

Item 1 Cover Page

DISCLOSURE BROCHURE
FORM ADV PART 2A

Strive Financial Group, LLC

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This brochure provides information about the qualifications and business practices of Strive Financial Group, LLC. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 317-590-0146. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

**ADDITIONAL INFORMATION ABOUT STRIVE FINANCIAL GROUP, LLC (CRD #333298)
IS AVAILABLE ON THE SEC'S WEBSITE AT WWW.ADVISERINFO.SEC.GOV**

Item 2: Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

Initial Filing.

Full Brochure Available

This Firm Brochure being delivered is the complete brochure for the Firm.

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Item 4: Advisory Business

Firm Description

Strive Financial Group, LLC ("SFG") was founded and became registered to offer investment advisory services in 2024. SFG is co-owned by Hillman Financial, LLC and Freeman Financial LLC, which are solely owned by Joseph T. Hillman and Gregory T. Freeman respectively. Joseph T. Hillman is the Chief Compliance Officer.

Types of Advisory Services

ASSET MANAGEMENT

SFG offers discretionary asset management services to advisory Clients. SFG will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The Client will authorize SFG discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

FINANCIAL PLANNING AND CONSULTING

SFG offers the following financial planning and consulting services as outlined below:

Consultation Services

This service is appropriate for clients who need assistance with individual topics. This is not a detailed financial review and will not provide/result in a complete financial plan. Client may select individual topics below, or other topics as may be deemed appropriate. The individual topics that will be included in this service will be outlined and agreed upon on the financial planning and consulting agreement.

Available topics include, but are not limited to:

- **Financial goals:** Based on an individual's or a family's clearly defined financial goals, including funding a college education for the children, buying a larger home, starting a business, retiring on time or leaving a legacy. Financial goals should be quantified and set to milestones for tracking.
- **Personal net worth statement:** A snapshot of assets and liabilities serves as a benchmark for measuring progress towards financial goals.
- **Cash flow analysis:** An income and spending plan determines how much can be set aside for debt repayment, savings and investing each month.
- **Retirement strategy:** A strategy for achieving retirement independent of other financial priorities. Including a strategy for accumulating the required retirement capital and its planned lifetime distribution.
- **Comprehensive risk management plan:** Identify all risk exposures and provide the necessary coverage to protect the family and its assets against financial loss. The risk management plan includes a full review of life and disability insurance, personal liability coverage, property and casualty coverage, and catastrophic coverage.
- **Long-term investment plan:** Include a customized asset allocation strategy based on specific investment objectives and a risk profile. This investment plan sets guidelines for selecting, buying and selling investments and establishing benchmarks for performance review.

- **Tax reduction strategy:** Identify ways to minimize taxes on personal income to the extent permissible by the tax code. The strategy should include identification of tax-favored investment vehicles that can reduce taxation of investment income.
- **Estate preservation:** Help update accounts, review beneficiaries for retirement accounts and life insurance, provide a second look at your current estate planning documents, and prompt you to update your plan when the legal environment changes or you have major life events such as a marriage, death, or births.

If a conflict of interest exists between the interests of SFG and the interests of the Client, the Client is under no obligation to act upon SFG's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through SFG. Financial plans will be completed and delivered inside of thirty (30) days contingent upon timely delivery of all required documentation.

Ongoing Financial Planning Services

Ongoing financial planning services are for ongoing monitoring of recommendation and advice. The client can expect to receive the following:

- At least one data gathering meeting.
- At least one meeting to deliver recommendations/advice and action items.
- Quarterly meetings to monitor progress and update any changes.
- Ongoing check-ins via phone or email for accountability, encouragement and to address changes along the way.
- Initial recommendations are completed and delivered within thirty (30) days, contingent upon timely delivery of all required documentation.

If a conflict of interest exists between the interests of SFG and the interests of the Client, the Client is under no obligation to act upon SFG recommendations. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through SFG. Ongoing services will continue from year to year unless cancelled by either party.

Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without Client consent.

Wrap Fee Programs

SFG does not sponsor any wrap fee programs.

Client Assets Under Management

SFG has the following Client assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$0	\$0	October 2, 2024

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

ASSET MANAGEMENT

SFG offers discretionary direct asset management services to advisory Clients. SFG charges an annual investment advisory fee based on the total assets under management as follows:

Assets Under Management	Annual Fee	Quarterly Fee
First \$500,000 (\$0-\$500,000)	1.25%	.3125%
Your next \$500,000 (\$500,000.01 - \$1,000,000)	0.85%	.2125%
Your next \$1,000,000 (\$1,000,000.01 - \$2,000,000)	0.75%	.1875%
Your next \$1,000,000 (\$2,000,000.01 - \$3,000,000)	0.60%	.1500%
Your next \$2,000,000 (\$3,000,000.01 - \$5,000,000)	0.45%	.1125%
Your next \$5,000,000 (\$5,000,000.01 - \$10,000,000)	0.35%	.0875%
Subsequent amounts (\$10,000,000.01+)	0.20%	.0500%

This is a tiered/blended fee schedule, the asset management fee is calculated by applying different rates to different portions of the portfolio. SFG may group certain related Client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

For example (based on quarterly billing period):

Client with \$2,500,000 under management would pay \$5,250.00 on a quarterly basis.

<u>AUM</u>	<u>Quarterly fee</u>	<u>Total</u>
First \$500,000	x 0.3125% =	\$1,562.50
Next \$500,000	x 0.2125% =	\$1,062.50
Next \$1,000,000	x 0.1875% =	\$1,875.00
Next \$500,000	x 0.1500% =	\$750.00
Grand total for the quarter		<u>\$5,250.00</u>

The annual fee is negotiable based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.). SFG considers cash to be an asset class, and as such is included in fee calculations. Also, to be noted, at times fees will exceed the money market yield. Fees are billed quarterly in advance based on the amount of assets managed as of the close of business on the last business day of the previous quarter.

Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. After the initial five (5) business days,

the agreement may be terminated by SFG with thirty (30) days written notice to Client and by the Client at any time with written notice to SFG. No fee adjustment will be made for account deposits and/or withdrawals during a billing period. For accounts opened or closed mid-billing period, fees will be prorated based on the days services are provided during the given period. All unpaid earned fees will be due to SFG. Additionally, all unearned fees will be refunded to the Client. Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

FINANCIAL PLANNING AND CONSULTING

Consultation Services

SFG charges a fixed fee ranging between \$250 to \$1,000 based on complexity and unique Client needs for consulting services. Prior to the planning process the Client will be provided an estimated plan fee.

Fees for financial recommendations are due upon commencement of the Advisory Agreement.

Services are completed and delivered inside of thirty (30) days contingent upon timely delivery of all required documentation. Client may cancel within five (5) business days of signing Agreement with no obligation and without penalty. If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to SFG.

Ongoing Financial Planning Services

SFG charges a fixed annual fee for ongoing financial planning services. The fee is based on the complexity of a Client's financial situation and the number of financial goals to be addressed. The fixed annual fee ranges from \$250 to \$1,000 paid on a monthly, quarterly, or annual basis in advance. Client will elect payment frequency in the Financial Planning and Consulting Agreement.

Client may cancel within five (5) business days of signing Agreement with no obligation and without penalty. If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to SFG. SFG. Fees will continue from year to year unless cancelled by either party in writing. All refunds will be calculated on a pro-rata basis based on the number of days services were provided.

Client Payment of Fees

Fees for asset management services are:

- Deducted from a designated Client account. The Client must consent in advance to direct debiting of their investment account.
- Electronic Payment via ACH (fees will be paid via a third party payment processor in which the client will securely input payment information and pay the advisory fee through a secure portal. SFG will not have continuous access to the Client's banking information.)

Fees for financial plans will be billed:

- Deducted from a designated non-qualified Client account. The Client must consent in advance to direct debiting of their investment account.
- Check – to be remitted by Client to SFG

- Electronic Payment via ACH (fees will be paid via a third party payment processor in which the client will securely input payment information and pay the advisory fee through a secure portal. SFG will not have continuous access to the Client's banking information.)

Additional Client Fees Charged

Custodians may charge transaction fees and other related costs on the purchases or sales of mutual funds, equities, bonds, options and exchange-traded funds. Mutual funds, money market funds and exchange-traded funds also charge internal management fees, which are disclosed in the fund's prospectus. SFG does not receive any compensation from these fees. All of these fees are in addition to the management fee you pay to SFG. For more details on the brokerage practices, see Item 12 of this brochure.

Prepayment of Client Fees

SFG does not require any prepayment of fees of more than \$1,200 per Client and six months or more in advance.

Fees for ongoing financial planning services are billed monthly, quarterly or annually in advance.

Fees for consulting services are due, in full, at the commencement of the contract.

Investment management fees are billed quarterly in advance.

If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to SFG.

External Compensation for the Sale of Securities to Clients

Investment Advisor Representatives of SFG receive external compensation from sales of investment related products such as insurance as licensed insurance agents. This represents a conflict of interest because it gives an incentive to recommend products based on the commission received. This conflict is mitigated by disclosures, procedures, and SFG's fiduciary obligation to place the best interest of the Client first and Clients are not required to purchase any products or services. Clients have the option to purchase these products through another insurance agent of their choosing.

Item 6: Performance-Based Fees and Side-by-Side Management

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

SFG does not use a performance-based fee structure because of the conflict of interest. Performance based compensation may create an incentive for SFG to recommend an investment that may carry a higher degree of risk to the Client.

Item 7: Types of Clients

Description

SFG generally provides investment advice to individuals high net worth individuals, corporations or business entities. Client relationships vary in scope and length of service.

Account Minimums

SFG does not require a minimum to open or maintain an account.

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

Methods of Analysis

Security analysis methods may include quantitative analysis and qualitative analysis. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

Quantitative analysis (QA) is a technique that seeks to understand behavior by using mathematical and statistical modeling, measurement, and research. Quantitative analysts aim to represent a given reality in terms of a numerical value.

QA is employed for several reasons, including measurement, performance evaluation or valuation of a financial instrument, and predicting real-world events, such as changes in a country's gross domestic product (GDP). QA is a technique that seeks to understand behavior by using mathematical and statistical modeling, measurement, and research.

QA is used to analyze investment opportunities, such as when to purchase or sell securities. Investors perform quantitative analysis when using key financial ratios, such as the price-earnings ratio (P/E) or earnings per share (EPS), in their investment decision-making process (e.g., whether to purchasing shares of a company's stock). Quantitative analysis ranges from the examination of simple statistical data (e.g., revenue) to complex calculations (e.g., discounted cash flow or option pricing).

Qualitative analysis uses subjective judgment based on 'soft' or non-quantifiable data. Qualitative analysis deals with intangible and inexact information that can be difficult to collect and measure. Machines have difficulty conducting qualitative analysis as intangibles cannot be defined by numeric values. Understanding the people and company culture are important to qualitative analysis. In addition, looking at a company through the eyes of a customer and understanding its competitive advantage helps when conducting this type of analysis.

Often quantitative and qualitative analyses will be used together to examine a company's operations and evaluate any potential investment opportunity.

Investment Strategy

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time by providing written notice to SFG. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

Security Specific Material Risks

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with SFG:

- *Market Risk:* The prices of securities in which clients invest may decline in response to certain events taking place around the world, including those directly involving the

companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.

- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Management Risk:* The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the client's portfolio may suffer.
- *Equity Risk:* Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.
- *Fixed Income Risk:* The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- *Investment Companies Risk:* When a client invests in open end mutual funds or ETFs, the client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an

underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value or (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which client invests.

- *Derivatives Risk:* Funds in a client's portfolio may use derivative instruments. The value of these derivative instruments derives from the value of an underlying asset, currency or index. Investments by a fund in such underlying funds may involve the risk that the value of the underlying fund's derivatives may rise or fall more rapidly than other investments, and the risk that an underlying fund may lose more than the amount that it invested in the derivative instrument in the first place. Derivative instruments also involve the risk that other parties to the derivative contract may fail to meet their obligations, which could cause losses.
- *Foreign Securities Risk:* Funds in which clients invest may invest in foreign securities. Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks may include, among others, currency risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government supervision, less publicly available information, limited trading markets and greater volatility. To the extent that underlying funds invest in issuers located in emerging markets, the risk may be heightened by political changes, changes in taxation, or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.
- *Long-term purchases:* Long-term investments are those vehicles purchased with the intention of being held for more than one year. Typically, the expectation of the investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.
- *Short-term purchases:* Short-term investments are typically held for one year or less. Generally, there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk — the risk that your investment's return will not keep up with inflation.
- *Trading risk:* Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.
- *Options Trading:* The risks involved with trading options are that they are very time sensitive investments. An options contract is generally a few months. Clients should be aware that the use of options involves additional risks. The risks of covered call writing

include the potential for the market to rise sharply. In such case, the security may be called away and the account will no longer hold the security. When purchasing options there is the risk that the entire premium paid for the option can be lost if the option is not exercised or otherwise sold prior to the option's expiration date. When selling ("writing") options, the risk of loss can be much greater if the options are written uncovered ("naked"). The risk of loss can far exceed the amount of the premium received for an uncovered option and in the case of an uncovered call option the potential loss is unlimited.

- *Trading on Margin:* In a cash account, the risk is limited to the amount of money that has been invested. In a margin account, risk includes the amount of money invested plus the amount that has been loaned. As market conditions fluctuate, the value of marginable securities will also fluctuate, causing a change in the overall account balance and debt ratio. As a result, if the value of the securities held in a margin account depreciates, the client will be required to deposit additional cash or make full payment of the margin loan to bring account back up to maintenance levels. Clients who cannot comply with such a margin call may be sold out or bought in by the brokerage firm.
- *Private Equity/Placement Risk:* Because offerings are exempt from registration requirements, no regulator has reviewed the offerings to make sure the risks associated with the investment and all material facts about the entity raising money are adequately disclosed. Securities offered through private placements are generally illiquid, meaning there are limited opportunities to resell the security. Risk of the underlying investment may be significantly higher than publicly traded investments.
- *Alternative Investments Risk:* Alternative investments involve a high degree of risk and can be illiquid due to restrictions on transfer and lack of a secondary trading market. They can be highly leveraged, speculative and volatile, and an investor could lose all or a substantial amount of an investment.
- *Foreign Investment Risk:* Investments in foreign securities may be riskier than U.S. investments because of factors such as, unstable international, political and economic conditions, currency fluctuations, foreign controls on investment and currency exchange, foreign governmental control of some issuers, potential confiscatory taxation or nationalization of companies by foreign governments, withholding taxes, a lack of adequate company information, less liquid and more volatile exchanges and/or markets, ineffective or detrimental government regulation, varying accounting standards, political or economic factors that may severely limit business activities, and legal systems or market practices that may permit inequitable treatment of minority and/or non-domestic investors. Investments in emerging markets may involve these and other significant risks such as less mature economic structures and less developed and more thinly-traded securities markets.
- *Land:* Investments in land have unique risks with several restrictions and challenges. Factors to consider when investing in land are zoning restrictions with the way the land can be used, environmental issues and access to utilities. Investing in land is a speculative investment and for small investors can be a high risk gamble of earning a fair rate of return while continuing to have expenses while holding the land.

- *Cryptocurrencies:* Investments in cryptocurrencies may include:
 - *Volatility:* Crypto pricing has proven to be extremely volatile, meaning it changes quickly and frequently showing high highs and low lows. While trends can change, there are many factors that contribute to the pricing fluctuation.
 - *Regulatory uncertainties:* Government regulations are constantly changing/evolving and may be different depending on where you live. Regulations can affect how you use and/or access your crypto, which can cause volatility and uncertainty. Since crypto is still new, it may take some time for policymakers to establish clear and consistent guidelines.
 - *Securities and scams:* Not all cryptocurrencies and trading platforms are created equal. Some platforms are more secure than others, and some newer coins could be a higher scam risk than those more established. There is no protection or insurance for lost or stolen cryptocurrencies.
 - *Technical:* The two main ways to store crypto are a non-custodial wallet on a personal device or using a third party custodian. When storing privately, you are solely responsible for the safety and security of your crypto.

Item 9: Disciplinary Information

Criminal or Civil Actions

SFG and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

SFG and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

SFG and its management have not been involved in any self-regulatory organizational enforcement proceedings that are material to a Client's or prospective Client's evaluation of SFG or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

SFG is not registered as a broker-dealer and no affiliated representatives of SFG are registered representatives of a broker-dealer.

Futures or Commodity Registration

Neither SFG nor its affiliated representatives are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Joseph T. Hillman and Gregory T. Freeman have a financial affiliated business as an insurance agent with SFG. Approximately 30% of Mr. Hillman's time and Mr. Freeman's time is spent on this activity. They will offer Clients services from this activity. As an insurance agent, they may receive separate yet typical compensation.

Mr. Hillman and Mr. Freeman will remain registered with Wellington Wealth Strategies through the transition to SFG.

These practices represent conflicts of interest because it gives an incentive to recommend products based on the commission or fee amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products or services. Clients have the option to purchase these products or services through another insurance agent or investment advisor representative of their choosing.

In addition, Mr. Hillman is an owner/Vice President of M.E.D. Distribution and the owner of Hillman Financial. These are not conflicts of interest as there will be no crossover clients.

Finally, Mr. Freeman is the owner of Freeman Financial. This is not a conflict of interest as there will be no crossover clients.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest
SFG does not select or recommend other investment advisors.

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

Code of Ethics Description

The affiliated persons (affiliated persons include employees and/or independent contractors) of SFG have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of SFG affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of SFG. The Code reflects SFG and its supervised persons' responsibility to act in the best interest of their Client.

One area which the Code addresses is when affiliated persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any affiliated persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

SFG's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other affiliated person, officer or director of SFG may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

SFG's Code is based on the guiding principle that the interests of the Client are our top priority. SFG's officers, directors, advisors, and other affiliated persons have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either affiliated persons or the company.

The Code applies to "access" persons. "Access" persons are affiliated persons who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are

involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

SFG will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

SFG and its affiliated persons do not recommend to Clients securities in which we have a material financial interest.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

SFG and its affiliated persons may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as trading ahead of Client transactions, affiliated persons are required to disclose all reportable securities transactions as well as provide SFG with copies of their brokerage statements.

The Chief Compliance Officer of SFG is Joseph T. Hillman. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

SFG does not have a material financial interest in any securities being recommended. However, affiliated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest such as front running, affiliated persons are required to disclose all reportable securities transactions as well as provide SFG with copies of their brokerage statements.

The Chief Compliance Officer of SFG is Joseph T. Hillman. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

SFG will require the use of a particular broker-dealer based on their duty to seek best execution for the client, meaning they have an obligation to obtain the most favorable terms for a client under the circumstances. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is affected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. SFG will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. SFG relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be

available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by SFG. SFG does not receive any portion of the trading fees.

SFG will require the use of Charles Schwab & Co., Inc.

- *Research and Other Soft Dollar Benefits*

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by SFG from or through a broker-dealer in exchange for directing Client transactions to the broker-dealer. Although SFG has no formal soft dollar arrangements, SFG may receive products, research and/or other services from custodians or broker-dealers connected to client transactions or “soft dollar benefits”. As permitted by Section 28(e) of the Securities Exchange Act of 1934, SFG receives economic benefits as a result of commissions generated from securities transactions by the custodian or broker-dealer from the accounts of SFG. SFG cannot ensure that a particular client will benefit from soft dollars or the client's transactions paid for the soft dollar benefits. SFG does not seek to proportionately allocate benefits to client accounts to any soft dollar benefits generated by the accounts.

A conflict of interest exists when SFG receives soft dollars which could result in higher commissions charged to Clients. This conflict is mitigated by the fact that SFG has a fiduciary responsibility to act in the best interest of its Clients and the services received are beneficial to all Clients.

- *Brokerage for Client Referrals*

SFG does not receive client referrals from any custodian or third party in exchange for using that broker-dealer or third party.

- *Directed Brokerage*

SFG does not allow directed brokerage accounts. Not all advisors require their clients to direct brokerage.

Aggregating Securities Transactions for Client Accounts

SFG is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of SFG. All Clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis. If aggregation is not allowed or infeasible and individual transactions occur (e.g., withdrawal or liquidation requests, odd-lot trades, etc.) an account may potentially be assessed higher costs or less favorable prices than those where aggregation has occurred.

Item 13: Review of Accounts

Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

Account reviews are performed quarterly by the Chief Compliance Officer of SFG, Joseph T. Hillman. Account reviews are performed more frequently when market conditions dictate. Reviews of Client accounts include, but are not limited to, a review of Client documented risk tolerance, adherence to account objectives, investment time horizon, and suitability

criteria, reviewing target allocations of each asset class to identify if there is an opportunity for rebalancing, and reviewing accounts for tax loss harvesting opportunities.

Financial recommendations generated are updated as requested by the Client and pursuant to a new or amended agreement, SFG suggests updating at least annually.

Review of Client Accounts on Non-Periodic Basis

Other conditions that may trigger a review of Clients' accounts are changes in the tax laws, new investment information, and changes in a Client's own situation.

Content of Client Provided Reports and Frequency

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by SFG's custodian. Client receives confirmations of each transaction in account from custodian and an additional statement during any month in which a transaction occurs. SFG does not provide additional reports to Clients.

Item 14: Client Referrals and Other Compensation

Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest

SFG receives additional economic benefits from external sources as described above in Item 12.

Advisory Firm Payments for Client Referrals

SFG does not compensate for Client referrals.

Item 15: Custody

Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. Clients are urged to carefully compare the account statements received directly from their custodians to any documentation or reports prepared by SFG.

SFG is deemed to have limited custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of SFG.

SFG is also deemed to have limited custody due to its Third-Party Standing Letters of Authorization ("SLOA").

SFG and its qualified custodian meet the following seven (7) conditions in order to avoid maintaining full custody and be subject to the surprise exam requirement:

1. The Client provides an instruction to the qualified custodian, in writing, that includes the Client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
2. The Client authorizes SFG, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.

3. The Client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the Client's authorization and provides a transfer of funds notice to the Client promptly after each transfer.
4. The Client has the ability to terminate or change the instruction to the Client's qualified custodian.
5. SFG has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the Client's instruction.
6. SFG maintains records showing that the third party is not a related party nor located at the same address as SFG.
7. The Client's qualified custodian sends the Client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

Item 16: Investment Discretion

Discretionary Authority for Trading

SFG requires discretionary authority to manage securities accounts on behalf of Clients. SFG has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. Client will authorize SFG discretionary authority as stated within the Investment Advisory Agreement.

SFG allows Clients to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. These restrictions must be provided to SFG in writing.

The Client approves the custodian to be used and the commission rates paid to the custodian. SFG does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

Item 17: Voting Client Securities

Proxy Votes

SFG does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, SFG will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client. If the Client requires assistance or has questions, they can reach out to the investment advisor representatives of the firm at the contact information on the cover page of this document.

Item 18: Financial Information

Balance Sheet

A balance sheet is not required to be provided to Clients because SFG does not serve as a custodian for Client funds or securities and SFG does not require prepayment of fees of more than \$1,200 per Client and six months or more in advance.

Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

SFG has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

Bankruptcy Petitions during the Past Ten Years

SFG has not had any bankruptcy petitions in the last ten years.

Item 1 Cover Page

SUPERVISED PERSON BROCHURE
FORM ADV PART 2B

Joseph T. Hillman, RICP®

Strive Financial Group, LLC

Office Address:

5901 N. Meridian Street
Indianapolis, IN 46208

Tel: 317-590-0146

Email: jhillman@strivefg.com

October 2, 2024

This brochure supplement provides information about Joseph T. Hillman and supplements the Strive Financial Group, LLC brochure. You should have received a copy of that brochure. Please contact Joseph T. Hillman if you did not receive the brochure or if you have any questions about the contents of this supplement.

**ADDITIONAL INFORMATION ABOUT JOSEPH T. HILLMAN (CRD #6233607) IS
AVAILABLE ON THE SEC'S WEBSITE AT WWW.ADVISERINFO.SEC.GOV.**

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Principal Executive Officer – Joseph T. Hillman, RICP®

- Year of birth: 1966
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Item 2 - Educational Background and Business Experience

Educational Background:

- Indiana University; Bachelor of Science – Business Finance; 1988

Business Experience:

- Strive Financial Group, LLC.; Chief Compliance Officer/Investment Advisor Representative/Insurance Agent; 09/2024-Present
- Hillman Financial; Owner; 12/2021-Present
- Wellington Wealth Strategies, LLC; Investment Advisor Representative/Owner; 11/2019-Present
- M.E.D. Distribution; Vice President; 01/2001-Present
- TrustWealth Strategies; Managing Member; 10/2019-09/2023
- MML Investor Services, LLC; Investment Advisor Representative; 10/2014-09/2019
- MML Investor Services, LLC; Registered Representative; 10/2013-09/2019
- Mass Mutual Life Insurance Co; Insurance Agent; 08/2013-09/2019

Professional Certifications

Joseph Hillman has earned certifications and credentials that are required to be explained in further detail.

Retirement Income Certified Professional® (RICP®) certification is awarded by The American College of Financial Services, candidates must:

- Complete RICP® coursework within five months from the date of initial enrollment.
 - Complete three in-depth online courses.
 - Meet the experience requirements: Three years of full-time business experience within the five years preceding the date of the award. An undergraduate or graduate degree from an accredited educational institution qualifies as one year of business experience.
 - Sign and agree to abide by a Code of Ethics.
 - Pass an exam administered by Pearson VUE Testing Center. Minimum test score 70%.
 - When you achieve the RICP® designation, you are subject to the PACE Recertification Program earning 30 credit hours of educational activities in subject matter that is acceptable to PACE Recertification every two years.
-

Item 3 - Disciplinary Information

A. Mr. Hillman has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:

1. Was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property,

- bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
 3. Was found to have been involved in a violation of an investment-related statute or regulation; or
 4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.
- B. Mr. Hillman never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:
1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
 2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority
(a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.
- C. Mr. Hillman has never been the subject of a self-regulatory organization (SRO) proceeding in which he:
1. Was found to have caused an investment-related business to lose its authorization to do business; or
 2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.
- D. Mr. Hillman has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

Item 4 - Other Business Activities

Joseph T. Hillman has a financial affiliated business as an insurance agent with SFG. Approximately 30% of Mr. Hillman's time is spent on this activity. He will offer Clients services from this activity. As an insurance agent, he may receive separate yet typical compensation.

Mr. Hillman will remain registered with Wellington Wealth Strategies through the transition to SFG.

These practices represent conflicts of interest because it gives an incentive to recommend products based on the commission or fee amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products or services. Clients have the option to purchase these products or services through another insurance agent or investment advisor representative of their choosing.

In addition, Mr. Hillman is an owner/Vice President of M.E.D. Distribution and the owner of Hillman Financial. These are not conflicts of interest as there will be no crossover clients.

Item 5 - Additional Compensation

Mr. Hillman receives commissions on the insurance products he sells. He does not receive any performance-based fees and does not receive any additional compensation for performing advisory services other than what is disclosed in Item 5 of Part 2A.

Item 6 - Supervision

Since Mr. Hillman is the Chief Compliance Officer of SFG and is responsible for all supervision and monitoring of investment advice offered to Clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual. He can be reached at jhillman@strivefg.com or 317-590-0146.

SUPERVISED PERSON BROCHURE
FORM ADV PART 2B

Gregory T. Freeman

Strive Financial Group, LLC

Office Address:

5901 N. Meridian Street
Indianapolis, IN 46208

Tel: 317-691-0626

Email: gfreeman@strivefg.com

October 2, 2024

This brochure supplement provides information about Gregory T. Freeman and supplements the Strive Financial Group, LLC brochure. You should have received a copy of that brochure. Please contact Gregory T. Freeman if you did not receive the brochure or if you have any questions about the contents of this supplement.

**ADDITIONAL INFORMATION ABOUT GREGORY T. FREEMAN (CRD #5695227) IS
AVAILABLE ON THE SEC'S WEBSITE AT WWW.ADVISERINFO.SEC.GOV.**

Brochure Supplement (Part 2B of Form ADV)
Supervised Person Brochure

Principal Executive Officer – Gregory T. Freeman

- Year of birth: 1985
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Item 2 - Educational Background and Business Experience

Educational Background:

- Indiana University; Bachelor of Arts – Finance; 2009

Business Experience:

- Strive Financial Group, LLC.; Investment Advisor Representative/Insurance Agent; 09/2024-Present
 - Freeman Financial; Owner; 12/2021-Present
 - Wellington Wealth Strategies, LLC; Investment Advisor Representative/CEO; 11/2019-Present
 - TrustWealth Strategies; Owner; 09/2019-Present
 - MML Investor Services, LLC; Investment Advisor Representative; 01/2016-09/2019
 - MML Investor Services Inc; Registered Representative; 09/2009-09/2019
 - Mass Mutual Life Insurance Co; Insurance Agent; 06/2009-09/2019
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Item 3 - Disciplinary Information

A. Mr. Freeman has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:

1. Was convicted of, or pled guilty or nolo contender (“no contest”) to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
3. Was found to have been involved in a violation of an investment-related statute or regulation; or
4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.

B. Mr. Freeman never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:

1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority

(a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.

C. Mr. Freeman has never been the subject of a self-regulatory organization (SRO) proceeding in which he:

1. Was found to have caused an investment-related business to lose its authorization to do business; or
2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.

D. Mr. Freeman has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

Item 4 - Other Business Activities

Gregory T. Freeman has a financial affiliated business as an insurance agent with SFG. Approximately 30% of Mr. Freeman's time is spent on this activity. He will offer Clients services from this activity. As an insurance agent, he may receive separate yet typical compensation.

Mr. Hillman and Mr. Freeman will remain registered with Wellington Wealth Strategies through the transition to SFG.

These practices represent conflicts of interest because it gives an incentive to recommend products based on the commission or fee amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products or services. Clients have the option to purchase these products or services through another insurance agent or investment advisor representative of their choosing.

In addition, Mr. Freeman is the owner of Freeman Financial. This is not a conflict of interest as there will be no crossover clients.

Item 5 - Additional Compensation

Mr. Freeman receives commissions on the insurance products he sells. He does not receive any performance-based fees and does not receive any additional compensation for performing advisory services other than what is disclosed in Item 5 of Part 2A.

Item 6 - Supervision

Joseph T. Hillman is the Chief Compliance Officer of SFG. Joseph Hillman reviews Greg Freeman's work through Client account reviews and quarterly personal transaction reports, as well as face-to-face and phone interactions. Joseph Hillman can be reached at jhillman@strivefg.com or 317-590-0146.