



**Cyr Financial Inc.**

**Form ADV Part 2A – Disclosure Brochure**

**Effective: January 31, 2024**

This Form ADV2A ("Disclosure Brochure") provides information about the qualifications and business practices of Cyr Financial Inc. ("Cyr Financial" or the "Advisor"). If you have any questions about the contents of this Disclosure Brochure, please contact us at (815) 925-7501.

Cyr Financial is a registered investment advisor located in the State of Illinois. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission ("SEC") or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information through Cyr Financial to assist you in determining whether to retain the Advisor.

Additional information about Cyr Financial and its advisory persons are available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by our firm name or our CRD# 277118.

**Cyr Financial Inc.**  
**220 E High St, Suite 102, Hennepin, IL 61327**  
**Phone: (815) 925-7501 Fax: (815) 305-7396**  
<http://www.cyrfinancial.net>

## **Item 2 – Material Changes**

---

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of Cyr Financial.

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

### Material Changes

This Disclosure Brochure dated January 31, 2024, represents an amendment to the Disclosure Brochure for Cyr Financial.

Since the filing of the firm's annual update Disclosure Brochure on January 23, 2024, we have updated our regulatory jurisdiction due to growth of the firm. We have also made various other minor updates but no other material changes were made to the Disclosure Brochure.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Cyr Financial.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by our firm name or by our CRD# **277118**. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (815) 925-7501.

---

#### **Cyr Financial Inc.**

220 E High St, Suite 102, Hennepin, IL 61327  
Phone: (815) 925-7501 Fax: (815) 305-7396  
<http://www.cyrfinancial.net>

### Item 3 – Table of Contents

---

<b>Item 1 – Cover Page .....</b>	<b>1</b>
<b>Item 2 – Material Changes .....</b>	<b>2</b>
<b>Item 3 – Table of Contents.....</b>	<b>3</b>
<b>Item 4 – Advisory Services.....</b>	<b>4</b>
A. Firm Information.....	4
B. Advisory Services Offered .....	4
C. Client Account Management.....	5
D. Wrap Fee Programs .....	6
E. Assets Under Management .....	6
<b>Item 5 – Fees and Compensation .....</b>	<b>6</b>
A. Fees for Advisory Services .....	6
B. Fee Billing.....	7
C. Other Fees and Expenses .....	7
D. Advance Payment of Fees and Termination.....	8
E. Compensation for Sales of Securities .....	8
<b>Item 6 – Performance-Based Fees and Side-By-Side Management.....</b>	<b>8</b>
<b>Item 7 – Types of Clients .....</b>	<b>8</b>
<b>Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss .....</b>	<b>8</b>
A. Methods of Analysis.....	8
B. Risk of Loss .....	9
<b>Item 9 – Disciplinary Information.....</b>	<b>9</b>
<b>Item 10 – Other Financial Industry Activities and Affiliations .....</b>	<b>9</b>
<b>Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....</b>	<b>10</b>
A. Code of Ethics.....	10
B. Personal Trading with Material Interest.....	10
C. Personal Trading in Same Securities as Clients .....	10
D. Personal Trading at Same Time as Client .....	10
<b>Item 12 – Brokerage Practices .....</b>	<b>11</b>
A. Recommendation of Custodian[s].....	11
B. Aggregating and Allocating Trades.....	11
<b>Item 13 – Review of Accounts.....</b>	<b>12</b>
A. Frequency of Reviews .....	12
B. Causes for Reviews .....	12
C. Review Reports .....	12
<b>Item 14 - Client Referrals and Other Compensation.....</b>	<b>12</b>
A. Compensation Received by Cyr Financial .....	12
B. Client Referrals from Solicitors.....	13
<b>Item 15 – Custody.....</b>	<b>13</b>
<b>Item 16 – Investment Discretion .....</b>	<b>13</b>
<b>Item 17 – Voting Client Securities .....</b>	<b>13</b>
<b>Item 18 – Financial Information .....</b>	<b>14</b>
<b>Item 19 – Requirements for State Registered Advisors .....</b>	<b>14</b>
A. Educational Background and Business Experience of Principal Officer.....	14
B. Other Business Activities of Principal Officer .....	14
C. Performance Fee Calculations .....	14
D. Disciplinary Information .....	14
E. Material Relationships with Issuers of Securities .....	14
<b>Form ADV Part 2B – Brochure Supplement .....</b>	<b>15</b>
<b>Privacy Policy .....</b>	<b>25</b>

## **Item 4 – Advisory Services**

---

### **A. Firm Information**

Cyr Financial Inc. (“Cyr Financial” or the “Advisor”) is a registered investment advisor located in the State of Illinois and is organized as a Corporation under the laws of Illinois. Cyr Financial was founded in December 2013 and became a registered investment advisor in September 2015. Cyr Financial is owned and operated by Christian J. Cyr (President and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Cyr Financial.

### **B. Advisory Services Offered**

Cyr Financial offers investment advisory services to individuals, high net worth individuals, trusts, estates, pensions and profit sharing plans in Illinois and other states (each referred to as a “Client”).

#### Investment Management Services

Cyr Financial provides customized investment advisory solutions for its Clients. The firm feels that this is best achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services.

Cyr Financial works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. Cyr Financial implements Client investment portfolios utilizing up to five (5) of the Advisor’s proprietary investment models, in different combinations and weighting to achieve the goals of each Client. Securities included in the Advisor’s strategies include blue chip equity securities, exchange-traded funds (“ETFs”), diversified mutual funds and alternative investments (through mutual funds). The Advisor may employ options, business development companies and/or other types of investments, as appropriate, to meet the needs of each Client.

Cyr Financial’s investment strategies are primarily long-term focused, although the Advisor may buy, sell or re-allocate positions that have been held less than one year to help meet the objectives of the Client or due to market conditions. Cyr Financial will construct, implement and monitor the portfolio to help ensure that it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

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

Cyr Financial will not provide securities custodial or other administrative services. At no time will Cyr Financial accept or maintain custody of a Client’s funds or securities, except for authorized deduction of the Advisor’s fees. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client investment advisory agreement.

Cyr Financial may provide recommendations to our clients for their retirement plan assets when requested. IARs will provide written asset allocation and/or specific investment recommendations for client retirement plan assets based on the investment options available within the retirement plan and based on financial and other information provided by the client. The IAR tailors the recommendation to the individual needs of the client based upon the investment objective chosen by the client. The engagement terminates upon delivery of the written recommendation. The client retains the sole responsibility for determining whether to implement any recommendations made by the IAR and for placing any resulting transactions. Cyr Financial and the IAR do not

provide ongoing consulting or management services, and do not have discretionary authority with respect to the client's retirement plan assets. In addition, Cyr Financial and the IAR do not provide any advice or recommendations regarding any participant loans from client's retirement plan assets.

### Financial Planning Services

Cyr Financial offers a variety of customized financial planning services to individuals and families, pursuant to a written financial planning agreement. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives and financial situation. For instance, the Advisor may provide a more comprehensive financial plan or a more targeted financial consultation based on a Client's specific area[s] of need. The Advisor's more comprehensive level of service may include but may not be limited to investment planning, retirement planning, personal savings, insurance needs, education savings and tax planning. The scope, duration and costs of a financial planning engagement will vary based on the needs of the Client and the complexity of their situation as discussed prior to the engagement. The Advisor will provide the Client an estimated cost to the Client prior to engaging for these services based on the aforementioned preliminary discussion. Please see Item 5 below.

A financial plan developed for a Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. Cyr Financial may also refer Clients to an accountant, attorney or another specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For more targeted engagements, the Advisor may not provide a written summary. Planning engagements generally start with a formal financial planning process, which is often completed within the first two months. Clients can also engage the Advisor for ongoing planning on an annual retainer. Please see Item 5.

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

### **C. Client Account Management**

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

- Establishing an Investment Policy Statement – Cyr Financial, in connection with the Client, may develop a statement that summarizes the Client's investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives.
- Asset Allocation – Cyr Financial will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – Cyr Financial will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Cyr Financial will provide investment management and ongoing oversight of the Client's portfolio and overall account.

Because Cyr Financial is a registered investment adviser, we are required to meet certain fiduciary standards when providing investment advice to clients. Additionally, when we provide investment advice related to a retirement plan account or an individual retirement account, we are considered fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which

are laws governing retirement accounts. As such, we are required to act in your best interest and not put our interest ahead of yours, even though our compensation creates some conflicts with your interests in that the more you have us manage, the more we can earn. Our clients however are under no obligation to use services recommended by our associated persons. Furthermore, we believe that our recommendations are in the best interests of our clients and are consistent with our clients' needs.

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

Cyr Financial does not sponsor, offer, or participate in a wrap fee program. Investment management services are provided directly by Cyr Financial.

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

As of December 31, 2023, Cyr Financial manages \$112,110,138 in discretionary assets. Clients may request more current information at any time by contacting the Advisor.

### **Item 5 – Fees and Compensation**

---

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign one or more agreements that detail the responsibilities of Cyr Financial and the Client.

#### **A. Fees for Advisory Services**

##### **Investment Management Services - Tiered Fee Plan**

Investment advisory fees are charged and due quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management (including cash and cash equivalents) at the end of the prior calendar quarter. Investment advisory fees are based on the following schedule:

Assets Under Management	Annual Fee/ Rate
First \$500,000	\$6,000
Next \$500,000 (Up to \$1,000,000)	1.00%
Next \$1,000,000 (Up to \$2,000,000)	0.90%
Next \$1,000,000 (Up to \$3,000,000)	0.80%
Next \$2,000,000 (Up to \$5,000,000)	0.70%
Over \$5,000,000	0.60%

#### **Tier Fee Examples**

A \$300,000 household would pay a quarterly fee of \$1,500.

A \$400,000 household would pay a quarterly fee of \$1,500.

A \$500,000 household would pay a quarterly fee of \$1,500.

A \$750,000 household would pay a quarterly fee of \$2,125.

A \$1,000,000 household would pay a quarterly fee of \$2,750.

A \$2,000,000 household would pay a quarterly fee of \$5,000.

A \$3,000,000 household would pay a quarterly fee of \$7,000.

A \$4,000,000 household would pay a quarterly fee of \$8,750.

The investment advisory fee in the first quarter of service for any new account is prorated from the inception date of the account[s] to the end of the first quarter of service for the applicable account(s). Fees may be negotiable at the sole discretion of the Advisor. Certain legacy Client relationships may have a fee schedule that differs from the table above. The Advisor will take into consideration the aggregate assets under management the Client has with Advisor when determining fees. All securities held in accounts managed by Cyr Financial will be independently valued by the designated Custodian. Cyr Financial will not have the authority or responsibility to value portfolio securities.

---

#### **Cyr Financial Inc.**

220 E High St, Suite 102, Hennepin, IL 61327

Phone: (815) 925-7501 Fax: (815) 305-7396

<http://www.cyrfinancial.net>

### Financial Planning Services

Cyr Financial offers financial planning at an hourly rate up to \$500 per hour or a fixed planning engagement that ranges up to \$1,500, based on the scope of services to be provided. Planning engagements with a fixed scope and duration may be offered a fixed fee. Engagements where analysis and overall effort cannot be determined at the start of the engagement are offered services based on the negotiated hourly rate. Planning fees are negotiable and priced based on the nature and complexity of each Client's circumstances as well as the overall relationship with the Advisor. Planning fees for more comprehensive financial plans or more complex financial consultations are charged a higher overall fee due to the complexity, effort and duration involved. Planning fees may be waived for ongoing investment advisory Clients, at the sole discretion of the Advisor. The Advisor may waive its financial planning fees based for larger advisory accounts or based on the overall relationship with the Client. Fixed fee engagements are based on the expected number of hours to complete the engagement at the negotiated hourly rate. An estimate for total hours and/or costs will be provided to the Client prior to engaging for planning services.

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs. The hourly fees are determined after considering many factors, such as the level and scope of the services.

## **B. Fee Billing**

### Investment Management Services

Investment advisory fees will be calculated by the Advisor and deducted from the Client account[s] at the Custodian. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Cyr Financial at the beginning of each calendar quarter. Investment advisory fees will be adjusted on a prorated basis for cash flows of over \$100,000 in or out of an Account during a service quarter. Clients will be provided with an account statement, at least quarterly, from the Custodian which includes the deduction of the investment advisory fee. In addition, the Advisor will provide the Client (when requested by the Client or when required by the applicable regulatory jurisdiction) a report itemizing the fee, with detail including the period covered by the fee, the account value, the methodology used to calculate the fee, and any prorated fee adjustments (if applicable). Clients are asked to direct any questions about fee calculations to Advisor as Custodian does not audit fee calculations. Clients provide written authorization permitting Cyr Financial to be paid directly from their accounts held at the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

### Financial Planning Services

Financial planning fees are invoiced up to fifty percent (50%) upon execution of the financial planning agreement. The remaining balance is due upon receipt of the agreed upon deliverable[s].

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

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

In addition, all fees paid to Cyr Financial for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. The Client could invest in these products directly, without the services of Cyr Financial, but would not receive the services provided by Cyr Financial which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees



charged by Cyr Financial to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

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

##### Investment Management Services

Cyr Financial is compensated for its services in advance of the quarter in which investment advisory services are rendered. Either party may request to terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client shall be responsible for investment advisory fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid fees from the effective date of termination to the end of the quarter on any account where such unearned prepaid fees exceed \$50. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior approval.

##### Financial Planning Services

Cyr Financial may be partially compensated for its planning services in advance of delivering such services. Either party may request to terminate their financial planning agreement, at any time, by providing advance written notice to the other party. In addition, the Client may terminate the agreement within five (5) business days of signing the Advisor's financial planning agreement at no cost to the Client. The Client shall be responsible for financial planning fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid fees. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior approval.

##### Brochure Delivery

If the Disclosure Brochure was not delivered to the Client at least 48 hours prior to entering into an agreement with the Advisor, the Client may terminate the agreement within five (5) business days of signing the Advisor's financial planning 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.

#### **E. Compensation for Sales of Securities**

Cyr Financial does not receive any commissions or other compensation related to securities transactions in any Client account, other than the investment advisory fees noted above.

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

---

Cyr Financial 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 non-performance based accounts.

### **Item 7 – Types of Clients**

---

Cyr Financial provides investment advisory services to individuals, high net worth individuals, trusts, estates, pensions and profit sharing plans. Cyr Financial generally requires a minimum relationship size of \$500,000, which may be reduced at the sole discretion of the Advisor.

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

---

#### **A. Methods of Analysis**

Cyr Financial primarily employs fundamental analysis methods in developing investment strategies for its Clients. Research and analysis from Cyr Financial is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.



Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in "Item 13 – Review of Accounts".

As noted above, Cyr Financial generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Cyr Financial will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Cyr Financial may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

## **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Cyr Financial will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

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

The risks associated with a particular strategy are communicated to each Client in advance of investing Client accounts. The Advisor will work with each Client to assess their tolerance for risk as part of the portfolio construction process. **Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

## **Item 9 – Disciplinary Information**

---

**There are no legal, regulatory or disciplinary events involving Cyr Financial or any of its management persons.** Cyr Financial values the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by our firm name or our CRD# 277118.

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

---

### Insurance Agency Affiliations

Certain Supervised Persons of Cyr Financial are licensed insurance professionals. Implementations of insurance recommendations are separate and apart from a supervised person's role with Cyr Financial.

As an insurance professional, the supervised person will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This causes a conflict of interest when recommending insurance products. Clients are under no obligation to implement any recommendations made by the Advisor or any of its Supervised Persons.

### Annuities

Certain Supervised Persons of Cyr Financial may also recommend annuity products. Implementation of an annuity investment is separate and apart from a supervised person's role with Cyr Financial. The supervised person will receive customary commissions and other related revenues from the various annuity companies whose products are sold. Commissions generated by these sales do not offset regular advisory fees. This causes a conflict of interest when recommending annuity products. Clients are under no obligation to implement any recommendations made by the Advisor or any of its Supervised Persons.

### Tax Services

Certain Supervised Persons of Cyr Financial also provide tax and accounting services to Clients. Such services are separate from the advisory services offered to Clients. Clients are under no obligation to utilize the tax services offered by Cyr Financial.

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

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

Cyr Financial has implemented a Code of Ethics (the "Code") that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with Cyr Financial (herein our "Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Cyr Financial and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Cyr Financial Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code of Ethics, please contact us at (815) 925-7501.

### **B. Personal Trading with Material Interest**

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

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

Cyr Financial allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted the Code, which addresses insider trading (material non-public information controls); gifts and entertainment, outside business activities and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of Cyr Financial may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Cyr Financial requiring reporting of personal securities trades pursuant to its Code of Ethics. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

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

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

## Item 12 – Brokerage Practices

---

### A. Recommendation of Custodian[s]

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

While Cyr Financial does not exercise discretion over the selection of the Custodian, Cyr Financial will typically recommend the Custodian to Clients. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by Cyr Financial.

Cyr Financial may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, reputation and/or the location of the Custodian's offices. Cyr Financial does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other brokers. Cyr Financial will generally recommend that Clients establish their account[s] at Charles Schwab & Co., Inc. ("Charles Schwab"), a FINRA-registered broker-dealer and member SIPC. Charles Schwab will serve as the Client's "qualified custodian". Cyr Financial maintains an institutional relationship with Charles Schwab, whereby the Advisor receives economic benefits from Charles Schwab (Please see Item 14 below.); however, there is no direct link between our firm's participation in their program and the investment advice we may provide to our clients or the portfolio holdings we may recommend.

The Advisor does not receive research services or compensation as a result of recommending a particular custodian that may result in the Client paying higher commissions than those generally obtainable through other custodians. The Advisor may have institutional custodial relationship where the Advisor will receive certain services that are an economic benefit to the Advisor, such as duplicate statements, access to technology, access to investment and analysis tools, and the ability to deduct its advisory fees.

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **Cyr Financial does not participate in soft dollar programs sponsored or offered by any broker-dealer.**

**2. Brokerage Referrals** - Cyr Financial does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where Cyr Financial will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the Custodian, Cyr Financial will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian. The Advisor will seek best execution, but does not do so on a trade-by-trade basis. The Advisor evaluates the execution quality of the Custodian as part of its annual review of service providers.

### B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Cyr Financial will execute its transactions through an unaffiliated broker-dealer selected by the Client. Cyr Financial may aggregate orders in a block trade or trades

when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

## **Item 13 – Review of Accounts**

---

### **A. Frequency of Reviews**

Investments in a Client's account[s] are monitored on a regular and continuous basis by Mr. Cyr, President of the Advisor. Client investment profile reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

### **B. Causes for Reviews**

Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify Cyr Financial if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

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

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

---

### **A. Compensation Received by Cyr Financial**

Cyr Financial does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party, except as noted in Item 10 above. Cyr Financial may refer Clients to various third parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, Cyr Financial may receive referrals of new Clients from a third-party.

#### Participation in Institutional Advisor Platform

Cyr Financial participates in the institutional advisor program (the "Program") offered by Charles Schwab. Charles Schwab offers to independent investment advisors services, which include custody of securities, trade execution, clearance and settlement of transactions. Cyr Financial receives some benefits from Charles Schwab through its participation in the Program.

As disclosed above, Cyr Financial participates in Charles Schwab's institutional customer program and the Advisor may recommend Charles Schwab to Clients for custody and brokerage services. There is no direct link between the Advisor's participation in the program and the investment advice it gives to its Clients, although the firm receives economic benefits through its participation in the program that are typically not available to Charles Schwab 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; 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 advisory 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 the Advisor by third party vendors.

Charles Schwab may also have paid for business consulting and professional services received by the firm's related persons. Some of the products and services made available by Charles Schwab through the program may benefit the firm but may not benefit its Client accounts. These products or services may assist the firm in managing and administering Client accounts, including accounts not maintained at Charles Schwab. Other services made available by Charles Schwab are intended to help the firm manage and further develop its business enterprise. The benefits received by the firm or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to Charles Schwab. As part of its fiduciary duties to clients, Cyr Financial endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Cyr Financial or its related persons in and of itself creates a conflict of interest and may indirectly influence our choice of Charles Schwab for custody and brokerage services.

Cyr Financial may only implement its investment recommendations after the Client has arranged for and furnished the Advisor with all information and authorization[s] regarding account[s] with their financial institutions. Clients are not obligated to use the recommended custodian and will not incur any extra fee or cost associated with using a broker not recommended by Cyr Financial. Cyr Financial may recommend a custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and location of the custodian's offices. In addition, Cyr Financial reviews the custodians that the recommend at least annually to confirm the appropriateness of its recommendations.

#### **B. Client Referrals from Solicitors**

Cyr Financial may pay outside individuals or other professional entities to refer clients to us via a Solicitor's Agreement. Such agreements are structured to be in compliance with applicable securities laws. Each client is provided a disclosure statement prior to or at the time of entering into any advisory contract which describe the specific compensation arrangement. The advisory fee charged to clients will not increase as a result of the referral arrangement.

---

### **Item 15 – Custody**

Cyr Financial does not accept or maintain possession of any Client accounts. The firm may however have limited control to trade on your behalf, to deduct our advisory fees from your account, or request disbursements to your or other outside parties (although various types of written authorizations are required depending on the type of disbursements.) All Clients must place their assets with a qualified custodian. Clients are required to select the Custodian to retain their funds and securities and direct Cyr Financial to utilize the Custodian for the Client's security transactions. Cyr Financial encourages Clients to review statements provided by the Custodian. For more information about custodians and brokerage practices, see "Item 12 - Brokerage Practices".

---

### **Item 16 – Investment Discretion**

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

---

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

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

## **Item 18 – Financial Information**

---

Neither Cyr Financial, nor its management, have any adverse financial situations that would reasonably impair the ability of Cyr Financial to meet all obligations to its Clients. Neither Cyr Financial, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. Cyr Financial is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$500 or more for services to be performed six months or more in advance.

---

**Cyr Financial Inc.**

220 E High St, Suite 102, Hennepin, IL 61327

Phone: (815) 925-7501 Fax: (815) 305-7396

<http://www.cyrfinancial.net>

## Privacy Policy

---

**Effective Date: January 1, 2021**

### **Our Commitment to You**

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

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Cyr Financial (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.

Cyr Financial 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?**

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

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

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

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

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

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



### How do we share your information?

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

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> Cyr Financial 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 Cyr Financial or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
<b>Information About Former Clients</b> Cyr Financial 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 (815) 925-7501.