

enTrust Financial Group, Inc.

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FORM ADV PART 2A BROCHURE

This brochure provides information about the qualifications and business practices of enTrust Financial Group, Inc. If you have any questions about the contents of this brochure, please contact us at 216-292-6450. 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 enTrust Financial Group, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for enTrust Financial Group, Inc. is 120851.

enTrust Financial Group, Inc. is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Item 2 Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Generally, enTrust Financial Group, Inc. will notify clients of material changes on an annual basis. However, where we determine that an interim notification is either meaningful or required, we will notify our clients promptly. In either case, we will notify our clients in a separate document.

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Item 4 Advisory Business

enTrust Financial Group, Inc. is a registered investment adviser based in Beachwood, Ohio. Our firm is organized as a corporation under the laws of the State of Ohio. We have been operating as a financial planning business since our inception in 1970. Richard A. Schenkelberg is our principal owner.

As used in this brochure, the words "we", "our" and "us" refer to enTrust Financial Group, Inc. and the words "you", "your" and "client" refer to you as either a client or prospective client of our firm. Also, you may see the term Associated Person throughout this brochure. As used in this brochure, our Associated Persons are our firm's officers, employees, and all individuals providing investment advice on behalf of our firm.

We provide our clients with a wide range of financial planning services that are customized to each client's individual needs and investment objectives. Services include business planning, estate planning, personal planning, executive benefits, pension services, employee benefits, risk management, insurance planning, investment planning, and tax planning, among others. We generally prepare individually designed reports concerning the specific services requested by our client.

Our approach to financial planning is founded on the premise that most immediate financial decisions have long term consequences. By taking a long term perspective on the many areas of financial planning, we help our clients make informed decisions on all areas of their financial planning needs. By helping our clients take a long term perspective of their financial choices, we are better able to advise our clients on the need for retirement planning, college planning, life and other insurance planning, and designing a specific investment strategy. As a firm, we also assist our client in implementing their financial needs through the evaluation and purchase of insurance products, retirement plan designs, and investment plan design and products.

Our financial planning fees may consist of a fixed fee or an hourly charge for services performed. In either case, such fees are negotiated in advance of services rendered, predicated on the scope and complexity of the requested services, and are payable on completion of the requested services, or as invoiced.

Associated Persons of our firm may be Registered Representatives of Walnut Street Securities, Inc. ("WSS") and investment adviser representatives of Walnut Street Advisors, Inc. ("WSA"), a wholly owned subsidiary of WSS. In general, we will recommend WSS, WSA, and these individuals to you for implementation of financial planning and consulting recommendations, provided that this recommendation is consistent with our fiduciary duty. Refer to the *Fees and Compensation* section below for additional disclosures on this topic.

Selection of Other Advisers

In providing financial planning services, and through advisory programs made available through WSS and WSA, we may recommend that you use the services of a third party investment adviser ("TPA") to manage your entire, or a portion of your, investment portfolio. After gathering information about your financial situation and objectives, we may recommend that you engage a specific TPA and/or WSA investment program. Factors that we take into consideration when making our recommendation(s) include, but are not limited to, the following: the TPA's performance, methods of analysis, fees, your financial needs, investment goals, risk tolerance, and investment objectives. We will periodically monitor the TPA(s)' performance to ensure its management and investment style remains aligned with your investment goals and objectives.

We do not charge you a separate fee for the selection of other TPAs. Rather, we will share in the advisory fee you pay directly to the TPA, which is established and payable in accordance with the disclosure brochure provided by each TPA to whom you are referred. These fees may or may not

be negotiable. Our compensation may differ depending upon the individual arrangement we have with each TPA. As such, a conflict of interest may arise where our firm or our Associated Persons may have an incentive to recommend one TPA over another TPA with whom we have more favorable compensation arrangements.

You may be required to sign an agreement directly with the recommended TPA(s). You may terminate your advisory relationship with the TPA according to the terms of your agreement with the TPA. You should review each TPA's disclosure brochure for specific information on how you may terminate your advisory relationship with the TPA and how you may receive a refund of prepaid fees, if applicable.

Asset Management Program

Through WSS and WSA, we offer various Asset Management Programs, which are generally designed as follows:

1. Determine your risk profile and investment objectives. We determine your investment objectives, investment time horizon, and risk profile by means of an interview process and the completion of a questionnaire.
2. Set a relevant asset allocation policy for the investor. You will choose one of many mutual fund asset allocation models. You may also purchase the individual mutual funds without choosing one of the asset allocation models. If you so choose, automatic rebalancing to model allocation and recommended model allocation changes will not be available.
3. Diversify among asset classes and styles. The investment managers of the underlying mutual funds are selected by the firm sponsoring the program, and may include institutional investment management firms. The managers are monitored by Associated Persons of our firm in their separate capacity as representatives of WSS and/or WSA to ensure that their investment styles and performance remain consistent with the objectives of the mutual funds.
4. Rebalance the portfolio. Rebalancing maintains the proper allocation to each asset class in the model. Rebalancing occurs automatically depending on the asset manager chosen.
5. Report results. You will receive periodic reports from your account custodian including consolidated monthly statements, quarterly performance reports, and year-end tax reports.

The services offered under, and the corresponding terms and conditions pertaining to, the above services, including applicable fees and fee paying arrangements, are discussed in the WSS Form ADV disclosure brochure. You will receive a copy of the relevant disclosure brochure if you participate in any of the programs offered by WSS and/or WSA.

Accuracy of Client Information

In providing the contracted services, we are not required to verify any information we receive from you or from your other professionals (e.g. attorney, accountant, etc.) and we are expressly authorized to rely on the information you provide. You must promptly notify us if your financial situation, goals, objectives, or needs change for the purpose of reviewing, evaluating, and/or revising previous recommendations and/or services.

Types of Investments

We generally provide advice on mutual funds for our clients. We will also provide advice on: equity securities, corporate debt securities, municipal securities, variable products, US Government securities, and real estate investments (publicly offered interests). Additionally, we may recommend

other types of investments since each client has different needs and different tolerances for risk. We may also advise you on any type of investment held in your portfolio at the inception of our advisory relationship, or on specific types of investments at your request.

You may request that we refrain from investing in particular securities or certain types of securities. You must provide these restrictions to our firm in writing.

Assets Under Management

At this time we do not have any assets under management.

Item 5 Fees and Compensation

Refer to the *Advisory Business* section above for information on our advisory fees, fee paying arrangements, and refund policy according to each service we offer.

Additional Fees and Expenses

As part of our investment advisory services to you, we recommend that you invest in mutual funds and /or exchange traded funds. The fees that you pay our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. Refer to the *Brokerage Practices* section below for additional disclosures on this topic.

Associated Persons may receive benefits such as assistance with conferences and educational meetings from product sponsors. Additionally, Associated Persons receive various support, educational, and research services through their broker/dealer. Such services and support are used to benefit all clients regardless of the services obtained by clients.

Compensation for the Sale of Securities or Other Investment Products

Certain Associated Persons of our firm are also registered representatives with Walnut Street Securities, Inc. ("WSS"), an unaffiliated securities broker-dealer, and a member of FINRA and the Securities Investor Protection Corporation ("SIPC"). As such, these individuals are licensed to sell securities and insurance related products for separate commission based compensation, including 12b-1 fees for the sale of investment company products. This practice presents a conflict of interest because these individuals may have an incentive to effect securities transactions for the purpose of generating commissions. You are under no obligation, contractually or otherwise, to purchase securities products through any person affiliated with our firm.

Certain Associated Persons of our firm may also be registered as Investment Adviser Representatives of Walnut Street Advisers, Inc. ("WSA"), an unaffiliated registered investment adviser. In this capacity, these individuals will provide investment advice to clients of WSA and will receive separate fee-based compensation.

Executive officers and other Associated Persons of our firm may be licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

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

We do not accept performance-based fees or participate in side-by-side management. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees.

Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Our fees are calculated as described in the *Advisory Business* section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

Item 7 Types of Clients

We offer investment advisory services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations, and other business entities. In general, we do not require a minimum dollar amount to retain our firm for investment advisory services.

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

We generally employ fundamental analysis, which considers such factors as earnings, sales, products, management, and the outlook for the company's industry in an attempt to measure the true value of the company's stock compared to its current market value. The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value.

A long term investment strategy is the cornerstone of our financial planning and wealth building recommendations. Nonetheless, our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine financial planning recommendations based upon your predefined objectives, risk tolerance, time horizon, financial horizon, financial information, liquidity needs, and other various suitability factors.

Investment Strategy and Tax Disclosures

Our strategies and investments may have unique and significant tax implications. We generally take tax efficiency into consideration in the management of your assets. Nonetheless, regardless of your account size or any other factors, we recommend that you consult with a tax professional prior to and throughout the investing of your assets.

Moreover, as a result of revised IRS regulations, custodians and broker-dealers will begin reporting the cost basis of equities acquired in client accounts on or after January 1, 2011. Your custodian will default to the FIFO (First-In First-Out) accounting method for calculating the cost basis of your investments. You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes another accounting method is more advantageous, please provide written notice to our firm immediately and we will alert your account custodian of your individually selected accounting method. Please note that decisions about cost basis accounting methods will need to be made before trades settle, as the cost basis method cannot be changed after settlement.

Risk of Loss

Investing in securities involves risk of loss that you should be prepared to bear. This includes equity, fixed income, and any other type of investment held in your account. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

Recommendation of Particular Types of Securities

As disclosed under the *Advisory Business* section above, we primarily recommend mutual funds to our clients. Mutual funds are funds that are operated by an investment company that raises money from shareholders and invests it in stocks, bonds, and/or other types of securities. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. The mutual funds charge a separate management fee for their services. The returns on mutual funds can be reduced by the costs to manage the funds. While mutual funds generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market. Funds that are sold through brokers are called load funds, and those sold to investors directly from the fund companies are called no-load funds. Mutual funds come in many varieties. Some invest aggressively for capital appreciation, while others are conservative and are designed to generate income for shareholders. Investors should carefully assess their tolerance for risk before they decide which fund is suitable for their account. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, other types of mutual funds do charge such fees which can also reduce returns.

Item 9 Disciplinary Information

enTrust Financial Group, Inc. has been registered and providing investment advisory services since 1970. Neither our firm nor any of our Associated Persons has any reportable disciplinary information.

Item 10 Other Financial Industry Activities and Affiliations

Registrations with Broker-Dealer

Persons providing investment advice on behalf of our firm are registered representatives with Walnut Street Securities, a registered securities broker-dealer. Refer to the *Fees and Compensation* section above for additional disclosures on this topic.

Registrations with Other Investment Advisers

Persons providing investment advice on behalf of our firm are also Investment Adviser Representatives with Walnut Street Advisers, Inc., an SEC-registered investment adviser. Refer to the *Fees and Compensation* section above for additional disclosures on this topic.

Insurance Licenses

Persons providing investment advice on behalf of our firm are also licensed as independent insurance agents. Refer to the *Fees and Compensation* section above for additional disclosures on this topic.

Recommendation of Other Advisers

We may recommend that you use a third party adviser ("TPA") based on your needs and suitability. We will receive compensation from the TPA for recommending their services. These compensation arrangements present a conflict of interest because we have a financial incentive to recommend the services of the third party adviser. You are not obligated, contractually or otherwise, to use the services of any TPA we recommend.

Accountant and Lawyer

William Kobyljanec, an Associated Person of our firm, holds current and active licenses in the State of Ohio as an attorney and as a CPA. Mr. Kobyljanec has been licensed as an attorney since 1981 and as a CPA since 1980. Mr. Kobyljanec has assisted individuals throughout his nearly 30 year professional career in their tax and estate planning and related legal matters where a licensed attorney is required. Since 1987, Mr. Kobyljanec has been employed by our firm and on occasion, a client of ours will engage Mr. Kobyljanec to assist in the preparation of legal documents such as wills or trusts. In those instances where Mr. Kobyljanec is engaged as an attorney, all fees associated with the services to be provided are thoroughly reviewed in advance of any engagement and all charges for any services provided are paid directly to Mr. Kobyljanec and are independent

of any charges or services that may be provided by our firm. You are under no obligation to use Mr. Kobyljanec for legal or accounting services and you may obtain comparable services and/or lower fees through other firms.

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

We have adopted a Code of Ethics that sets the standard of conduct expected to comply with applicable securities laws. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. We adhere strictly to these guidelines. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm. Clients or prospective clients may obtain a copy of our Code of Ethics by contacting us at the telephone number on the cover page of this brochure.

Participation or Interest in Client Transactions

Neither our firm nor any of our Associated Persons has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

Personal Trading Practices

Generally, except for mutual fund families, neither our firm nor our Associated Persons will simultaneously engage in purchasing or selling securities or investment products for their own account if the securities are being traded for client accounts. However, in limited circumstances, we may buy or sell the same securities in which you are already invested. We have adopted a written Code of Ethics designed to prevent and detect personal trading activities that may interfere or be in conflict with client interests, as discussed above in this section.

Item 12 Brokerage Practices

We recommend the brokerage and custodial services of Walnut Street Securities, Inc. ("WSS"), a registered securities broker-dealer and a member of FINRA. We believe that WSS provides quality execution services at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by WSS, including the promptness of execution, WSS's reputation, promptness and accuracy of reports on execution, research (if any), execution capabilities, commission rates, and responsiveness to our clients and our firm. In recognition of the value of research services and additional brokerage products and services WSS provides, you may pay higher commissions and/or trading costs than those that may be available elsewhere.

Persons providing investment advice on behalf of our firm who are Registered Representatives of WSS will recommend WSS to you for brokerage services. These individuals are subject to applicable rules that restrict them from conducting securities transactions away from WSS unless WSS provides the Representative with written authorization to do so. Therefore, these individuals are generally limited to conducting securities transactions only through WSS. It may be the case that WSS charges higher transactions costs and/or custodial fees than another broker charges for the same types of services. You may utilize the broker-dealer of your choice and have no obligation to purchase or sell securities through WSS. However, if you do not use WSS, we may not be able to accept your account. Refer to the *Fees and Compensation* section above for additional disclosures on this topic.

You should be aware that best execution and lower commissions may not necessarily be achieved if recommended transactions are placed through Associated Persons of our firm in their separate capacity as a Registered Representative of WSS or as a licensed insurance agent/broker.

We periodically review other alternatives that are available to the financial adviser market. However, we believe that excellent customer service and trade execution as we believe is available through WSS is superior to the less service oriented, discount and Internet-based brokers that may otherwise be available to the public. The preferred service providers such as WSS feature a broad line of products and services that are available to all types of investors.

Soft Dollar Benefits

We do not receive any soft dollar benefits.

Brokerage for Client Referrals

We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

Block Trades

We do not provide portfolio management services through this entity; therefore, we do not combine multiple orders for shares of the same securities purchased for advisory accounts. A practice commonly referred to as ("block trading").

Item 13 Review of Accounts

All accounts are reviewed at least quarterly, depending on many factors, including size, activity and investment objective. Charles J. Schenkelberg, President, conducts all reviews and tracks the activity and results of any mutual funds which are being used for the individual client account. Investment performance is tracked with performance results compared to the client's particular investment objectives and general market investment indices.

Periodic meetings are held with the client on a quarterly or yearly basis depending on the size and need of the client. Schedules are prepared for meetings which serve to track the individual investments for the year. Our reports generally will detail deposits, withdrawals, and appreciation (depreciation). The results are compared with major indices and other industrial benchmarks in relation to the objectives of the clients.

Item 14 Client Referrals and Other Compensation

We do not directly or indirectly use, employ, or compensate non-employee (outside) consultants, individuals, and/or entities (Solicitors) for client referrals.

Refer to the *Brokerage Practices* section above for disclosures on research and other benefits we may receive from Walnut Street in connection with utilizing their brokerage services.

Beyond the disclosures provided in this Brochure, we do not receive any compensation from any third party in connection with providing investment advice to you.

Item 15 Custody

We do not take physical custody of your funds or securities. Your funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian. We do not directly debit advisory fees from your account, however, as paying agent for our firm, your independent custodian(s) for your Asset Management Program account(s) may directly debit your Asset Management Program account(s) for the payment of our related investment advisory fees, but only if you previously consented to any such deductions in writing. This authority to deduct our related investment advisory fees from your Asset Management Program account(s) causes our firm to exercise limited custody over your funds or securities. You will receive account statements from your independent custodian(s) holding your funds and securities at least quarterly. The account statement(s) will indicate the amount of investment advisory fees deducted from your account(s) each billing period. If you have a question regarding your account statement(s) or if you do not receive a statement from your custodian(s), please contact your custodian(s) directly.

Item 16 Investment Discretion

We do not accept discretionary authority to manage your securities accounts. As disclosed under the *Advisory Business* section above, the investment advisory services we provide are strictly on a non-discretionary basis, which means we will obtain your approval prior to the reallocation of any of your assets. You have an unrestricted right to decline to implement any advise provided by our firm.

Item 17 Voting Client Securities

Without exception, we will not vote proxies on behalf of your advisory accounts.

Item 18 Financial Information

We are not required to provide financial information to our clients because we do not:

- require the prepayment of more than \$1,200 in fees and six or more months in advance, or
- take custody of client funds or securities, or
- have a financial condition that is reasonably likely to impair our ability to meet our commitments to you.

Item 19 Requirements for State-Registered Advisers

We are an SEC registered investment adviser; therefore, we are not required to respond to this item.

Item 20 Additional Information

Your Privacy

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any nonpublic personal information about you to any nonaffiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to nonpublic personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your nonpublic personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of our privacy policy notice to you on an annual basis. Please contact us at the telephone number on the cover page of this brochure if you have any questions regarding this policy.

Class Action Lawsuits

We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.