

Sessions Financial Group, Inc.

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This brochure provides information about the qualifications and business practices of Sessions Financial Group, Inc. If you have any questions about the contents of this brochure, please contact us at 763-494-0095 or jj@sessionsfinancial.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Sessions Financial Group, Inc. is a SEC registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Sessions Financial Group, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2. Material Changes

On July 28, 2010, the United States Securities and Exchange Commission ("SEC") published "Amendments to Form ADV" which amends the disclosure document that we provide to clients as required by SEC Rules. This brochure, dated March 31, 2011, is our new document prepared according to the SEC's new requirements and rules. As such, this document is different in form and structure and includes certain new information that our previous brochure did not require.

In the future, this page will provide our clients with a summary of material changes that are made to the brochure. We will also reference the date of our last annual update of our brochure.

In the past we have offered or delivered information about our qualifications and business practices to our clients on at least an annual basis. As required by the new SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent brochures within 120 days of the close of our business' fiscal year. We may also provide ongoing disclosure information about material changes as necessary.

We will provide you with a new brochure as necessary based on changes or new information, at any time, without charge, upon request from you.

Currently, our brochure may be requested by contacting Joseph J. Sessions, President, at 763-494-0095 or jj@sessionsfinancial.com. Our brochure is also available free of charge, on our web site, at www.sessionsfinancial.com.

Additional information about Sessions Financial Group, Inc. is available by accessing the SEC's web site at www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with Sessions Financial Group who are registered, or are required to be registered, as investment adviser representatives of the firm.

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Item 4. Advisory Business

Sessions Financial Group, Inc. is a SEC-registered investment adviser that was founded 1995. The principal owner of the firm is Jeffrey L. Sessions, President, and the firm's main office is located in Maple Grove, Minnesota.

Sessions Financial Group, Inc. ("SFG") offers individualized investment advisory services based on the financial needs and goals of the client. SFG provides investment supervisory and investment management services on a fee basis, as a percentage of assets under management. SFG also provides financial planning services and consulting services, billed on an hourly fee basis, which may include services and advice on matters not involving securities.

Financial Planning Services

SFG offers personal financial planning services. The firm offers a comprehensive financial plan or a modular approach to financial planning. These plans may or may not include investment advice. The fee for Financial Planning Services covers the development and preparation of a financial plan for the client. Dependent upon the scope of the services to be performed by SFG, the preparation of each plan involves guiding clients in gathering, compiling, preparing, and analyzing personal financial data. At the completion of the financial planning process, the client has the option to implement recommendations through SFG, but is not obligated to do so. If SFG assists in the implementation of any recommendations, clients may engage the firm separately for Investment Management Services described below.

Investment Management Services

SFG offers individual portfolio management and investment supervisory services ("Investment Management"). The firm provides individualized investment advice to clients based upon the client's specific needs. Through personal consultations, SFG gathers specific financial data to develop a client's personalized profile, which includes a client's investment objectives, current financial position, risk profile, investment time horizon, tax situation and liquidity needs. SFG reviews the client's personalized profile and based upon this review, determines an appropriate asset allocation model for the client. Such model takes into account the client's liquidity needs, portfolio goals, tax objectives and risk tolerance. SFG then recommends specific investments to implement the client's recommended asset allocation model, incorporating a client's existing holdings where appropriate. SFG may also recommend non-securities products as part of this service, in an effort to provide a more comprehensive approach to evaluating a client's financial situation. SFG offers this on-going Investment Management to clients on a discretionary basis.

Third Party Investment Advisors

In certain circumstances, SFG may determine that it is suitable to utilize third party investment advisors to manage portfolios as part of a discretionary asset management program. In utilizing third party investment advisers, SFG will generally assist a client in determining, among other things, the client's suitability for the program, as well as the appropriate allocation model based on the client's investment needs and objectives. SFG currently has a relationship with Financial Advantage, Inc. ("FAI"), who will act as Sub-Advisor on certain SFG accounts. SFG and FAI are not affiliated companies. FAI will maintain discretion over the account, and will provide continuous supervision and re-balancing of account assets. All buy and sell orders will be initiated by FAI, pursuant to a Fee and Trading Authorization signed by the client. The client will, however, retain all rights to vote proxies on the account.

SFG will determine whether a program offered by a third-party managers is suitable for a client, and any applicable third-party manager disclosure brochures will be provided to the client, in addition to SFG's disclosure materials. Clients should read all disclosure materials carefully, including the discussions of specific program details, minimum account balances, and the fees associated with such programs. The third-party manager programs will typically involve the selection of an asset allocation strategy, where certain securities will be managed by the third-party manager in accordance with the strategy.

Consulting Services

SFG also provides consultation services, which do not involve the development of a financial plan. Such consultations may include individualized advice related to a specific area, such as advice with regard to a qualified plan allocation, education planning, estate planning, tax strategies, etc. Clients will sign an agreement that specifies the consulting services to be provided, and the fee to which client is subject.

General Information Related to Investment Recommendations

For each of the above disclosed advisory services, SFG does not limit its investment recommendations to any specific type of product or security. A client's individual needs and objectives are analyzed to determine appropriate investments and products for the client. Since different types of investments typically involve different types of risk, the firm conducts a risk analysis of the client and his/her overall portfolio, before recommending a certain investment. SFG manages assets on a discretionary basis; however, the client is always free to place restrictions on the types of investments the firm recommends for the client's portfolio. In general, the firm utilizes equity investments in individual stocks, no-load or

load-waived mutual funds, and exchange traded funds. SFG also provides recommendations on fixed income investments, including individual bond positions, bond mutual funds, certificates of deposit, and fixed income exchange traded funds. In addition, SFG provides advice related to non-securities products, including insurance products.

Assets Under Management

As of December 31, 2010, SFG was providing investment advisory services to 129 clients. The total value of assets under management for which SFG provides regular and continuous investment management services was \$38,461,053, held in 348 accounts.

Item 5. Fees and Compensation

Financial Planning Services

For financial planning services, clients are billed on either an hourly fee basis or a flat-fee basis. For hourly fees, SFG charges between \$175-\$250 per hour, depending on the complexity of the client's planning needs. This rate is negotiable and is agreed upon in advance between SFG and the client. An estimate of the total fee is provided, and one-half of the fee is collected at the execution of the Investment Advisory Agreement, with the balance due upon delivery of the financial plan.

Investment Management Services

Investment Management Services are typically billed as a percentage of assets under management. In some cases, clients may be charged an annual flat fee, not to exceed \$10,000, depending on the complexity of the investment management services provided. The specific fee arrangement will be disclosed in the Investment Advisory Agreement, signed by the client at the inception of the engagement.

Asset based fees are generally billed according to the below fee schedule:

<u>Assets Under Management</u>	<u>Annual Fee</u>
\$0 - \$250,000	1.4% - 2.0%
\$250,001 - \$500,000	1.2%
\$500,001 - \$1,000,000	1.0%
\$1,000,001 and up	0.8%

This fee is billed quarterly, in advance, based on the value of the portfolio as of the last business day of the preceding quarter. In some cases, fees may be negotiable at the sole discretion of SFG. Fees are typically debited from a client's brokerage account, with written permission from the client. In the event that an account does not have enough cash to pay a

quarterly fee, SFG will contact the client to determine which, if any, asset should be liquidated to generate the necessary cash. In some cases, SFG will allow clients to directly remit payment for advisory fees, upon presentation of an invoice.

As an alternative fee methodology, SFG may assess fees for investment management services based on a percentage of a client's income and net worth. In these cases, SFG will charge an annual fee of 1% of a client's income, plus 0.5% of a client's net worth. This fee is payable quarterly, in advance of services rendered. SFG will typically debit a client's brokerage account for the quarterly fee, as agreed to in writing by the client, but may allow direct payment upon presentation of an invoice. SFG will determine when this fee schedule is applicable to a given client and it will be disclosed to the client in the Investment Advisory Agreement. In some cases, SFG may negotiate these fees.

Third-Party Advisory Services

The annual fee charged to the client for third party investment advisory programs will typically conform to the SFG Investment Management Fee Schedule described above, of which a portion will be paid to the third-party advisor. The amount paid to the third-party advisor will not exceed 1.00%, with the remaining fee being paid to SFG. FAI currently receives up to 0.60% annually (depending on account size), as Sub-Advisor to certain SFG client accounts. Fees will be debited from the client's account on a quarterly basis, and statements will be provided to the client. Participation in any third party investment advisory program may cost the client more or less than purchasing program services separately.

Consulting Services

As described in Item 4 above, SFG also offers investment consulting services on an hourly basis. SFG charges clients an hourly fee at a rate of \$175 - \$250 per hour, depending on the complexity of the consulting services provided. In some cases, SFG may provide consulting services on a fixed fee basis, and such fee will not exceed \$5,000. Clients will sign a specific Agreement which details the rate at which the consulting services will be provided.

General Information Related to Fees and Termination

While SFG has established the above referenced fee schedule for its advisory services, the firm may negotiate fees under certain, limited circumstances, at its sole discretion. Factors considered when determining whether a different fee will be negotiated include, among other things, the complexity of the client's financial situation, related accounts under management, portfolio style, and the provision of other services provided to the client. Clients will receive advance written notice of any change in their applicable fee schedules.

Investment advisory services provided by SFG may cost a client more or less than advisory services offered by other investment advisors. SFG will not be compensated on the basis of a share of capital gains in a client's account.

In addition to advisory fees, clients may be subject to custodial and account fees charged by account custodians or broker/dealers with whom clients establish accounts. Such additional fees may include, but are not limited to, transaction charges, IRA fees and other account administrative fees. Please see additional disclosure made for Item 12, Brokerage Practices, later in this brochure. In cases where shares of mutual funds or exchange traded funds are included in clients' portfolios, clients may also be subject to fees and expenses charged directly by the mutual fund or exchange traded fund company. Such fees may include, but are not limited to, management fees, fund expenses, distribution fees, and 12b-1 fees. Clients should refer to the applicable product prospectus for a complete discussion of the fees and charges associated with the product.

Clients have the option of purchasing investment products through any broker/dealer of their choice; however, SFG associates may not be able to provide Investment Management Services for assets purchased away from custodians recommended by SFG.

If SFG makes recommendations to clients for the purchase of insurance products, clients may pay a normal and customary insurance commission for the purchase of the product. In these cases, SFG's President and associated persons may receive a commission, as insurance agents, generally based upon a percentage of the premiums paid. Such insurance commission is paid directly to the SFG associate from the issuer of the insurance product. SFG makes this service available to clients simply as a convenience to clients. Clients are not obligated to purchase any insurance products from SFG's associates.

Clients may terminate Investment Advisory Agreements at any time upon prior written notice. If an Agreement is terminated within the first five business days, clients are entitled to a full refund of any fees paid. If an Investment Advisory Agreement is terminated after more than five business days, clients may be assessed fees on a pro-rata basis at the sole discretion of SFG, based on the number of days that investment management services were provided. Clients may also be assessed an account termination fee, which would be fully disclosed in the Investment Advisory Agreement.

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

SFG does not charge performance-based fees.

Item 7. Types of Clients

SFG provides investment advisory services to individuals, high-net worth individuals, corporations or other businesses, trust, estates and charitable organizations. SFG does not have a formal minimum account size for which advisory services will be offered, but the firm reserves the right to impose a minimum advisory fee. In addition, SFG may charge a minimum account set-up fee for the establishment of an advisory relationship.

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

There are general standards of education and business experience which SFG requires of those involved in determining or giving investment advice to its clients. SFG associates are required to have the technical knowledge in the areas of securities portfolio management. SFG requires that all advisors be college graduates in a related field (accounting, economics, business, etc.) and/or have achieved a professional designation (CFP, CLU, ChFC, etc.) or are working toward achieving the designation.

In most instances, the method of security analysis, sources of information and investment strategy chosen for an Investment Management client will be dictated by the client's investment needs and objectives which are discussed with the client at the inception of the advisory relationship. In addition to reviewing documents and materials provided by product sponsors or research services, SFG may, in some cases, conduct on-site due diligence visits where necessary or appropriate. For Investment Management clients, SFG takes a comprehensive approach to evaluate an overall portfolio strategy and asset allocation that meets a client's needs and objectives. Rather than focusing on specific investments, SFG identifies an appropriate ratio of securities, fixed income investments, real estate investments and cash, to build a portfolio that is suitable for a client's investment needs, objectives and risk tolerance. SFG typically does not recommend frequent and short-term trading strategies for its clients. Portfolios are typically made up of various no-load or load-waived mutual funds, fixed income securities, exchange traded funds, and other equity and debt based securities. Portfolios may also include individual equity or bond positions, certificates of deposits, and non-securities products.

SFG conducts its research on the investments it recommends using publicly available performance information. SFG also utilizes the Investigo performance software system. SFG evaluates the experience and track record of product managers, to determine whether a manager has demonstrated the ability to manage assets under varying economic situations. SFG also evaluates the underlying investments in a mutual fund or exchange traded fund, to determine whether the manager invests in a manner that is consistent with the fund's investment objective. A risk associated with this type of analysis is that past

performance is not a guarantee of future results. While a manager may have demonstrated a certain level of success in past economic times, he or she may not be able to replicate that success in future markets. In addition, just because a manager may have invested in a certain manner in past years, such manager may deviate from his/her strategy in future years. To mitigate this risk, SFG attempts to select investments from companies with proven track records that have demonstrated a consistent level of performance and success. SFG also relies on an assumption that the rating agencies it uses to evaluate investments are providing accurate and unbiased analysis.

SFG uses investment management strategies that it feels best meet its clients' needs and objectives. Such strategies typically include long-term investment strategies of holding investments for a year or longer. While this strategy typically meets the needs and objectives of our clients, long-term investment strategies may include the risk of not taking advantage of short-term gains that could be profitable to a client. In addition, all securities investments involve risk and clients may lose all or part of their investment. Clients who elect to invest in securities must be willing to bear this risk. For this reason, SFG takes extra care to determine an appropriate risk tolerance of its clients. Investment recommendations are always made with this risk tolerance in mind.

Item 9. Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of SFG or the integrity of SFG's management. SFG has no reportable information applicable to this Item.

Item 10. Other Financial Industry Activities and Affiliations

Both Jeffry and J.J. Sessions are licensed to sell various insurance products for which they receive product commissions. The potential for this additional compensation creates a conflict of interest when making advisory recommendations that involve insurance products for which commissions may be earned. SFG associates make these recommendations when they feel it is in the client's best interest to do so, based on the specific needs and objectives of the client. The potential for additional compensation is not a criterion on which these recommendations are based. Only a small portion of Jeffry and J.J. Sessions' time is spent on this activity, as these services are generally provided in connection with giving investment advice.

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

SFG has adopted a Code of Ethics to promote the principles of honesty and integrity in its business practices, and to maintain SFG's reputation as a firm that operates with the highest level of professionalism. SFG recognizes its fiduciary responsibilities to its clients, and its duty and pledge to place clients' interests first and foremost. In connection with this duty, all employees of SFG are subject to the firm's Code of Ethics, and are required to acknowledge their understanding of its terms. A copy of the SFG Code of Ethics will be provided to any client or prospective client upon request.

SFG's Code of Ethics establishes procedures for employees to report personal securities transactions and personal securities holdings. The Code sets forth procedures for management review of these reports. In some cases, SFG's employees may be required to obtain pre-approval for certain personal securities transactions or refrain from certain transactions altogether. SFG's Code of Ethics also sets forth the obligation of all SFG employees to comply with applicable state and federal securities laws, and the duty to cooperate in any investigation or inquiry conducted on or by SFG. Finally, SFG's Code of Ethics establishes procedures for the reporting of any potential violation of the firm's Code.

SFG or its owners, officers and employees may buy or sell securities that are the same or different than those they recommend to clients. While buying or selling the same security as a client would be incidental, it may represent a potential conflict of interest, which would be fully disclosed to the client. SFG or its owners, officers and employees may not sell securities from their accounts directly to a client, nor may they purchase securities directly from a client. SFG, its owners, officers and employees are prohibited from trading on material nonpublic information. SFG does not trade ahead of clients, but instead puts clients' interests first. Employees may not purchase or sell any security prior to a transaction being implemented for an advisory client, unless the timing of such transaction was done without the employee's knowledge of a client's transaction. SFG endeavors to ensure that the personal trading activities of its owners, officers and employees do not interfere with the decision making process for client investment recommendations. SFG also endeavors to ensure that the personal trading activities of its owners, officers and employees do not interfere with the implementation of investment recommendations made to clients.

SFG prohibits its owners, officers, and employees from participating in any principal transactions, where securities are purchased directly from, or sold directly to a client. SFG also prohibits its owners, officers and employees from purchasing shares in initial public offerings or private placement offerings, unless express written permission is provided in

advance, by the firm's Chief Compliance Officer. SFG, its owners, officers and employees, do not recommend to clients that they buy or sell securities in which a person associated with SFG has a material financial interest.

Item 12. Brokerage Practices

If the client has not selected a broker/dealer through which transactions should be executed, SFG will suggest those brokers or dealers which provide best execution taking into consideration, the reasonableness of commissions, the broker's ability to provide timely, professional client services, research and other services that assist SFG in its investment management business. SFG makes every effort to ensure that clients are receiving quality execution of investments, however, best execution can never be guaranteed.

Of course, all clients are free to choose any custodian. For those clients who wish to continue an existing brokerage relationship, they may instruct SFG to execute all transactions through that broker. In those cases, SFG may have limited ability to negotiate favorable commission rates or execution services. Otherwise, SFG utilizes the custodial services of Shareholder Services Group, Inc., which has a clearing and brokerage arrangement with Pershing, LLC ("Pershing"), an affiliate of The Bank of NY Mellon. SFG will recommend that clients custody their assets at that firm. Shareholder Services Group, Inc. ("SSG") is a member FINRA/SIPC. Neither SSG nor Pershing is affiliated with SFG. SSG offers independent investment advisers, access to services that include custody of securities, trade execution, and clearance and settlement of transactions. SFG receives some benefits from SSG through its use of SSG's custodial services, including access to research and software programs. Client brokerage commissions are not used to purchase research or software programs.

SFG provides investment advisory services on a discretionary basis. Clients are free to place restrictions on investment recommendations made by SFG, but trades are executed on a discretionary basis.

SFG is unable to negotiate specific transaction costs for transaction execution.

Transactions executed by SSG/Pershing are subject to the transaction and execution fee schedule in effect at the time of execution. SFG does not negotiate commission rates or volume discounts. Therefore, brokerage and investment advisory services offered by SFG may cost a client more or less than similar investment advisory services offered by another firm, or by purchasing similar services separately.

As noted previously, SFG recommends SSG to clients for custody and brokerage services. SFG receives economic benefits through its use of SSG's custodial services. These benefits may include: receipt of duplicate trade confirmations; access to research; access to a trading desk serving advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, technology and practice management products or services provided to SFG by third party vendors. These benefits received by the firm do not depend on the amount of brokerage transactions directed to SSG.

As part of its fiduciary duty to clients, SFG endeavors at all times to put clients' interests first. Clients should be aware, however, that the receipt of economic benefits by the firm in and of itself creates a potential conflict of interest. While SFG feels the quality of custodial services provided by SSG/Pershing is beneficial to clients, the firm cannot guarantee that best execution will be obtained.

SFG does not recommend broker/dealers in order to receive client referrals from such broker/dealers. SFG may aggregate the purchase or sale of securities for various client accounts, and clients will be afforded an average-priced allocation.

Item 13. Review of Accounts

Investment Management Services: On an ongoing basis, all accounts are monitored for aggregate performance in light of general market and economic conditions. Each Investment Management account undergoes a thorough review at least quarterly. Each account is reviewed in light of the client's specific objectives, overall market conditions and current asset mix. Recommendations are made at the end of these reviews, as necessary, for the rebalancing of an account or to recommend alternative investments. More frequent reviews may be made when there are material market changes or changes in the client's financial situation. All reviews are conducted by either Jeffery L. Sessions or J.J. Sessions. All accounts receive performance reports on an annual basis, typically at the time of the annual review meeting. Such reports shall include investment strategy, investment summaries and allocation, and performance relative to relevant market indices. Clients also receive normal and customary brokerage account statements, if applicable, whenever there is activity in the accounts or at least quarterly. Clients should compare account information provided in reports furnished by SFG with the information provided on the custodial brokerage statements.

Financial Planning Services: Once a comprehensive financial plan is completed for a client, if the client engages SFG for Investment Management Services, the client's overall financial plan will be reviewed at least annually. Otherwise, ongoing financial plan reviews will only be done on the request of the client and for an additional fee. All clients receive a written financial plan summarizing the client's financial situation and recommendations for future implementation to assist the client in meeting his/her financial goals.

Item 14. Client Referrals and Other Compensation

As discussed previously, the sole business of SFG is that of providing the financial planning and investment advisory services described herein. However, in order to provide comprehensive investment advisory services, SFG may, from time to time, utilize other professionals from whom clients may receive specific advice.

SFG associates may recommend the placement of all or a portion of client assets with an independent money manager or with a third party investment adviser. Clients will be assessed SFG's normal investment management fee and no separate fee will be charged for this independent money manager. SFG endeavors at all times, to only make such referrals when they are in the best interests of its clients.

If SFG makes recommendations to clients for the purchase of insurance products, clients may pay a normal and customary insurance commission for the purchase of the product. In these cases, SFG's President and associated persons may receive a commission, as insurance agents, generally based upon a percentage of the premiums paid. Such insurance commission is paid directly to the SFG associate from the issuer of the insurance product. SFG makes this service available to clients simply as a convenience to clients. Clients are not obligated to purchase any insurance products from SFG's associates.

From time to time, SFG may feel it is appropriate to refer clients to other professionals from whom certain services may be received as part of a comprehensive approach to financial planning. Examples of these other professionals include attorneys or accountants. SFG makes these referrals as a convenience to clients only. Clients are not obligated to work with the professionals to whom SFG may refer them, and they do so at their sole discretion. SFG is not responsible or liable for any services provided by these outside professionals.

Item 15. Custody

SFG does not maintain custody of client funds or securities except to the extent that it has the ability to debit advisory fees directly from client accounts, as agreed to in writing by the

client. Clients receive normal and customary custodial account statements at least quarterly, which detail the amount of advisory fees debited from an account. Clients are strongly encouraged to review all statements carefully. Clients, not account custodians, are responsible for verifying the accuracy of all fees.

Item 16. Investment Discretion

For investment management services, SFG requests that clients grant SFG discretionary authority to manage securities accounts on behalf of clients. Such discretion is granted in writing by the client, at the time an investment management relationship is established.

Item 17. Voting Client Securities

SFG does not accept authority to vote client securities on behalf of clients. Clients retain all rights to their brokerage accounts, including the right to vote proxies. Clients are responsible for directing each custodian of their assets to forward copies of all proxies and shareholder communications directly to the client. While SFG may provide information or consultation to assist a client in deciding how to vote a particular security, the ultimate decision and responsibility to vote a security lies with the client.

Item 18. Financial Information

SFG does not require or solicit prepayment of more than \$1,200 in advisory fees more than six months in advance of services rendered. SFG is therefore not required to include a financial statement or balance sheet with this brochure.

SFG does not have any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients. SFG has not been the subject of any bankruptcy petition.

Privacy Policy

SFG maintains a specific Privacy Policy that is distributed to each client at the time an account is opened and annually thereafter. SFG collects nonpublic information about clients from the following sources: information the firm receives from clients verbally, on applications or other forms and information about client transactions with others or SFG.

We may have to share client information with unaffiliated firms in order to service client accounts. Additionally, we may have to provide information about clients to regulatory agencies as required by law. Otherwise, SFG will not disclose any client information to an unaffiliated entity unless a client has given express permission for SFG to do so.

SFG is committed to protecting client privacy. The firm restricts access to clients' personal and account information to those employees who need to know the information. SFG also maintains physical, electronic and procedural safeguards to protect client information.