

## **Firm Brochure**

(Part 2A of Form ADV)

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This brochure provides information about the qualifications and business practices of Snider Financial Group. If you have any questions about the contents of this brochure, please contact us at: 425-453-7080, or by email at: [monte@sniderfinancialgroup.com](mailto:monte@sniderfinancialgroup.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 Snider Retirement Strategies DBA Snider Financial Group is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Monday, March 21, 2016

## **Material Changes**

### **Annual Update**

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

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

There were minor changes made to the 2016 ADV filing. Some clarifying language regarding our fee structure was modified as well as an update to the assets under management amounts.

### **Full Brochure Available**

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 425-453-7080 or by email at: [monte@SniderFinancialGroup.com](mailto:monte@SniderFinancialGroup.com).

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# **Advisory Business**

## **Firm Description**

Snider Financial Group was founded in 2001.

Snider Financial Group provides personalized confidential financial planning and investment management to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and might include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

Snider Financial Group is in the business of selling annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products.

Investment advice is an integral part of financial planning. In addition, Snider Financial Group advises clients regarding cash flow, college planning, retirement planning, tax planning and estate planning.

Investment advice is provided, with the advisor making the final decision on investment selection on discretionary accounts and the client giving the final permission on the recommendations for non-discretionary accounts. Snider Financial Group does not act as a custodian of client assets. The client always maintains control of assets. Snider Financial Group places trades for clients under a limited power of attorney.

A written evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g. lawyers, accountants, insurance agents) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the event they should occur.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

## **Principal Owners**

Monte L. Snider is a 100% stockholder.

### **Types of Investment Advisory Services**

Snider Financial Group provides investment supervisory services, also known as asset management services; manages investment advisory accounts not involving investment supervisory services; furnishes investment advice through consultations; issues periodicals about securities by subscription; issues special reports about securities; and issues, charts, graphs, formulas, or other devices which clients may use to evaluate securities.

On more than an occasional basis, Snider Financial Group furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning.

As of March 21, 2016 Snider Financial Group manages approximately \$102,290,000 in assets for approximately 264 clients. Approximately \$61,500,000 is managed on a discretionary basis, and \$40,790,000 is managed on a non-discretionary basis.

### **Tailored Relationships**

The goals and objectives for each client are documented in our client relationship management system. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

### **Types of Agreements**

The following agreements define the typical client relationships.

#### **Financial Planning Agreement**

A financial plan is designed to help the client with all aspects of financial planning without ongoing investment management after the financial plan is completed.

The financial plan might include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

Detailed investment advice and specific recommendations are provided as part of a financial plan. Implementation of the recommendations is at the discretion of the client.

The fee for a financial plan is predicated upon the facts known at the start of the engagement. The minimum fee is \$3,500 or 10 basis points of net worth, whichever is higher. The fee is negotiable. Since financial planning is a discovery process, situations occur wherein the client is unaware of certain financial exposures or predicaments.

In the event that the client's situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. The client must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

After delivery of a financial plan, future face-to-face meetings may be scheduled as necessary.

### **Investment Advisory Agreement**

Most clients choose to have Snider Financial Group manage their assets in order to obtain ongoing in-depth advice and life planning. All aspects of the client's financial affairs are reviewed. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis in discretionary accounts and changes are recommended and approved by the client in non- discretionary accounts.

The scope of work and fee for an Investment Advisory Agreement is provided to the client in writing prior to the start of the relationship. An Investment Advisory Agreement includes: cash flow management; insurance review; investment management (including performance reporting); education planning; retirement planning; estate planning; and tax preparation, as well as the implementation of recommendations within each area.

The annual Investment Advisory Agreement fee is based on a percentage of the assets according to the following schedule in addition to the fee required for the respective underlying manager for each account if applicable:

First <u>\$500,000</u>	1.80%
The next <u>\$500,000</u>	1.55%
<u>\$1,000,000</u> and above	1.30%

The minimum annual fee of \$3,000 is *negotiable*. Current client relationships may exist where the fees are higher or lower than the fee schedule above but not higher than the maximum allowed by LPL Financial. Accounts smaller than \$200,000.00 will pay an effective fee greater than 1.8%.

In addition clients may be billed using the above schedule for advisory planning services on assets not held at LPL financial or Snider Financial group such as 401K or Pension accounts.

Although the Investment Advisory Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or Snider Financial Group may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The portfolio value at the completion of the prior full billing quarter is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

### **Retainer Agreement**

Snider Financial Group does not offer a retainer option, other than the scheduled payment for completion of a financial plan.

### **Investment Management Agreement**



Snider Financial Group works with clients on an advisory fee basis only, for investment management.

### **Tax Preparation Agreement**

Snider Financial Group does not prepare tax returns for clients.

### **Hourly Planning Engagements**

Snider Financial Group provides hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements is \$500.

### **Asset Management**

Assets are invested primarily in no-load low-load mutual funds, or institutional class mutual funds and exchange-traded funds, usually through discount brokers or fund companies. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Discount brokerages may charge a transaction fee for the purchase of some funds.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades. Snider Financial Group does receive compensation from various financial institutions such as 12b-1 fees and commissions.

Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts, futures contracts, and interests in partnerships.

Initial public offerings (IPOs) are not available through Snider Financial Group.

### **LPL Financial Sponsored Advisory Programs**

Snider Financial Group may provide advisory services through certain programs sponsored by LPL Financial Corporation (LPL), a registered investment advisor and broker-dealer. Below is a brief description of each LPL advisory program available to Snider Financial Group. For more information regarding the LPL programs, including more information on the advisory services and fees that apply, the types of investments available in the programs and the potential conflicts of interest presented by the programs please see the LPL Financial Form ADV Part 2 and the applicable client agreement.

### **Manager Access Select (MAS)**

Manager Access Select is a separate account platform available through LPL Financial that offers high-net-worth investors the ability to access a variety of institutional portfolio managers at significantly lower account minimums. This enables clients to enjoy a higher level of specialization and service through the ownership of individual securities. You can choose from a broad range of portfolio managers and multiple investment

styles including equity, fixed income, asset classes, mutual funds, ETFs and specialty strategies.

The client will authorize LPL to act on a discretionary basis to purchase and sell securities and to liquidate previously purchased securities. The client will also authorize LPL to effect rebalancing for MAS accounts.

### **Optimum Market Portfolios Program (OMP)**

OMP offers clients the ability to participate in a professionally managed asset allocation program using Optimum Funds Class I shares. Under OMP, client will authorize LPL on a discretionary basis to purchase and sell Optimum Funds pursuant to investment objectives chosen by the client. Advisor will assist the client in determining the suitability of OMP for the client and assist the client in setting an appropriate investment objective. Advisor will have discretion to select a mutual fund asset allocation portfolio designed by LPL consistent with the client's investment objective. LPL will have discretion to purchase and sell Optimum Funds pursuant to the portfolio selected for the client. LPL will also have authority to rebalance the account.

A minimum account value of \$15,000 is required for OMP.

### **Model Wealth Portfolios Program (MWP)**

MWP offers clients a professionally managed mutual fund asset allocation program. Snider Financial Group will obtain the necessary financial data from the client, assist the client in determining the suitability of the MWP program and assist the client in setting an appropriate investment objective. The Advisor will initiate the steps necessary to open an MWP account and have discretion to select a model portfolio designed by LPL's Research Department consistent with the client's stated investment objective. LPL's Research Department is responsible for selecting the mutual funds within a model portfolio and for making changes to the mutual funds selected.

The client will authorize LPL to act on a discretionary basis to purchase and sell mutual funds (including in certain circumstances exchange traded funds) and to liquidate previously purchased securities. The client will also authorize LPL to effect rebalancing for MWP accounts.

The MWP program does make available model portfolios designed by strategists other than LPL's Research Department. Such models are made available and the Advisor will have discretion to choose among the available models designed by LPL and outside strategists.

A minimum account value of \$100,000 is required for MWP.

### **Personal Wealth Portfolios Program (PWP)**

PWP offers clients a professionally managed mutual fund asset allocation program. Snider Financial Group will obtain the necessary financial data from the client, assist the

client in determining the suitability of the PWP program and assist the client in setting an appropriate investment objective. The Advisor will initiate the steps necessary to open an PWP account and have discretion to select a model portfolio designed by LPL's Research Department consistent with the client's stated investment objective. LPL's Research Department is responsible for selecting the mutual funds within a model portfolio and for making changes to the mutual funds selected.

The client will authorize LPL to act on a discretionary basis to purchase and sell securities and to liquidate previously purchased securities. The client will also authorize LPL to effect rebalancing for PWP accounts.

A minimum account value of \$250,000 is required for PWP.

### **Strategic Wealth Management (SWM)**

SWM is a comprehensive, open-architecture, fee-based investment platform designed to help deliver highly customized advice and exceptional service. The platform provides a foundation to help you develop successful client relationships by thoroughly understanding your clients' long-term financial goals and offering solutions to achieve them. With this platform, multiple investments can be wrapped in one account with one consolidated statement for the client. Snider Financial Group has the fiduciary responsibility on the account, and also selects, recommends, and makes changes to these accounts on a discretionary basis.

The client will authorize Snider Financial Group to act on a discretionary basis to purchase and sell securities and to liquidate previously purchased securities. The client will also authorize Snider Financial Group to effect rebalancing for SWM accounts.

### **Termination of Agreement**

A Client may terminate any of the aforementioned agreements at any time by notifying Snider Financial Group in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, Snider Financial Group will refund any unearned portion of the advance payment.

Snider Financial Group may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, Snider Financial Group will refund any unearned portion of the advance payment.

## **Fees and Compensation**

### **Description**

Snider Financial Group bases its fees on a percentage of assets under management, hourly charges, fixed fees, or commissions.

Financial plans are priced according to the degree of complexity associated with the client's situation.

Fees are negotiable.

### **Fees for LPL Advisory Programs**

The account fee charged to the client for each LPL advisory program is negotiable, subject to the following maximum account fees:

MAS	3.0%
OMP	2.5%
PWP	2.5%
MWP	2.5%
SWM	3.0%

Account fees are payable quarterly in advance.

LPL serves as program sponsor, investment advisor and broker-dealer for the LPL advisory programs. Snider Financial Group and LPL will share in the account fee and other fees associated with program accounts. Associated persons of Advisor might also be registered representatives of LPL.

### **Potential Conflicts of Interest**

Transactions in LPL advisory program accounts are generally effected through LPL as the executing broker-dealer.

Advisor receives compensation as a result of a client's participation in an LPL program. Depending on, among other things, the size of the account, changes in its value over time, the ability to negotiate fees or commissions, and the number of transactions, the amount of this compensation may be more or less than what the Advisor would receive if the client participated in other programs, whether through LPL or another sponsor, or paid separately for investment advice, brokerage and other services.

This conflict creates a financial incentive for Snider Financial Group to recommend one investment or program over another where your best interest may not be aligned with ours.

### **Fee Billing**

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

Fees for financial plans are billed the lesser of 50% or \$1200.00 in advance, with the balance due upon delivery of the financial plan delivered in no more than 6 months.

### **Other Fees**

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. We feel the selection of the security is more important than the fee that the custodian charges to buy or sell the security.

Snider Financial Group, Inc., in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients).

### **Expense Ratios**

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to Snider Financial Group, Inc.

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

### **Past due Accounts and Termination of Agreement**

Snider Financial Group reserves the right to stop work on any account that is more than 30 days overdue. In addition, Snider Financial Group reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in Snider Financial Group's judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 30 days.

## **Performance-Based Fees**

### **Sharing of Capital Gains**

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

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

## **Types of Clients**

### **Description**

Snider Financial Group generally provides investment advice to individuals, banks or thrift institutions, investment companies, pension and profit sharing plans, trusts, estates, or charitable organizations, and corporations or business entities.

Client relationships vary in scope and length of service.

### **Account Minimums**

The minimum account size is \$200,000 of assets under management, which equates to an annual fee of \$3,000.

Snider Financial Group has the discretion to waive the account minimum. Accounts of less than \$200,000 may be set up when the client and the advisor anticipate the client will add additional funds to the accounts bringing the total to \$200,000 within a reasonable time. Other exceptions will apply to employees of Snider Financial Group and their relatives, or relatives of existing clients.

Clients receiving ongoing asset management services might be assessed a \$3,000 minimum annual fee. Clients with assets below the minimum account size will pay a higher percentage rate on their annual fees than the fees paid by clients with greater assets under management where the minimum fee is imposed. As a result all clients do not pay the same fee.

## **Methods of Analysis, Investment Strategies and Risk of Loss**

### **Methods of Analysis**

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

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

Other sources of information that Snider Financial Group might use include Morningstar, Forbes, Smart Money, Bloomberg Business Week, The Economist, Investment Advisor, Financial Advisor, Investment News and the World Wide Web.

### **Investment Strategies**

The primary investment strategy used on client accounts is strategic asset allocation with a tactical overlay. This means that we use managed funds, ETF's, and/or individual securities to compliment the portfolio. Portfolio diversification is achieved by using traditional as well as alternative asset classes. Portfolios are globally diversified to control the risk associated with traditional markets.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time.

Other strategies might at your request include long-term purchases, short-term purchases, trading, short sales, margin transactions, and option writing (including covered options, uncovered options or spreading strategies).

### **Risk of Loss**

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

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- **Margin Transactions:** If you request, we can help you establish your account to allow for margin transactions. Margin allows you to purchase investments for your portfolio with money borrowed from your custodian and secured by the investments in your brokerage account. This allows you to purchase more stock than you would be able to with your available cash, and allows us to purchase stock without selling other holdings. Therefore your exposure to market volatility increases. In a declining market your account could experience greater losses.

## **Disciplinary Information**

### **Legal and Disciplinary**

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

## **Other Financial Industry Activities and Affiliations**

### **Financial Industry Activities**

Snider Financial Group is not registered as a securities broker-dealer, or a futures commission merchant, commodity pool operator or commodity trading advisor.

### **Affiliations**

Snider Financial Group has arrangements that are material to its advisory or its clients with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, introducing broker, commodity trading adviser or futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships including but not limited to; LPL Financial, Insurance Companies and a variety of securities firms. When acting as an agent for these companies (Such as insurance products) Snider Financial Group is not acting as a fiduciary but as an agent compensated by commission where there may be a financial incentive to recommend one product over another based on the compensation paid to the financial advisor or firm.

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

### **Code of Ethics**

The employees of Snider Financial Group have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

### **Participation or Interest in Client Transactions**

Snider Financial Group and its employees may buy or sell securities that are also held by clients. Employees may not knowingly trade their own securities ahead of client trades on any given day prior to executing a client trade. Employees comply with the provisions of the LPL Financial compliance rules where all securities trading takes place and as Snider Financial Group is required to trade these securities through LPL Financial no best execution review is performed or attempted.

Trades occurring in accounts managed by a third party is not known in advance by anyone at Snider Financial Group therefore it would be highly unlikely that Snider Financial Group employees would be able to trade ahead of their clients in these scenarios.



### **Personal Trading**

The Chief Compliance Officer of Snider Financial Group is Monte L. Snider. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment.

## **Brokerage Practices**

### **Selecting Brokerage Firms**

Specific custodian recommendations are made to Clients based on their need for such services. Snider Financial Group recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

Snider Financial Group clears with LPL Financial and is an advisor with LPL Financial and as a result does not seek best execution.

## **Review of Accounts**

### **Periodic Reviews**

Securities held in clients' portfolios are reviewed in an ongoing basis by Monte L. Snider. Account reviews are performed more frequently when market conditions dictate and individual client portfolios are reviewed no less than annually.

### **Review Triggers**

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

### **Regular Reports**

Account reviewers are members of the firm's Investment Committee consisting of the registered representatives of Snider Financial Group meeting on at least a bi-monthly basis. They are instructed to consider the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client.

Clients receive periodic communications on at least an annual basis. *Investment Advisory Agreement* clients, and *Investment Management* clients, receive written quarterly updates. The written updates might include a net worth statement portfolio statement, tax return (if the client requests tax preparation services), and a summary of objectives and progress towards meeting those objectives.

## **Client Referrals and Other Compensation**

### **Incoming Referrals**

Snider Financial Group has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. Snider Financial Group may compensate certain non-employee individuals for the referral of clients. These individuals are referred to as “solicitors.” In these situations, we have a written contract with the solicitor that specifies the amount of compensation he or she will receive. This compensation does not affect the fees that any client pays to us. Any clients referred to us by a solicitor are provided with a written disclosure with the details of the compensation arrangement between the solicitor and Snider Financial Group.

### **Referrals Out**

Snider Financial Group does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

### **Other Compensation**

Snider Financial Group does receive compensation from the following sources as described in the affiliation section of this document.

## **Custody**

### **Account Statements**

All assets are held at qualified custodians, which mean the custodians provide account statements directly to clients at their address of record at least quarterly.

### **Performance Reports**

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by Snider Financial Group.

### **Net Worth Statements**

Some clients are provided net worth statements and net worth graphs that are generated from our client relationship management system. Net worth statements contain approximations of bank account balances provided by the client, as well as the value of land and hard-to-price real estate. The net worth statements are used for long-term financial planning where the exact values of assets are not material to the financial planning tasks.

## **Investment Discretion**

### **Discretionary Authority for Trading**

Snider Financial Group manages accounts on both discretionary and non-discretionary basis on behalf of clients. Snider Financial Group has the authority to determine,

without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold in the discretionary accounts.

The client approves the custodian to be used and the transaction rates paid to the custodian. Snider Financial Group does not receive any portion of the transaction fees paid by the client to the custodian on certain trades.

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

In non-discretionary accounts Snider Financial Group will obtain permission via the regular review meetings or through instructions accepted or delivered by the client via the telephone.

### **Potential Effect of Advisor Paying Transaction Costs**

Because in the SWM Program we pay for the cost of securities transactions and have the full discretionary power to decide if and when a securities transaction is made, we have the financial incentive not to make securities transaction. Paying for securities transactions in the client's investment portfolio creates a potential conflict of interest where we have the financial incentive not to make a securities transaction in the client's account when it is in the client's best interests to do so. The wrap program may cost you more or less than purchasing such services separately. Some Clients grant discretionary authority by signing the LPL SWM agreement and no further Limited Power of Attorney is required.

### **Limited Power of Attorney**

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

## **Voting Client Securities**

### **Proxy Votes**

Snider Financial Group does not vote proxies on securities. Clients are expected to vote their own proxies.

When assistance on voting proxies is requested, Snider Financial Group will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

## **Financial Information**

### **Financial Condition**

Snider Financial Group does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

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

## **Business Continuity Plan**

### **General**

Snider Financial Group has a Business Continuity Plan and a Disaster Recovery Plan that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

### **Disasters**

The Disaster Recovery Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

### **Alternate Offices**

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

### **Loss of Key Personnel**

Snider Financial Group has signed a Business Continuation Agreement to support Snider Financial Group in the event of Monte L. Snider's serious disability or death.

## **Information Security Program**

### **Information Security**

Snider Financial Group maintains an information security program to reduce the risk that your personal and confidential information may be breached.

### **Privacy Notice**

Snider Financial Group is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a

limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this Privacy Notice to you annually, in writing.

## **Brochure Supplement (Part 2B of Form ADV)**

### **Education and Business Standards**

Snider Financial Group requires that advisors in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning. Examples of acceptable coursework include: an MBA, a CFP, a CFA, a ChFC, LUTCF, JD, CTFA, EA or CPA. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

### **Professional Certifications**

Employees have earned certifications and credentials that are required to be explained in further detail.

Chartered Financial Consultant (ChFC): Chartered Financial Consultants are licensed by The American College to use the ChFC mark. ChFC requirements:

- Completion of the financial planning education requirements set by The American College (<http://www.theamericancollege.edu/financial-planning/chfc-advanced-financial-planning>).
- Successful completion of the ChFC Exam
- Three years of full-time business experience

Life Underwriter Training Council Fellow (LUTCF): Life Underwriter Training Council Fellows are licensed by The American College to use the LUTCF mark. LUTCF requirements:

- Completion of the education requirements set by The American College (<http://www.theamericancollege.edu/insurance-education/lutcf-insurance-skills>).
- Successful completion of the LUTCF Exam
- Be a member of the National Association of Insurance and Financial Advisors (NAIFA)

Chartered Life Underwriter (CLU): Chartered Life Underwriters are licensed by The American College to use the CLU mark. CLU requirements:

- Successful completion of the CLU Exam
- Three years of full-time business experience

**Monte L. Snider, ChFC, LUTCF, CLU****Educational Background:**

- Date of birth:1968
- Institutions (1992): Bachelor's Degree in Finance from the University of Arkansas

**Business Experience:**

- Monte Snider, President of Snider Financial Group and financial advisor began his education in 1988 as finance major at the University of Arkansas and graduated in 1992. He earned the Chartered Financial Consultant designation in 2000, and became a Life Underwriter Training Council Fellow (LUTCF). He continued his financial education at the American College taking courses about income taxation, investments, risk management, and financial planning. He graduated from MetLife's Financial Planning School in 1999. He is currently FINRA series 6, 63, 7, 65, 24, 53, and 3 registered. He is also Life, Disability and Property and Casualty licensed. Registrations are with LPL Financial.

After graduation, Monte moved to Seattle and transferred the practice he began in college to MetLife Financial Services. During his career, Monte achieved awards in leadership among his peers, as well as, for excellence as a financial consultant in 1996 and 1997. Monte founded Snider Financial Group in June 2001.

Disciplinary Information: [None]

Other Business Activities: 50% owner of Flextron LLC, a commercial real estate rental property. Provides property and casualty referrals to The Partners Group and Cairnes Insurance Agency. 50% owner of 12505 Bel-Red Properties LLC, Commercial real estate. Offers non-variable insurance through Snider Financial Group, Serves on the board of directors for the Liger Foundation, a non-profit organization. Director of Liger Education Cambodia which is a corporation that is wholly owned by The Liger Charitable Foundation. Establishing schools and other service to support the education sector and administration of education. Monte Snider acts as trustee for Snider Financial Group 401(k) accounts. Monte Snider is a Notary Public for the State of Washington.

Additional Compensation: Monte Snider may receive the following forms of additional compensation as a result of providing advisory services to clients:

Monte Snider may receive non-cash compensation from product sponsors.

Such compensation may not be tied to the sales of any products. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings or marketing or advertising initiatives. Product sponsors may also pay for education or training events that he may attend. This practice gives Monte Snider an incentive to recommend investment products based on the compensation received, rather than on the client's needs.

Monte Snider may receive from LPL Financial production bonuses, stock options, reimbursement of fees paid to LPL Financial for items such as administrative services, and other things of value such as free or reduced- cost attendance at LPL Financials national sales conference or top producer forums and events. Production bonuses, administrative fee reimbursements, and awards for conference attendance are based on overall business produced by Monte Snider and do not favor one product or program over others. The awarding of stock is based on total production, recurring revenue and growth rate of production. Advisory fees are considered recurring revenue and, thus, there may be a financial incentive for Monte Snider to recommend client's establish advisory accounts so that he will receive recurring revenue and possibly receive stock from LPL Financial.

**Supervision:**

Monte Snider reviews all employees' work through frequent office interactions as well as remote interactions. Monte Snider also reviews all employees' activities through our client relationship management system and the LPL Branchnet system.

**Timothy J. Simunds**

**Educational Background:**

- Date of Birth 1976
- Institutions: Bachelor of Arts in Philosophy from Seattle Pacific University (2008). Graduated summa cum laude
- 1998 A.A.S. Direct Transfer Degree from Everett Community College. Graduated with honors - President's List.

**Business Experience:**

- Tim Simunds, Wealth Advisor of Snider Financial Group began his education in 1996 at Everett Community College continuing on at Seattle Pacific University in 2005. He is currently FINRA series 7, and 66 registered. He is also licensed for Life, & Disability. Registrations are with LPL Financial.

Disciplinary Information: [None]



Other Business Activities [None]

Additional Compensation: Tim Simunds may receive the following forms of additional compensation as a result of providing advisory services to clients:

Tim Simunds may receive non-cash compensation from product sponsors. Such compensation may not be tied to the sales of any products. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings or marketing or advertising initiatives. Product sponsors may also pay for education or training events that he may attend. This practice gives Tim Simunds an incentive to recommend investment products based on the compensation received, rather than on the client's needs.