



# S. Harris Financial Group

## **S Harris Financial Group, LLC**

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

**Effective: October 15, 2024**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of S Harris Financial Group, LLC (“SHFG” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at 210-547-3450.

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

Additional information about SHFG and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor’s firm name or CRD# 151899.

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## Item 2 – Material Changes

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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 the Advisory Persons of SHFG. For convenience, the Advisor has combined these documents into a single disclosure document.

SHFG believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. SHFG encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

### Material Changes

The following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

- SHFG is transitioning from registration with the State of Texas to registration with the SEC. For more information, please see Item 4.

### Future Changes

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

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 151899. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at 210-547-3450.

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## Item 4 – Advisory Services

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### A. Firm Information

S Harris Financial Group, LLC (“SHFG” or the “Advisor”) is a registered investment advisor with the SEC. The Advisor is organized as a Limited Liability Company (LLC) under the laws of Texas. SHFG was founded in September 2009 and is owned and operated by Stephanie Harris (Owner, Partner), and Gary Scott Harris (“Scott Harris”) (Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by SHFG.

### B. Advisory Services Offered

SHFG offers investment advisory services to individuals, high net worth individuals and families, and retirement plans (each referred to as a “Client”).

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

#### Wealth Management Services

SHFG provides customized wealth management services for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management services and a broad range of comprehensive financial planning. These services are listed below.

*Investment Management Services* – SHFG provides discretionary investment management services. The Advisor works closely with each Client to identify their investment goals, objectives, risk tolerance and financial situation in order to create a portfolio strategy. The Advisor will then construct an investment portfolio primarily consisting of individual stocks, exchange-traded funds (“ETFs”), mutual funds, bonds, or option contracts to meet the needs of its Clients. The Advisor may retain Client's legacy investments based on portfolio fit and/or tax considerations.

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

SHFG evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. SHFG may recommend, on occasion, redistributing investment allocations to diversify the portfolio. SHFG may recommend specific positions to increase sector or asset class weightings. SHFG may recommend employing cash positions as a possible hedge against market movement. SHFG 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 the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

*Retirement Accounts* – When the Advisor provides investment advice to Clients regarding ERISA retirement accounts or individual retirement accounts (“IRAs”), the Advisor is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act (“ERISA”) and/or the Internal Revenue Code (“IRC”), as applicable, which are laws governing retirement accounts. When deemed to be in the Client's best interest, the Advisor will provide investment advice to a Client regarding a distribution from an ERISA retirement account or to roll over the assets to an IRA, or recommend a similar transaction including rollovers from one ERISA sponsored Plan to another, one IRA to another IRA, or from one type of account to another account (e.g. commission-based account to fee-based account). Such a recommendation creates a conflict of interest if the Advisor will earn a new (or increase its current) advisory fee as a

result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by the Advisor.

At no time will SHFG accept or maintain custody of a Client's funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the advisory agreement. Please see Item 12 – Brokerage Practices.

*Financial Planning Services* – SHFG provides financial planning and consulting services to Clients as part of its wealth management services. Financial planning may also be offered on a standalone basis. Financial planning services are offered in several areas of a Client's financial situation, depending on the Client's attitudes, goals, objectives, time horizon, and risk tolerance. Generally, such financial planning services involve preparing a formal financial plan which may encompass one or more areas of need including but not limited to cash flow management, debt management, summary of net worth, retirement projections, risk tolerance review, insurance review, tax and estate planning, education planning, and Certified Divorce Financial Analysis.

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

The Advisor may also refer Clients to an accountant, attorney or other specialists, as appropriate for their unique situation. The Advisor will provide a written summary of observations, and recommendations. For certain standalone financial planning or ad-hoc engagements, the Advisor may not provide a written summary. For project based engagements, the plans or consultations are typically completed within six (6) months of contract date, assuming all information and documents requested are provided promptly.

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

#### Insurance Consulting

The Advisor has a relationship with DPL Financial Partners, LLC ("DPL"). The Advisor provides insurance review, analysis, education, and insurance solutions in collaboration with DPL. DPL is a third-party provider of a platform of insurance consulting services to registered investment advisers that have clients with a current or future need for insurance products. The Advisor has engaged with DPL to gain access to DPL's insurance platform for a fixed annual fee. The Advisor is provided access to fee-based insurance products through DPL's licensed insurance agents who are also registered representatives of The Leaders Group, Inc. ("The Leaders Group"), an unaffiliated SEC-registered broker-dealer and FINRA member. These services include, among others, providing the Advisor with analyses of the current methodology for evaluating Client insurance needs, educating and acting as a resource to the Advisor regarding insurance products generally and specific insurance products owned by Clients or that Clients are considering purchasing, and providing the Advisor access to and product marketing support regarding fee-based products that insurers have agreed to offer to the Advisor's Clients through DPL's platform. For providing platform services to the Advisor, DPL receives service fees from the insurers that offer fee-based products through the platform. These service fees are based on the insurance premiums received by the insurers. DPL is licensed as an insurance producer in Kentucky and other jurisdictions where required to perform the platform services. Its representatives are also licensed as insurance producers, appointed as insurance agents of the insurers offering their products through the platform, and registered representatives of The Leaders Group.

#### Certified Divorce Financial Analysis

SHFG provides consulting services specializing in the financial aspects of divorce. SHFG will assist the Client and attorney in understanding the financial implications of their decisions. SHFG will provide consulting services to best

understand the short- and long-term effects of dividing property, analyze pension and retirement plan[s], evaluate the Client's ability to afford the marital home and/or exploring alternative housing options, and recognize the tax consequences of various settlement proposals. SHFG provides a financial consultation to understand the Client's financial situation to help identify the Client's future financial goals, develop a budget, set retirement objectives, understand risk tolerance, and identify lifestyle goals. For certain engagements, SHFG will provide mediation and/or litigation support.

#### Retirement Plan Advisory Services

The Advisor provides 3(38) retirement plan advisory services on behalf of the retirement plans (each a "Plan") and the company (the "Plan Sponsor"). The Advisor's retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan and its Plan Participants. Each engagement is customized to the needs of the Plan and Plan Sponsor. Services generally include plan participant enrollment and education tracking and ongoing investment recommendation and assistance.

These services are provided by the Advisor serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of the Advisor's fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

#### Use of Independent Managers

SHFG will recommend that Clients utilize one or more unaffiliated investment managers or investment platforms (collectively "Independent Managers") for all or a portion of a Client's investment portfolio, based on the Client's needs and objectives. In such instances, the Client will be required to authorize and enter into an investment management agreement with an Independent Manager that defines the terms in which the Independent Manager will provide its services. The Advisor will perform initial and ongoing oversight and due diligence over each Independent Manager to ensure the strategy remains aligned with Client's investment objectives and overall best interest. The Advisor will also assist the Client in the development of the initial policy recommendations and managing the ongoing Client relationship. The Client, prior to entering into an agreement with an Independent Manager, will be provided with the Independent Manager's Form ADV Part 2A - Disclosure Brochure (or a brochure that makes the appropriate disclosures).

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

Prior to engaging SHFG 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 Strategy – SHFG, in connection with the Client, will develop a strategy that seeks to achieve the Client's goals and objectives.
- Asset Allocation – SHFG 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 – SHFG will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – SHFG will provide investment management and ongoing oversight of the Client's investment portfolio.

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

SHFG does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by SHFG.

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

As of October 14, 2024, SHFG manages \$218,700,000 in Client assets, \$218,700,000 of which are managed on a discretionary basis and \$0 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

## **Item 5 – Fees and Compensation**

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

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

#### Wealth Management Services

Wealth management fees are paid quarterly in advance pursuant to the terms of the wealth management agreement. Wealth management fees are based on the market value of assets under management at the end of the prior quarter. Certain Clients with a relationship size under \$1,000,000 will be charged a separate annual ongoing financial planning fee paid monthly in advance. Wealth management fees range up to 2.00%. Fees are negotiable based on several factors, including: the scope and complexity of the services to be provided; the level of assets to be managed; and the overall relationship with the Advisor.

The wealth management fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by SHFG will be independently valued by the Custodian. The Advisor will conduct periodic reviews of the Custodian's valuation to ensure accurate billing.

The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees, and other related costs and expenses described in Item 5.C below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

#### Financial Planning Services

SHFG offers financial planning services as part of its overall wealth management fee. However, certain Clients with a relationship size under \$1,000,000 will be charged an annual ongoing financial planning fee ranging from \$100 to \$200 per month paid in advance of each month. SHFG also offers standalone financial planning services on an hourly or fixed engagement basis. Hourly fees range from \$300 to \$750 per hour. Fixed engagement fees range from \$8,000 to \$30,000. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. SHFG also offers specific financial planning services (one-time or on-going) to address specific Client needs, these efforts are priced on a fee based on time and complexity. An estimate for total hours and/or total costs will be provided to the Client prior to engaging for these services.

#### Certified Divorce Financial Analysis

Fees are charged on an hourly basis ranging from \$300 to \$750 per hour. An estimate for total hours and/or total costs will be provided to the Client prior to engaging for these services.

#### Retirement Plan Advisory Services

Retirement plan advisory fees are charged an annual asset-based fee of up to 0.75%. Fees may be billed monthly or quarterly ("Billing Period") in advance or arrears pursuant to the terms of the retirement plan advisory agreement. Retirement plan fees are based on the market value of assets under management at the end of the Billing Period. Fees may be negotiable depending on the size and complexity of the Plan but shall not exceed the fee range stated above.

#### Use of Independent Managers

As noted in Item 4, the Advisor will implement all or a portion of a Client's investment portfolio utilizing one or more Independent Managers. To eliminate any conflict of interest, the Advisor does not earn any compensation from an Independent Manager. The Advisor will only earn its wealth management fee as described above. Independent Managers typically do not offer any fee discounts but may have a breakpoint schedule which will reduce the fee with an increased level of assets placed under management with an Independent Manager. The terms of such fee arrangements are included in the Independent Manager's disclosure brochure and applicable contract[s] with the Independent Manager. Clients pay the Independent Manager platform fee and investment management fee not to exceed 0.75% annually in addition to the investment advisory fees paid to the Advisor as described above,



## **B. Fee Billing**

### Wealth Management Services

Wealth management fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning respective quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with SHFG at the end of the prior quarter. Clients may make additions to and withdrawals from account[s] at any time. However, reconciliations are performed on a monthly basis to capture if, at any point, assets in excess of \$10,000 are deposited into or withdrawn from an account after the start of the quarterly billing period. An adjustment will be made in the form of a credit or debit the following billing period to reflect the interim change in portfolio value from the date of the deposit/withdrawal until the end of the quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the wealth management fee. Clients are urged to also review and compare the statement provided by the Advisor to the brokerage statement from the Custodian, as the Custodian does not perform a verification of fees. Clients provide written authorization permitting advisory fees to be deducted by SHFG to be paid directly from their account[s] held by the Custodian as part of the wealth management agreement and separate account forms provided by the Custodian.

### Financial Planning Services

Financial planning fees for annual ongoing engagements are invoiced monthly in advance. Financial planning fees for hourly or fixed engagement fees may be invoiced up to fifty percent (50%) of the expected total fee upon execution of the financial planning agreement. The balance shall be invoiced upon completion of the agreed upon deliverable[s]. Fees are paid via check or ACH.

### Certified Divorce Financial Analysis

Fees are invoiced up to one hundred (100%) of the total expected fee upon execution of the agreement. Upon completion of the agreed upon deliverable[s], the Client will be invoiced for any additional hours beyond the initial estimate as applicable.

### Retirement Plan Advisory Services

Retirement plan advisory fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

### Use of Independent Managers

For Client accounts implemented through an Independent Manager, the Client's overall fees will include SHFG's wealth management fee (as noted above) plus investment management fees and/or platform fees charged by the Independent Manager. The Independent Manager will assume the responsibility for calculating the Independent Manager platform and investment management fees and deducting those fees from the Client's account[s]. SHFG will be responsible for calculating the wealth management fee and deducting from the Client's account[s].

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

Clients may incur certain fees or charges imposed by third parties, other than SHFG, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian, as applicable. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodian typically charges for mutual funds and other types of investments. The fees charged by SHFG are separate and distinct from these custody and execution fees.

In addition, all fees paid to SHFG for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of SHFG, but would not receive the services provided by SHFG 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 SHFG 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**

##### Wealth Management Services

SHFG is compensated for its wealth management services in advance of the quarter in which services are rendered. Either party may terminate the wealth management agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the wealth management agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Advisor will refund any unearned, prepaid wealth management fees from the effective date of termination to the end of the quarter. The Client's wealth management agreement with the Advisor is non-transferable without the Client's prior consent.

##### Financial Planning Services / Certified Divorce Financial Analysis

SHFG requires an advance deposit as described above. Either party may terminate the agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be billed for actual hours logged on the project times the contractual hourly rate. In the case of a fixed fee engagement, the Client shall be billed for the percentage of the engagement scope completed by the Advisor. Upon termination of an annual ongoing engagement, the Advisor will refund any unearned, prepaid planning fees from the effective date of termination to the end of the month. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

##### Retirement Plan Advisory Services

The Advisor may be compensated for its services at the beginning of the Billing Period before services are rendered pursuant to the terms of the retirement plan advisory agreement. Either party may request to terminate a retirement plan advisory agreement, at any time, by providing advance written notice to the other party. The Client shall be responsible for fees up to and including the effective date of termination. If the fees are billed in advance, the Advisor will refund any unearned, prepaid retirement plan advisory fees from the effective date of termination to the end of the Billing Period. The Client's retirement plan services agreement with the Advisor is non-transferable without the Client's prior consent.

##### Use of Independent Managers

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

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

##### Insurance Agency Affiliation

Certain Advisory Persons are licensed as independent insurance professionals. As an independent insurance professional, an Advisory Person may earn commission-based compensation for selling insurance products, including insurance products offered to Clients. Insurance commissions earned by the Advisory Person are separate and in addition to investment advisory fees. This practice presents a conflict of interest as an Advisory Person who is also an insurance professional will have an incentive to recommend insurance products to the Client for the purpose of generating commissions rather than solely based on the Client's needs. Clients are under no obligation, contractual or otherwise, to purchase insurance products through any Advisory Person affiliated with the Advisor. Please see Item 10 below.

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

SHFG does not charge performance-based fees for its investment advisory services. The fees charged by SHFG are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

SHFG does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive or sales quotas to recommend any particular investment options to its Clients.

## **Item 7 – Types of Clients**

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SHFG generally requires a minimum relationship size of \$250,000 to effectively implement its investment process.

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

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

SHFG employs fundamental and technical analysis methods in developing investment strategies for its Clients. Research and analysis from SHFG are 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. This criteria consists generally of 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.

*Technical analysis* involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that SHFG will be able to accurately predict such a reoccurrence. As noted above, SHFG generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. SHFG 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, SHFG 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. SHFG will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

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

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

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

#### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

#### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

#### Bond Risks

Bonds are subject to specific risks, including the following: (1) interest rate risks, i.e. the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e. the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e. the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e. the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e. the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e. the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

#### Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

#### Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

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

#### **Item 9 – Disciplinary Information**

**There are no legal, regulatory or disciplinary events involving SHFG or its management persons.** SHFG values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor or Advisory Persons are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 151899.

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

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### Insurance Agency Affiliation

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

### Use of Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio with one or more Independent Managers. The Advisor does not receive any compensation nor does this present a material conflict of interest. The Advisor will only earn its investment advisory fee as described in Item 5.A.

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

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

SHFG has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with SHFG ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to each Client. SHFG and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of SHFG's 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 the Code, please contact the Advisor at 210-547-3450.

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

SHFG allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. SHFG 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. SHFG does not have a material interest in any securities traded in Client accounts.

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

SHFG allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can 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 SHFG requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate. The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

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

While SHFG allows 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 SHFG, or any Supervised Person of SHFG, transact in any security to the detriment of any Client.**

## Item 12 – Brokerage Practices

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### A. Recommendation of Custodian[s]

SHFG 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 SHFG to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, SHFG does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where SHFG does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. 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 SHFG. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. SHFG may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and its reputation and/or the location of the Custodian's offices.

SHFG will generally recommend that Clients establish their account[s] at Fidelity Clearing & Custody Solutions and related entities of Fidelity Investments, Inc. (collectively "Fidelity"). Fidelity is a FINRA-registered broker-dealer and member SIPC. Fidelity will serve as the Client's "qualified custodian". SHFG maintains an institutional relationship with Fidelity whereby the Advisor receives economic benefits from Fidelity. Please see Item 14 below.

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

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **SHFG does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**

**2. Brokerage Referrals** - SHFG does not receive any compensation from any third party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where SHFG will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective 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]). SHFG 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.

### 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 the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. SHFG will execute its transactions through the Custodian as authorized by the Client. SHFG may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Clients' accounts.

## **Item 13 – Review of Accounts**

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

Securities in Client accounts are monitored on a regular and continuous basis by Advisory Persons and periodically by Scott Harris, Chief Compliance Officer of SHFG. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

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

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more 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[s]. The Client is encouraged to notify SHFG if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

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

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

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### **A. Compensation Received by SHFG**

SHFG is a fee-based advisory firm, that is compensated solely by its Clients and not from any investment product. SHFG does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. SHFG may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. SHFG does not receive compensation for referrals. Likewise, SHFG may receive non-compensated referrals of new Clients from various third-parties.

#### Participation in Institutional Advisor Platform

SHFG has established an institutional relationship with Fidelity to assist the Advisor in managing Client account[s]. The Advisor receives access to software and related support because the Advisor renders investment management services to Clients that maintain assets at Fidelity. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of this Custodian over one that does not furnish similar software, systems support, or services.

The following benefits are also received from Fidelity: financing services (e.g. margin, securities based lines of credit), receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; access to an electronic communication network for Client order entry and account information, and transition credits to provide financial support to assist with the Client transition to the Fidelity platform.

### **B. Compensation for Client Referrals**

The Advisor does not compensate, either directly or indirectly, any persons who are not supervised persons, for Client referrals.



## **Item 15 – Custody**

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

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

## **Item 16 – Investment Discretion**

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SHFG 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 SHFG. 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 a wealth/investment management agreement containing all applicable limitations to such authority. All discretionary trades made by SHFG will be in accordance with each Client's investment objectives and goals.

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

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SHFG 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**

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



# S. Harris Financial Group

## Form ADV Part 2B – Brochure Supplement

for

**Stephanie A. Harris, CFP®, CDFA®**  
**Owner, Partner**

**Effective: October 15, 2024**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Stephanie A. Harris, CFP®, CDFA® (CRD# 4534069) in addition to the information contained in the S Harris Financial Group, LLC ("SHFG" or the "Advisor", CRD# 151899) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the SHFG Disclosure Brochure or this Brochure Supplement, please contact us at 210-547-3450.

Additional information about Mrs. Harris is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 4534069.

## Item 2 – Educational Background and Business Experience

Stephanie A. Harris, CFP®, CDFA®, born in 1974, is dedicated to advising Clients of SHFG as the Owner/Partner. Mrs. Harris earned a Bachelor of Science in Applied Mathematical Sciences from Texas A&M University - College Station in 1995. Additional information regarding Mrs. Harris's employment history is included below.

### Employment History:

Owner, Partner S Harris Financial Group, LLC	02/2010 to Present
Investment Advisor Representative Raymond James Financial Services Advisors, Inc.	09/2020 to 10/2024
Registered Representative Raymond James Financial Services, Inc.	05/2002 to 10/2024

### CERTIFIED FINANCIAL PLANNER™ ("CFP®")

The CERTIFIED FINANCIAL PLANNER™, CFP®, and federally registered CFP® (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by CERTIFIED FINANCIAL PLANNER™ Board of Standards, Inc. ("CFP® Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 87,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real-world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP®.

### Certified Divorce Financial Analyst™ ("CDFA®")

The Certified Divorce Financial Analyst (CDFA®) is a professional certification granted in the United States and Canada by the Institute for Divorce Financial Analysts™ (IDFA®). To attain the right to use the CDFA® (Certified Divorce Financial Analyst™) certification, an individual must satisfactorily fulfill the following requirements:

- Education – Professionals must develop their theoretical understanding and knowledge of the financial aspects of divorce by completing a comprehensive course of study approved by the IDFA™;
- Examination – Practitioners must pass a four-part (in the USA) or three-part (in Canada) Certification Examination that tests their understanding and knowledge of the financial aspects of divorce. In addition, the practitioner must demonstrate the practical application of this knowledge in the divorce process;
- Experience – Individuals must have a minimum of three years' experience in a financial or legal capacity prior to earning the right to use the CDFA® certification mark; and
- Ethics – Practitioners agree to abide by a strict code of professional conduct known as the "Code of Ethics and Professional Responsibility," which sets forth their ethical responsibilities to the public, clients, employers, and other professionals. The IDFA® may perform a background check during this process, and each candidate for CDFA® certification must disclose any investigations or legal proceedings relating to his or her professional or business conduct.

Individuals who become certified must complete the following ongoing education requirements in order to maintain the right to continue to use the CDFA® designation:

- Continuing Education – Complete a minimum of fifteen (15) hours of continuing education every two years, that are specifically related to the field of divorce, and
- Ethics – Practitioners must voluntarily disclose any public, civil, criminal, or disciplinary actions that may have been taken against them during the past two years as part of the renewal process. If a complaint has been brought against a CDFA® by another professional or member of the general public, the CDFA® must be examined and cleared by IDFA's Ethics Committee to maintain their designation.

### **Item 3 – Disciplinary Information**

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***There are no legal, civil or disciplinary events to disclose regarding Mrs. Harris.*** Mrs. Harris has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mrs. Harris.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mrs. Harris.***

However, we do encourage you to independently view the background of Mrs. Harris on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 4534069.

### **Item 4 – Other Business Activities**

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#### Insurance Agency Affiliations

Mrs. Harris is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mrs. Harris's role with SHFG. As an insurance professional, Mrs. Harris will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mrs. Harris is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mrs. Harris or the Advisor. Mrs. Harris spends less than 5% of her time per month in this capacity.

### **Item 5 – Additional Compensation**

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Mrs. Harris has additional business activities where compensation is received that are detailed in Item 4 above.

### **Item 6 – Supervision**

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Mrs. Harris serves as the Owner/Partner of SHFG and is supervised by Scott Harris, the Chief Compliance Officer. Mr. Harris can be reached at 210-547-3450.

SHFG has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of SHFG. Further, SHFG is subject to regulatory oversight by various agencies. These agencies require registration by SHFG and its Supervised Persons. As a registered entity, SHFG is subject to examinations by regulators, which may be announced or unannounced. SHFG is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



# S. Harris Financial Group

## Form ADV Part 2B – Brochure Supplement

for

**Gary Scott Harris, CIMA®**  
**Chief Compliance Officer**

**Effective: October 15, 2024**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Gary Scott Harris, CIMA® (CRD# 6128900) in addition to the information contained in the S Harris Financial Group, LLC (“SHFG” or the “Advisor”, CRD# 151899) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the SHFG Disclosure Brochure or this Brochure Supplement, please contact us at 210-547-3450.

Additional information about Mr. Harris is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6128900.



## Item 2 – Educational Background and Business Experience

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Gary Scott Harris, CIMA® born in 1973, is dedicated to advising Clients of SHFG as the Owner/Chief Compliance Officer. Mr. Harris earned a BBA in Business Analysis from Texas A&M in 1995 and earned an MBA from University of Texas - San Antonio in 2006. Mr. Harris also earned a Business Strategy Certification from Harvard University in 2011. Mr. Harris completed the Chicago Booth CIMA® education program at the University of Chicago Booth School of Business in 2020. Additional information regarding Mr. Harris' employment history is included below.

### Employment History:

Chief Compliance Officer S Harris Financial Group, LLC	05/2015 to Present
Investment Advisor Representative Raymond James Financial Services Advisors, Inc.	09/2020 to 10/2024
Registered Representative Raymond James Financial Services, Inc.	06/2016 to 10/2024

### Certified Investment Management Analyst™ (“CIMA®”)

The CIMA® certification signifies that an individual has met initial and ongoing experience, ethical, education, and examination requirements for investment management consulting, including advanced investment management theory and application. To earn CIMA® certification, candidates must: submit an application, pass a background check and have an acceptable regulatory history; pass an online Qualification Examination; complete an in-person or online executive education program at an AACSB® accredited university business school; pass an online Certification Examination; and have an acceptable regulatory history as evidenced by FINRA Form U-4 or other regulatory requirements and have three years of financial services experience at the time of certification.

CIMA® certificates must adhere to IMCA's Code of Professional Responsibility, Standards of Practice, and Rules and Guidelines for Use of the Marks. CIMA® designees must report 40 hours of continuing education credits, including two ethics hours every two years to maintain the certification. The designation is administered through the Investment Management Consultants Association™ (IMCA®).

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Harris.*** Mr. Harris has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Harris.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Harris.***

However, we do encourage you to independently view the background of Mr. Harris on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6128900.

## Item 4 – Other Business Activities

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### Harris Ventures and Advisory

Mr. Harris is also the Owner of Harris Ventures and Advisory (“Harris Ventures”). In this capacity, Mr. Harris consults for start-ups and small business in areas such as business development, efficiencies and business structure. Clients are not offered consulting services from Mr. Harris in his separate capacity with Harris Ventures. Mr. Harris spends approximately 5% of his time per month in this capacity.

### **Item 5 – Additional Compensation**

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Mr. Harris has additional business activities where compensation is received that are detailed in Item 4 above.

### **Item 6 – Supervision**

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Mr. Harris serves as the Chief Compliance Officer of SHFG. Mr. Harris can be reached at 210-547-3450.

SHFG has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of SHFG. Further, SHFG is subject to regulatory oversight by various agencies. These agencies require registration by SHFG and its Supervised Persons. As a registered entity, SHFG is subject to examinations by regulators, which may be announced or unannounced. SHFG is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



S. Harris Financial Group

**Form ADV Part 2B – Brochure Supplement**

**for**

**Mitchell A. Byrum, CFP®  
Financial Advisor**

**Effective: October 15, 2024**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Mitchell A. Byrum, CFP® (CRD# 6812718) in addition to the information contained in the S Harris Financial Group, LLC (“SHFG” or the “Advisor”, CRD# 151899) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the SHFG Disclosure Brochure or this Brochure Supplement, please contact us at 210-547-3450.

Additional information about Mr. Byrum is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6812718.

## Item 2 – Educational Background and Business Experience

Mitchell A. Byrum, CFP® born in 1994, is dedicated to advising Clients of SHFG as a Financial Advisor. Mr. Byrum earned a Bachelor of Science in Agricultural Economics (Finance, Real Estate, and Investment) from Texas A&M University in 2017. Additional information regarding Mr. Byrum's employment history is included below.

### Employment History:

Financial Advisor S Harris Financial Group, LLC	05/2019 to Present
Financial Planning Associate S Harris Financial Group, LLC	05/2017 to 05/2019
Investment Advisor Representative Raymond James Financial Services Advisors, Inc.	09/2020 to 10/2024
Registered Representative Raymond James Financial Services, Inc.	10/2017 to 10/2024

### CERTIFIED FINANCIAL PLANNER™ ("CFP®")

The CERTIFIED FINANCIAL PLANNER™, CFP®, and federally registered CFP® (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by CERTIFIED FINANCIAL PLANNER™ Board of Standards, Inc. ("CFP® Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 87,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real-world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP®.

### **Item 3 – Disciplinary Information**

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Byrum.*** Mr. Byrum has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Byrum.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Byrum.***

However, we do encourage you to independently view the background of Mr. Byrum on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6812718.

### **Item 4 – Other Business Activities**

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#### Insurance Agency Affiliations

Mr. Byrum is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Byrum's role with SHFG. As an insurance professional, Mr. Byrum will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Byrum is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Byrum or the Advisor. Mr. Byrum spends approximately 10% of his time per month in this capacity.

### **Item 5 – Additional Compensation**

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Mr. Byrum has additional business activities where compensation is received that are detailed in Item 4 above.

### **Item 6 – Supervision**

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Mr. Byrum serves as a Financial Planning Associate of SHFG and is supervised by Scott Harris, the Chief Compliance Officer. Mr. Harris can be reached at 210-547-3450.

SHFG has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of SHFG. Further, SHFG is subject to regulatory oversight by various agencies. These agencies require registration by SHFG and its Supervised Persons. As a registered entity, SHFG is subject to examinations by regulators, which may be announced or unannounced. SHFG is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



# S. Harris Financial Group

## **Form ADV Part 2B – Brochure Supplement**

**for**

**Daniel P. King  
Financial Planning Associate**

**Effective: October 15, 2024**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Daniel P. King (CRD# 7733665) in addition to the information contained in the S Harris Financial Group, LLC (“SHFG” or the “Advisor”, CRD# 151899) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the SHFG Disclosure Brochure or this Brochure Supplement, please contact us at 210-547-3450.

Additional information about Mr. King is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 7733665.



## Item 2 – Educational Background and Business Experience

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Daniel P. King, born in 1995, is dedicated to advising Clients of SHFG as a Financial Planning Associate. Mr. King earned a Bachelor of Science from Texas A&M University in 2018. Additional information regarding Mr. King's employment history is included below.

### Employment History:

Financial Planning Associate S Harris Financial Group, LLC	05/2023 to Present
Registered Representative Raymond James Financial Services, Inc.	06/2023 to 10/2024
Investment Advisor Representative Raymond James Financial Services Advisors, Inc.	05/2023 to 10/2024
Director of Operations Indian Z Stone Ranch, LLC	02/2022 to 05/2023
Director of Operations Rolling Plains Quail Research Foundation	11/2018 to 02/2022

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. King.*** Mr. King has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. King.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. King.***

However, we do encourage you to independently view the background of Mr. King on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 7733665.

## Item 4 – Other Business Activities

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### Insurance Agency Affiliations

Mr. King is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. King's role with SHFG. As an insurance professional, Mr. King will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. King is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. King or the Advisor. Mr. King spends approximately 10% of his time per month in this capacity.

## Item 5 – Additional Compensation

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Mr. King has additional business activities where compensation is received that are detailed in Item 4 above.

## Item 6 – Supervision

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Mr. King serves as a Financial Planning Associate of SHFG and is supervised by Scott Harris, the Chief Compliance Officer. Mr. Harris can be reached at 210-547-3450.

SHFG has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of SHFG. Further, SHFG is subject to regulatory oversight by various agencies. These agencies require registration by SHFG and its Supervised Persons. As a registered entity, SHFG is

subject to examinations by regulators, which may be announced or unannounced. SHFG is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



# S. Harris Financial Group

## Form ADV Part 2B – Brochure Supplement

for

**Cole A. McCool, CFP®**  
**Financial Advisor**

**Effective: October 15, 2024**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Cole A. McCool, CFP® (CRD# 7384026) in addition to the information contained in the S Harris Financial Group, LLC (“SHFG” or the “Advisor”, CRD# 151899) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the SHFG Disclosure Brochure or this Brochure Supplement, please contact us at 210-547-3450.

Additional information about Mr. McCool is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 7384026.

## Item 2 – Educational Background and Business Experience

Cole A. McCool, CFP®, born in 1998, is dedicated to advising Clients of SHFG as a Financial Advisor. Mr. McCool earned a Bachelor of Business Administration in Finance from Texas A&M University in 2017. Additional information regarding Mr. McCool's employment history is included below.

### Employment History:

Financial Advisor S Harris Financial Group, LLC	06/2023 to Present
Financial Planning Associate S Harris Financial Group, LLC	06/2021 to 06/2023
Investment Advisor Representative Raymond James Financial Services Advisors, Inc.	10/2021 to 10/2024
Registered Representative Raymond James Financial Services, Inc.	09/2021 to 10/2024
Analyst Texas Health Design	10/2020 to 12/2020
Analyst Avondale Private Lending	05/2020 to 08/2020
Server Fish Daddy's Seafood Grill	05/2019 to 08/2019

### CERTIFIED FINANCIAL PLANNER™ ("CFP®")

The CERTIFIED FINANCIAL PLANNER™, CFP®, and federally registered CFP® (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by CERTIFIED FINANCIAL PLANNER™ Board of Standards, Inc. ("CFP® Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 87,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real-world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of

care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP®.

### **Item 3 – Disciplinary Information**

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***There are no legal, civil or disciplinary events to disclose regarding Mr. McCool.*** Mr. McCool has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. McCool.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. McCool.***

However, we do encourage you to independently view the background of Mr. McCool on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 7384026.

### **Item 4 – Other Business Activities**

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#### Insurance Agency Affiliations

Mr. McCool is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. McCool's role with SHFG. As an insurance professional, Mr. McCool will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. McCool is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. McCool or the Advisor. Mr. McCool spends approximately 10% of his time per month in this capacity.

### **Item 5 – Additional Compensation**

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Mr. McCool has additional business activities where compensation is received that are detailed in Item 4 above.

### **Item 6 – Supervision**

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Mr. McCool serves as a Financial Planning Associate of SHFG and is supervised by Scott Harris, the Chief Compliance Officer. Mr. Harris can be reached at 210-547-3450.

SHFG has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of SHFG. Further, SHFG is subject to regulatory oversight by various agencies. These agencies require registration by SHFG and its Supervised Persons. As a registered entity, SHFG is subject to examinations by regulators, which may be announced or unannounced. SHFG is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



# S. Harris Financial Group

## **Form ADV Part 2B – Brochure Supplement**

**for**

**Samuel J. Haager  
Financial Planning Associate**

**Effective: October 15, 2024**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Samuel J. Haager (CRD# 7557458) in addition to the information contained in the S Harris Financial Group, LLC (“SHFG” or the “Advisor”, CRD# 151899) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the SHFG Disclosure Brochure or this Brochure Supplement, please contact us at 210-547-3450.

Additional information about Mr. Haager is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 7557458.



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## Item 2 – Educational Background and Business Experience

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Samuel J. Haager, born in 2000, is dedicated to advising Clients of SHFG as a Financial Planning Associate. Mr. Haager earned Bachelor of Business Administration from Texas A&M University in 2023. Additional information regarding Mr. Haager's employment history is included below.

### Employment History:

Financial Planning Associate S Harris Financial Group, LLC	06/2023 to Present
Investment Advisor Representative Raymond James Financial Services Advisors, Inc.	11/2023 to 10/2024
Registered Representative Raymond James Financial Services, Inc.	09/2023 to 10/2024
Intern Cantera Capital Partners	05/2022 to 08/2022
Ranch Hand, Bar D Ranch	05/2021 to 08/2021
Camp Counselor, Kanakuk Family Camps	06/2020 to 07/2020
Camp Counselor, Kanakuk Family Camps	06/2019 to 07/2019

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## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Haager.*** Mr. Haager has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Haager.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Haager.***

However, we do encourage you to independently view the background of Mr. Haager on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 7557458.

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## Item 4 – Other Business Activities

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### Insurance Agency Affiliations

Mr. Haager is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Haager's role with SHFG. As an insurance professional, Mr. Haager will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Haager is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Haager or the Advisor. Mr. Haager spends approximately 10% of his time per month in this capacity.

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## Item 5 – Additional Compensation

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Mr. Haager has additional business activities where compensation is received that are detailed in Item 4 above.

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## Item 6 – Supervision

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Mr. Haager serves as a Financial Planning Associate of SHFG and is supervised by Scott Harris, the Chief Compliance Officer. Mr. Harris can be reached at 210-547-3450.

SHFG has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of SHFG. Further, SHFG is subject to regulatory oversight by various agencies. These agencies require registration by SHFG and its Supervised Persons. As a registered entity, SHFG is subject to examinations by regulators, which may be announced or unannounced. SHFG is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Privacy Policy

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Effective: October 15, 2024

### Our Commitment to You

S Harris Financial Group, LLC ("SHFG" 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. SHFG (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.

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

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

### Why you need to know?

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

### What information do we collect from you?

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

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

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

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide 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> SHFG 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 SHFG 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> SHFG 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 210-547-3450.