

Item 1 Cover Page

Mariner Financial Group, LLC

CRD No. 287649

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March 25, 2019

NOTICE TO PROSPECTIVE CLIENTS: READ THIS DISCLOSURE BROCHURE IN ITS ENTIRETY

This brochure provides information about the qualifications and business practices of Mariner Financial Group, LLC. If you have any questions about the contents of this brochure, please contact us at (860) 657-1037 or andrea.camoin@lpl.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about Mariner Financial Group, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Registration does not imply a certain level of skill or training.

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A lighthouse with a red roof and a glowing light inside, situated on a rocky coastline. The ocean is visible in the background with waves crashing against the shore. The lighthouse is white with a red roof and a red lantern room. The light inside is bright yellow.

Item 2 – Material Changes

The firm now consider SWM II to be a wrap fee program. There are no changes to how the platform is managed but an Appendix 1 has been added to this brochure.

Additional information about Mariner Financial Group, LLC is available via the SEC's Web Site www.adviserinfo.sec.gov. The SEC's Web Site also provides information about any persons affiliated with Mariner Financial Group, LLC who are registered, or are required to be registered, as investment representatives of Mariner Financial Group, LLC.

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Item 4 – Advisory Business

The Firm

Mariner Financial Group, LLC is a comprehensive financial services firm committed to helping our clients to improve their long-term financial success. The firm has been an independent SEC registered investment advisor since 2017 but has been offering advisory services through LPL Financial LLC since 2011.

The firm offers discretionary and non-discretionary asset management services primarily to high net worth individuals and business owners. Financial planning services are included as part of a comprehensive asset management offering and may include a written financial plan. The firm does not directly hold cash or securities or have direct access to client funds. The firm has a custodial relationship with LPL Financial as the qualified custodian.

- Investment representatives of the firm are also registered representatives of LPL Financial, a FINRA/SIPC member broker/dealer, to offer brokerage services.
- Certain investment representatives are also insurance agents appointed with various insurance carriers to offer insurance products.
- The overall focus of the firm is approximately 75% to 80% advisory services, approximately 15% to 20% brokerage services and approximately 5% to 10% insurance business.

Mariner Financial Group, LLC has engaged LPL Financial, LLC to act in a custodial capacity and investment representatives of Mariner Financial Group, LLC are individually registered with LPL Financial as a broker/dealer, LPL Financial LLC is a separate and legally unaffiliated entity.

The Mariner Financial serves as a fiduciary to Clients, as defined under applicable laws and regulations. As a fiduciary, Mariner Financial Group upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see “Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Principal Owners

Andrea E. Camoin, ChFC® – Andrea is a 25% owner and serves as the Chief Compliance Officer but her focus is to provide wealth management, financial planning and investment advisory services to clients. Prior to co-founding Mariner Financial Group, LLC Andrea held key positions with other companies in the financial services industry, including Operations Manager with Morgan Stanley Smith Barney in Newport, RI and Fixed Income Sales Associate with UBS Financial Services in Boston. Andrea received a BA in Economics from Rhode Island College in 2000. Andrea’s securities registrations include a General Securities Representative (Series 7), Uniform Securities Agent (Series 63), Uniform Investment Adviser Law Examination, (Series 65), General Securities Sales Supervisor (Series 9/10), and General Securities Principal (Series 24). She also holds a license to sell life, accident and health insurance.

Ty S. Martinelli, CFP® – Ty is a 25% owner and is focused on providing financial planning and portfolio management services. Prior to co-founding Mariner Financial Group, LLC Ty held key positions with other companies in the financial services industry, including Aetna Retirement Services and ING Financial Services. Most recently he formed his own wealth management and financial planning firm, which has merged with Mariner Financial Group, LLC.

Ty received his BA from Wake Forest University in 1998. Ty's professional credentials include an Investment Company Products/Variable Contracts Limited Representative (Series 6), General Securities Representative (Series 7), Uniform Securities Agent (Series 63). Ty obtained his CERTIFIED FINANCIAL PLANNER™ designation in 2009. He also holds a license to sell life, accident and health insurance.

Norman J. Yester, CPA – Norman Yester is a 25% owner and co-founder of Mariner Financial Group, LLC. He provides financial services, financial planning and tax planning to closely-held businesses and individuals. He is responsible for business development and strategic planning. Norman is a member of the American Institute of CPAs, the Connecticut Society of CPAs and the Connecticut Construction Industry Association. He is also involved in a variety of fundraising activities for civic organizations.

Norman holds a B.S. in Accounting from Central Connecticut State University and is a practicing CPA. Norman's professional credentials include a General Securities Representative (Series 7), and Uniform Securities Agent/Uniform Investment (Series 66).

Brendan W. Yester – Brendan is a 25% owner and Director of Operations. His focus at Mariner Financial Group, LLC is providing security analysis and portfolio management support. Prior to co-founding Mariner Financial Group, LLC Brendan was a portfolio analyst for Glastonbury Financial Services, LLC.

Brendan received a B.S. in Accounting from Central Connecticut State University in 2006. Brendan's professional credentials include a General Securities Representative (Series 7) and a Uniform Securities Agent/Uniform Investment (Series 66). He holds the life, accident and health insurance license.

Advisory Services Offered

Mariner Financial Group, LLC offers investment advisory services to high net worth individuals and business owners in Connecticut and other states (each referred to as a "Client").

Asset Management

Investment representatives of Mariner Financial Group, LLC primarily provide discretionary fee based asset management services to high-net worth individuals as well as business owners. More specifically, they provide advice on the purchase and sale of various types of investments, such as mutual funds, exchange-traded funds ("ETFs"), real estate investment trusts ("REITs"), equities, and fixed income securities. Non-discretionary fee based asset management services are also available.

Mariner Financial Group, LLC offers an open architecture custodial account where investment representatives directly select and manage the specific securities based on a client's investment profile. The firm also offers advisory programs where the underlying investments are selected and managed by independent professional

portfolio managers but the firm remains responsible for portfolio allocation and direct advice. A broad range of portfolio managers and multiple investment styles are available, including equity, fixed income, asset classes, mutual funds, ETFs, and specialty strategies. More specific account information and acknowledgements are detailed in the account opening documents.

Mariner Financial Group, LLC is responsible to:

- obtain the necessary financial data from each client;
- select the proper advisory program;
- determine the investment allocation; and,
- provide tailored investment advice based on a client's investment objective.

Accounts are reviewed on a regular basis and rebalanced as necessary according to each client's investment profile. Depending on the anticipated level of trading and account size, investment representatives of Mariner Financial Group, LLC will work with each client to determine the most cost effective fee structure.

Minimum Investment Amount

The account minimum for an asset management account is generally \$250,000; however, the firm reserves the right to open an account for a lesser amount to accommodate a client referral or family member as well as other reasons at the discretion of management.

Assets Under Management

As of December 31, 2018 the firm has \$113,300,575.00 of discretionary assets and \$0.00 non-discretionary assets under management.

Wrap Fee Program

A wrap fee program is a comprehensive advisory account with a single fee that covers a bundle of services; such as, portfolio management, advice, and investment research as well as trade execution, custody and reporting fee. The fee is not based directly upon advisory services or the execution of transactions. Mariner Financial Group, LLC is the sponsor and portfolio manager of a wrap fee program – additional details are provided in Appendix-1.

Financial Planning Services

Mariner Financial Group, LLC through its investment representatives generally provides financial planning as part of a comprehensive asset management engagement. The types of financial planning most frequently offered include:

- Cash Flow / Budgeting
- Retirement Planning
- Estate Planning
- College Planning
- Insurance Planning

The extent of planning can vary greatly depending on the scope and complexity of a particular individual's financial situation and may include other areas of focus as warranted.

Conflicts of Interest

Investment representatives must fully disclose all material facts concerning any conflict, and should avoid even the appearance of a conflict of interest and abide by honest and ethical business practices.

- Investment representatives of Mariner Financial Group, LLC are also registered representatives of LPL Financial to offer securities transactions for a commission.
- Investment representatives of Mariner Financial Group, LLC are also insurance agents appointed with multiple insurance carriers to sell insurance products for a commission.
 - The recommendation that a client purchase a commission product from an investment representative in their separate capacity as a registered representative of LPL or as an agent of an insurance company presents a conflict of interest, as the receipt of commissions provides an incentive that may not be in a client's best interests.
- Investment representatives must not induce trading in a client's account that is excessive in size or frequency in view of the financial resources and character of the account.
- Investment representatives must make recommendations as a fiduciary acting in a client's best interest based on the information furnished by the client or otherwise known.
- Investment representatives may not borrow money or securities from, or lend money or securities to a client.
- Investment representatives must not place an order for the purchase or sale of a security if the security is not registered, or the security or transaction is not exempt from registration in the specific state.
- Product sponsors may pay for, or reimburse Mariner Financial Group, LLC for the reasonable costs associated with, education or training events.
- The code of ethics permits employees and investment representatives or related persons to invest for their own personal accounts in the same or different securities that an investment representative may purchase for clients in program accounts.

Such conflicts and risk of misconduct are mitigated by an investment representative's fiduciary duty to act in the best interests of its clients and acting accordingly. The firm's Chief Compliance Officer, Andrea Camoin, is available to address any questions regarding conflicts of interest.

Other Considerations

Neither the firm nor any investment representative are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading Mariner Financial Group, LLC or a representative of the foregoing.

Mariner Financial Group, LLC is not a law firm or an accounting firm and does not offer legal or accounting services. Accordingly, Mariner Financial Group, LLC does not prepare legal documents or prepare tax returns. Mariner Financial Group, LLC may introduce clients to other professionals for such non-investment related services, which in some cases may be an investment representative of Mariner Financial Group, LLC acting in an unaffiliated separate individual capacity. Clients are under no obligation to use these professionals and should conduct their own due-diligence prior to engaging their services. Mariner Financial Group, LLC should not be considered a party to any disputes that may arise.

Certain mutual funds recommended by investment representatives of Mariner Financial Group, LLC are publically available for purchase without engaging the services of Mariner Financial Group, LLC. However, if a client elects to make such direct purchases, they do so without the benefit of the on-going advisory services offered by Mariner Financial Group, LLC.

Item 5 – Fees and Compensation

Investment representatives may only provide services and charge fees based on the account agreement. However, the exact service and fees charged to a particular client are dependent upon the representative that is working with the client. Investment representative will consider the individual needs of each client when recommending an advisory platform. Furthermore, investment strategies and recommendations are tailored to the individual needs of each client.

- Asset management fees are deducted by LPL Financial LLC as the qualified custodian in advance.
 - Clients of Mariner Financial Group, LLC enter into a separate agreement regarding the amount of asset management fees to be deducted.
 - Mariner Financial Group, LLC does not have the independent ability to increase an asset management fee.
- LPL Financial as the qualified custodian sends clients of Mariner Financial Group, LLC quarterly performance report that details the:
 - amount of the fee charged;
 - amount of assets subject to the fee; and,
 - time period covered by the fee.

The specific fee charged is negotiated based on the below fee schedule and subject to account specifics such as household account size, management style, complexity of holdings, investment type, management strategy and the expected amount of time and effort required.

Asset Under Management	Annual Fee
\$2 Million and below	1.00%
\$2 Million to \$4,999,999	.85%
\$5 Million to \$9,999,999	.50%
\$10 Million and above	Negotiable

Fees are billed in advance based assets under management as of the last business day of the previous quarter.

$$[Quarter\ End\ Value\ x\ Advisory\ Fee] / 360\ x\ 90\ Days = Advance\ Billing$$

Ticket Charges

Ticket charges are an administrative fee charged per trade in an account. An asset management fee may include ticket charges or a client may be responsible for such charges. Investment representatives of Mariner Financial Group, LLC will work with each client to determine the most cost effective fee structure depending on such things as the anticipated level of trading and account size. When clients do not pay a transaction charge for transactions, clients should be aware that Mariner Financial Group, LLC pays the custodian (LPL Financial) the transaction charges on their behalf. The transaction charges paid by Mariner Financial Group, LLC vary based on the type of transaction (e.g., mutual fund, equity or ETF) and for mutual funds based on whether or not the mutual fund pays 12b-1 fees and/or recordkeeping fees to LPL Financial.

- Transaction charges paid by the Mariner Financial Group for equities and ETFs are \$9.
- For mutual funds, the transaction charges range from \$0 to \$26.50.

When Mariner Financial Group, LLC pays the transaction charges on behalf of a client, there is a conflict of interest based on an incentive to avoid a fee rather place a trade. This conflict is mitigated by an investment's fiduciary duty to act in their client's best interest and acting accordingly.

Mutual Fund Share Classes

The share class represents the amount a client will be charged for buying shares of a mutual fund, when the fee will be paid and they determine the amount of annual fees to be paid.

- Class A Shares typically pay a 12b-1 fee to LPL Financial for providing brokerage-related services to the mutual funds by charging a front or rear load.
- Class I Shares ("institutional," "investor," "retail," "service," "administrative" or "platform") share classes are no-load or load-waived share classes and therefore not subject to any upfront sales charge and do not pay 12b-1 fees

Clients may also incur certain charges imposed by third-parties in connection with investments made in the account(s), including , but not necessarily limited to, the following types of charges: investment managers, mutual fund management fees and administrative servicing fees, mutual fund 12b-1 fees, certain deferred sales charges on previously purchased mutual funds, clearing, custody, postage and handling, other transaction charges and service fees (i.e. account transfer fees, wire transfer fees, termination fees, etc.) interest on debt balances, IRA Qualified Retirement Plan fees, and other costs or charges with securities transactions mandated by law. Further information regarding charges and fees assessed by a mutual fund or other securities sponsors is available in the appropriate prospectus or disclosure statement.

Advance Payment of Fees and Termination

Clients may terminate the agreement without penalty for a full refund of the fees within five business days of signing an agreement. Thereafter, clients may terminate the agreement with 30 days' written notice. If the advisory agreement is terminated before the end of the quarterly period, client is entitled to a pro-rated refund of any pre-paid quarterly advisory fee based on the number of days remaining in the quarter after the termination date, which will be processed by the custodian.

Financial Planning

Financial planning is incorporated as part of a comprehensive asset management engagement and not billed separately. The Client may terminate the financial planning agreement within five (5) business days of signing the Mariner Financial Group, LLC'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.

Compensation for Sales of Securities

Broker-Dealer Affiliation

Commissions are not charged for asset management services; however, a client of Mariner Financial Group, LLC can engage certain investment representatives in their capacity as a registered representative of LPL Financial an SEC registered and FINRA/SIPC member broker-dealer and separate unaffiliated legal entity, to implement investment recommendations on a commission basis. LPL Financial will charge brokerage commissions to effect securities transactions in a brokerage account. Securities transactions in an advisory account do not generate commission based compensation. The brokerage commissions charged by LPL Financial may be higher or lower than those charged by other broker/dealers. The Firm and the IAR will:

- Allocate securities in a manner that is fair and equitable to all clients
- Not effect agency-cross transactions for client accounts
- Not act in a principal capacity.

The firm generally does not receive more than 20% of its revenue from advisory clients as a result of brokerage commissions or other compensation for the sale of investment products the firm recommends to its clients. When the firm's representatives sell an investment product on a commission basis, the firm does not charge an advisory fee in addition to the commissions paid by the client for such product in order to address this conflict of interest.

Insurance Agency Affiliations

Investment representatives may also be licensed insurance agents. In the capacity of an insurance agent, they may recommend the purchase of certain insurance-related products on a commission basis separate from providing advisory services.

Please see "Item 10 – Other Financial Industry Activities and Affiliations".

Item 6 – Performance-Based Fees and Side-by-side Management

Mariner Financial Group, LLC does not accept performance-based fees.

- Fees based on a share of capital gains; or,
- Capital appreciation of assets (such as a client that is a hedge fund or other pooled investment vehicle).

Mariner Financial Group, LLC does not participate in side-by-side management.

- Management of accounts that are both charged a performance-based fee and accounts that are charged another type of fee, such as an hourly or fixed fee or an asset-based fee.

Item 7 – Types of Clients

Mariner Financial Group, LLC generally provides advisory services to high net worth individuals and business owners. The amount of each type of Client is available on the Mariner Financial Group LLC's Form ADV Part 1A. These amounts may change over time and are updated at least annually. However, the advisory services offered by Mariner Financial Group, LLC may be offered to additional types of clients as such opportunities may arise.

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

A client's portfolio may include assets of publicly held companies in the United States and foreign markets. This may include both equities and fixed income assets. Other options may include domestic and foreign debt instruments (i.e. government and corporate bonds), real estate investment trusts and mutual funds or private placements that invest in natural resources or managed futures (markets such as, and not limited to, currency, commodity, agriculture and energy).

Each market may function and change in different ways depending on supply and demand, current events and investor behaviors. While our goal is to help increase a client's net worth, there is potential for losses in market, principal, and interest values. These changes may also affect a client's tax situation and filings.

The firm employs a fundamental value style of analysis

Fundamental Value Analysis – involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages in an attempt to measure and evaluate the intrinsic value. This type of analysis concentrates on factors that determine a company's undervalued market position with a focus on the potential for expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Analysis and strategies also consider:

- Publicly Available Data
- A Client's Net Worth
- Risk Tolerance
- Goals for Investment Account Funds
- 3rd Party Research

Each client portfolio will be initially designed to meet a particular investment goal, which we determine to be appropriate for the client's circumstances. Once the portfolio has been determined, we regularly review the portfolio and as appropriate, rebalance it based upon the client's individual needs, stated goals and objectives.

Risk of Loss

Investing in securities involves a risk of loss that clients should be prepared to bear. There are different types of investments that involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy will be profitable or equal any specific performance level(s). Past performance is not indicative of future results. Investment representatives of Mariner Financial Group, LLC consider the following risks when managing client assets. While there may be additional risks to consider, clients, at a minimum, should understand, consider and as appropriate accept certain risks as detailed below.

- **Market Risk** – the risk that the value of securities may go up or down, sometimes rapidly or unpredictably, due to factors affecting securities markets generally or particular industries. This is a risk that will affect all securities in the same manner caused by some factor that cannot be controlled by diversification
- **Interest Rate Risk** – the risk that fixed income securities will decline in value because of an increase in interest rates; a bond or a fixed income fund with a longer duration will be more sensitive to changes in interest rates than a bond or bond fund with a shorter duration.
- **Credit Risk** – the risk that an investor could lose money if the issuer or guarantor of a fixed income security is unable or unwilling to meet its financial obligations.
- **Business Risk** – the measure of risk associated with a particular security. It is also known as unsystematic risk and refers to the risk associated with a specific issuer of a security. Generally speaking, all businesses in the same industry have similar types of business risk. More specifically, business risk refers to the possibility that the issuer of a particular company stock or a bond may go bankrupt or be unable to pay the interest or principal in the case of bonds.
- **Taxability Risk** – the risk that a security that was issued with tax-exempt status could potentially lose that status prior to maturity. Since municipal bonds carry a lower interest rate than fully taxable bonds, the bond holders would end up with a lower after-tax yield than originally planned.
- **Call Risk** – the risk specific to bond issues and refers to the possibility that a debt security will be called prior to maturity. Call risk usually goes hand in hand with reinvestment risk because the bondholder must find an investment that provides the same level of income for equal risk. Call risk is most prevalent when interest rates are falling, as companies trying to save money will usually redeem bond issues with higher coupons and replace them on the bond market with issues with lower interest rates.
- **Inflationary Risk** – the risk that future inflation will cause the purchasing power of cash flow from an investment to decline.

- **Liquidity Risk** – the possibility that an investor may not be able to buy or sell an investment as and when desired or in sufficient quantities because opportunities are limited.
- **Reinvestment Risk** – the risk that falling interest rates will lead to a decline in cash flow from an investment when its principal and interest payments are reinvested at lower rates.
- **Social/Political Risk** – the possibility of nationalization, unfavorable government action or social changes resulting in a loss of value.
- **Legislative Risk** – the risk of a legislative ruling resulting in adverse consequences.
- **Currency/Exchange Rate Risk** – the risk of a change in the price of one currency against another.

The firms' methods of analysis and investment strategies do not represent any significant or unusual risks however all strategies have inherent risks and performance limitations.

Types of Investments (Examples, not limitations)

Investment representatives of Mariner Financial Group, LLC allocate a client's assets as appropriate to help them reach their individual investment objectives within their time horizon in a manner consistent with their risk profile. Client funds are allocated appropriately in such investments as listed below:

- **Equity** – investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environment.
- **Fixed Income** – investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.
- **Mutual Funds** – a pool of funds collected from many investors for the purpose of investing in securities such as stocks, bonds, money market instruments and similar assets.
 - **Open-End Mutual Funds** – a type of mutual fund that does not have restrictions on the amount of shares the fund will issue and will buy back shares when investors wish to sell.

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

- **Closed-End Mutual Funds** – a type of mutual fund that raises a fixed amount of capital through an initial public offering (IPO). The fund is then structured, listed and traded like a stock on a stock exchange. Clients should be aware that closed-end funds available within the program are not readily marketable. In an effort to provide investor liquidity, the funds may offer to repurchase a certain percentage of shares at net asset value on a periodic basis. Thus, clients may be unable to liquidate all or a portion of their shares in these types of funds.
- **Exchange Traded Funds (ETFs)** – an ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.
- **Exchange-Traded Notes (ETNs)** – An ETN is a senior unsecured debt obligation designed to track the total return of an underlying market index or other benchmark. ETNs may be linked to a variety of assets, for example, commodity futures, foreign currency and equities. ETNs are similar to ETFs in that they are listed on an exchange and can typically be bought or sold throughout the trading day. However, an ETN is not a mutual fund and does not have a net asset value; the ETN trades at the prevailing market price. Some of the more common risks of an ETN are as follows. The repayment of the principal, interest (if any), and the payment of any returns at maturity or upon redemption are dependent upon the ETN issuer’s ability to pay. In addition, the trading price of the ETN in the secondary market may be adversely impacted if the issuer’s credit rating is downgraded. The index or asset class for performance replication in an ETN may or may not be concentrated in a specific sector, asset class or country and may therefore carry specific risks.
- **Unit Investment Trust (UIT)** – An investment company that offers a fixed, unmanaged portfolio, generally of stocks and bonds, as redeemable “units” to investors for a specific period of time. It is designed to provide capital appreciation and/or dividend income. UITs can be resold in the secondary market. A UIT may be either a regulated investment corporation (RIC) or a grantor trust. The former is a corporation in which the investors are joint owners; the latter grants investors proportional ownership in the UIT's underlying securities.
- **Margin Accounts** – Client should be aware that margin borrowing involves additional risks. Margin borrowing will result in increased gain if the value of the securities in the account go up, but will result in increased losses if the value of the securities in the account goes down. The custodian, acting as the client’s creditor, will have the authority to liquidate all or part of the

account to repay any portion of the margin loan, even if the timing would be disadvantageous to the client. For performance illustration purposes, the margin interest charge will be treated as a withdrawal and will, therefore, not negatively impact the performance figures reflected on the quarterly advisory reports.

- **Cash Positions** – Based on a perceived or anticipated market conditions and/or events, certain assets may be taken out of the market and held in a defensive cash position. All cash shall be included as assets subject to the agreed upon advisory fee.
- **Non-U.S. Securities** – present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.
- **Long-Term Purchases** – Securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.
- **Short-Term Purchases** – Securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations.

Other investment types may be included as appropriate for a particular client and their respective trading objectives.

Item 9 – Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to the evaluation of an advisory firm or the integrity of the firm's management. Any such disciplinary information for the company and the company's investment representatives would be provided herein and publicly accessible by selecting the Investment Search option at www.adviserinfo.sec.gov. There are no such legal or material disciplinary events to disclose.

Item 10 – Other Financial Industry Activities and Affiliations

Investment representatives of Mariner Financial Group, LLC receive compensation for the sale of securities or other investment products in their capacity as a registered representative of LPL Financial. Investment representatives of Mariner Financial Group, LLC may also be insurance agents/brokers and offer insurance products and receive customary fees as a result of insurance sales. Insurance products will only be offered in states where the representative offering insurance is properly licensed.

Broker-Dealer Affiliation

LPL Financial is a registered broker-dealer (CRD No. 6413), member FINRA/SIPC. In one's separate capacity as a registered representative, the Advisory Person will typically receive commissions for the implementation of recommendations for commissionable transactions.

- Clients are not obligated to implement any recommendation.

- Mariner Financial Group, LLC nor the Advisory Person will earn ongoing investment advisory fees in connection with any services implemented by the Advisory Person in their separate capacity as a registered representative.
- LPL Financial is a separate unaffiliated legal entity.

Insurance Agency Affiliation

The Advisory Person is 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.
- Mariner Financial Group, LLC nor the Advisory Person will earn ongoing investment advisory fees in connection with any services implemented by the Advisory Person in their separate capacity as an insurance agent.

CPA Firm Affiliation

Certain investment representatives are also partners of Nicola | Yester, a CPA firm. Any accounting or tax services provided by Nicola | Yester are done so in an individual capacity independent from Mariner Financial Group, LLC.

- Mariner Financial Group, LLC does not receive any form of compensation for such services.

These individual affiliations create a conflict of interest, which is mitigated by an investment representative's fiduciary duty to act in the best interest of their client and to act accordingly.

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

Mariner Financial Group, LLC maintains a Code of Ethics, which serves to establish a standard of business conduct for all employees that are based upon fundamental principles of openness, integrity, honesty and trust.

- The code of ethics includes guidelines regarding personal securities transactions of its employees and investment representatives.
 - As disclosed in the Conflicts of Interests section, the code of ethics permits employees and investment representatives or related persons to invest for their own personal accounts in the same or different securities that an investment representative may purchase for clients in program accounts.
 - Neither Mariner Financial Group, LLC nor a related person recommends to clients, or buys or sells for client accounts, securities in which they or a related person has a material financial interest.

- An investment advisor is considered a fiduciary.
 - As a fiduciary, it is an investment advisor's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times.
 - A fiduciary duty is considered the core underlying principle for a Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures.
 - All of our supervised persons must conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times.
 - Upon employment or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with the Code of Ethics.

This disclosure is provided to give all clients a summary of our Code of Ethics. However, if a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided promptly upon request.

Item 12 – Brokerage Practices

All investment representatives of Mariner Financial Group, LLC are also registered representatives of LPL Financial and will recommend LPL Financial for securities transactions.

- Mariner Financial Group, LLC does not maintain discretionary authority in determining the broker/dealer with whom orders for the purchase and sale of securities are placed for execution.
- Mariner Financial Group, LLC does not have discretion regarding the commission rates at which such transactions are effected.

Each asset management client of Mariner Financial Group, LLC will be required to establish an LPL Financial account.

Soft Dollars

Mariner Financial Group, LLC does not receive soft dollar support services from LPL Financial. Support services are provided without cost, at a discount, and/or at a negotiated rate, and may include the following:

- investment-related research;
- pricing information and market data;
- software and other technology that provide access to client account data;
- compliance and/or practice management-related publications;
- consulting services;
- attendance at conferences, meetings, and other educational and/or social events;

- marketing support;
- computer hardware and/or software; and,
- other products and services used in furtherance of investment advisory business operations.

These support services are not considered “soft dollar” because they are provided to Mariner Financial Group, LLC based on the overall relationship with LPL Financial, without regard to a minimum production standard or the amount of assets under management.

Best Execution

In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer’s services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although we will seek competitive rates, for the benefit of all clients, we may not necessarily obtain the lowest possible commission rates for specific client account transactions. Our recommendations to our clients are based on our clients’ interests in receiving best execution and the level of competitive, professional services.

Trade Aggregation

For advisory services, Mariner Financial Group, LLC and its related persons may aggregate transactions in equity and fixed income securities for a client with other clients to improve the quality of execution. When transactions are so aggregated, the actual prices applicable to the aggregated transactions will be averaged, and the client account will be deemed to have purchased or sold its proportionate share of the securities involved at the average price obtained. Mariner Financial Group, LLC and its related persons may determine not to aggregate transactions, for example, based on the size of the trades, number of client accounts, the timing of trades, and the liquidity of the securities and the discretionary or non-discretionary nature of the trades. If Mariner Financial Group, LLC or its related persons do not aggregate orders, some clients purchasing securities around the same time may receive a less favorable price than other clients. This means that this practice of not aggregating may cost clients more money.

Item 13 – Review of Accounts

Account surveillance is conducted on an ongoing basis. Client review periods are generally annually depending on market conditions, the client's funding needs and changes in investment objectives. Occasionally a review may result in a "no change" recommendation. If a client has a change in their financial situation Mariner Financial Group, LLC will perform a review to make sure that the portfolio is appropriate for the client and meets their cash needs. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for accounts.

- All clients are advised that it remains their responsibility to advise Mariner Financial Group, LLC of any changes in their investment objectives and/or financial situation.
- All clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with their investment representative on an annual basis.

LPL Financial's Advisory Compliance Department regularly performs surveillance on SWM/SWM II accounts and accounts managed through an external custodian. Investment Representatives ("IAR") with accounts identified based on the surveillance criteria will receive a system notification. Alerts will be reviewed by the Home Office first and sent to the Mariner Financial, LLC as needed. Formal communication is sent to IARs regarding their advisory surveillance alerts. The notification provides access to the Proactive Surveillance portal which provides information that will assist the chief compliance officer to respond to an alert. The surveillance process focuses on accounts that have potential issues in the following areas:

Market Performance
Trading Inactivity
High Cash Balance

Position Concentration
Asset Allocation

Risk Tolerance
Senior Suitability

Item 14 – Client Referrals and Other Compensation

Mariner Financial Group, LLC and employees may receive additional compensation from product sponsors. However, such compensation may not be tied to the sales of any products. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings with investment representative, client workshops or events, marketing events or advertising initiatives, including services for identifying prospective clients.

Product sponsors may also pay for, or reimburse Mariner Financial Group, LLC for the costs associated with, education or training events that may be attended by Mariner Financial Group, LLC employees and investment representatives and for Mariner Financial Group, LLC sponsored conferences and events. Such additional compensation represents a conflict of interest however investment representatives of Mariner Financial Group, LLC have a fiduciary duty to act in the client's best interest.

Mariner Financial Group, LLC does not currently have any agreements in place to pay solicitors a portion of advisory fees. Mariner Financial Group, LLC does not receive any other economic benefit for providing investment advice or other advisory service from someone who is not a client.

There are no other economic benefits provided by someone who is not a client for providing investment advice.

Item 15 – Custody

Mariner Financial Group, LLC does not have actual custody of client funds. Clients of Mariner Financial Group, LLC directly authorize a qualified custodian to deduct the firm's investment management advisory fees in advance from their account or Mariner Financial Group, LLC will send an invoice to the custodian for the deduction of advisory fees in arrears.

- The custodian sends statements at least quarterly to clients showing all disbursements in account including the amount of the advisory fees paid to Mariner Financial Group, LLC the value of client assets upon which Mariner Financial Group LLC's fee was based, and the specific manner in which Mariner Financial Group's fee was calculated.

- Clients may provide authorization permitting advisory fees to be deducted in advance from client advisory accounts or receive an invoice for fees deducted in arrears.
- Payment of fees may result in the liquidation of a client's positions if there are insufficient funds in the account.
- Fees are assessed on all assets in the account(s), including securities, cash or money market balances.
- Margin debits do not reduce the value of the assets in the account for billing purposes.

Clients should review the fee calculated and deducted by the custodian to ensure that the fees were calculated correctly.

Item 16 - Investment Discretion

Mariner Financial Group, LLC provides investment advisory services on a discretionary or non-discretionary basis. Prior to Mariner Financial Group, LLC assuming discretionary authority over a client's account, the client shall be required to grant permission by executing a written advisory agreement, naming Mariner Financial Group, LLC as the client's attorney and agent-in-fact. Such an agreement, grants Mariner Financial Group, LLC full authority to buy and/or sell the type and amount of securities on behalf of a client, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

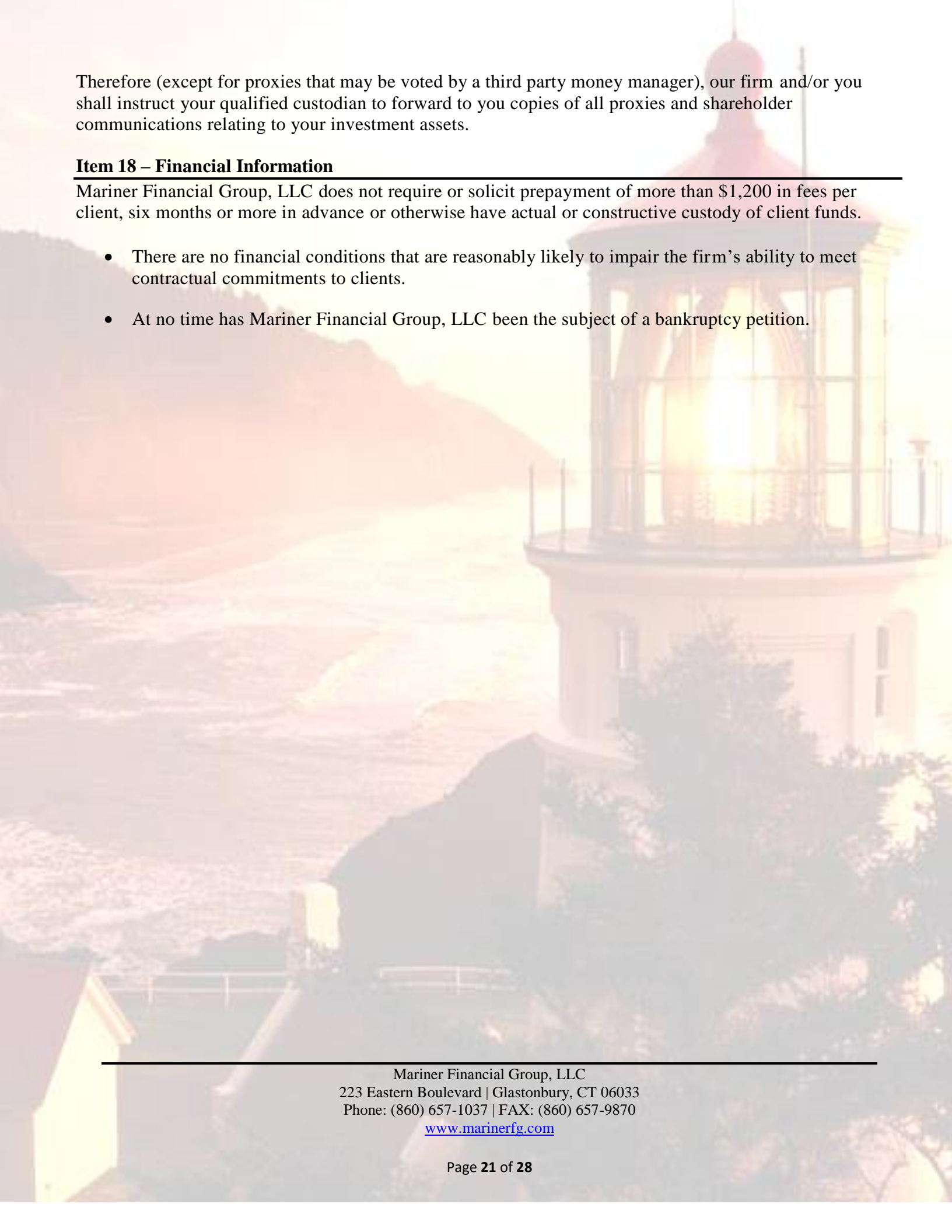
Mariner Financial Group, LLC does not have discretionary authority to determine the broker or dealer to be used for a purchase or sale of securities for a client's account or the commission rates to be paid to a broker or dealer for a client's securities transaction.

Item 17 – Voting Client Securities

Mariner Financial Group, LLC does not vote client proxies. Clients will otherwise receive their proxies or other solicitations directly from their custodian. Clients may contact Mariner Financial Group, LLC at (860) 657-1037 to discuss any questions they may have with a particular proxy vote. To request assistance on a proxy voting issue please contact the offering company.

However, third party money managers selected or recommended by our firm may vote proxies for clients. Therefore, except in the event a third party money manager votes proxies, clients maintain exclusive responsibility for:

- (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted; and,
- (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.

A lighthouse on a rocky coastline with waves crashing against the shore.

Therefore (except for proxies that may be voted by a third party money manager), our firm and/or you shall instruct your qualified custodian to forward to you copies of all proxies and shareholder communications relating to your investment assets.

Item 18 – Financial Information

Mariner Financial Group, LLC does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance or otherwise have actual or constructive custody of client funds.

- There are no financial conditions that are reasonably likely to impair the firm’s ability to meet contractual commitments to clients.
- At no time has Mariner Financial Group, LLC been the subject of a bankruptcy petition.

Appendix 1 – Wrap Fee Program Brochure

Mariner Financial Group, LLC

CRD No. 287649

223 Eastern Boulevard | Glastonbury, CT 06033

Phone: (860) 657-1037 | Fax: (860) 657-9870

March 25, 2019

This Form ADV2A - Appendix 1 (“Wrap Fee Brochure”) provides information about the qualifications and business practices for Mariner Financial Group, LLC services when offering services pursuant to a wrap program. This Wrap Fee Brochure shall always be accompanied by the Mariner Financial Group, LLC Disclosure Brochure, which provides complete details on the business practices of the Mariner Financial Group, LLC. If you did not receive the complete Mariner Financial Group, LLC Disclosure Brochure or you have any questions about the contents of this Wrap Fee Brochure or the Mariner Financial Group, LLC Disclosure Brochure, please contact us at (860) 657-1037 or andrea.camoin@lpl.com

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about Mariner Financial Group, LLC and its Advisory persons are available on the SEC’s website at www.adviserinfo.sec.gov by searching for our firm name or by our CRD No. 287649.

Registration does not imply a certain level of skill or training

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www.marinerfg.com



Item 2 - Material Changes

The firm now consider SWM II to be a wrap fee program. There are no changes to how the platform is managed but an Appendix 1 has been added to this brochure.

Additional information about Mariner Financial Group, LLC is available via the SEC's Web Site www.adviserinfo.sec.gov. The SEC's Web Site also provides information about any persons affiliated with Mariner Financial Group, LLC who are registered, or are required to be registered, as investment representatives of Mariner Financial Group, LLC.

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Item 4 – Services, Fees and compensation

Mariner Financial Group, LLC provides investment Advisory services where the asset management fee and ticket charges are “wrapped” into a single fee. This Wrap Fee Program Brochure is provided as a supplement to the Mariner Financial Group, LLC Disclosure Brochure (Form ADV 2A) to provide further details of the business practices and fee structure.

This Wrap Fee Program Brochure references back to the Mariner Financial Group, LLC Form ADV 2A in which this Wrap Fee Program Brochure serves as an Appendix. Please see Item 4 – Advisory Services of the Form ADV 2A for details on Mariner Financial Group LLC’s investment philosophy and related services.

Mariner Financial Group, LLC is the sponsor and portfolio manager of this Wrap Fee Program, receives investment Advisory fees paid by clients and pays the Custodian for the costs associated with the normal trading activity.

Asset Under Management	Annual Fee
\$2 Million and below	1.00%
\$2 Million to \$4,999,999	.85%
\$5 Million to \$9,999,999	.50%
\$10 Million and above	Negotiable

Participation in this wrap fee program may cost more or less than purchasing such services separately.

Item 5 – Account Requirements and Types of Clients

Please see Item 7 – Types of Clients in the Form ADV 2A Disclosure Brochure.

Item 6 - Portfolio Manager Selection and Evaluation

Mariner Financial Group, LLC serves as sponsor and portfolio manager for the services under this Wrap Fee Program. Mariner Financial Group, LLC does not charge performance-based fees.

Mariner Financial Group, LLC does not accept proxy-voting responsibility. Clients will receive proxy statements directly from the Custodian. Mariner Financial Group, LLC can assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 7 – Client Information Provided to Portfolio Managers

Mariner Financial Group, LLC is the sponsor and sole portfolio manager for the Program. There is no other portfolio manager where client information can be shared.

Item 8 – Client Contact with Portfolio Managers

Mariner Financial Group, LLC is a full-service investment management Advisory firm. Clients always have direct access to the Portfolio Managers at Mariner Financial Group, LLC.

Item 9 – Additional Information

Our backgrounds, disciplinary information (none) and other financial industry activities and affiliations are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for our firm name or by our CRD No. 287649 as well as Items 10 and 14 of the Form ADV Part 2A.

Please also see Item 9 of the Mariner Financial Group, LLC Disclosure Brochure as well as Item 3 of each Investment Representatives Form ADV 2B Brochure Supplement (included with this Wrap Fee Program Brochure) for additional information on how to research the background information.

Mariner Financial Group, LLC has implemented a Code of Ethics that defines our fiduciary commitment to each Client. The details of the Mariner Financial Group, LLC Code of Ethics can be found under Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading in the Disclosure Brochure (included with this Wrap Fee Program Brochure).

Client accounts are monitored on a regular and continuous basis by Mariner Financial Group, LLC under the supervision of the Chief Compliance Officer (“CCO”). Details of the review policies and practices are provided in Item 13 of the Form ADV Part 2A – Disclosure Brochure.

Please see Item 14 – Other Compensation in the Form ADV Part 2A – Disclosure Brochure (included with this Wrap Fee Brochure) for details on additional compensation that may be received by Mariner Financial Group, LLC or its Investment Representatives. Each Advisory Person’s Form ADV 2B Brochure Supplement (also included with this Wrap Fee Brochure) provides details on any outside business activities and the associated compensation.

Mariner Financial Group, LLC does not pay a referral fee for the introduction of clients.

Financial information is available in Item 18 of the Form ADV Part 2A – Disclosure Brochure.

Privacy Policy

Effective: March 25, 2019

Our Commitment to You

Mariner Financial Group, LLC 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, 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. Mariner Financial Group, LLC (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.

Mariner Financial Group, LLC 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

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How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information. We require third parties that assist in providing our services to you to protect the personal information they receive from us.

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?
Servicing our Clients We share information with technology vendors and third-party service providers to manage and support operations and regulatory compliance (such as administrators, brokers, custodians, regulators, credit agencies, consultants 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
Marketing Purposes Mariner Financial Group, LLC 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 Mariner Financial Group, LLC or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users 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
Information About Former Clients Mariner Financial Group, LLC 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 (860) 657-1037 or via email at andrea.camoin@lpl.com.