

# **Form ADV Part 2A Appendix 1 - Investment Management Wrap Fee Program Brochure**

**Midwest Financial Group, LLC**

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This Investment Management Wrap Fee Program Brochure provides information about the qualifications and business practices of Midwest Financial Group, LLC (MFG). If you have any questions about the contents of this Brochure, please contact us at (913) 696-0041. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or any state securities authority.

MFG is a registered investment adviser. Registration as an investment adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information from which you can determine whether to hire or retain an adviser.

Additional information about MFG is also available via the SEC's web site  
[www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 – Material Changes**

This Brochure, dated December 04, 2019, represents an update to the Wrap Fee Program Brochure for Midwest Financial Group, LLC.

Since the filing of the firm's annual Wrap Brochure on March 28, 2019, various updates were made, but no material changes were made.

Pursuant to SEC Rules, we will deliver to you a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our fiscal year. We may further provide other ongoing disclosure information about material changes as necessary. All such information will be provided to you free of charge.

Currently, our Brochures may be requested by contacting us at (913) 696-0041.

Additional information about MFG is also available via the SEC's web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's web site also provides information about any persons affiliated with MFG who are registered as investment adviser representatives of the firm.

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## **Item 4 – Services, Fees and Compensation**

### **Investment Management Services**

Investment management services are provided through this Wrap Fee Program where participants will receive portfolio management, custodial, reporting, and clearing services for one all inclusive fee.

When providing investment management services, the firm not only makes recommendations related to investments, but also implements these recommendations and provides ongoing monitoring and reporting.

MFG will assist the client in assessing their current financial situation, financial goals and attitudes towards risk, and will then recommend an appropriate asset allocation. Once an asset allocation is approved by a client, the individual portfolios will be managed by the advisory representative on a discretionary or non-discretionary basis. Clients may elect to give the firm discretion to make all decisions (discretionary management), or may prefer to approve all decisions before implementation (non-discretionary management).

Portfolios will be invested in a variety of investment classes, including stocks, bonds, mutual funds, and exchange traded funds, among others. The advisory representative will recommend changes to a client's portfolio based on market, economic, or political circumstances, and the individual characteristics of the securities in the portfolio.

Annual wrap program fees range up to 1.5% and are negotiated based on the complexity of the engagement prior to the start of the engagement. Fees are generally calculated and charged quarterly in advance based on the average daily balance of assets under management during the preceding quarter. Fees for partial quarters are prorated based on the number of days assets are under management. Fees are typically deducted directly from the client's account.

Wrap programs may be terminated by either party at any time with 30 days written notice to the other party. Upon termination, any unearned prepaid fees will be refunded.

Wrap program fees include investment management and brokerage charges, but are separate from charges that may be imposed by third parties, such as custodial fees, expense or other charges imposed directly by mutual funds or exchange traded funds, margin costs, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund transfer fees, and other fees and taxes on brokerage accounts and securities transactions.

MFG does not hold client assets. Instead, we require all client assets be maintained in an account at a non-affiliated "qualified custodian," generally a broker-dealer or bank. The

custodian will hold your assets in a brokerage account and will be able to buy and sell securities on your behalf.

For our clients' accounts that the custodian maintains, the custodian generally does not charge separately for custody services but instead is compensated by charging commissions or other fees on trades that it executes or trades that are executed by other brokers to and from client accounts. Fees applicable to our client accounts were negotiated based on the condition that our clients collectively maintain a certain level of assets at the custodian. We feel this commitment benefits you because we expect the overall rates you pay will be lower than they might be otherwise.

Services purchased through this program may cost clients less than purchasing similar services from the firm on a stand-alone basis, in that brokerage costs (if any) are paid on behalf of the client through the Wrap Program. However, since MFG absorbs certain transaction costs in Wrap Program accounts, we may have a financial incentive not to place trade orders in those accounts, so clients should be aware that this potential conflict of interest may exist.

Clients are encouraged to compare the costs they may incur in this Wrap Program vs. a typical investment management account, as the anticipated level of trading activity will impact the costs associated with each type of arrangement.

#### **Item 5 – Account Requirements and Types of Clients**

MFG provides advisory services to individuals, businesses and retirement plans. The firm has not set a minimum investment amount to open a Wrap Program account; however we reserve the right to decline certain accounts if we feel a relationship would not be beneficial or economical for the client.

#### **Item 6 – Portfolio Manager Selection and Evaluation**

MFG functions not only as the Wrap Program sponsor but also as the portfolio manager. No outside portfolio managers are used.

Since MFG functions as the Wrap Program's sole portfolio manager, a conflict of interest may exist because MFG pays certain client trading costs from its fee. This may give us an incentive to make recommendations that cost us less, or to recommend fewer trades, regardless of the benefit to our client. However, we feel that the cost of trading is not material enough to

influence our investment recommendations, and we feel that the harm to our clients and our reputation far outweighs any potential cost savings. It is our policy to always act in the best interests of our clients.

### **Advisory Business**

In addition to providing investment management services under this Wrap Program, MFG also provides investment management and advisory services on a stand-alone basis (See Form ADV Part 2A Brochure). We also provide advice on strategies for education funding, retirement planning, estate planning, risk management, employee benefits planning and tax planning, as well as general financial planning and consultation services.

Whether services are provided through this Wrap Program or on a stand-alone basis, MFG accepts discretionary and non-discretionary authority, and services are tailored to the individual needs of clients. Clients can also impose restrictions on investing in certain securities or types of securities.

### **Performance Based Fees and Side by Side Management**

MFG does not charge performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client) and consequently does not simultaneously manage performance based and not performance based accounts.

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

MFG's general investment strategy, consistent with the tenets of modern portfolio theory, is to attempt to reduce risk and volatility by building globally diversified portfolios. To implement this strategy, MFG primarily uses fundamental security methods of analysis, as well as market trend and economic cycle analysis. While mutual funds and exchange traded funds are the primary investment vehicles used in or recommended for client accounts, we may also use or recommend various other investment vehicles in the implementation of our strategies, including long-term purchases (securities held at least a year), short-term purchases (securities sold within a year), trading (securities sold with 30 days), margin and options.

Investing in securities involves risk of loss that clients should be prepared to bear. Such risks include market risk, interest rate risk, currency risk, and political risk, and loss of capital, among others. Additionally, certain trading strategies can affect investment performance through increased brokerage and other transactions. Each client's propensity for risk however is thoroughly evaluated, documented, and considered throughout the portfolio implementation process.

Although MFG intends to manage risk through the careful selection of investments, no investment strategy can assure a profit or avoid a loss.

### **Voting Client Securities**

MFG does not vote proxies on behalf of clients.

### **Item 7 – Client Information Provided to Portfolio Managers**

As the Wrap Program's sole portfolio manager, MFG does not communicate client information to outside portfolio managers.

### **Item 8 – Client Contact with Portfolio Managers**

MFG does not use outside portfolio managers, and consequently has no restrictions related to client contact with outside managers.

### **Item 9 – Additional Information**

#### **Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to the evaluation of the firm or the integrity of its management. MFG is currently not subject to, nor has ever been subject to, any legal or disciplinary events of a material nature.

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

MFG may also offer clients advice or recommendations related to insurance products. Some associated persons of MFG are licensed insurance agents and represent various insurance companies. Any insurance product placed through associated persons will generate standard and customary insurance commissions and other compensation, a portion of which may be received by associated persons of MFG.

While MFG will endeavor at all times to put the interest of clients first as part of its fiduciary duty, clients should be aware that the receipt of additional compensation creates a potential conflict of interest, and may affect the judgment of individuals who make recommendations. However, our clients are under no obligation to purchase products recommended by our associated persons or to purchase products through our associated persons. We believe that our recommendations are in the best interests of our clients, and are consistent with our clients' needs.

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

MFG has adopted a Code of Ethics expressing the firm's commitment to ethical conduct. The MFG Code of Ethics describes the firm's fiduciary duties and responsibilities to clients, and details practices for reviewing the personal securities transactions of supervised persons with access to client information. The Code also requires compliance with applicable securities laws, addresses insider trading, and details possible disciplinary measures for violations. MFG will provide a complete copy of its Code of Ethics to any client upon request to the Chief Compliance Officer. MFG also requires prior approval from the Chief Compliance Officer for investing in any IPOs or private placements (limited offerings).

### **Review of Accounts**

Accounts are generally reviewed on a weekly, monthly, quarterly, or semi-annual basis, depending on the type of account. Reviews may be general in nature, addressing investment objectives, risk tolerances or asset allocations, or they may be more detailed, depending on circumstances. The level of detail of the review is generally triggered by factors such as market, political, or economic conditions, or the client's individual financial situation. Clients should notify the firm of any material personal financial changes.

In addition to the monthly statements and confirmations of transaction that clients receive from the custodian, MFG may provide other reports directly to the client from time to time depending on the type of engagement. Investment management clients for example may receive periodic performance related reports. Financial planning clients may receive a planning analysis but do not receive regular reports from MFG.

MFG urges clients to carefully review custodial statements and compare them to the reports which we may provide.



### **Client Referrals and Other Compensation**

MFG does not compensate any outside parties for client referrals, nor do we receive any compensation or non-cash economic benefit for client referrals.

MFG does however receive economic benefits from our custodian in the form of the support products and services that are made available to us and to other independent investment advisors. These products and services, how they benefit us, and the related conflicts of interest are described in Item 12 of Form ADV Part 2A Brochure. The firm may also on limited occasions receive travel expense reimbursements for industry meetings related to market analysis, investment strategies, and practice management. The availability to us of these economic benefits is not based on us giving particular investment advice, such as buying or recommending particular securities for our clients. Furthermore, our representatives are required to make all investment decisions and recommendations based solely on the interests of the applicable client.

### **Financial Information**

Registered investment advisers are required in some cases to provide certain financial information and or disclosures about their financial condition. For example, if the firm requires prepayment of fees for six months in advance or has custody of client funds it is required to disclose any condition that is reasonably likely to impair its ability to meet its contractual commitments to its clients.

MFG has no financial or operating conditions which trigger such additional reporting requirements.