



# BARKER

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FINANCIAL GROUP, INC.  
*Strategic Wealth Management Advisors*

## Form ADV Part 2A Investment Adviser Disclosure Brochure

Effective: March 10, 2018

This Form ADV2A ("Disclosure Brochure") provides information about the qualifications and business practices of Barker Financial Group, Inc. ("Advisor"). If you have any questions about the contents of this Disclosure Brochure, please contact James T. Barker, President at **781.743.2600**. The information in this Disclosure Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. Registration as an investment advisor does not imply a certain level of skill or training.

Additional information about Barker Financial Group, Inc. is also available on the SEC's website at **[www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)**. You may search this site using a unique identifying number, known as a CRD number. Barker Financial Group, Inc.'s CRD Number is **116817**.

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## Item 2 – Material Changes

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This Item of the Disclosure Brochure is updated if material changes have occurred during the course of Barker Financial Group, Inc.'s fiscal year.

### **Material Changes:**

There have been no material changes to this Disclosure Brochure since the last distribution to Clients.

### **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 Barker Financial Group, Inc.

Barker Financial Group, Inc. believes that communication and transparency are the foundation of our relationship and continually strives to provide you with complete and accurate information at all times. We encourage all current and prospective investors to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

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 Barker Financial Group, Inc. search the site by company name, individual name or by CRD number **116817** (our firm's CRD number). You may also request a copy of this Disclosure Brochure at any time by contacting us by telephone at **781.743.2600** or by email at [info@barkerfg.com](mailto:info@barkerfg.com).

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## Item 4 – Advisory Services

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### Firm Information

Barker Financial Group, Inc. (the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”), and is organized as a corporation under the laws of the Commonwealth of Massachusetts. Barker Financial Group, Inc. was founded in 1997 and is owned and operated by President and Chief Compliance Officer, James T. Barker. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Barker Financial Group, Inc.

### Advisory Services Offered

Barker Financial Group, Inc. offers investment advisory services to individuals, trusts, estates, non-profit organizations, pension and profit sharing plans, and corporations (each referred to as a “Client”). Services include financial planning, investment consulting, non-investment related consulting, and investment management services.

***Financial Planning*** – Barker Financial Group, Inc. typically provides a variety of financial planning services to individuals, families, and other Clients pursuant to the deliverables outlined in a written Financial Planning 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 providing a financial consultation for Clients based on the Client’s financial goals and objectives. This planning 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 financial plan developed for 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 include the Client start or revise their investment programs, commence or alter retirement savings, and/or establish education savings and/or charitable giving programs. Barker Financial Group, Inc. may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, Barker Financial Group, Inc. will provide a written summary of a Client’s financial situation, observations, and recommendations.

***Investment Consulting*** – Barker Financial Group, Inc. may provide its Clients with a broad range of consulting services, including, but not limited to, investment advice and/or portfolio management services for ERISA plan trustees, personal trusts, non-profit organizations, municipalities, and individuals, comparing the results to the Client’s portfolio performance against various indices pursuant to a Consulting Agreement. Other portfolio management services related to retirement income needs, or liquidity needs of corporations and municipalities are also provided. Fixed income and cash management portfolios are created on a customized basis to meet stated client objectives.

***Non-Investment Related Consulting*** – Barker Financial Group, Inc. may provide Clients with a broad range of non-investment related consulting services, including but not limited to, estate administration assistance, asset transfers, administration of routine gifting programs, tracking employer stock option grants, retirement transition services, and others as requested by the client, pursuant to a Consulting Agreement.

***Investment Related Consulting*** – Prior to engaging Barker Financial Group, Inc. to provide investment advisory services, each Client is required to enter into an Investment Advisory Agreement with Barker Financial Group, Inc. that defines the terms, conditions, authority and responsibilities of Barker Financial Group, Inc. and the Client. These investment related consulting services may include:

- **Establishing an Investment Policy Statement** – Barker Financial Group, Inc., in conjunction 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, and investment strategies to be undertaken/taken.
- **Client risk tolerance** – Barker Financial Group, Inc., in conjunction with the Client, will define a risk tolerance and any trading restrictions for the Client.

- **Asset Allocation** – Barker Financial Group, Inc. 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** – Barker Financial Group, Inc. will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- **Investment Management and Supervision** – Barker Financial Group, Inc. will provide investment management and ongoing oversight of the Client's portfolio and overall account.

**Cash Management Services** – Barker Financial Group, Inc. offers investment management services for short term fixed income accounts generally investing in cash or other liquid instruments.

**Defined Contribution Plans** – Barker Financial Group, Inc. may utilize retirement platforms at third parties that provide plan administration services and various investment portfolio options. The Client will then enter into a program agreement with the Third Party record keeping platform and/ or Third Party Administrator and Barker Financial Group, Inc. Barker Financial Group, Inc. will assist and advise the Client in establishing investment options of the plan and will continue to provide oversight of these investment options.

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, the Client is under no obligation to effect the transaction through the Advisor.

## **Wrap Fee Programs**

Barker Financial Group, Inc. does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Barker Financial Group, Inc.

## **Tailored Relationships**

Barker Financial Group, Inc. tailors investment advisory services to the individual needs of the Client. Barker Financial Group, Inc. Clients are allowed to impose restrictions on the investments in their account[s]. Barker Financial Group, Inc. may accept any reasonable limitation or restriction to discretionary authority on the account placed by the Client. All limitations and restrictions placed on accounts must be presented to Barker Financial Group, Inc. in writing.

## **Assets Under Management**

As of December 31, 2017, Barker Financial Group, Inc. manages the following assets:

Assets Under Management	Assets
Discretionary Assets	\$147,247,622
Non-Discretionary Assets	\$137,280
<b>Total</b>	<b>\$147,384,902</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 a Financial Planning Agreement and/or an Investment Advisory Agreement that details the responsibilities of Barker Financial Group, Inc. and the Client.

**Financial Planning** – Barker Financial Group, Inc. offers financial planning on a fixed fee or an hourly rate basis. Fixed fee engagements are typically charged between \$1,000 and \$3,000. For engagement on an hourly rate basis, fees are charged ranging from \$200 to \$350 per hour. Hourly and fixed fee rates may be negotiable depending on the nature and complexity of each Client's circumstances. For hourly rate engagements, an estimate of the total hours will be determined prior to establishing the advisory relationship and incorporated into the Financial Planning Agreement. The fees will be due and payable upon completion of the engagement deliverable[s].

**Investment Consulting** – Barker Financial Group, Inc. offers investment consulting where actual account management is not required on a fixed fee or an hourly rate basis. For engagement on an hourly rate basis, fees are charged ranging from \$200 to \$350 per hour depending on the nature and complexity of the Client's circumstances. For fixed fee engagements, the total fee is negotiable, but generally ranges from \$1,000 to \$10,000, based upon the scope of work involved. An estimate of the total hours and the applicable rate or total costs will be determined prior to establishing the consulting relationship. The Consulting Agreement may specify an amount of the fee to be paid in advance of the engagement, subject to the limitations below.

**Non-Investment Related Consulting** – Barker Financial Group, Inc. offers non-investment related consulting services on a fixed fee and an hourly rate basis. For engagement on an hourly rate basis, fees are charged ranging from \$200 to \$350 per hour depending on the nature and complexity of each Client's circumstances. For fixed fee engagements, the total fee is negotiable, but generally ranges from \$1,000 to \$10,000, based upon the scope of work involved. An estimate of the total hours and/or total costs will be determined prior to establishing the advisory relationship. The Consulting Agreement may specify an amount of the fee to be paid in advance of the engagement, subject to the limitations below.

Barker Financial Group, Inc.'s fee for Financial Planning, Investment Consulting and Non-Investment Related Consulting is exclusive of, and in addition to, brokerage commissions, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, Barker Financial Group, Inc. shall not receive any portion of these commissions, fees, and costs. The hourly rate fees and fixed fees are determined after considering many factors, such as the level and scope of the services. The Advisor will not require payment, more than or equal to 6 months in advance, of \$1,200 or more, for services to be performed where consulting and planning services are provided. Further, most assignments are completed within 2 to 3 weeks.

**Investment Management Services** – Investment advisory fees are paid by the Client quarterly in arrears pursuant to the terms of the Investment Advisory Agreement. Investment advisory fees are based on the market value of the Client's assets under management at the end of each calendar quarter. Investment advisory fees generally range from 1.00% to 0.40% annually based on the following schedule:

<b>Assets Under Management</b>	<b>Annual Rate</b>
\$500,000 to \$1,000,000	1.00%
\$1,000,001 to \$2,000,000	1.00% to 0.85%
\$2,000,001 to \$5,000,000	0.85% to 0.60%
\$5,000,001 to \$7,000,000	0.60% to 0.40%
Above \$7,000,001	Negotiable

The investment advisory fee in the first quarter of service is prorated to the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of Barker Financial Group, Inc. per the schedule above and in instances of family or other relationships where multiple accounts may be aggregated to achieve a lower fee rate.

The Client's fees will take into consideration the aggregate assets under management with Barker Financial Group, Inc. All securities held in accounts managed by Barker Financial Group, Inc. will be

independently valued by the designated Custodian. Barker Financial Group, Inc. will not have the authority or responsibility to value portfolio securities.

**Account Portfolio Management** – Investment advisory fees will be calculated by the Advisor and automatically deducted from the Client's account[s] by the Custodian. Barker Financial Group, Inc. shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the respective quarter-end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the Client's total assets under management with Barker Financial Group, Inc. 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. 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 Barker Financial Group, Inc. 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. Fees charged by Third-Party Managers or platforms may calculate fees on other methodologies (i.e., average assets, prior period assets or other methods).

**Cash Management Services** – Barker Financial Group, Inc. offers investment management services for short term fixed income accounts, and generally offers a reduced management fee for this service due to the nature of lower yields typical of the securities and holding periods involved. These accounts would generally include cash or other liquid instruments and the fee is negotiated based upon the size, client needs, duration, etc. Cash management services fees will be charged 0.10% quarterly in arrears.

## **Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third-parties, other than Barker Financial Group, Inc., in connection with investments made on behalf of the Clients' account[s]. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The investment advisory fee charged by Barker Financial Group, Inc. is separate and distinct from these custodian and execution fees.

In addition, all fees paid to Barker Financial Group, Inc. for investment advisory services are separate and distinct from the fees and 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 Barker Financial Group, Inc., but would not receive the services provided by Barker Financial Group, Inc. which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial condition and objectives. Accordingly, the Client should review both the fees and expenses charged by the fund[s] and the fees charged by Barker Financial Group, Inc. to fully understand the total fees to be paid.

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

**Financial Planning, Investment Consulting, and Non-Investment Related Services** – Barker Financial Group, Inc. may be partially compensated for its planning, consulting, or non-investment related services in advance. 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. Upon termination, the Client shall be billed for actual hours logged on the planning project multiplied by the agreed upon hourly rate or based on a percentage of the engagement completed. Upon termination, the Advisor will refund any unearned, prepaid planning fees

**Investment Management Services** – Barker Financial Group, Inc. is compensated for its services at the end of the quarter after investment advisory services are rendered. Either party may terminate the Investment Advisory Agreement with Barker Financial Group, Inc., at any time, by providing advance written notice to the other party. The Client shall be responsible for investment advisory fees up to and including the effective date of termination. The Client's Investment Advisory Agreement with Barker Financial Group, Inc. is non-transferable without the Client's written approval.

## Compensation for Sales of Securities

Barker Financial Group, Inc. does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

## Item 6 – Performance Based Fees

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

Barker Financial Group, Inc. does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

## Item 7 – Types of Clients

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Barker Financial Group, Inc. 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, investing pooled assets
- **Foundation and Endowments** – non-profit organizations that manage a pool of assets, and distribute funds according to a mandate or mission
- **501(c)(3) Non-Profit Organizations and Municipalities** – mission-based, non-profit organizations, and Municipality funding portfolios for specific purpose use
- **Corporations and Businesses** – taxable business entities, investing cash reserves

The relative percentage of each type of Client is available on Barker Financial Group, Inc.'s Form ADV Part 1. These percentages will change over time. Barker Financial Group, Inc. generally requires a minimum relationship size of \$500,000 to effectively implement its investment process. Barker Financial Group, Inc. may waive this minimum account size based on the size of the overall relationship or at the discretion of Barker Financial Group, Inc.

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

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### Methods of Analysis

Barker Financial Group, Inc. employs fundamental and technical analysis methods in developing investment strategies for its Clients. Research and analysis from Barker Financial Group, Inc. 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, Barker Financial Group, Inc. generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Barker Financial Group, Inc. 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 its Clients. At times, Barker Financial Group, Inc. 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.



## 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. Barker Financial Group, Inc. 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.

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. Barker Financial Group, Inc. 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 Barker Financial Group, Inc. of any changes in financial condition, goals or other factors that may affect this analysis. Barker Financial Group, Inc. primarily employs investment strategies that do not involve any significant or unusual risk other than domestic equity and international market risks. The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. Barker Financial Group, Inc. will work with each Client to determine their tolerance for risk as part of the portfolio construction process.

Barker Financial Group, Inc. may use margin in Client accounts to manage the timing of purchases and sales, as appropriate. Barker Financial Group, Inc. may employ options strategies to hedge or gain additional exposure to a particular asset class or sector. Barker Financial Group, Inc.'s investment strategy encompasses active trading in concentrated portfolios. Following are some of the risks associated with certain 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. Options trading risk includes the possibility of a complete loss of principal.

***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.

***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. Clients should only have a portion of their assets in these investments.

Past performance is not a guarantee of future returns. Investing in securities and other investments involves a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with Barker Financial Group, Inc.

## Item 9 – Disciplinary Information

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**There are no legal, regulatory or disciplinary events involving** Barker Financial Group, Inc. Barker Financial Group, Inc. and its advisory personnel value the trust you place in Barker Financial Group, Inc.

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 (IAPD) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and can be found by searching for our firm name or by our CRD number 116817.

## Item 10 – Other Financial Activities and Affiliations

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### Financial Industry Activities – Broker/Dealers

Barker Financial Group, Inc. is not registered as a broker-dealer, and none of its Supervised Persons are registered representatives of a broker-dealer.

### Financial Industry Activities – Futures and Commodities

Neither Barker Financial Group, Inc. nor any of its Supervised Persons is registered as (or associated with) a futures commissions merchant, commodity pool operator, or a commodity trading advisor.

### Financial Industry Affiliations

**Pension Consulting** – Clients of Barker Financial Group, Inc. may be offered pension administration services through a referred Third Party Administrator (TPA). Clients are under no obligation to accept the referral or use any retirement plan services provided by the referred TPA. Barker Financial Group, Inc. receives no referral fees for referrals made to any Third Party Administrators.

**Insurance** – Clients of Barker Financial Group, Inc. may be offered various insurance products through a referred insurance agent. Clients are under no obligation to accept the referral or purchase any insurance products. No referral fees are exchanged for referrals made to the insurance agent.

**Other Investment Advisors** – Barker Financial Group, Inc. does not recommend or select other investment advisors for its Clients other than what is described above in Item 4.

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

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### Code of Ethics

Barker Financial Group, Inc. has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with Barker Financial Group, Inc. (our “Supervised Persons”). The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Barker Financial Group, Inc. and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Barker Financial Group, Inc. and our Supervised Persons 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 may include: general ethical principles, protection of personal, non-public information, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. Barker Financial Group, Inc. has written its Code of Ethics to meet and/or exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at **781.743.2600** or by email at **info@barkerfg.com**.

**Personal Trading with Material Interest** – Barker Financial Group, Inc. allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Barker Financial Group, Inc. does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of any mutual fund, or advise an investment company. Barker Financial Group, Inc. does not have a material interest in any securities traded in Client accounts.

### Personal Trading and Conflicts of Interest

Barker Financial Group, Inc. allows Supervised Persons 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 Clients presents a potential conflict of interest that, as fiduciaries, Barker Financial Group, Inc. must disclose to clients and mitigate through policies and procedures.

**At no time will Barker Financial Group, Inc. or any Supervised Person of Barker Financial Group, Inc., transact in any security to the detriment of any Client.**

## Item 12 – Brokerage Practices

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### Recommendation of Custodian[s]

Barker Financial Group, Inc. 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 Barker Financial Group, Inc. to direct trades to this Custodian as agreed in the investment advisory agreement. Further, Barker Financial Group, Inc. does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where Barker Financial Group, Inc. does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] to Clients for execution and/or custodial services. 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 Barker Financial Group, Inc.

Barker Financial Group, Inc. typically recommends to Clients that they establish their brokerage account[s] at Charles Schwab & Co., Inc. ("Schwab") and/or TD Ameritrade Institutional, a division of TD Ameritrade Inc., member FINRA/SIPC/NFA ("TD Ameritrade") and collectively the "Institutional Platforms". The Institutional Platforms offer independent Investment Advisors with services, which include custody of securities, trade execution, clearance and settlement of transactions. Barker Financial Group, Inc. receives some benefits from the Institutional Platforms through its participation in their programs. Barker Financial Group, Inc. considers a number of factors in recommending a Custodian for its Clients' accounts, including, but not limited to, execution capability, experience and financial stability, reputation and the quality of services provided. Barker Financial Group, Inc. is not affiliated with, or related to, any Custodian. Please see Item 14 below.

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. **Barker Financial Group, Inc. does not participate in soft dollar programs sponsored or offered by any broker-dealer.**
2. **Brokerage Referrals** - Barker Financial Group, Inc. 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 Barker Financial Group, Inc. 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]. Barker Financial Group, Inc. will not engage in any principal transactions (i.e., trade of any security from or to Barker Financial Group, Inc.'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, Barker Financial Group, Inc. 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.

Barker Financial Group, Inc. may only implement its investment recommendations after the Client has arranged for and furnished the Advisor with all information and authorization[s] regarding account[s] with their financial institutions.

### 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 consideration such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Barker Financial Group, Inc. will execute its transactions through an unaffiliated broker-dealer selected by the Client. Barker Financial Group, Inc. 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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### **Frequency of Reviews**

Investments in Client accounts are monitored on a regular and continuous basis by Mr. Barker, President and Chief Compliance Officer, and certain other Supervised Persons of the Advisor. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the client, or as market conditions may dictate.

### **Causes for Reviews**

In addition to the investment monitoring noted above, 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 Barker Financial Group, Inc. if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

### **Review Reports**

The Client will receive brokerage statements no less than quarterly from the account 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], including Advisor fees drawn against the account. Barker Financial Group, Inc. may at its discretion, also provide clients with periodic reports regarding their holdings, allocations, and performance.

## **Item 14 – Client Referral and Other Compensation**

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### **Compensation Received by Barker Financial Group, Inc.**

Barker Financial Group, Inc. receives no compensation other than the direct fees billed to the Client for services rendered. Please refer to Item 5 for further details.

### **Participation in Schwab Institutional Advisor Platform**

Barker Financial Group, Inc. has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like Barker Financial Group, Inc. As a registered investment advisor participating in the Schwab Advisor Services platform, Barker Financial Group, Inc. receives access to software and related support without cost because Barker Financial Group, Inc. renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit Barker Financial Group, Inc. and many, but not all, services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, Barker Financial Group, Inc. 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 Barker Financial Group, Inc.'s recommendation of this Custodian over one that does not furnish similar software, systems support, or services.

**Services that Benefit the Client** – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, Barker Financial Group, Inc. may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, Barker Financial Group, Inc. may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

**Services that May Indirectly Benefit the Client** – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, Barker Financial Group, Inc. receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist Barker Financial Group, Inc. in effectively managing accounts for its Clients, but may not directly benefit all Clients.

**Services that May Only Benefit Barker Financial Group, Inc.** – Schwab also offers other services and financial support to Barker Financial Group, Inc. that may not benefit the Client, including: educational conferences and events, financial start-up support, consulting services and discounts for various service providers. Access to these services creates a financial incentive for Barker Financial Group, Inc. to recommend Schwab, which results in a potential conflict of interest. Barker Financial Group, Inc. believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

### **Participation in TD Ameritrade Institutional ("TDA") Advisor Platform**

Barker Financial Group, Inc. has established an institutional relationship with TD Ameritrade to assist Barker Financial Group, Inc. in managing Client account[s]. Access to the TD Ameritrade Institutional platform is provided at no charge to Barker Financial Group, Inc. Barker Financial Group, Inc. receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at TD Ameritrade. The software and related systems support may benefit Barker Financial Group, Inc., but not its Clients directly. In fulfilling its duties to its Clients, Barker Financial Group, Inc. 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 Barker Financial Group, Inc.'s recommendation of this Custodian over one that does not furnish similar software, systems support, or services.

Additionally, Barker Financial Group, Inc. may receive the following benefits from TD Ameritrade: 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.

### **Client Referrals from Solicitors**

Barker Financial Group, Inc. does not engage paid solicitors for Client referrals.

## **Item 15 – Custody**

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### **Custody – Fee Debiting**

Barker Financial Group, Inc. does not accept or maintain custody of any Client accounts, except for the authorized deduction of Barker Financial Group, Inc.'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 Barker Financial Group, Inc. to utilize that Custodian for the Client's security transactions. For more information about Custodians and brokerage practices, see "Item 12 - Brokerage Practices".

### **Custody – Account Statements**

As described above and in Item 13, clients receive at least quarterly statements from the broker dealer, bank or other qualified Custodian that holds and maintains Client's investment assets. Clients are urged to carefully review such statements and compare such official custodial records to the account statements or other reports that Barker Financial Group, Inc. provides. Barker Financial Group, Inc. statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## **Item 16 – Investment Discretion**

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Barker Financial Group, Inc. 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 are generally subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Barker Financial Group, Inc. in writing. Discretionary authority will only be authorized upon full disclosure to the Client. The discretionary authority will be documented with the Custodian by executing a limited power of attorney to allow Barker Financial Group, Inc. limited access for trading and account administration purposes. 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 Barker Financial Group, Inc. will be in accordance with each Client's investment objectives and goals.

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

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Barker Financial Group, Inc. does not accept proxy-voting responsibility for any Client.

## **Item 18 – Financial Information**

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Neither Barker Financial Group, Inc., nor its management has any adverse financial situations that would reasonably impair the ability of Barker Financial Group, Inc. to meet all obligations to its Clients. Barker Financial Group, Inc. is not required to deliver a balance sheet along with this Disclosure Brochure as Barker Financial Group, Inc. will not require payment of more than \$1,200, more than or equal to 6 months in advance, under any circumstances, for services to be performed.

Neither Barker Financial Group, Inc., nor any of its advisory persons, has been subject to a bankruptcy or financial compromise.

# BARKER

FINANCIAL GROUP, INC.

*Strategic Wealth Management Advisors*

## **Form ADV Part 2B**

### **Investment Adviser Disclosure Supplement**

# BARKER

FINANCIAL GROUP, INC.

*Strategic Wealth Management Advisors*

## Form ADV Part 2B

### Investment Adviser Disclosure Supplement for

**James Theodore Barker**

Effective: March 10, 2018

This Form ADV2B ("Brochure Supplement") provides information about a Supervised Person of Barker Financial Group, Inc. (CRD number **116817**) that supplements Barker Financial Group, Inc.'s Disclosure Brochure. You should have received a copy of that Disclosure Brochure. Please contact Mr. Barker if you did not receive a copy of Barker Financial Group, Inc.'s Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement, please contact Barker Financial Group, Inc. by telephone at **781.743.2600** or by email at **info@barkerfg.com**.

Additional information about Barker Financial Group, Inc.'s Supervised Persons is also available on the SEC's website at **[www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)** by searching Mr. Barker's name or his CRD number **1622909**.

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**Florida Office**

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## Item 2 – Education Background and Business Experience

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James Theodore Barker is the President and Chief Compliance Officer of Barker Financial Group, Inc. Mr. Barker, born in 1960, is a dedicated Portfolio Manager for Client accounts of Barker Financial Group, Inc.

Mr. Barker earned the Chartered Financial Consultant (ChFC) and Chartered Life Underwriter (CLU) designations from the American College, Bryn Mawr, PA, and a Retirement Plans Certification from the International Foundation of Employee Benefit Plans (IFEBP) and the Wharton Business School at the University of Pennsylvania. He also holds Associate Degrees from the University of Maine in Resource Business Management and Agriculture Technology. Mr. Barker expanded his background at Bentley College in Economics and Finance. Additional information regarding Mr. Barker's employment history is included below.

### Employment History:

<b>Barker Financial Group, Inc.</b> President and Chief Compliance Officer	1997 to Present
<b>Jefferson Pilot Securities Corporation</b> Registered Securities Principal	2000 to 2003
<b>Polaris Financial Services, Inc.</b> (Acquired by JPSC) Registered Securities Principal	1998 to 2000
<b>Nathan and Lewis Securities Corporation Inc.</b> Registered Representative	1997 to 1998
<b>Nathan and Lewis Securities Corporate, RIA</b> Investment Advisor Representative	1997 to 1998

### Professional Certifications

Barker Financial Group, Inc.'s supervised persons maintain professional designations, which required the following minimum requirements:

**ChFC® - Chartered Financial Consultant®** – The Chartered Financial Consultant® (ChFC®) program prepares the ChFC® to meet the advanced financial planning needs of individuals, professionals and small business owners. The ChFC® gains a sustainable advantage in this competitive field with in-depth coverage of the key financial planning disciplines, including insurance, income taxation, retirement planning, investments and estate planning. The ChFC® program requires three years of full-time, relevant business experience, nine two-hour course specific proctored exams, and 30 hours of continuing education every two years. Holders of the ChFC® designation must adhere to The American College's Code of Ethics.

### Program Learning Objectives:

- Function as an ethical, competent and articulate practitioner in the field of financial planning
- Utilize the intellectual tools and framework needed to maintain relevant and current financial planning knowledge and strategies
- Apply financial planning theory and techniques through the development of case studies and solutions
- Apply in-depth knowledge in a holistic manner from a variety of disciplines; namely, estate planning, retirement planning or non-qualified deferred compensation

**CLU® – Chartered Life Underwriter®** – Chartered Life Underwriter® (CLU®) is a designation of insurance expertise, helping gain a significant advantage in a competitive market. This course of study helps by providing in-depth knowledge on the insurance needs of individuals, business owners and professional clients:

### **Program Learning Objectives:**

- Provide guidance to clients on types and amounts of life insurance needed
- Make recommendations on aspects of risk management, including personal and business uses of a variety of insurance solutions
- Provide guidance to clients on legal aspects of life insurance contracts and beneficiaries
- Assist clients in making decisions about estate planning, including proper holding of assets and title to assets, as well as the implications of various wills and trust arrangements on financial, retirement and succession planning issues
- Provide a holistic and comprehensive approach to addressing the insurance planning needs of clients

### **Item 3 – Disciplinary Information**

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**There are no legal, civil or disciplinary events to disclose regarding James T. Barker.** Mr. Barker 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. Barker.

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. Barker.**

However, we do encourage you to independently view the background of Mr. Barker on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by his name or his CRD number **1622909**.

### **Item 4 – Other Business Activities**

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Mr. Barker has no additional business activities to report.

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

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

### **Item 6 – Supervision**

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Mr. Barker serves as the President and Chief Compliance Officer of Barker Financial Group, Inc. and is responsible for supervising Barker Financial Group, Inc.'s advisory activities and managing Barker Financial Group, Inc.'s team of Supervised Persons. Mr. Barker can be reached at **781.743.2600**.

Barker Financial Group, Inc. has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of Barker Financial Group, Inc. Further, Barker Financial Group, Inc. is subject to regulatory oversight by various agencies. These agencies require registration by Barker Financial Group, Inc. and its Supervised Persons. As a registered entity, Barker Financial Group, Inc. is subject to examinations by regulators, which may be announced or unannounced. Barker Financial Group, Inc. 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.

# BARKER

FINANCIAL GROUP, INC.

*Strategic Wealth Management Advisors*

## Form ADV Part 2B

### Investment Adviser Disclosure Supplement for **Paul L. Chern**

Effective: March 10, 2018

This Form ADV2B ("Brochure Supplement") provides information about a Supervised Person of Barker Financial Group, Inc. (CRD# **116817**) that supplements Barker Financial Group, Inc.'s Disclosure Brochure. You should have received a copy of that Disclosure Brochure. Please contact James T. Barker if you did not receive a copy of Barker Financial Group, Inc.'s Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement, please contact Barker Financial Group, Inc. by telephone at **781.743.2600** or by email at **info@barkerfg.com**.

Additional information about Barker Financial Group Inc.'s Supervised Persons is also available on the SEC's website at **www.adviserinfo.sec.gov**. You may search this site using a unique identifying number, known as a CRD number for each Supervised Person. Mr. Chern's CRD number is **2577325**.

#### **Massachusetts Office**

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#### **Florida Office**

1990 Main Street, Suite 750  
Sarasota, FL 34236  
941.587.6486

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## Item 2 – Education Background and Business Experience

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Paul L. Chern, born in 1940, is a dedicated Investment Adviser Representative for Client accounts of Barker Financial Group, Inc. Mr. Chern holds a Master's Degree in Actuarial Science from Northeastern University, a Master's Degree in Mathematics from the University of Oregon, and a Bachelor's Degree in Mathematics from the University of California. Additional information regarding Mr. Chern's employment history is included below.

### Employment History:

<b>Barker Financial Group, Inc.</b> Investment Adviser Representative	2002 to Present
<b>PCA Benefits Group, Inc.</b> President	2003 to 2017
<b>Jefferson Pilot Securities Corporation</b> Representative	2000 to 2003
<b>Paul Chern</b> Consulting Actuary	2000 to 2003
<b>Nationwide Investment Services Corporation</b> Representative	1996 to 2000

## Item 3 – Disciplinary Information

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**There are no legal, civil or disciplinary events to disclose regarding Paul L. Chern.** Mr. Chern 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. Chern.

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. Chern.**

However, we do encourage you to independently view the background of Mr. Chern on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching his name or by CRD number **2577325**.

## Item 4 – Other Business Activities

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Mr. Chern has no additional business activities to report.

## Item 5 – Additional Compensation

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

## Item 6 – Supervision

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Mr. Chern is supervised in his role as Investment Adviser Representative by James T. Barker, the President and Chief Compliance Officer of Barker Financial Group, Inc.

Mr. Barker supervises Mr. Chern by holding regular meetings, which may include staff, investment, compliance issues, and other ad hoc meetings. Mr. Barker reviews Client reports, emails and trading, as well as personal securities transactions and holdings reports with Mr. Chern. Mr. Barker can be reached at **781.743.2600**.

Barker Financial Group, Inc. has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of Barker Financial Group, Inc. Further, Barker Financial Group, Inc. is subject to regulatory oversight by various agencies. These agencies require registration by Barker Financial Group, Inc. and its Supervised Persons. As a registered entity, Barker Financial Group, Inc. is subject to examinations by regulators, which may be announced or unannounced. Barker Financial Group, Inc. 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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FINANCIAL GROUP, INC.

*Strategic Wealth Management Advisors*

## **Form ADV Part 2B**

### **Investment Adviser Disclosure Supplement for Douglas Steven Huddleston**

Effective: March 10, 2018

This Form ADV2B ("Brochure Supplement") provides information about a Supervised Person of Barker Financial Group, Inc. (CRD# **116817**) that supplements Barker Financial Group, Inc.'s Disclosure Brochure. You should have received a copy of that Disclosure Brochure. Please contact James T. Barker if you did not receive a copy of Barker Financial Group, Inc.'s Disclosure Brochure or if you have any questions about the contents of this supplement, please contact Barker Financial Group, Inc. by telephone at **781.743.2600** or by email at **info@barkerfg.com**.

Additional information about Barker Financial Group, Inc.'s Supervised Persons is also available on the SEC's website at **www.adviserinfo.sec.gov**. You may search this site using a unique identifying number, known as a CRD number for each Supervised Person. Mr. Huddleston's CRD number is **5725521**.

#### **Massachusetts Office**

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## Item 2 – Education Background and Business Experience

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Douglas S. Huddleston, born in 1963, is a dedicated Investment Adviser Representative for Client accounts of Barker Financial Group, Inc. Mr. Huddleston also serves on the securities selection and research committee of Barker Financial Group, Inc. and is also involved in the creation of financial planning for clients requesting these services.

Mr. Huddleston received the Certified Financial Planner™ designation from the Certified Financial Planner Board of Standards, Inc. He holds a Bachelor's Degree in Business Administration/Finance from the University of Idaho and a Certification in Financial Planning from Boston University.

Prior to joining Barker Financial Group, Inc. Mr. Huddleston held management positions with global leaders in the technology industry. Additional information regarding Mr. Huddleston's employment history is included below.

### Employment History:

<b>Barker Financial Group, Inc.</b> Investment Adviser Representative	2009 to Present
<b>SAS Institute</b> National Account Manager	2007 to 2010
<b>BMC Software</b> Strategic Account Manager	1997 to 2007

### Professional Certifications

Barker Financial Group, Inc.'s Supervised Persons maintain professional designations, which required the following minimum requirements:

**CFP® – Certified Financial Planner** – The Certified Financial Planner™, CFP® and federally registered CFP® marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

- **Ethics** – Agree to be bound by CFP® Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals
- Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:
- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

### Item 3 – Disciplinary Information

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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.

In May 2015, Mr. Huddleston consented to an administrative proceeding with the Office of Financial Regulation of the State of Florida related to a violation of their registration rules.

However, we do encourage you to independently view the background of Mr. Huddleston on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching his name or CRD number **5725521**.

### Item 4 – Other Business Activities

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Mr. Huddleston has no additional business activities to report.

### Item 5 – Additional Compensation

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

### Item 6 – Supervision

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Mr. Huddleston is supervised in his role as Investment Adviser Representative by James T. Barker, the President and Chief Compliance Officer of Barker Financial Group, Inc.

Mr. Barker supervises Mr. Huddleston by holding regular meetings, which may include staff, investment, compliance issues, and other ad hoc meetings. Mr. Barker reviews client reports, emails and trading, as well as personal securities transactions and holdings reports with Mr. Huddleston. Mr. Barker can be reached at **781.743.2600**.

Barker Financial Group, Inc. has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of Barker Financial Group, Inc. Further, Barker Financial Group, Inc. is subject to regulatory oversight by various agencies. These agencies require registration by Barker Financial Group, Inc. and its Supervised Persons. As a registered entity, Barker Financial Group, Inc. is subject to examinations by regulators, which may be announced or unannounced. Barker Financial Group, Inc. 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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