



# Form ADV Part 2A – Disclosure Brochure

**Silver Grove Financial Group, Inc.  
d/b/a**

## **Silver Grove Advisory Services**

**Effective: March 22, 2019**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Silver Grove Financial Group, Inc. d/b/a Silver Grove Advisory Services (“Silver Grove” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (716) 800-4291.

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

Additional information about Silver Grove and its advisory persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD# 287512.

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## **Item 2 – Material Changes**

The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest.

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

### **Material Changes**

The firm has made the following changes since the last annual update of this brochure on March 22, 2018:

Item 4 has been updated to detail the advisory programs offered.

Item 5 has been updated to clearly define that fees are charged in advance for LPL Financial and the Wrap Program.

Item 5 was updated to reflect that the total fee charged by Silver Grove and the Independent Manager shall not exceed 3% annually.

Items 10 and 14 have been updated to disclose that Silver Grove does not receive a portion of the Independent Managers fee which is charged separately.

### **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.

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) by searching for our firm name or by our CRD# 287512. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (716) 800-4291.

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**Item 4 – Advisory Services****A. Firm Information**

Silver Grove Financial Group, Inc. d/b/a Silver Grove Advisory Services, (“Silver Grove Advisory Services” or the “Advisor”) is a registered investment advisor with the SEC, which is organized as a Corporation under the laws of the State of New York. Silver Grove Advisory Services was founded in February 2013 and became registered as an investment advisor in March 2017. The Advisor is owned and operated by Jason J. Weber (Founder and President) and Ryan D. Seufert (Founder and Vice President) (collectively herein the “Principal Officers”). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Silver Grove Advisory Services.

**B. Advisory Services Offered**

Silver Grove Advisory Services offers investment advisory services to individuals, high net worth individuals, trusts, estates and other businesses in the State of New York and other states (each referred to as a “Client”).

**Investment Management Services**

Silver Grove Advisory Services provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. Silver Grove Advisory Services works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy based on an understanding of the Client’s overall financial picture. Silver Grove Advisory Services will then construct a portfolio, consisting of low-cost, diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize individual stocks, bonds or options contracts to meet the needs of its Clients. The Advisor may retain certain types of investments based on a Client’s legacy portfolio construction.

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

Silver Grove Advisory Services evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Silver Grove Advisory Services may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Silver Grove Advisory Services may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. Silver Grove Advisory Services may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

At no time will Silver Grove Advisory Services accept or maintain custody of a Client’s funds or securities, except for authorized deduction of the Advisor’s fees. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client’s investment advisory agreement. Please see Item 12.

**Use of Independent Managers** - Silver Grove Advisory Services may recommend that a Client utilize one or more unaffiliated investment managers or investment platforms (collectively “Independent Managers”) described below for all or a portion of a Client’s investment portfolio. In such instances, the Client may be required to authorize and enter into an advisory agreement with the Independent Manager[s] that defines the terms in which the Independent Manager[s] will provide investment management and related services. The Advisor may also assist in the development of the initial policy recommendations and managing the ongoing Client relationship. The Advisor will perform initial and ongoing oversight and due diligence over the selected Independent Manager[s] to ensure the Independent Managers’ strategies and target allocations remain aligned with its Clients’ investment objectives and overall best interests.

**LPL Financial Sponsored Advisory Programs**

Silver Grove provides advisory services through programs sponsored by LPL Financial LLC (LPL), a registered investment adviser and broker-dealer. Below is a brief description of each LPL advisory program available to [Advisor].

**Manager Access Select Program**

Under this program, the Advisor will select a third-party portfolio manager (Portfolio Manager) for the client from a list of Portfolio Managers made available by LPL. The Portfolio Manager manages client’s assets on a discretionary basis.

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### Optimum Market Portfolios Program (OMP)

Under this program, 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.

### Personal Wealth Portfolios Program (PWP)

Under this program, Advisor will have discretion to select an asset allocation model portfolio based on client's investment objective. Advisor will also have discretion to select third party money managers (PWP Advisors), mutual funds and ETFs within each asset class of the model portfolio. LPL will act as the overlay portfolio manager on all PWP accounts and will have discretion to purchase and sell mutual funds, ETFs and equity and fixed income securities.

### Model Wealth Portfolios Program (MWP)

Under this program, Advisor will 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 or third-party portfolio strategists are responsible for selecting the mutual funds or ETFs within a model portfolio and for making changes to the mutual funds or ETFs selected.

### Guided Wealth Portfolios (GWP)

Under this program, Advisor will assist client in establishing an account managed through an algorithm-based investment program ("robo-advisory" program) of Xulu, Inc., doing business as FutureAdvisor, an SEC registered investment adviser. Investment recommendations for accounts in this program are based on model portfolios constructed by LPL. A model portfolio will be assigned to the client's account based on the client's investment objectives.

### SEI Sponsored Advisory Programs

Silver Grove may recommend asset allocation and managed programs through SEI Investments Management Corporation, a registered investment adviser who serves as the Independent Manager for the client's account. Through the SEI advisory programs, Silver Grove provides the following services:

- Assist the client to evaluate and determine one or more of the SEI programs
- Assist the client to determine the asset allocation model best suited to each client's investment objectives and risk tolerance. Clients may accept, reject or modify asset allocations.

- Make changes to the selected asset allocation and/or selected managers (i.e. hire and fire managers) as Silver Grove deems appropriate

### FTJ Fund Choice Sponsored Advisory Programs

Silver Grove may recommend advisory programs available through FTJ FundChoice, a registered investment adviser.

Under this program, Silver Grove will have discretion to select a model portfolio designed by third-party portfolio strategists (Independent Managers). The strategists are responsible for selecting the mutual funds or ETFs within a model portfolio and for making changes to the mutual funds or ETFs selected.

### Betterment, LLC Advisory Program

Silver Grove may recommend that certain Clients establish an account with Betterment, LLC, a registered investment adviser that will serve as the Independent Manager for the Client's account. Betterment provides an online wealth management service through an automated, algorithm-based investment program ("robo-advisory" services). Robo-advisors use technology to deliver similar services as traditional advisors, but generally only offer portfolio management and do not get involved in a Client's personal situation, such as taxes and retirement or estate planning. Through this program, Silver Grove assists clients in choosing portfolios of exchange-traded funds managed by Betterment on a discretionary basis. A client can obtain some of Betterment's services directly from Betterment without paying an additional fee to Silver Grove.

The Client, prior to entering into an agreement with unaffiliated investment manager[s] or investment platform[s], will be provided with the Independent Manager's Form ADV 2A (or a brochure that makes the appropriate disclosures). The Independent Manager will implement the portfolio and be responsible for the discretionary trading of the Client's accounts, including the purchase and sale of investments and the automatic rebalancing back to targets.

### Financial Planning Services

Silver Grove Advisory Services will typically provide a variety of financial planning and consulting services to Clients, pursuant to 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 involve preparing a formal financial plan or rendering a specific financial consultation based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to, investment planning, retirement planning, personal

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savings, education savings and other areas of a Client's financial situation.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

Silver Grove Advisory Services may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of the contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations may pose a conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to affect the transaction through the Advisor.

### C. Client Account Management

Prior to engaging Silver Grove Advisory Services to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – Silver Grove Advisory Services, in connection with the Client, may develop a statement that summarizes the Client's investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives.
- Asset Allocation – Silver Grove Advisory Services will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance of risk for each Client.

- Portfolio Construction – Silver Grove Advisory Services will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Silver Grove Advisory Services will provide investment management and ongoing oversight of the Client's investment portfolio.

### D. Wrap Fee Programs

For certain accounts, Silver Grove Advisory Services includes securities transaction fees together with its investment advisory fees. Including these fees into a single asset-based fee is considered a "Wrap Fee Program". The Advisor customizes its investment management services for its Clients. The Advisor sponsors the Silver Grove Advisory Services Wrap Fee Program solely as a supplemental disclosure regarding the combination of fees. Depending on the level of trading required for the Client's account[s] in a particular year, the Client may pay more or less in total fees than if the Client paid its own transaction fees. Please see Appendix 1 –Wrap Fee Program Brochure, which is included as a supplement to this Disclosure Brochure.

### E. Assets Under Management

As of March 2019, Silver Grove Advisory Services manages discretionary assets under management of \$101,686,283.

## Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into a written agreement with the Advisor.

### A. Fees for Advisory Services

#### Investment Management Services

Investment advisory fees are paid either monthly or quarterly ("Billing Period"), in arrears or in advance, pursuant to the terms of the agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior Billing Period. Silver Grove's investment advisory fees range from 0.0% to 2.00% annually based on several factors, including: the complexity of the services to be provided, the level of assets to be managed, and the overall relationship with the Advisor. Silver Grove's fees are negotiable, and Silver Grove's advisory fee will be set forth in its advisory agreement with the client. As described below, when Independent Managers are selected for client accounts, the client will also pay advisory fees to the

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Independent Manager. The total advisory fee will be set forth in the account application of the advisory program selected for the client.

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

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

### **Use of Independent Managers**

For Clients referred by the Advisor to an Independent Manager, the Client's fee will be separately billed and deducted from the Client's account[s] by the Independent Manager. The total fee charged by Silver Grove Advisory Services and the Independent Manager shall not exceed 3% annually. The fees of the Independent Manager are set forth in the ADV Part 2 of the program sponsor (LPL, SEI, Betterment, or FTJ FundChoice) or of ADV Part 2 of the Independent Manager which is provided to the client. The total advisory fee including Silver Grove's advisory fee and the Independent Manager's fee will be set forth in the account application of the program selected for the client.

### **Financial Planning Services**

Silver Grove Advisory Services offers financial planning services either on an hourly basis or a fixed engagement fee. Hourly engagements range from \$0.00 up to \$400 per hour. Fixed fee engagement fee range from \$0.00 up to \$15,000. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. An estimate for total hours and total costs will be provided to the Client prior to engaging for these services.

## **B. Fee Billing**

### **Investment Management Services**

Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian.. The amount due is calculated by applying the annual rate divided by either 4 or 12 based on the Billing Period to the total assets under management with Silver Grove Advisory Services at the end of each

Billing Period. 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 Silver Grove Advisory Services to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

### **Use of Independent Managers**

For Clients referred by the Advisor to an Independent Manager, the Client's fee will be separately billed and deducted from the Client's account[s] with the respective manager in addition to the investment advisory fee charged by Silver Grove Advisory Services.

### **Financial Planning Services**

Financial planning fees are invoiced by the Advisor and are due upon completion of the agreed upon deliverable[s].

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

Clients may incur certain fees or charges imposed by third parties in connection with investments made on behalf of the Client's account[s]. Silver Grove Advisory Services includes securities transactions costs as part of its overall investment advisory fee through the Silver Grove Advisory Services Wrap Fee Program. Securities transaction fees for Client-directed trades may be charged back to the Client. Please see Item 4.D. above as well as Appendix 1 – Wrap Fee Program Brochure.

In addition, all fees paid to Silver Grove Advisory Services for investment advisory services or part of the Silver Grove Advisory Services Wrap Fee Program are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of Silver Grove Advisory Services, but would not receive the services provided by Silver Grove Advisory Services which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Silver Grove Advisory Services to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.



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**D. Advance Payment of Fees and Termination****Investment Management Services**

Except for accounts in LPL programs which are charged in advance, Silver Grove Advisory Services is compensated for its services at the end of the Billing Period after investment advisory services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. In addition, the Client may terminate the investment advisory agreement within five (5) business days of signing the Advisor's 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. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior approval.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate\* times the number of days elapsed in the billing period up to and including the day of termination. (\*The daily rate is calculated by dividing the annual asset-based fee by 365.).

**Use of Independent Managers**

In the event that a Client should wish to terminate their relationship with the Independent Manager, the terms for termination will be set forth in the respective agreements between the Client and that Independent Manager. Silver Grove Advisory Services will assist the Client with the termination and transition as appropriate.

**Financial Planning Services**

Silver Grove Advisory Services is compensated for its services upon completion of the engagement deliverable[s]. Either party may terminate the financial planning agreement by providing advance written notice to the other party. The Client may terminate the financial planning agreement within five (5) business days of signing the Advisor's 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 times the contractual hourly rate or in the case of a fixed fee engage, the percentage of the engagement scope completed by the Advisor. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior approval.

**E. Compensation for Sales of Securities**

Certain Advisory Persons are also registered representatives of LPL Financial LLC ("LPL"). LPL is a registered broker-dealer (CRD No. 6413), member FINRA, SIPC. In one's separate capacity as a

registered representative of LPL, an Advisory Person may implement securities transactions under LPL and not through Silver Grove Advisory Services. In such instances, an Advisory Person will receive commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by an Advisory Person in one's capacity as a registered representative is separate and in addition to Silver Grove Advisory Services' advisory fees. This practice presents a conflict of interest because Advisory Persons who are registered representatives have an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on the Client. Clients are not obligated to implement any recommendation provided by Advisory Persons. Neither the Advisor nor Advisory Persons will earn ongoing investment advisory fees in connection with any products or services implemented in the Advisory Person's separate capacity as a registered representative. Please see Item 10.

The Advisor and certain Advisory Persons are also licensed as an insurance agent or broker and independent insurance professionals. The Advisor and these persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

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

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

Silver Grove Advisory Services 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.



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**Item 7 – Types of Clients**

Silver Grove Advisory Services offers investment advisory services to individuals, high net worth individuals, trusts, estates and other businesses in the State of New York and other states. Silver Grove Advisory Services generally does not impose a minimum account size for establishing a relationship.

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

**A. Methods of Analysis**

Each investment advisor representative at Silver Grove Advisory Services has access to various research reports and model portfolios to refer to when providing investment advice to Clients. The investment advisor representative chooses which research method will be employed with each Client. Research and analysis from Silver Grove Advisory Services 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, Silver Grove Advisory Services generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Silver Grove Advisory Services will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Silver Grove Advisory Services may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

**B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Silver Grove Advisory Services 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.

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

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

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

**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.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

**Item 9 – Disciplinary Information**

**There are no legal, regulatory or disciplinary events involving Silver Grove Advisory Services or any of its management persons.** Silver Grove Advisory Services values the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by our firm name or our CRD# 287512.

**Item 10 – Other Financial Industry Activities and Affiliations****Broker-Dealer Affiliation**

As noted in Item 5, certain Advisory Persons are also registered representatives of LPL Financial LLC (“LPL”). LPL is a registered broker-dealer (CRD No. 6413), member FINRA, SIPC. In one’s separate capacity as a registered representative, Advisory Persons will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Advisory Persons. Neither the Advisor nor Advisory Persons will earn ongoing investment advisory fees in connection with any services implemented in Advisory Persons’ separate capacity as a registered representative.

**Insurance Agency Affiliations**

As noted in Item 5, the Advisor and certain Advisory Persons are also licensed insurance professionals. Implementations of insurance recommendations are separate and apart from one’s role as an investment advisor representative with Silver Grove Advisory Services. As an insurance professional, Advisory Persons may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Advisory Persons are not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Advisory Persons or the Advisor.

**Financial Institution Arrangements**

The Advisor may offer advisory services on the premises of unaffiliated financial institutions. In these cases, the Advisor will have an arrangement to compensate the financial institution for use of the premises and administrative support.

**Use of Independent Managers**

As noted in Item 4, the Advisor may select Independent Managers to assist with the implementation of a Client’s investment strategy. Clients will pay Silver Grove its standard fee in addition to a fee to the Independent Managers. The total fees will not exceed any limit imposed by any regulatory agency. Silver Grove will always act in the best interests of the client, including when determining which Independent Manager to recommend to clients. Silver Grove will ensure that all recommended managers are exempt, licensed or notice filed in the states in which Silver Grove is recommending them to clients.

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

Silver Grove Advisory Services has implemented a Code of Ethics (the “Code”) that defines our fiduciary commitment to each Client. This Code applies to all persons associated with Silver Grove Advisory Services (our “Supervised Persons”). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Silver Grove Advisory Services and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Silver Grove Advisory Services’ 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 covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code, please contact us at (716) 800-4291.

**B. Personal Trading with Material Interest**

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

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

Silver Grove Advisory Services allows our 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 you presents a conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Silver Grove Advisory Services requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer (“CCO”) or delegate. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

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

While Silver Grove Advisory Services allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will Silver Grove Advisory Services, or any Supervised Person of Silver Grove Advisory Services transact in any security to the detriment of any Client.**

**Item 12 – Brokerage Practices****A. Recommendation of Broker-Dealer/Custodian[s]**

Silver Grove Advisory Services does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services. The Client will select the broker-dealer or custodian (herein the "Custodian") to safeguard Client assets and authorize Silver Grove Advisory Services to direct trades to this Custodian as agreed in the investment advisory agreement. Further, Silver Grove Advisory Services does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where Silver Grove Advisory Services does not exercise discretion over the selection of the Custodian, Silver Grove Advisory Services will generally recommend that Clients establish their account[s] at LPL Financial LLC ("LPL") or other qualified custodians depending on the advisory program recommended to the client. Silver Grove Advisory Services maintains an institutional relationship with LPL and other qualified custodians, whereby the Advisor receives economic benefits from those firms (Please see Item 14 below.).

As registered representatives of LPL, the Advisor may be limited in using other broker-dealers/custodians as LPL must approve the use of any outside broker-dealer/custodian.

Silver Grove Advisory Services may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and location of the Custodian's offices.

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. Silver Grove Advisory Services does not participate in soft dollar programs sponsored or offered by any broker-dealer. As noted above, Silver Grove Advisory Services does receive certain

benefits from LPL and other qualified custodians (Please see Item 14 below.).

**2. Brokerage Referrals** - Silver Grove Advisory Services 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 Silver Grove Advisory Services will place trades within the established account[s] at the custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the Custodian, Silver Grove Advisory Services will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated Custodian.

**B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Silver Grove Advisory Services will execute its transactions through an unaffiliated broker-dealer selected by the Client. Silver Grove Advisory Services may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts in the same trading day. 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 any particular Client accounts.

**Item 13 – Review of Accounts****A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by the Principal Owners of Silver Grove Advisory Services. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

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**B. Causes for Reviews**

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

**C. Review Reports**

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

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

**A. Compensation Received by Silver Grove Advisory Services**

**Participation in Institutional Advisor Platform**

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

**Use of Independent Managers**

As noted in Item 4, the Advisor may select Independent Managers to assist with the implementation of a Client's investment strategy. In such arrangements, Silver Grove Advisory Services will not receive

any portion of the investment advisory fees collected by the Independent Manager from the Client. The Advisor will charge its own investment advisory fee for assets referred to an Independent Manager.

**B. Client Referrals from Solicitors**

At this time, Silver Grove Advisory Services does not engage paid solicitors for Client referrals.

**Item 15 – Custody**

Silver Grove Advisory Services does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a qualified custodian. Clients are required to engage the Custodian to retain their funds and securities and direct Silver Grove Advisory Services to utilize that Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by Silver Grove Advisory Services to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see "Item 12 - Brokerage Practices".

**Item 16 – Investment Discretion**

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

**Item 17 – Voting Client Securities**

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

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responsibility for proxy decisions and voting.

**Item 18 – Financial Information**

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

## **Firm Privacy Policy**

Effective: May 1, 2017

### **Our Commitment to You**

Silver Grove Financial Group, Inc. ("Silver Grove Advisory Services" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

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

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

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

### **Why you need to know?**

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

### **What information do we collect from you?**

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

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

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

### **How do we protect your information?**

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide



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security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

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

### How do we share your information?

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

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

### Changes to our Privacy Policy

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

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

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (716) 800-4291.