

SFG Retirement Plan Consulting, LLC

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of SFG Retirement Plan Consulting, LLC. If you have any questions about the contents of this brochure, please contact us at (626) 578-0816 or by email at: mshuster@shusterfinancial.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about SFG Retirement Plan Consulting, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. SFG Retirement Plan Consulting, LLC's CRD number is: 170233.

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Registration does not imply a certain level of skill or training.

Version Date: 11/20/2015

Item 2: Material Changes

SFG Retirement Plan Consulting, LLC has the following material changes to report. This list summarizes changes to policies, practices or conflicts of interests only.

- SFG Retirement Plan Consulting, LLC has transitioned to registration with the United States Securities and Exchange Commission from its prior registration at the state level.

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- A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background **Error! Bookmark not defined.**
- B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any) **Error! Bookmark not defined.**
- C. Calculation of Performance-Based Fees and Degree of Risk to Clients **Error! Bookmark not defined.**
- D. Material Disciplinary Disclosures for Management Persons of this Firm **Error! Bookmark not defined.**
- E. Material Relationships That Management Persons Have With Issuers of Securities (If Any) **Error! Bookmark not defined.**

Item 4: Advisory Business

A. Description of the Advisory Firm

SFG Retirement Plan Consulting, LLC (hereinafter “SFGRPC”) is a Limited Liability Company organized in the State of California.

The firm was formed in February 2014, and the principal owner is Mark Allan Shuster.

B. Types of Advisory Services

SFG Retirement Plan Consulting, LLC (“SFGRPC”) provides investment consulting services to a variety of institutions, including Pension and Profit Sharing Plans, States and Municipalities, Educational Institutions and Charitable Organizations.

SFGRPC operates with a single focus in mind: Executing what’s right for the client. We are a non-proprietary firm which allows us to deliver unbiased and objective advice to our clients.

- We are independently owned and operated.
- Our growth is organic, not purchased.
- Investment managers and record-keepers are independently selected based upon the quality of their products, services and performance.

SFGRPC provides a wide range of services, including:

- Investment manager search and recommendations
- Record-Keeper search and recommendations
- Independent fee negotiations to include interest rates, expense ratios and revenue requirements
- Performance analysis and monitoring
- Plan design analysis and recommendations
- Investment policy statement development and monitoring
- Fiduciary Services
- Client and participant education
- Plan consolidation services
- Plan conversation facilitation
- Legal/compliance education
- Document review
- Vendor management/Issue resolution

C. Client Tailored Services and Client Imposed Restrictions

SFGRPC offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client's current situation (income, tax levels, and risk tolerance levels). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent SFGRPC from properly servicing the client account, or if the restrictions would require SFGRPC to deviate from its standard suite of services, SFGRPC reserves the right to end the relationship.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. SFGRPC does not participate in any wrap fee programs.

E. Assets Under Management

SFGRPC has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$0.00	\$215,612,000.00	November 2015

Item 5: Fees and Compensation

A. Fee Schedule

The entirety of our revenue is generated from our plan consulting, marketing, implementation and support services. We have a standard fee schedule that is based upon plan assets. However, we assess the scope of services to be provided to determine the fees required. We normally charge a fee that encompasses the proposed range of services to be provided throughout a 12-month period. All our fees are benchmarked against a national database of industry norms for a selected plan size and services provided. Fees can also be charged on an a-la-carte/fee for service basis. All our fees are negotiable.

Consideration of the following factors is made to determine the fee charged.

- Plan assets
- Range of services required
- Location/client travel requirements
- Plan design
- Meeting requirements

Our Standard Fee Schedule is as follows.

Plan Assets	Annual Fee
\$0 - \$2,499,999	0.40% - 0.50% bps
\$2,500,000 - \$4,999,999	0.35% - 0.40% bps
\$5,000,000 - \$9,999,999	0.25% - 0.35% bps
\$10,000,000 - \$19,999,999	0.20% - 0.25% bps
\$20,000,000 - \$39,999,999	0.15% - 0.20% bps
\$40,000,000 +	Negotiable

We may adjust our fees periodically to account for inflation or to cover the cost of services that fall outside the scope of services listed in Appendix A or Appendix B of the Investment Advisory Agreement with each client. Fees will not be adjusted without advance, written client agreement. Travel expenses and other out-of-pocket costs (if applicable) may be billed to the client separately, as detailed in the client agreement. Lower fees for comparable services may be available from other sources.

B. Payment of Fees

Fees may be charged as a percentage of assets or as a flat annual fee. Generally, fees are billed quarterly in arrears, hereby known as the "Billing Period." The billed fee and frequency is stated in Appendix C of the Investment Advisory Agreement.

For purposes of determining and calculating the fee as a percentage of assets, plan assets are valued net of Excluded Assets as of the last day of a calendar quarter, unless otherwise indicated. Annual flat fees will be billed $\frac{1}{4}$ of the annual fee at the end of each calendar quarter. Initial fees billed will be the amount, prorated for the number of days remaining in the initial Billing Period. Thereafter, fees will be billed at the end of each calendar quarter.

Clients may choose to pay for our services as follows:

- Via check
- Via wire transfer
- Via deduction from client account (deduction made by record-keeper then paid to SFGRPC)

C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by SFGRPC. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

SFGRPC collects its fees in arrears. It does not collect fees in advance.

E. Outside Compensation For the Sale of Securities to Clients

SFGRPC or its supervised persons may accept compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

Mark Allan Shuster is a registered representative of a broker-dealer and an insurance agent and, in these roles, accepts compensation for the sale of securities and other products to SFGRPC clients.

1. This is a Conflict of Interest

Supervised persons may accept compensation for the sale of securities or other investment products, including asset based sales charges or service fees from the sale of mutual funds to SFGRPC's clients. This presents a conflict of interest and gives the supervised person an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending the sale of securities or investment products for which the supervised persons receives compensation, SFGRPC will document the conflict of interest in the client file and inform the client of the conflict of interest.

2. Clients Have the Option to Purchase Recommended Products From Other Brokers

Clients always have the option to purchase SFGRPC recommended products through other brokers or agents that are not affiliated with SFGRPC.

3. Commissions are not the Primary Source of Income for SFGRPC

Commissions are not SFGRPC's primary source of compensation.

4. Advisory Fees in Addition to Commissions or Markups

Advisory fees that are charged to clients are not reduced to offset the commissions or markups on securities or investment products recommended to clients.

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

SFGRPC does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

SFGRPC We provide consulting services to the following types of clients:

- Pension and Profit Sharing Plans
- State and Municipal Governmental Entities
- School Districts and Higher Education Institutions
- Charitable Organizations

Minimum Account Size

There is no account minimum for any of SFGRPC's services.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

SFGRPC's methods of analysis include technical analysis, quantitative analysis and modern portfolio theory.

Technical analysis involves the analysis of past market data; primarily price and volume.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Investment Strategies

SFGRPC is committed to providing our clients with comprehensive portfolios that meet the objective of the client and plan participants. We have identified where revenue is

generated internally by record-keepers and fund companies and leverage that knowledge to reduce plan fees and enhance interest crediting rates. SFGRPC recommends long term trading.

SFGRPC's investment consulting services include a thorough analysis of historical performance, manager activity, manager fees, revenue sharing, and internal investment redundancy. Both quantitative and qualitative factors are used in evaluating fund managers and their investment strategies.

We employ the Scorecard System Methodology™ which is built around pass/fail criteria, on a scale of 0 to 10, with 10 being the best. The System has the ability to measure Active, Passive and Asset Allocation investing strategies. The fund's scoring incorporates modern portfolio theory statistics, quadratic optimization analysis, peer group rankings, manager tenure, expense ratios in relation to the average fund expense in that asset class category, and the fund's strength of statistics, among other quantitative and qualitative factors.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Quantitative Model Risk: Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Modern Portfolio Theory assumes that investors are risk adverse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

As a registered representative of AXA Advisors, LLC, Mark Allan Shuster accepts compensation for the sale of securities.

Any investment advice provided by SFGRPC is independent of AXA Advisors. AXA Advisors is not acting as an ERISA fiduciary for your plan/account, and neither provides, oversees nor monitors (i) any investment advice you may receive from SFGRPC or (ii) the compliance of SFGRPC with applicable law including but not limited to ERISA fiduciary standards and prohibited transaction rules.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither SFGRPC nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

SFGRPC may receive payment from plan providers for consulting services. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. SFGRPC always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of SFGRPC in connection with such individual's activities outside of SFGRPC.

Mark Allan Shuster is a registered representative of AXA Advisors, LLC and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. SFGRPC always acts in the best interest of the client, including with respect to the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of SFGRPC in such individual's capacity as a registered representative.

Mark Allan Shuster is an investment adviser representative with two other investment advisory firms, AXA Advisors & The Sterling Group, and from time to time, may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. SFGRPC always acts in the best interest of the client and clients are in no way required to use the services of any representative of SFGRPC in connection with such individual's activities outside of SFGRPC.

Mark Allan Shuster is a licensed insurance agent with Shuster Financial & Insurance Services, Inc., and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. SFGRPC always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of SFGRPC in connection with such individual's activities outside of SFGRPC.

Mark Allan Shuster acts as a pension consultant and from time to time, may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. SFGRPC always acts in the best interest of the client and clients are in no way required to utilize the services of any representative of SFGRPC in connection with such individual's activities outside of SFGRPC.

All material conflicts of interest under California Code of Regulations Section 260.238(k) are disclosed regarding the investment adviser, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

SFGRPC does not utilize nor select third-party investment advisers. All assets are managed by SFGRPC management.

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

A. Code of Ethics

SFGRPC has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. SFGRPC's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

SFGRPC does not recommend that clients buy or sell any security in which a related person to SFGRPC or SFGRPC has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of SFGRPC may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of SFGRPC to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. SFGRPC will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of SFGRPC may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of SFGRPC to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients.

Such transactions may create a conflict of interest; however, SFGRPC will never engage in trading that operates to the client's disadvantage if representatives of SFGRPC buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on SFGRPC's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent.

SFGRPC will require clients to use AXA Advisors, LLC, LPL Financial, LLC, and/or Sterling Group Wealth Management, LLC.

1. *Research and Other Soft-Dollar Benefits*

SFGRPC does not trade client's accounts and therefore receives no research, product, or services from a broker-dealer ("soft dollar benefits").

2. *Brokerage for Client Referrals*

SFGRPC receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

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

SFGRPC does not trade client's accounts.

B. Aggregating (Block) Trading for Multiple Client Accounts

SFGRPC does not trade clients' accounts and therefore does not have the ability to block trade purchases across accounts.

Item 13: Reviews of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts for SFGRPC's advisory services provided on an ongoing basis are reviewed at least quarterly by Mark A Shuster, Super Account Administrator with regard

to clients' respective investment policies and risk tolerance levels. All accounts at SFGRPC are assigned to this reviewer.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

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

C. Content and Frequency of Regular Reports Provided to Clients

Each client of SFGRPC's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

SFGRPC does not receive any economic benefit, directly or indirectly from any third party for advice rendered to SFGRPC's clients.

B. Compensation to Non – Advisory Personnel for Client Referrals

SFGRPC does not does not compensate non-advisory personnel for client referrals.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, SFGRPC will be deemed to have limited custody of client's assets. Because client fees will be withdrawn directly from client accounts, SFGRPC will:

(A) Possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian.

(B) Send the qualified custodian written notice of the amount of the fee to be deducted from the client's account.

(C) Send the client a written invoice itemizing the fee upon or prior to fee deduction, including the formula used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based.

Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

SFGRPC does not have discretion over client accounts at any time. Where SFGRPC does not have discretionary authority to place trade orders, SFGRPC will secure client permission prior to effecting securities transactions for the client's account.

Item 17: Voting Client Securities (Proxy Voting)

SFGRPC will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

SFGRPC neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither SFGRPC nor its management has any financial condition that is likely to reasonably impair SFGRPC's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

SFGRPC has not been the subject of a bankruptcy petition in the last ten years.