an incentive to use certain products to maintain access to these tools and technology.

### **B. Client Referrals from Solicitors**

Archford does not engage paid solicitors for Client referrals.

## **Item 15 – Custody**

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Archford does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fee. All Clients must place their assets with a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct Archford to utilize that custodian for the Client's security transactions. Archford encourages Clients to review statements provided by the account custodian. For more information about custodians and brokerage practices, see "Item 12 - Brokerage Practices".

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## **Item 16 – Investment Discretion**

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Archford generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Archford. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by Archford will be in accordance with each Client's investment objectives and goals.

## **Item 17 – Voting Client Securities**

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Archford does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

## **Item 18 – Financial Information**

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Neither Archford, nor its management, have any adverse financial situations that would reasonably impair the ability of Archford to meet all obligations to its Clients. Neither Archford, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. Archford is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.

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## Form ADV Part 2B – Brochure Supplement for

**James D. Maher, AIF®, CRPC®**  
**Chief Executive Officer, Founder**

**Effective: March 31, 2014**

This Brochure Supplement provides information about the background and qualifications of James D. Maher, AIF®, CRPC® (CRD# **2326090**) in addition to the information contained in the Archford Capital Strategies, LLC (“Archford” or the “Advisor”) (CRD # **164482**) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Archford Disclosure Brochure or this Brochure Supplement, please contact us at (618) 416-7086.

Additional information about Mr. Maher is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## Item 2 – Educational Background and Business Experience

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James Maher is the Chief Executive Officer and Founder of Archford. James Maher, born in 1966, is dedicated to advising Clients of Archford.

Mr. Maher earned a Juris Doctor from University of Missouri-Columbia in 1991. Mr. Maher earned a Bachelor of Science from University of Missouri-Columbia in 1988.

Additional information regarding Mr. Maher's employment history is included below.

### Employment History:

Chief Executive Officer, Founder, Archford Capital Strategies, LLC	03/2013 to Present
Registered Representative, Purshe Kaplan Sterling Investments, Inc.	03/2013 to Present
Senior VP, Resident Director, Financial Advisor, Bank of America, NA	11/2009 to 03/2013
Financial Advisor, Merrill Lynch, Pierce, Fenner & Smith, Inc.	04/2001 to 12/2009

### Professional Designation: Accredited Investment Fiduciary ("AIF®")

Since October 2002, the Accredited Investment Fiduciary® (AIF®) designation has been the mark of commitment to a standard of investment fiduciary excellence. Those who earn the AIF® mark successfully complete a specialized program on investment fiduciary standards of care and subsequently passed a comprehensive examination. AIF® designees demonstrate a thorough understanding of fi360's Prudent Practices for investment advisors and stewards.

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Maher.*** Mr. Maher has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Maher.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Maher.***

However, we do encourage you to independently view the background of Mr. Maher on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select "Investment Adviser Search" from the left navigation menu. Then select the option for "Individual" and enter **2326090** in the field labeled "Individual Name or CRD#".

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Maher is also a registered representative of Purshe Kaplan Sterling Investments, Inc of Albany, NY. Purshe Kaplan Sterling is a registered broker-dealer (CRD No. 35747), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Maher will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Maher. Neither the Advisor nor Mr. Maher will earn investment advisory fees in connection with any services implemented in Mr. Maher's separate capacity as a registered representative where commissions are earned.

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Generally, recommendations made by Archford to its Clients are implemented by Mr. Maher in his role as the Chief Executive Officer and Founder, not in his role as a Registered Representative. As such, Clients of Archford will only pay advisory fees as described above. In no circumstances will Archford earn an advisory fee and a commission on the same investment. In the event that Mr. Maher earns a commission on an investment, the advisory fee will be waived by Archford.

#### Insurance Agency Affiliations

Mr. Maher, Chief Executive Officer and Founder of Archford, may serve as a sales agent for various insurance companies. This activity is done separate and apart from his role with Archford. As an insurance agent, Mr. Maher may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Maher or the Advisor.

#### Maier Law Firm

Mr. Maher is a Member of the Missouri Bar Association (Member #39188). As such he is licensed as a Missouri Attorney. This practice specializes in tax, estate planning, probate, business transition, litigation and class action suits. He may work and with other attorneys of law firms and enter into fee sharing arrangements where he would receive a portion of the fee they would charge for legal services.

#### Business Transition Services and Business Consulting

Archford can receive compensation for consulting and assistance in securing financing or transfer of businesses as they assist owners in the transfer of the organization.

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

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Mr. Maher has additional business activities where compensation is received. These business activities are detailed in “Item 4 - Other Business Activities” in Part 2B above.

### **Item 6 – Supervision**

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Mr. Maher serves as the Chief Executive Officer and Founder of Archford and is supervised by Tracy L. Winters, the Chief Compliance Officer. Tracy L. Winters can be reached at (618) 416-7086.

Archford has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Archford. Further, Archford is subject to regulatory oversight by various agencies. These agencies require registration by Archford and its employees. As a registered entity, Archford is subject to examinations by regulators, which may be announced or unannounced. Archford is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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## Form ADV Part 2B – Brochure Supplement for

**Jerry L. West, CFA**  
**Chief Investment Officer, Wealth Management Advisor**

**Effective: March 31, 2014**

This Brochure Supplement provides information about the background and qualifications of Jerry L. West, CFA (CRD# **2868834**) in addition to the information contained in the Archford Capital Strategies, LLC (“Archford” or the “Advisor”) (CRD # **164482**) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Archford Disclosure Brochure or this Brochure Supplement, please contact us at (618) 416-7086.

Additional information about Mr. West is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## Item 2 – Educational Background and Business Experience

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Jerry West is the Chief Investment Officer and Wealth Management Advisor of Archford. Jerry West, born in 1973, is dedicated to advising Clients of Archford.

Mr. West earned a Bachelor of Arts in Finance from University of Central Missouri in 1996.

Additional information regarding Mr. West's employment history is included below.

### Employment History:

Chief Investment Officer, Wealth Management Advisor, Archford Capital Strategies, LLC	03/2013 to Present
Registered Representative, Purshe Kaplan Sterling Investments	03/2013 to 08/2013
Investment Advisor, Bank of America, N.A.	12/2009 to 03/2013
Investment Associate, Merrill Lynch, Pierce, Fenner & Smith Incorporated	01/2005 to 12/2009

### Professional Designation: Chartered Financial Analyst ("CFA")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charterholders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. West.*** Mr. West has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. West.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. West.***

However, we do encourage you to independently view the background of Mr. West on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select "Investment Adviser Search" from the left navigation menu. Then select the option for "Individual" and enter **2868834** in the field labeled "Individual Name or CRD#".

## Item 4 – Other Business Activities

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### Insurance Agency Affiliations

Mr. West, Chief Investment Officer and Wealth Management Advisor of Archford, may serve as a sales agent for various insurance companies. This activity is done separate and apart from his role with Archford. As an insurance agent, Mr. West may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. West or the Advisor.

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### Archford Capital Strategies, LLC

4941 Benchmark Centre Drive, Suite 200 \* Swansea, IL 62226  
Phone: (618) 416-7086 \* Fax: (618) 416-7090  
[www.archfordcapital.com](http://www.archfordcapital.com)

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

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Mr. West has additional business activities where compensation is received. These business activities are detailed in “Item 4 - Other Business Activities” in Part 2B above.

#### **Item 6 – Supervision**

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Mr. West serves as the Chief Investment Officer and Wealth Management Advisor of Archford and is supervised by Tracy L. Winters, the Chief Compliance Officer. Tracy L. Winters can be reached at (618) 416-7086.

Archford has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Archford. Further, Archford is subject to regulatory oversight by various agencies. These agencies require registration by Archford and its employees. As a registered entity, Archford is subject to examinations by regulators, which may be announced or unannounced. Archford is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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## Form ADV Part 2B – Brochure Supplement for

**John R. Russo, CFA**  
**Chief Operating Officer, Wealth Management Advisor**

**Effective: March 31, 2014**

This Brochure Supplement provides information about the background and qualifications of John R. Russo, CFA (CRD# **4120209**) in addition to the information contained in the Archford Capital Strategies, LLC (“Archford” or the “Advisor”) (CRD # 164482) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Archford Disclosure Brochure or this Brochure Supplement, please contact us at (618) 416-7086.

Additional information about Mr. Russo is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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[www.archfordcapital.com](http://www.archfordcapital.com)

## Item 2 – Educational Background and Business Experience

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John Russo is the Chief Operating Officer and Wealth Management Advisor of Archford. John Russo, born in 1974, is dedicated to advising Clients of Archford.

Mr. Russo earned a Bachelor of Science in Business Administration with Major in Accounting from Southeast Missouri State in 1997.

Additional information regarding Mr. Russo's employment history is included below.

### Employment History:

Chief Operating Officer, Wealth Management Advisor, Archford Capital Strategies, LLC	03/2013 to Present
Registered Representative, Purshe Kaplan Sterling Investments	03/2013 to 08/2013
Investment Associate, Bank of America, N.A.	12/2009 to 03/2013
Investment Associate, Merrill Lynch, Pierce, Fenner & Smith Incorporated	10/2004 to 12/2009

### Professional Designation: Chartered Financial Analyst ("CFA")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charterholders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Russo.*** Mr. Russo has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Russo. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Russo.***

However, we do encourage you to independently view the background of Mr. Russo on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select "Investment Adviser Search" from the left navigation menu. Then select the option for "Individual" and enter **4120209** in the field labeled "Individual Name or CRD#".

## Item 4 – Other Business Activities

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### Insurance Agency Affiliations

Mr. Russo, Chief Operating Officer and Wealth Management Advisor of Archford, may serve as a sales agent for various insurance companies. This activity is done separate and apart from his role with Archford. As an insurance agent, Mr. Russo may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Russo or the Advisor.

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

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Mr. Russo has additional business activities where compensation is received. These business activities are detailed in “Item 4 - Other Business Activities” in Part 2B above.

#### **Item 6 – Supervision**

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Mr. Russo serves as the Chief Operating Officer and Wealth Management Advisor of Archford and is supervised by Tracy L. Winters, the Chief Compliance Officer. Tracy L. Winters can be reached at (618) 416-7086.

Archford has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Archford. Further, Archford is subject to regulatory oversight by various agencies. These agencies require registration by Archford and its employees. As a registered entity, Archford is subject to examinations by regulators, which may be announced or unannounced. Archford is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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

**Robert G. Schlueter**  
**Director of Operations, Wealth Management Advisor**

**Effective: March 31, 2014**

This Brochure Supplement provides information about the background and qualifications of Robert G. Schlueter (CRD# **2586460**) in addition information contained in the Archford Capital Strategies, LLC (“Archford” or the “Advisor”) (CRD # 164482) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Archford Disclosure Brochure or this Brochure Supplement, please contact us at (618) 416-7086.

Additional information about Mr. Schlueter is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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[www.archfordcapital.com](http://www.archfordcapital.com)

## Item 2 – Educational Background and Business Experience

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Robert Schlueter is the Director of Operations and Wealth Management Advisor of Archford. Robert Schlueter, born in 1968, is dedicated to advising Clients of Archford.

Mr. Schlueter earned a Bachelors Degree in Accounting from Southern Illinois University in 1990.

Additional information regarding Mr. Schlueter's employment history is included below.

### Employment History:

Director of Operations, Wealth Management Advisor, Archford Capital Strategies, LLC	03/2013 to Present
Registered Representative, Purshe Kaplan Sterling Investments	03/2013 to 08/2013
Investment Associate, Bank of America, N.A.	12/2009 to 03/2013
Investment Advisor, Merrill Lynch	04/2001 to 12/2009

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Schlueter.*** Mr. Schlueter has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Schlueter.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Schlueter.***

However, we do encourage you to independently view the background of Mr. Schlueter on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select "Investment Adviser Search" from the left navigation menu. Then select the option for "Individual" and enter **2586460** in the field labeled "Individual Name or CRD#".

## Item 4 – Other Business Activities

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### Insurance Agency Affiliations

Mr. Schlueter, Director of Operations and Wealth Management Advisor of Archford, may serve as a sales agent for various insurance companies. This activity is done separate and apart from his role with Archford. As an insurance agent, Mr. Schlueter may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Schlueter or the Advisor.

## Item 5 – Additional Compensation

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Mr. Schlueter has additional business activities where compensation is received. These business activities are detailed in "Item 4 - Other Business Activities" in Part 2B above.

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## **Item 6 – Supervision**

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Mr. Schlueter serves as the Director of Operations and Wealth Management Advisor of Archford and is supervised by Tracy L. Winters, the Chief Compliance Officer. Tracy L. Winters can be reached at (618) 416-7086.

Archford has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Archford. Further, Archford is subject to regulatory oversight by various agencies. These agencies require registration by Archford and its employees. As a registered entity, Archford is subject to examinations by regulators, which may be announced or unannounced. Archford is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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## Form ADV Part 2B – Brochure Supplement for

**Bernard E. Thebeau, AIF®  
Retirement Specialist**

**Effective: May 16, 2014**

This Brochure Supplement provides information about the background and qualifications of Bernard E. Thebeau, AIF® (CRD# **5944064**) in addition to the information contained in the Archford Capital Strategies, LLC (“Archford” or the “Advisor”) (CRD # 164482) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Archford Disclosure Brochure or this Brochure Supplement, please contact us at (618) 416-7086.

Additional information about Mr. Thebeau is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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[www.archfordcapital.com](http://www.archfordcapital.com)

## Item 2 – Educational Background and Business Experience

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Bernard Thebeau is the Retirement Specialist of Archford. Bernard Thebeau, born in 1975, is dedicated to advising Clients of Archford.

Mr. Thebeau attended Southwestern Illinois College.

Additional information regarding Mr. Thebeau's employment history is included below.

### Employment History:

Retirement Specialist, Archford Capital Strategies, LLC	03/2013 to Present
Registered Representative, Purshe Kaplan Sterling Investments	03/2013 to Present
Client Associate, Merrill Lynch Pierce, Fenner & Smith, Inc.	06/2011 to 03/2013
Sales Manager, Affordable Roofing & Exteriors	07/2009 to 06/2011
Production, Chrysler	11/1995 to 07/2009

### Professional Designation: Accredited Investment Fiduciary ("AIF®")

Since October 2002, the Accredited Investment Fiduciary® (AIF®) designation has been the mark of commitment to a standard of investment fiduciary excellence. Those who earn the AIF® mark successfully complete a specialized program on investment fiduciary standards of care and subsequently passed a comprehensive examination. AIF® designees demonstrate a thorough understanding of fi360's Prudent Practices for investment advisors and stewards.

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Thebeau.*** Mr. Thebeau has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Thebeau.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Thebeau.***

However, we do encourage you to independently view the background of Mr. Thebeau on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select "Investment Adviser Search" from the left navigation menu. Then select the option for "Individual" and enter **5944064** in the field labeled "Individual Name or CRD#".

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Thebeau is also a registered representative of Purshe Kaplan Sterling Investments, Inc of Albany, NY. Purshe Kaplan Sterling is a registered broker-dealer (CRD No. 35747), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Thebeau will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Thebeau. Neither the Advisor nor Mr. Thebeau will earn investment advisory fees in connection with any services implemented in Mr. Thebeau's separate capacity as a registered representative where commissions are earned.

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Generally, recommendations made by Archford to its Clients are implemented by Mr. Thebeau in his role as an Retirement Specialist, not in his role as a Registered Representative. As such, Clients of Archford will only pay advisory fees as described above. In no circumstances will Archford earn an advisory fee and a commission on the same investment. In the event that Mr. Thebeau earns a commission on an investment, the advisory fee will be waived by Archford.

#### Insurance Agency Affiliations

Mr. Thebeau, Retirement Specialist of Archford, may serve as a sales agent for various insurance companies. This activity is done separate and apart from his role with Archford. As an insurance agent, Mr. Thebeau may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Thebeau or the Advisor.

#### Item 5 – Additional Compensation

---

Mr. Thebeau has additional business activities where compensation is received. These business activities are detailed in “Item 10 - Other Financial Activities and Affiliations” in Part 2A above.

#### Item 6 – Supervision

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Mr. Thebeau serves as the Retirement Specialist of Archford and is supervised by Tracy L. Winters, the Chief Compliance Officer. Tracy L. Winters can be reached at (618) 416-7086.

Archford has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Archford. Further, Archford is subject to regulatory oversight by various agencies. These agencies require registration by Archford and its employees. As a registered entity, Archford is subject to examinations by regulators, which may be announced or unannounced. Archford is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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[www.archfordcapital.com](http://www.archfordcapital.com)



## Form ADV Part 2B – Brochure Supplement for

**Joshua E. Anderson  
Associate Analyst**

**Effective: March 31, 2014**

This Brochure Supplement provides information about the background and qualifications of Joshua E. Anderson (CRD# **5537519**) in addition to the information contained in the Archford Capital Strategies, LLC (“Archford” or the “Advisor”) (CRD # 164482) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Archford Disclosure Brochure or this Brochure Supplement, please contact us at (618) 416-7086.

Additional information about Mr. Anderson is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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[www.archfordcapital.com](http://www.archfordcapital.com)

## Item 2 – Educational Background and Business Experience

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Joshua Anderson is the Associate Analyst of Archford. Joshua Anderson, born in 1987, is dedicated to advising Clients of Archford. Mr. Anderson earned a Master of Business Administration from Southern Illinois University - Edwardsville in 2012. Mr. Anderson earned a Bachelor of Science in Finance from Southern Illinois University - Carbondale in 2010.

Additional information regarding Mr. Anderson's employment history is included below.

### Employment History:

Associate Analyst, Archford Capital Strategies, LLC	03/2013 to Present
Registered Representative, Purshe Kaplan Sterling Investments	03/2013 to 08/2013
Registered Client Associate, Merrill Lynch	07/2010 to 03/2013
Intern, First Command Financial Planning	05/2009 to 08/2009

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Anderson.*** Mr. Anderson has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Anderson. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Anderson.*** However, we do encourage you to independently view the background of Mr. Anderson on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select "Investment Adviser Search" from the left navigation menu. Then select the option for "Individual" and enter **5537519** in the field labeled "Individual Name or CRD#".

## Item 4 – Other Business Activities

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Mr. Anderson is a dedicated employee of Archford Capital Strategies, LLC and has no additional business activities where compensation is received.

## Item 5 – Additional Compensation

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Mr. Anderson has no additional business activities where compensation is received.

## Item 6 – Supervision

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Mr. Anderson serves as the Associate Analyst Advisor of Archford and is supervised by Tracy L. Winters, the Chief Compliance Officer. Tracy L. Winters can be reached at (618) 416-7086.

Archford has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Archford. Further, Archford is subject to regulatory oversight by various agencies. These agencies require registration by Archford and its employees. As a registered entity, Archford is subject to examinations by regulators, which may be announced or unannounced. Archford is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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# **Archford Capital Strategies, LLC**

## **Privacy Policy**

**Effective: March 31, 2014**

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### **Archford Capital Strategies, LLC**

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[www.archfordcapital.com](http://www.archfordcapital.com)



## Privacy Policy

### Our Commitment to You

Archford Capital Strategies, LLC ("Archford" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Archford (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Archford does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

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### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> Archford does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Archford or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
<b>Information About Former Clients</b> Archford does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (618) 416-7086.

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