

# Sloan Advisory Group, Inc.

## Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of Sloan Advisory Group, Inc. If you have any questions about the contents of this brochure, please contact us at (888) 978-8880 or by email at: Rachel@sloanadvisorygroup.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 Sloan Advisory Group, Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Sloan Advisory Group, Inc.'s CRD number is: 284325.*

12 E. Washington Street  
Glens Falls, NY 12801  
(888) 978-8880  
Rachel@sloanadvisorygroup.com  
<https://www.SloanAdvisoryGroup.com>

*Registration does not imply a certain level of skill or training.*

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## Item 2: Material Changes

Since the last annual filing, dated March 2, 2018, the following material changes have occurred:  
Item 5 – Updated Advisory Service fees.

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## **Item 4: Advisory Business**

### **A. Description of the Advisory Firm**

Sloan Advisory Group, Inc. (hereinafter "Sloan Advisory Group") is a Corporation. The firm was formed in April 2009, and the principal owner is Rachel Sloan.

### **B. Types of Advisory Services**

#### ***Portfolio Management Services***

Sloan Advisory Group offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. Sloan Advisory Group creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

Sloan Advisory Group evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Sloan Advisory Group seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of Sloan Advisory Group's economic, investment or other financial interests. To meet its fiduciary obligations, Sloan Advisory Group attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, Sloan Advisory Group's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is Sloan Advisory Group's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

#### ***Selection of Other Advisers***

Sloan Advisory Group may direct clients to LWI Financial Inc. ("Loring Ward") as an independent third-party to perform certain services such as portfolio allocation analysis, account administration, asset-class investment strategy, back-office fulfillment, report and statement production, and fee debiting. Such services are paid directly through advisory fees billed to the client or are indirectly paid by Sloan Advisory Group. Loring Ward is

an investment adviser registered with the Securities and Exchange Commission. Sloan Advisory Group conducts due diligence on Loring Ward, which may involve one or more of the following: phone calls, meetings and review of Loring Ward's services and fees. While Sloan Advisory Group provides investment management services to its clients, Loring Ward provides administrative and reporting services.

Loring Ward may also sponsor educational seminars for the benefit of Sloan Advisory Group and its clients. Such educational seminars provide Sloan Advisory Group with access to information and ideas regarding practice development, client servicing, investment strategy, relationship management and financial planning. Attendance expenses associated with such educational seminars may be paid or reimbursed, either in whole or in part, by Loring Ward.

### ***Financial Planning***

Financial plans and financial planning may include but are not limited to: investment planning; life insurance; tax concerns; retirement planning; cash flow analysis and planning; college planning; and debt/credit planning.

### ***Financial Coaching Services***

Financial coaching services are a natural extension of the financial planning process. This service will consist of ongoing support and advice to help clients make informed decisions to help meet important goals.

### ***Educational Seminars***

We may provide educational seminars on an "as announced" basis for groups seeking general advice on investments and other areas of personal finance. The content of these seminars will vary depending upon the needs of the attendees. These seminars are purely educational in nature and do not involve the sale of any investment products. Information presented will not be based on any one individual person's needs, nor does Sloan Advisory Group provide individualized investment advice to attendees during these seminars.

### ***Services Limited to Specific Types of Investments***

Sloan Advisory Group generally limits its investment advice to mutual funds, fixed income securities, insurance products including annuities, equities, ETFs, treasury inflation protected/inflation linked bonds or non-U.S. securities, although Sloan Advisory Group primarily recommends investment strategies based upon asset -class based allocations to reflect a client's goals, objectives, time horizon and risk tolerance. Sloan Advisory Group may use other securities as well to help diversify a portfolio when applicable.

### **C. Client Tailored Services and Client Imposed Restrictions**

Sloan Advisory Group will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by Sloan Advisory Group on behalf of the client. Sloan Advisory Group may use "model portfolios" together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent Sloan Advisory Group from properly servicing the client account, or if the restrictions would require Sloan Advisory Group to deviate from its standard suite of services, Sloan Advisory Group reserves the right to end the relationship.

### **D. Wrap Fee Programs**

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. Sloan Advisory Group does not participate in any wrap fee programs.

### **E. Assets Under Management**

Sloan Advisory Group has the following assets under management:

<b>Discretionary Amounts:</b>	<b>Non-discretionary Amounts:</b>	<b>Date Calculated:</b>
\$24,277,668.00	\$8,160,652.00	December 31, 2018

## Item 5: Fees and Compensation

### A. Fee Schedule

#### *Portfolio Management Fees*

Total Assets Under Management	Sloan Advisory Group's Fee*
For the amount from \$0 - \$750,000	1.00%
Next amount from \$750,000.01 - \$5,000,000	0.75%
Above \$5,000,000.01	0.375%

\* Minimum annual fee - \$5,000.00. Under certain circumstances, and at its sole discretion, the Firm may waive or reduce the annual minimum fee.

The advisory fee is calculated using the value of the assets on the last business day of the prior billing period.

These fees are generally negotiable, and the final fee schedule is included in the account agreement. Clients may terminate the agreement without penalty for a full refund of Sloan Advisory Group's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 5 days' written notice.

#### *Selection of Other Advisers Fees*

Sloan Advisory Group will receive its standard fee on top of the fee paid Loring Ward. This relationship will be memorialized in each contract between Sloan Advisory Group, Loring Ward, and the client. The fees will not exceed any limit imposed by any regulatory agency.

The annual fee schedule is as follows:

Total Assets Under Management	LW Annual Fee
For the amount from \$0 - \$1,000,000	0.45%
Next amount from \$1,000,000.01 - \$5,000,000	0.20%
Above - \$5,000,000.01	0.15%

The fee charged by LW is in addition to Sloan Advisory Group's advisory fee schedule. Fees are paid quarterly in advance. Refunds are given on a prorated basis, based on the



number of days remaining in a quarter at the point of termination. These fees are negotiable.

Sloan Advisory Group may recommend, where appropriate, that client invest in shares of the SA Funds – Investment Trust (the “SA Funds”), a family of nine asset class mutual funds advised, managed and administrated by Loring Ward. Fees are not charged directly upon investments in the SA Funds. Loring Ward receives certain fees and expenses directly from the SA Funds for its services as disclosed in that Fund’s prospectus.

### ***Financial Planning Fees***

#### **Fixed Fees**

The negotiated fixed rate for creating client financial plans is between \$1,950 and \$4,500.

#### **Hourly Fees**

The hourly fee for these services is \$275.

### ***Financial Coaching Fees***

The negotiated fee for financial coaching will be between \$175 and \$500 paid monthly or between \$525 and \$1,500 quarterly in advance, depending on complexity and needs of client. The fee may be negotiable in certain cases.

### ***Educational Seminars***

Seminars are offered to organizations and the public on a variety of financial topics. Fees range from free to \$15,000 per seminar or free to \$1,500 per participant. Half of the fees are due prior to the engagement, and the other half are to be paid the day of, no later than the conclusion of the Seminar. The fee range is based on the content, amount of research conducted, number of hours of preparation needed, and the number of attendees.

## **B. Payment of Fees**

### ***Payment of Portfolio Management Fees***

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis or may be invoiced and billed directly to the client; clients may select the method in which they are billed. Fees are paid in advance.

### ***Payment of Selection of Other Advisers Fees***

Fees for selection of LWI Financial Inc. as third-party adviser are withdrawn directly from the client's accounts with client's written authorization. Fees are paid quarterly in advance.

### ***Payment of Financial Planning Fees***

Financial planning fees are paid via check.

Fixed financial planning fees may be payable at the time the client signs the financial planning agreement or a portion of the fee may be collected at the time the agreement is signed with the remaining portion of the fee due at the delivery and presentation of the plan.

Hourly financial planning fees are paid in advance, at minimum of one hour of time and maximum 3 hours, and the remainder of the fees are paid upon completion. The estimate of the total hours required, and advance payment will be discussed with the client prior to signing the financial planning agreement.

### ***Payment of Financial Coaching Fees***

Financial coaching fees are paid via check. If Sloan Advisory Group also manages assets for clients who engage in financial coaching services, fees may be directly deducted from the clients' portfolios.

## **C. Client Responsibility For Third Party Fees**

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by Sloan Advisory Group. Please see Item 12 of this brochure regarding broker-dealer/custodian.

## **D. Prepayment of Fees**

Sloan Advisory Group collects certain fees in advance and certain fees in arrears, as indicated above. Refunds for fees paid in advance will be returned within fourteen days to the client via check or return deposit back into the client's account.

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 rate by 365.)

## **E. Outside Compensation For the Sale of Securities to Clients**

Neither Sloan Advisory Group nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

## **Item 6: Performance-Based Fees and Side-By-Side Management**

Sloan Advisory Group does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## **Item 7: Types of Clients**

Sloan Advisory Group generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals

There is no account minimum for any of Sloan Advisory Group's services.

## **Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss**

### **A. Methods of Analysis and Investment Strategies**

#### *Methods of Analysis*

Sloan Advisory Group's methods of analysis include Modern portfolio theory.

**Modern portfolio theory** is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

#### *Investment Strategies*

Sloan Advisory Group uses long term trading and short term trading strategies.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### **B. Material Risks Involved**

#### *Methods of Analysis*

**Modern portfolio theory** assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

### ***Investment Strategies***

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Selection of Other Advisers:** Although Sloan Advisory Group will seek to select only money managers who will invest clients' assets with the highest level of integrity, Sloan Advisory Group's selection process cannot ensure that money managers will perform as desired and Sloan Advisory Group will have no control over the day-to-day operations of any of its selected money managers. Sloan Advisory Group would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulatory breaches or fraud.

**Short term trading** risks include liquidity, economic stability, and inflation, in addition to the long term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### **C. Risks of Specific Securities Utilized**

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** 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.

**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 environments.

**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.

**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.

**Annuities** are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

**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.

**Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9: Disciplinary Information**

### **A. Criminal or Civil Actions**

There are no criminal or civil actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

### **C. Self-regulatory Organization (SRO) Proceedings**

There are no self-regulatory organization proceedings to report.

## **Item 10: Other Financial Industry Activities and Affiliations**

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Neither Sloan Advisory Group nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

### **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither Sloan Advisory Group nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Rachel Sloan is an independent licensed insurance agent, however she does not engage in commission sales.

Rachel Sloan is designer and creator of a trademarked financial planning process called Journey Through Retirement®. This is marketed towards financial planners to adopt in their own practice to enhance the client engagement and experience.

### **D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections**

Sloan Advisory Group may direct clients to Loring Ward to provide administrative and reporting for client accounts. Clients will pay Sloan Advisory Group its standard fee in

addition to the standard fee for Loring Ward. This relationship will be memorialized in each contract between Sloan Advisory, Loring Ward, and the client. The fees will not exceed any limit imposed by any regulatory agency. Sloan Advisory Group will always act in the best interests of the client, including determining the use of Loring Ward with clients. Loring Ward provides Sloan Advisory Group with access to software and may compensate Sloan Advisory Group for attendance at educational seminars.

## **Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

### **A. Code of Ethics**

Sloan Advisory Group has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Sloan Advisory Group's Code of Ethics is available free upon request to any client or prospective client.

### **B. Recommendations Involving Material Financial Interests**

Sloan Advisory Group does not recommend that clients buy or sell any security in which a related person to Sloan Advisory Group or Sloan Advisory Group has a material financial interest.

### **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of Sloan Advisory Group may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of Sloan Advisory Group to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. Sloan Advisory Group will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

### **D. Trading Securities At/Around the Same Time as Clients' Securities**

From time to time, representatives of Sloan Advisory Group may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of Sloan Advisory Group to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the

recommendations they provide to clients. Such transactions may create a conflict of interest; however, Sloan Advisory Group will never engage in trading that operates to the client's disadvantage if representatives of Sloan Advisory Group buy or sell securities at or around the same time as clients.

## **Item 12: Brokerage Practices**

### **A. Factors Used to Select Custodians and/or Broker/Dealers**

Custodians/broker-dealers will be recommended based on Sloan Advisory Group's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and Sloan Advisory Group may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in Sloan Advisory Group's research efforts. Sloan Advisory Group will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

Sloan Advisory Group will require clients to use TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC.

#### ***1. Research and Other Soft-Dollar Benefits***

While Sloan Advisory Group has no formal soft dollars program in which soft dollars are used to pay for third party services, Sloan Advisory Group may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). Sloan Advisory Group may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and Sloan Advisory Group does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. Sloan Advisory Group benefits by not having to produce or pay for the research, products or services, and Sloan Advisory Group will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that Sloan Advisory Group's acceptance of soft dollar benefits may result in higher commissions charged to the client.

Sloan Advisory Group participates in the institutional advisor program (the "Program") offered by TD Ameritrade. TD Ameritrade offers to independent investment advisor services which include custody of securities, trade execution, clearance and settlement of transactions. Sloan Advisory Group receives some benefits from TD Ameritrade through its participation in the Program.



As disclosed above, Sloan Advisory Group participates in TD Ameritrade's institutional advisor program and Sloan Advisory Group may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between Sloan Advisory Group's participation in the Program and the investment advice it gives to its clients, although Sloan Advisory Group receives economic benefits through its participation in the Program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Sloan Advisory Group participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have Sloan Advisory Group's fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Sloan Advisory Group by third party vendors. TD Ameritrade may also pay for business consulting and professional services received by Sloan Advisory Group's related persons. Some of the products and services made available by TD Ameritrade through the Program may benefit Sloan Advisory Group but may not benefit its client accounts. These products or services may assist Sloan Advisory Group in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Sloan Advisory Group manage and further develop its business enterprise. The benefits received by Sloan Advisory Group or its personnel through participation in the Program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Sloan Advisory Group endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Sloan Advisory Group or its related persons in and of itself creates a conflict of interest and may indirectly influence the Sloan Advisory Group's choice of TD Ameritrade for custody and brokerage services.

## ***2. Brokerage for Client Referrals***

Sloan Advisory Group receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

## ***3. Clients Directing Which Broker/Dealer/Custodian to Use***

Sloan Advisory Group will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

## **B. Aggregating (Block) Trading for Multiple Client Accounts**

Sloan Advisory Group does not aggregate or bunch the securities to be purchased or sold for multiple clients. This may result in less favorable prices, particularly for illiquid securities or during volatile market conditions.

## **Item 13: Review of Accounts**

### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

All client accounts for Sloan Advisory Group's advisory services provided on an ongoing basis are reviewed at least quarterly by Rachel Sloan, President, with regard to clients' respective investment policies and risk tolerance levels. All accounts at Sloan Advisory Group are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Rachel Sloan, President. There is only one level of review for financial planning, and that is the total review conducted to create the financial plan.

### **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, Sloan Advisory Group's services will generally conclude upon delivery of the financial plan.

### **C. Content and Frequency of Regular Reports Provided to Clients**

Sloan Advisory Group does not provide written reports to clients. TD Ameritrade, Inc. will provide independent reporting to clients on a monthly basis.

Each financial planning client will receive the financial plan upon completion.

## **Item 14: Client Referrals and Other Compensation**

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

Sloan Advisory Group may receive compensation from the selected third party advisers via a fee split. Sloan Advisory Group will also receive soft dollar benefits discussed in Item 12 above, though there is no direct link between Sloan Advisory Group's participation in the TD Ameritrade Program and the investment advice it gives to its clients.

## **B. Compensation to Non – Advisory Personnel for Client Referrals**

Sloan Advisory Group does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

## **Item 15: Custody**

When advisory fees are deducted directly from client accounts at client's custodian, Sloan Advisory Group will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

## **Item 16: Investment Discretion**

Sloan Advisory Group provides discretionary and non-discretionary investment advisory services to clients. The Investment Advisory Contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, Sloan Advisory Group generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some instances, Sloan Advisory Group's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to Sloan Advisory Group).

## **Item 17: Voting Client Securities (Proxy Voting)**

Sloan Advisory Group will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

## **Item 18: Financial Information**

### **A. Balance Sheet**

Sloan Advisory Group neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither Sloan Advisory Group nor its management has any financial condition that is likely to reasonably impair Sloan Advisory Group's ability to meet contractual commitments to clients.

### **C. Bankruptcy Petitions in Previous Ten Years**

Sloan Advisory Group has not been the subject of a bankruptcy petition in the last ten years.