

Boon Investment Group, Inc.

Form ADV Part 2A– Brochure March 2024

Item 1 – Cover Page

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This brochure provides information about the qualifications and business practices of Boon Investment Group, Inc. If you have any questions about the contents of this brochure, please contact us at (512/652-7556) or e-mail at lfischer@booninvestmentgroup.com. The information in this brochure has not been approved or verified by the United State Securities and Exchange Commission or by any state securities authority.

Additional information about Boon Investment Group, Inc. is also available on the SEC's web site at www.adviserinfo.sec.gov.

The Boon Investment Group, Inc. is a registered investment adviser that provides advisory investment services and consulting services to pension and profit sharing plans. BIG offers its services for a fee based upon the amount of assets in the plan. Prior to engaging Adviser, the client will enter into a written agreement with BIG setting forth the terms and conditions under which services will be rendered.

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

Item 2 Material Changes

Since the last Brochure amendment released August 2023, the Boon Investment Group, Inc. registered with the SEC pursuant to Section 203A as a pension consultant with respect to pension plans with at least \$200 Million in assets under advisement in total. The order granting registration pursuant to Section 203(c) was generated on March 28, 2024.

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Item 4 Advisory Business

Boon Investment Group, Inc. (BIG) was formed in March, 2009. BIG is a wholly owned subsidiary of The Boon Group, Inc. The officers of BIG are:

Taylor A. Boon	CEO/President
Kathy Sullivan	Chief Finance Officer
Lauren W. Fischer	Secretary / Chief Compliance Officer
Stanley K. Kinnett II	Executive Vice President
Lesli P. Whisenant	Vice President
Steven Muscatello	SVP, Deputy General Counsel & Asst. Sec.

BIG provides consulting services to pension and 401K plan sponsors. Depending upon the individual needs of each plan sponsor, the services provided may involve plan design, asset allocation reviews, performance monitoring, portfolio structure analysis, meeting with plan participants, fund selection and conducting education and enrollment meetings, and compliance assistance. The adviser may also provide assistance in the selection of third party administrators, recordkeepers, and custodians. BIG uses an established set of criteria to determine an initial selection of suitable mutual funds to make-up the offered plan. The final grouping of funds offered will be determined based upon how well each fund complements the overall diversification, return and risk parameters of the stated investment policy/plan. BIG will provide no less than a semi-annual review of fund performance upon client request and annual fund review meeting.

Employees of BIG serve in the role of Investment Adviser Representative (IAR) to the plan. In that role, representatives are responsible for solicitation of new business, proposal development, client meetings, client presentations, and client communication. IARs may provide for 401(k) participant enrollment meetings, periodic site visits, engagement fulfillment, and plan sponsor communication.

Item 5 Fees and Compensation:

The annual fee is based on a percentage of plan assets with a range of .25% to 2.50%, the variance of which depends upon the complexity of the plan design and the frequency of client reviews that exceed a semi-annual analysis. Client reviews include an assessment of asset allocation, due diligence, vendor benchmarking, employee communications including site visits and teleconferences, customization of plan sponsor communications, and employee fulfillment. The percentage is prorated on a quarterly basis and paid in arrears.

Fees may be paid from plan assets or directly by the plan sponsor as noted in the Consulting Agreement. Fees for the initial quarter will be adjusted pro-rata based upon the number of calendar days in the calendar quarter that the Consulting Agreement is in effect. The billable amount is based upon the market value of the plan assets at the end of the previous calendar quarter. BIG is not compensated on the basis of a share of capital gains or capital appreciation in a client's account or any portion thereof. The terms of each Consulting Agreement, including any fees, are determined on a case-by-case basis and are negotiated with the client after a review of the services to be offered.

The advisory services may be terminated by providing 30 days advance written notice. If an account is terminated prior to the last day of the quarter and the client has paid any fee in advance, then a portion of the pre-paid fee, which is pro-rated based on the days remaining in such quarter, will be returned to the client. All advisory services can be terminated within 5 days of engaging Adviser without penalty (full refund or no fees due), if the client notifies BIG that the Adviser's Form ADV Part II was not delivered within 2 days prior to the time of engagement.

Plan Assets:

\$0 - \$200,000	-not more than 2.5%
\$201,000 - \$499,999	- not more than 2%
\$500,000 - \$999,999	- not more than 1.5%
> \$1,000,000	- not more than 1%

General Fee Information:

Clients may have the option to purchase investment products that BIG recommends through other brokers or agents that are not affiliated with you. Clients may incur certain charges imposed by the plan administrator and other third parties such as custodial fees, charges imposed directly by a mutual fund or exchange traded fund in the account, which shall be disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Such charges, fees and commissions are exclusive of and in addition to BIG's fee established by the Consulting Agreement.

BIG's Consulting Agreement may authorize BIG, through the Third Party Administrator ("TPA"), to debit the Adviser fee from a client's account and to directly remit that management fee to BIG in accordance with applicable custody rules. The TPA will send a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of management fees paid directly to BIG.

Item 6 Performance-Based Fees and Side-By-Side Management

Boon Investment Group, Inc. (BIG) does not accept performance-based fees and, therefore, has no need to conduct Side-by-Side Management.

Item 7 Types of Clients

BIG's clients are generally pension & profit sharing plans that are corporate-sponsored defined contribution plans. BIG does not have any requirements for becoming or maintaining a client relationship, such as minimum account size.

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

BIG determines the appropriate investment strategy on a per-client basis. Based on the Adviser's analysis and recommended investment strategy, the client adopts an investment package. The investments that are selected are then monitored on a quarterly basis as compared to the established criteria. Investing in securities such as mutual funds involve a risk of loss that clients should be prepared to bear as the plan sponsor. There is no guarantee of return.

BIG Portfolio Composition and Investment Strategies:

Customized Portfolio Approach: BIG recognizes the diversity of client preferences and perspectives when it comes to investing. As a result, the portfolio composition can vary based on each client's specific views, goals, and risk tolerance.

Blend of Active and Passive Investments: BIG employs a balanced approach by incorporating both active and passive investment strategies within client portfolios. This approach allows for the advantages of both strategies, potentially enhancing returns and mitigating risk.

Diverse Asset Allocation Models: To cater to different investor profiles, BIG utilizes various asset allocation models. These models can be categorized into risk-based or age-based allocations. This flexible approach ensures that each portfolio aligns with the client's unique investment objectives.

Age-Based Target Date Funds (TDFs): Age-based Target Date Funds are employed as the default investment option for clients. These TDFs align with participants' expected retirement age and automatically adjust the asset allocation as the investor approaches retirement. This approach simplifies plan operations and meets the preferences of a majority of participants.

Client-Requested Specializations: While certain investment options, such as sector funds, high yield, and emerging market funds, are generally less utilized, BIG remains responsive to client preferences. When specific clients express a desire for these specialized funds, BIG accommodates their requests.

Boon Investment Group (BIG): 3(21) Co-Fiduciary and Investment Policy

3(21) Co-Fiduciary Role: Boon Investment Group operates as a 3(21) co-fiduciary, specializing in providing services for defined contribution retirement plans that fall under the scope of ERISA regulations. This fiduciary role involves making investment-related recommendations and decisions in collaboration with plan sponsors.

Primary Screening Tool: BIG utilizes fi360 as its primary screening tool to evaluate funds that are potential candidates for inclusion in client portfolios. This tool helps ensure a systematic and comprehensive assessment of investment options.

Investment Policy Highlights: The investment policy followed by BIG is designed to optimize investment selection for client portfolios. While the policy is complex, its core objective is to identify funds that demonstrate consistent above-average returns on a risk-adjusted basis, while also maintaining lower-than-average fees relative to the corresponding asset class.

Key Evaluation Factors: The investment policy employs a standardized methodology that examines eight factors when assessing funds for potential inclusion in client portfolios:

1. **Inception Date:** Funds must have a minimum of three years of performance history.
2. **Manager Tenure:** The fund's management team should have at least two years of experience with the specific strategy.
3. **Net Assets:** A minimum net asset value of 75 million is required.
4. **Expense Ratio:** The expense ratio is considered in relation to the asset class.
5. **Alpha:** The fund's alpha over the past three years is evaluated.
6. **Returns:** One, three, five, and ten-year returns are assessed.
7. **Expense Ratio (again):** An additional assessment of the fund's expense ratio.
8. **Composition and Style Drift:** The composition and potential deviations from the intended investment style are examined.

These factors are weighted at different intervals depending on the length of prior performance. In general, BIG recommends funds with longer track records and they generally have a ten year history. The final grouping of funds offered by Adviser is based upon how well each fund complements the overall diversification, return and risk parameters of the stated investment policy/plan.

Benefits of the Investment Policy:

1. **Consistency:** The standardized evaluation process ensures a consistent approach to fund assessment.
2. **Performance:** Prioritizing consistent above-average returns helps clients potentially achieve their retirement goals.
3. **Fees:** The emphasis on lower-than-average fees aligns with cost-effective investing.

4. **Risk-Adjusted Returns:** The focus on risk-adjusted returns reflects a holistic approach to portfolio optimization.

Item 9 Disciplinary Information

None.

Item 10 Other Financial Industry Activities and Affiliations

OUTSIDE BUSINESS ACTIVITIES

Individuals associated with BIG may also be associated with The Boon Group, Inc. (“TBG”), the parent company to BIG. TBG is an employee benefits company. Persons associated with TBG generally serve in roles that are similar to the roles with BIG, and spend 75% of their time on duties related to TBG.

Individuals associated with BIG may be licensed as registered representatives with Kestra Investment Services, LLC (“Kestra”), an unaffiliated broker/dealer. They may also be licensed as insurance agents with an affiliated insurance agency, The Boon Insurance Agency, Inc. (“TBIA”). Any such registrations are intended to facilitate the sale of insurance products as benefits offered by corporate employers through TBG. Clients are under no obligation to engage with these individuals when purchasing such products. Outside of the sale of benefits-related products, there is no time spent on functions related to Kestra or TBIA.

FINANCIAL INDUSTRY AFFILIATIONS

BIG is under common ownership with TBIA. Persons associated with BIG may also be associated with TBIA. Boon Administrative Services, Inc. (BAS) is a Third-Party Administrator that is a wholly owned subsidiary of TBG. As part of the advisory services provided to defined contribution pension plans, BIG may recommend that BAS act in a third-party administrator capacity for a client’s plan. Since the services offered by BAS ultimately benefit TBG, a conflict of interest in recommending BAS exists because total compensation to TBG may be less if clients choose an unaffiliated third-party administrator.

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

CODE OF ETHICS

BIG has adopted a Code of Ethics (the “Code”) to address securities-related conduct. The Code focuses primarily on fiduciary duty, personal securities transactions, insider trading, gifts, and conflicts of interest. The Code includes BIG's policies and procedures developed to protect client's interests in relation to the following topics:

- The duty at all times to place the interests of clients first;
- The requirement that all personal securities transactions be conducted in such a manner as to be consistent with the Code of Ethics and to avoid conflicts of interest or abuse of an employee's position of trust and responsibility;
- The principle that investment adviser personnel should not take inappropriate advantage of their positions;
- The fiduciary principle that information concerning the identity of security holdings and financial circumstances of clients is confidential; and
- The principle that independence in the investment decision-making process is paramount.

BIG will provide a copy of the Code to any client or prospective client upon request.

PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

Advisers of BIG are also registered representatives with Kestra. In this capacity, the Advisers may facilitate the purchase and/or sale of products related to a benefits package to corporate clients that may or may not have an advisory fee agreement with BIG. The client is under no obligation to purchase products either through BIG or through Kestra.

BIG does not buy nor sell securities that it also recommends to clients. However, all persons associated with Adviser (“Associated Persons”) are permitted to buy or sell securities that are recommended to clients. The personal securities transactions by Associated Persons may raise potential conflicts of interest when such persons trade in a security that is 1) owned by a client or 2) recommended to a client for purchase or sale. BIG has adopted policies and procedures that are intended to ensure that Registered Investment Adviser and Associated Persons affect transactions for clients in a manner that is consistent with the fiduciary duty owed to clients and in accordance with applicable law. Associated Persons who wish to purchase or sell securities of the types purchased or sold for clients may do so only in a manner consistent with BIG policies.

Item 12 Brokerage Practices

BIG does not select broker-dealers to execute transactions. Asset trades are executed by the custodian/recordkeeper at the plan level.

Item 13 Review of Accounts

Registered Investment Adviser person(s) are responsible for reviewing the performance of the plan's fund selections on an ongoing basis, which will be conducted on at least a semi-annual frequency. There is no limit to the number of accounts assigned to a particular Registered Investment Advisor. External factors for each client may trigger additional reviews, and the type of review to be conducted is established by the Investment Committee of each corporate-sponsored pension plan, expressed in the plan documents and communicated to the Adviser.

The custodian holding the plan assets will provide to the pension plan a statement no less than quarterly that details all transactions that occurred during the prior quarter and provide the current account balances. The Adviser will also conduct a Due Diligence Analysis no less than semi-annual that involves an evaluation of the fund lineup as compared to the stated investment policy established by the Investment Committee.

Item 14 *Client Referrals and Other Compensation*

BIG has entered into written compensation agreements with certain unaffiliated investment advisor representatives and professionals such as CPAs, attorneys, etc. In the event a referral is made and the referred entity engages with BIG by executing an Advisor Agreement, BIG pays these persons a referral fee based on a percentage of the fee received from a client. These payments are a portion of the fee charged by BIG and do not result in an increase in the amount of the fee paid to BIG by clients. Any solicitation or referral arrangements will comply with any state or federal applicable laws that govern 1) the nature of the service, 2) fees to be paid, 3) disclosures to clients and 4) any necessary client consents.

Item 15 Custody

BIG does not have any assets under management and does not manage client assets and, therefore, does not have custody of client funds.

Item 16**Investment Discretions**

BIG does not have any assets under management and does not manage account. Therefore, doesn't have discretionary authority to manage securities accounts on behalf of clients.

Item 17**Voting *Client* Securities****PROXY VOTING POLICY**

BIG is expressly precluded from voting proxies for corporate-sponsored pension plans. Clients retain the right to vote the proxies of shares held in their accounts. In addition, BIG does not take any action or render any advice with respect to any securities held in any accounts that are named in or subject to class action lawsuits. Adviser will, however, forward to client any information received by BIG regarding class action legal matters that involve any security held in the account.

Item 18**Financial Information**

BIG does not require or solicit pre-payments of more than \$1,200 in fees per client, six months or more in advance. BIG does not have any assets under management or have custody of client funds. Therefore, BIG is not required to provide a balance sheet.

Item 19**Requirements for State-Registered Advisers****EDUCATION & BUSINESS STANDARDS**

All individuals that render investment advisory services on behalf of BIG must have earned a college degree and/or have substantive investment-related experience. In addition, all such individuals shall have attained all required investment-related licenses and/or designations.

Taylor A. Boon (YOB: 1981)

Post -Secondary Education:

University of Texas, Bachelor of Science

Recent Business Background:

Boon Investment Group, Inc., President, 03/2019 - Present

The Boon Group, President - 03/2019 - Present

The Boon Insurance Agency, Inc., President; 03/2019 – Present

Erik H. Little (YOB: 1970)

Post -Secondary Education:

University of Texas, Bachelor of Economics

Recent Business Background:

Boon Investment Group, Inc., Pension Sales Development Manager, 04/2009 - Present

The Boon Group; Pension Sales Development Manager; 3/2008 - Present

Princor Financial Services Corp., Registered Representative; 07/2008 - Present

Financial Network Investment Corp., Registered Representative; 07/2007 - 03/2008

SWBC Wealth Management, Registered Representative; 07/2007 - 01/2008

Diversified Investors Securities Corp., Registered Representative; 02/2003 - 07/2007

TransAmerica Occidental Life Insurance Company, Registered Representative; 02/2003 - 07/2007

Lauren Fischer (YOB: 1979)

Post -Secondary Education:

University of Texas, BBA-Finance

South Texas College of Law, J.D.

Recent Business Background:

Boon Investment Group, Inc., Chief Compliance Officer, 4/2022 - Present

Boon Investment Group, Inc., Head of Compliance – Associate Counsel, 1/1/2020-4/2022

The Boon Insurance Agency, Inc., Secretary/General Counsel, 04/2022 – Present

The Boon Insurance Agency, Inc., Head of Compliance/Associate Counsel, 8/2019 – 4/2022

Boon Administrative Services, Inc., Secretary/General Counsel, 4/2022-Present

Boon Administrative Services, Inc., Head of Compliance/Associate Counsel, 8/2019 – 4/2022

Form ADV Part 2B– Brochure Supplement

March 2024

Item 1 – Cover Page

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This brochure supplement is to provide information regarding Erik Little, a *supervised person* who formulates investment advice for Boon Investment Group, Inc. (“BIG”) clients and has direct contact with such clients. If you have any questions about the contents of this brochure, please contact us at (512/652-7556) or e-mail at lfischer@booninvestmentgroup.com. The information in this brochure supplement has not been approved or verified by the United State Securities and Exchange Commission or by any state securities authority.

This brochure supplement provides information about Erik Little that supplements the Boon Investment Group, Inc. Brochure. You should have received a copy of that brochure. Please contact Lauren Fischer, Chief Compliance Officer by phone 512/652-7556 or e-mail lfischer@booninvestmentgroup.com if you did not receive a copy of Boon Investment Group, Inc.’s brochure or if you have any questions about the contents of this Supplement.

Additional information about Erik Little is available on the SEC’s website at www.adviserinfo.sec.gov

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Item 2 Educational Background and Business Experience

Erik H. Little (*YOB: 1970*)

Post -Secondary Education:

University of Texas, Bachelor of Economics

Recent Business Background:

Boon Investment Group, Inc., Pension Sales Development Manager, 04/2009 - Present

The Boon Group; Pension Sales Development Manager; 3/2008 - Present

Princor Financial Services Corp., Registered Representative; 07/2008 - Present

Financial Network Investment Corp., Registered Representative; 07/2007 - 03/2008

SWBC Wealth Management, Registered Representative; 07/2007 - 01/2008

Diversified Investors Securities Corp., Registered Representative; 02/2003 - 07/2007

TransAmerica Occidental Life Insurance Company, Registered Representative; 02/2003 - 07/2007

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

None.

Item 5 Additional Compensation

None.

Item 6 Supervision

Erik Little is a registered investment advisor and employee of BIG. He is supervised by the officers listed within item 4 of the Brochure in order to ensure that the consulting services provided to clients is consistent with the compliance policies and procedures as required by the Compliance Rule under the Investment Advisors Act of 1940, and the standards of business conduct are consistent with the Code of Ethics as provided within Item 11 of the Brochure.

Item 7 Requirements for State-Registered Advisers

Erik Little has not been involved in any arbitration, civil or administrative proceedings, or bankruptcy petition, and therefore, does not have anything to disclose for this Item 7.