

FORM ADV**Part II - Page 1****Uniform Application for Investment Adviser Registration****OMB APPROVAL**

OMB Number: 3235-0049
Expires: February 28, 2011
Estimated average burden
hours per response. 4.07

Name of Investment Adviser:					
Address:	(Number and Street)	(City)	(State)	(Zip Code)	Area Code: Telephone number: ()

**This part of Form ADV gives information about the investment adviser and its business for the use of clients.
The information has not been approved or verified by any governmental authority.**

Table of Contents

<u>Item Number</u>	<u>Item</u>	<u>Page</u>
1	Advisory Services and Fees	2
2	Types of Clients	2
3	Types of Investments	3
4	Methods of Analysis, Sources of Information and Investment Strategies	3
5	Education and Business Standards	4
6	Education and Business Background	4
7	Other Business Activities	4
8	Other Financial Industry Activities or Affiliations	4
9	Participation or Interest in Client Transactions	5
10	Conditions for Managing Accounts	5
11	Review of Accounts	5
12	Investment or Brokerage Discretion	6
13	Additional Compensation	6
14	Balance Sheet	6
	Continuation Sheet	Schedule F
	Balance Sheet, if required	Schedule G

(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

**Potential persons who are to respond to the collection of information contained in this form
are not required to respond unless the form displays a currently valid OMB control number.**

FORM ADV
Part II - Page 2

Applicant:

SEC File Number:
801-

Date:

- 1. A. Advisory Services and Fees.** (check the applicable boxes) For each type of service provided, state the approximate % of total advisory billings from that service. (See instruction below.)

Applicant:

- | | | | | |
|--------------------------|-----|---|-------|---|
| <input type="checkbox"/> | (1) | Provides investment supervisory services | _____ | % |
| <input type="checkbox"/> | (2) | Manages investment advisory accounts not involving investment supervisory services | _____ | % |
| <input type="checkbox"/> | (3) | Furnishes investment advice through consultations not included in either service described above | _____ | % |
| <input type="checkbox"/> | (4) | Issues periodicals about securities by subscription | _____ | % |
| <input type="checkbox"/> | (5) | Issues special reports about securities not included in any service described above | _____ | % |
| <input type="checkbox"/> | (6) | Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities | _____ | % |
| <input type="checkbox"/> | (7) | On more than an occasional basis, furnishes advice to clients on matters not involving securities | _____ | % |
| <input type="checkbox"/> | (8) | Provides a timing service | _____ | % |
| <input type="checkbox"/> | (9) | Furnishes advice about securities in any manner not described above | _____ | % |

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

- B.** Does applicant call any of the services it checked above financial planning or some similar term? Yes No
☐ ☐

- C.** Applicant offers investment advisory services for: (check all that apply)

- | | |
|---|--|
| <input type="checkbox"/> (1) A percentage of assets under management | <input type="checkbox"/> (4) Subscription fees |
| <input type="checkbox"/> (2) Hourly charges | <input type="checkbox"/> (5) Commissions |
| <input type="checkbox"/> (3) Fixed fees (not including subscription fees) | <input type="checkbox"/> (6) Other |

- D.** For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

- 2. Types of clients** - Applicant generally provides investment advice to: (check those that apply)

- | | |
|--|---|
| <input type="checkbox"/> A. Individuals | <input type="checkbox"/> E. Trusts, estates, or charitable organizations |
| <input type="checkbox"/> B. Banks or thrift institutions | <input type="checkbox"/> F. Corporations or business entities other than those listed above |
| <input type="checkbox"/> C. Investment companies | <input type="checkbox"/> G. Other (describe on Schedule F) |
| <input type="checkbox"/> D. Pension and profit sharing plans | |

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

FORM ADV
Part II - Page 3

Applicant:

SEC File Number:
801-

Date:

3. Types of Investments. Applicant offers advice on the following: (check those that apply)

- | | |
|---|---|
| <input type="checkbox"/> A. Equity securities | <input type="checkbox"/> H. United States government securities |
| <input type="checkbox"/> (1) exchange-listed securities | <input type="checkbox"/> I. Options contracts on: |
| <input type="checkbox"/> (2) securities traded over-the-counter | <input type="checkbox"/> (1) securities |
| <input type="checkbox"/> (3) foreign issuers | <input type="checkbox"/> (2) commodities |
| <input type="checkbox"/> B. Warrants | <input type="checkbox"/> J. Futures contracts on: |
| <input type="checkbox"/> C. Corporate debt securities (other than commercial paper) | <input type="checkbox"/> (1) tangibles |
| <input type="checkbox"/> D. Commercial paper | <input type="checkbox"/> (2) intangibles |
| <input type="checkbox"/> E. Certificates of deposit | <input type="checkbox"/> K. Interests in partnerships investing in: |
| <input type="checkbox"/> F. Municipal securities | <input type="checkbox"/> (1) real estate |
| <input type="checkbox"/> G. Investment company securities: | <input type="checkbox"/> (2) oil and gas interests |
| <input type="checkbox"/> (1) variable life insurance | <input type="checkbox"/> (3) other (explain on Schedule F) |
| <input type="checkbox"/> (2) variable annuities | <input type="checkbox"/> L. Other (explain on Schedule F) |
| <input type="checkbox"/> (3) mutual fund shares | |

4. Methods of Analysis, Sources of Information, and Investment Strategies.

A. Applicant's security analysis methods include: (check those that apply)

- | | |
|--|--|
| (1) <input type="checkbox"/> Charting | (4) <input type="checkbox"/> Cyclical |
| (2) <input type="checkbox"/> Fundamental | (5) <input type="checkbox"/> Other (explain on Schedule F) |
| (3) <input type="checkbox"/> Technical | |

B. The main sources of information applicant uses include: (check those that apply)

- | | |
|--|--|
| (1) <input type="checkbox"/> Financial newspapers and magazines | (5) <input type="checkbox"/> Timing services |
| (2) <input type="checkbox"/> Inspections of corporate activities | (6) <input type="checkbox"/> Annual reports, prospectuses, filings with the Securities and Exchange Commission |
| (3) <input type="checkbox"/> Research materials prepared by others | (7) <input type="checkbox"/> Company press releases |
| (4) <input type="checkbox"/> Corporate rating services | (8) <input type="checkbox"/> Other (explain on Schedule F) |

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- | | |
|---|--|
| (1) <input type="checkbox"/> Long term purchases
(securities held at least a year) | (5) <input type="checkbox"/> Margin transactions |
| (2) <input type="checkbox"/> Short term purchases
(securities sold within a year) | (6) <input type="checkbox"/> Option writing, including covered options,
uncovered options or spreading strategies |
| (3) <input type="checkbox"/> Trading (securities sold within 30 days) | (7) <input type="checkbox"/> Other (explain on Schedule F) |
| (4) <input type="checkbox"/> Short sales | |

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

Applicant:

SEC File Number:

801-

Date:

5. Education and Business Standards.

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? ☐ Yes ☐ No
(If yes, describe these standards on Schedule F.)

6. Education and Business Background.

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- name
- year of birth
- formal education after high school
- business background for the preceding five years

7. Other Business Activities. (check those that apply)

- ☐ A. Applicant is actively engaged in a business other than giving investment advice.
- ☐ B. Applicant sells products or services other than investment advice to clients.
- ☐ C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

8. Other Financial Industry Activities or Affiliations. (check those that apply)

- ☐ A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- ☐ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
- | | |
|--|--|
| <input type="checkbox"/> (1) broker-dealer | <input type="checkbox"/> (7) accounting firm |
| <input type="checkbox"/> (2) investment company | <input type="checkbox"/> (8) law firm |
| <input type="checkbox"/> (3) other investment adviser | <input type="checkbox"/> (9) insurance company or agency |
| <input type="checkbox"/> (4) financial planning firm | <input type="checkbox"/> (10) pension consultant |
| <input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant | <input type="checkbox"/> (11) real estate broker or dealer |
| <input type="checkbox"/> (6) banking or thrift institution | <input type="checkbox"/> (12) entity that creates or packages limited partnerships |

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest? . ☐ Yes ☐ No

(If yes, describe on Schedule F the partnerships and what they invest in.)

Applicant:

SEC File Number:
801-

Date:

9. Participation or Interest in Client Transactions.

Applicant or a related person: (check those that apply)

- ☐ A. As principal, buys securities for itself from or sells securities it owns to any client.
- ☐ B. As broker or agent effects securities transactions for compensation for any client.
- ☐ C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- ☐ D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- ☐ E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

10. Conditions for Managing Accounts. Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other conditions for starting or maintaining an account?

Yes No

☐ ☐

(If yes, describe on Schedule F)

11. Review of Accounts. If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

B. Describe below the nature and frequency of regular reports to clients on their accounts.

FORM ADV
Part II - Page 6

Applicant:

SEC File Number:
801-

Date:

12. Investment or Brokerage Discretion.

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

- | | Yes | No |
|--|--------------------------|--------------------------|
| (1) securities to be bought or sold? | <input type="checkbox"/> | <input type="checkbox"/> |
| (2) amount of the securities to be bought or sold? | <input type="checkbox"/> | <input type="checkbox"/> |
| (3) broker or dealer to be used? | <input type="checkbox"/> | <input type="checkbox"/> |
| (4) commission rates paid? | <input type="checkbox"/> | <input type="checkbox"/> |

B. Does applicant or a related person suggest brokers to clients? ☐ Yes ☐ No

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for product and research services received.

13. Additional Compensation.

Does the applicant or a related person have any arrangements, oral or in writing, where it:

- | | | |
|---|---------------------------------|--------------------------------|
| A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? | Yes
<input type="checkbox"/> | No
<input type="checkbox"/> |
| B. directly or indirectly compensates any person for client referrals? | Yes
<input type="checkbox"/> | No
<input type="checkbox"/> |

(For each yes, describe the arrangements on Schedule F.)

14. Balance Sheet. Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities (unless applicant is registered or registering only with the Securities and Exchange Commission); or
- requires prepayment of more than \$500 in fees per client and 6 or more months in advance

Has applicant provided a Schedule G balance sheet?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
--	---------------------------------	--------------------------------

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

Schedule F of	Applicant:	SEC File Number:	Date:
Form ADV Continuation Sheet for Form ADV Part II	Strategic Financial Group, LLC	801-68171	March 19, 2010
(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)			
1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:			IRS Empl. Ident. No.:
Strategic Financial Group, LLC			35-1984039
Item of Form			
(identify)	Answer		
Introduction	<p>This document is being offered to you on behalf of Strategic Financial Group, LLC ("SFG") so as to provide you with information about the services SFG provides and the manner in which those services are made available to its clients.</p> <p>A copy of this disclosure document shall be provided to the client prior to, or contemporaneously with, the execution of any Client Advisory Agreement ("CAA") between each client and SFG. Any client who has not received a copy of SFG's written disclosure statement at least forty-eight (48) hours prior to executing any advisory agreement shall have five (5) business days subsequent to executing the agreement to terminate SFG's services and to receive a full refund of all client monies already paid without penalty.</p> <p>Prior to engaging SFG to provide investment advisory services, the client will be required to enter into an advisory agreement with SFG and a separate custodial/clearing agreement. The advisory agreement shall set forth the terms and conditions of the engagement, and describes the scope of the services to be provided and the fees for such.</p> <p>In performing its services, SFG shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. If requested by the client, SFG may recommend and/or engage the services of other professionals for implementation purposes. The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from SFG.</p> <p><u>Proxy Voting</u></p> <p>Unless specifically agreed to otherwise, Client shall be responsible for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the Client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other types of events pertaining to the Assets. Adviser assumes no responsibility in connection with client proxy notices or voting thereof.</p>		
Item 1.A(1)	<p>SFG may provide investment supervisory services. This service may be provided on a discretionary or non-discretionary basis and would include ongoing monitoring and supervision of client accounts. SFG's non-discretionary investment supervisory services are not available to new clients after October 1, 2009. Clients who had engaged SFG for non-discretionary investment supervisory services prior to October 1, 2009 will still be able to receive such non-discretionary services for the effective duration of their advisory service agreement in place with SFG.</p> <p>In order to determine a suitable course of action for an individual client, SFG shall perform a review of the client's financial circumstances. Such review may include, but would not necessarily be limited to, investment objectives, consideration of the client's overall financial condition, income and tax status, personal and business assets, risk profile, and other factors unique to the client's particular circumstances.</p>		

<p>Item 1.A(1) (continued)</p>	<p>Some examples of SFG’s investment supervisory services may include the following:</p> <p>SFG may design, revise, and reallocate a client’s custom portfolio. Investments are determined based upon the client’s investment objectives, risk tolerance, net worth, net income, age, time horizon, tax situation and other various suitability factors. Restrictions and guidelines imposed by the client may affect the composition and performance of custom portfolios (as a result, performance of custom portfolios within the same investment objective may differ and the client should not expect that the performance of his/her custom portfolios will be identical to any other individual’s portfolio performance).</p> <p>Fees for SFG’s advisory services described in this section may involve the following fee types:</p> <ul style="list-style-type: none"> • Percentage of Assets Under Management • Fixed/Flat Fees • Hourly fees <p>Please refer to Item 1.D below for specific details related to the fees SFG may charge for its investment supervisory or asset management services.</p>
<p>Item 1.A.(2)</p>	<p>Use of Outside Managers</p> <p>SFG may recommend products or services managed or offered by other investment advisers or third parties that may or may not be affiliated with SFG. Such products or services may include, but would not be limited to, “separately managed account programs” as well as “wrap fee programs.” In making investment decisions on behalf of the client, SFG shall rely on a client profile document or client questionnaire, which would be completed by the client.</p> <p>A “separately managed account program” is essentially a traditional brokerage account managed by an investment adviser. In the context of SFG’s services, SFG may refer its clients to outside investment advisers who would perform specific investment advisory or portfolio management services over clients’ accounts. SFG may recommend outside investment advisers to perform such services for its clients’ accounts and in turn, SFG will monitor such outside investment advisers’ performance with respect to such separately managed account programs. Specific services and fees related to such programs will be available in the outside investment adviser’s current disclosure documents.</p> <p>A “wrap fee program” is a program that offers participants a suite of services such as asset allocation; portfolio management; trade execution; and certain administration activities, all for a single fee – typically an annual percentage of the client’s total assets under the investment adviser’s management. A wrap fee programs is designed to assist clients in obtaining professional asset management services for a convenient single "wrapped" fee.</p> <p>SFG shall offer a wrap fee brochure or other appropriate disclosure document to any advisory clients who are recommended to participate in a wrap programs. The wrap fee brochure provides clients with disclosure information about the wrap fee program itself. SFG shall also provide a copy of current disclosure document for the specific investment manager selected to manage a client's assets in a wrap program. A wrap program participant should consider all of the information within the wrap fee brochure and the selected investment manager's disclosure document before participating in a wrap fee program recommended by SFG.</p> <p>The recommendation of investment managers will be provided on a non-discretionary basis. Any recommendation to hire or fire a particular investment manager will be based upon continued suitability and performance of Client’s account, however, Client shall always retain the sole ability to hire or fire an outside money manager.</p>

<p>Item 1.A.(2) (continued)</p>	<p>As a result of recommending any outside money managers/investment advisers, SFG typically will not directly charge clients for its advisory services. Rather, the outside money managers that are managing the client's assets will charge the fees for the services provided. On occasion, however, SFG may actually perform the fee billing process and in connection therewith, may pay the outside money manager its portion of those fees. SFG will enter into all appropriate agreements with such parties whereby SFG will receive a portion of such fees. Unless specifically agreed to otherwise by the client, SFG's fees will not represent any additional charge to the Client above and beyond the normal and customary fees charged by any outside money managers.</p> <p>The specific fees and assessment/collection frequency for fees associated with any management services provided by outside investment advisers recommended by SFG will be contained in such investment adviser's current disclosure document.</p> <p>Pension Consulting</p> <p>SFG offers and provides pension consulting services to various types of pension plans, including, but not limited to, profit sharing plans, employee stock ownership plans, and 401(k) plans. While the primary clients for these services will be corporations or other business entities, SFG may also offer these services, where appropriate, to certain individuals.</p> <p>SFG gathers and reviews extensive information on each Client and each plan on an individualized basis including each client's plan's objectives and needs. SFG's pension consulting services include plan feasibility, plan design, plan review, document preparation, plan amendments and assistance with Department of Labor and/or IRS issues, among others.</p> <p>Other than those briefly described above, there are several distinct activities that may be available under SFG's pension consulting services. These services may be provided separately or in combination with one another. Although not all-inclusive, the following information will describe some of the activities offered under SFG's pension consulting services.</p> <p><i>Preparation of Investment Policy Statement ("IPS"):</i></p> <p>SFG may meet with the client to determine the Client's investment needs and goals. SFG will then prepare a written IPS stating those needs and goals and encompassing a policy under which these goals are to be achieved. The IPS will also list the criteria for selection of investment options/vehicles and the procedures and timing interval for monitoring of investment performance.</p> <p><i>Selection of Investment Options:</i></p> <p>SFG will review various investments, consisting predominantly of mutual funds (both index and managed) to determine which of these investments are appropriate to implement the client's IPS. The number of investment options/vehicles to be recommended will be determined by the client, based on the IPS.</p> <p><i>Monitoring of Investment Performance:</i></p> <p>Client investments will be monitored continuously based on the procedures and timing intervals delineated in the IPS. Although SFG will not be involved in any way in the purchase or sale of these investments, SFG will supervise the client's portfolio and will make recommendations to the client as market factors and the client's needs dictate.</p> <p><i>Plan Performance Reporting:</i></p> <p>In conjunction with its monitoring activities, SFG may also provide periodic reports regarding the performance of a client's pension plan. Such reports may include analysis from both SFG as well as</p>
---	--

<p>Item 1.A.(2) (continued)</p>	<p>outside parties engaged by SFG to provide additional analysis in regard to such plans. Such outside parties will be engaged exclusively by SFG and not by the client.</p> <p><i>Employee Communications:</i></p> <p>For pension, profit sharing and 401(k) plan clients wherein there are individual accounts with participants exercising control over assets in their own account (“self-directed plans”), SFG may also provide educational support and investment workshops designed for the plan participants. The nature of the topics to be covered will be determined by SFG and the client under the appropriate ERISA guidelines. The educational support and investment workshops will not be designed so as to provide plan participants with individualized, tailored investment advice or individualized, tailored asset allocation recommendations.</p> <p><i>Advice to Participants:</i></p> <p>Clients may engage SFG to provide individualized advice to plan participants. This service includes a review of a participant’s individual situation, including age, existing assets, financial goals and attitude towards risk, and recommending an allocation of assets offered by the plan based on this information. SFG will not monitor the client's situation or otherwise supervise or consult on the ongoing management of the participant’s assets.</p> <p>Plans that want to provide more detailed advice to their participants may engage SFG to provide individualized advisory services as described further in this disclosure document.</p> <p>Fees for SFG’s advisory services described in this section may involve the following fee types:</p> <ul style="list-style-type: none"> • Percentage of Assets Under Management • Fixed/Flat Fees • Hourly fees <p>Please refer to Item 1.D below for specific details related to the fees SFG may charge for its investment supervisory or asset management services.</p>
<p>Item 1.A(3)</p>	<p>SFG may furnish investment advice through consultations not included in any of the services described above. SFG may prepare a written financial plan as part of its advisory services. SFG’s written financial plan services may involve consultation, analysis, and recommendations in the six areas of financial planning, which include (1) financial situation; (2) income taxes; (3) insurance; (4) investments; (5) retirement planning; and (6) estate planning.</p> <p>In order to determine a suitable course of action for an individual client, SFG shall perform a review of the variables that are presented. Such review may include, but would not necessarily be limited to, investment objectives, consideration of the client’s overall financial condition, income and tax status, personal and business assets, risk profile, and other factors unique to the client’s particular circumstances.</p> <p>SFG shall review the client’s present financial situation and issue a written analysis and report of recommendations in accordance with the client’s goals and objectives. This service may include an initial consultation and subsequent follow-up visits. SFG, unless engaged separately to do so, will not be responsible for the implementation of the plan. The client assumes full responsibility for the implementation of the plan. The services provided in this regard may include but would not be limited to the following:</p> <ul style="list-style-type: none"> • Preparation of an annual net worth statement; • Create a cash flow statement; • Review current investments and make recommendations thereon; • Review client’s most recent tax returns and provide tax planning advice or tax preparation services;

Item 1.A(3) (continued)	<ul style="list-style-type: none"> • Review client's life insurance and disability insurance and make recommendations thereon; • Review client's estate plan and make recommendations thereon; • Complete a retirement analysis; and • Provide education planning advice. <p>SFG's fees for a written financial plan may be affected by several factors such as the complexity of pertinent circumstances, the responsibility assumed by SFG, the potential benefit resulting to the client and the perceived probability of certain anticipated complications that may arise. Although not an all-inclusive list, the following factors may impact the fee charged to a client.</p> <ul style="list-style-type: none"> • investment objectives; • consideration of the client's overall financial condition, including current financial holdings; • net worth; • income and tax status, personal and business assets; • marital status; • number of dependents; • risk profile; • previous investment experience; and • other factors unique to the client's particular circumstances. <p>It should be noted that the above listed factors are NOT intended to represent prospective examples of ALL factors that may contribute to the ultimate fee determination for any given client, however, any of these factors COULD contribute to such. Further, no single one of these factors should be solely relied upon in a client's fee arrangement determination.</p> <p>Fees for SFG's advisory services described in this section may involve the following fee types:</p> <ul style="list-style-type: none"> • Fixed/Flat Fees • Hourly fees <p>Please refer to Item 1.D below for specific details related to the fees SFG may charge for its services described in this section.</p>
Item 1.A(7)	<p>On more than an occasional basis, individuals associated with SFG may furnish advice to the client on matters not involving securities. Such matters would include various insurance-related products and services.</p> <p>As part of these services, the client may or may not engage SFG to provide to him/her with any written documentation that supports recommendations or conclusions reached in advising the client.</p> <p>Fees for SFG's advisory services described in this section may involve the following fee types:</p> <ul style="list-style-type: none"> • Fixed/Flat Fees • Hourly fees <p>Please refer to Item 1.D below for specific details related to the fees SFG may charge for its services described in this section.</p>
Item 1.D	<p>The following information shall address the fees that SFG may charge for the services described in the previous sections. Information noted below shall address the general fee ranges, calculation methods, billing frequency, and manner of billing.</p>

Item 1.D
(continued)

Annual Asset-Based Fee:

Account(s) Value	Annual Percentage
Any	1.50%
Fees are subject to negotiation at the sole discretion of SFG.	

SFG's asset based fees may be charged either in advance or in arrears. Both options are described below.

Assessment of Annual Asset-Based Fees (advance):

SFG shall bill client on a quarterly (calendar) basis. The first bill ("inception bill") shall be calculated and prorated according to the date ("inception date") of execution of the CAA and shall be payable at the end of the calendar quarter in which the initial meeting between the client and SFG takes place. The inception bill shall be based upon a percentage of assets in client's account(s) as of the inception date. This fee portion shall be referred to as the "inception fee."

At the same time the inception fee is calculated, SFG shall also calculate, in advance, the next quarter's fee based upon a percentage of the assets contained in client's account(s) as of the last business day of that calendar quarter. This fee amount shall be calculated by assessing one quarter (1/4) of the total annual percentage charged against the assets in client's account(s). Client's first bill shall include the inception fee and the first full quarter's fee (advanced). Thereafter, each subsequent quarterly fee shall be calculated, in advance, based upon the dollar amount of assets in client's account(s) as of the last business day of each calendar quarter.

In the event of termination, the client will receive a pro rata refund of any pre-paid fees attributable to any period after the date of termination.

Assessment of Annual Asset-Based Fees (arrears):

If billing in arrears, one quarter (1/4) of the total asset-based fee, prorated according to the date of execution ("inception date") of the CPAA, will be payable at the end of the calendar quarter in which the CPAA was executed. The remaining three quarterly portions of the annual fee amount will be individually due and payable by the client at the end of each subsequent calendar quarter. This arrangement will continue until the CPAA is properly terminated or otherwise modified.

Annual Asset-Based Fees (In connection with recommendation or selection of outside investment advisers):

Outside managers recommended or selected by SFG charge their own advisory fees for managing client assets/accounts. Such fees shall generally be based on a percentage of the assets under management. SFG's fees are subject to negotiation and are part of the overall fees charged by such outside money managers. SFG's compensation will not increase the overall fees charged by outside money managers who are actively managing a client's assets. Additional details related to fees charged by outside investment advisers will be explained in any such adviser's disclosure document.

Assessment of Annual Asset-Based Fees (In connection with recommendation or selection of outside investment advisers):

SFG may or may not bill or invoice clients directly for its fees related to the recommendation and/or selection of other investment advisers, depending on the nature of the arrangement. Such fees may be charged in advance or in arrears; monthly, quarterly, or annually. Further, fees may be collected via the custodian or by way of direct billing by such investment adviser. In the event that the outside adviser handles deducting all fees, SFG's compensation shall be received by SFG from the other adviser in accordance with the normal and customary billing practices as outlined in the outside investment adviser's

Item 1.D
(continued)

disclosure document.

Annual Fixed Fees:

SFG may charge an annual fixed fee for its advisory services. SFG's fixed fee range is from \$500 to \$20,000 on an annual basis, depending upon the level and scope of the services required. Alternatively, SFG may charge a non-annual fixed fee for its advisory services, which could include or be limited solely to financial planning services.

The services that may correspond to the designated fixed fee amount may vary. SFG is unable to forecast the exact services that may be involved for the client who is charged \$500 or one who is charged \$20,000 for SFG's services on a fixed-fee basis. As such, the determination of the fixed-fee amount will vary based upon any number of factors which may be specific to each individual client's set of circumstances. Advisory services that are anticipated to be more complex will generally warrant a higher fixed-fee amount. Less complex services may generally result in a lower fixed-fee amount.

There is no set group of services that may be obtained at the \$500 level nor any particular set of services that may be obtained at the \$20,000 level. The fixed-fees will be based on the complexity of the service that is anticipated to be necessary for the particular client.

SFG's fixed fee for providing advisory services is determined based on anticipated work to be done. Since SFG cannot accurately determine the fee amount until learning about the client's financial circumstances, it is SFG's practice to provide an initial, no obligation, no cost meeting in order to become familiar with the client's circumstances. SFG will obtain information from the client verbally and on any current information gathering documents approved for use by SFG. The information gathered during this session will assist SFG in determining the fee amount for the client's advisory services.

Assessment of Annual Fixed Fees:

One quarter (1/4) or one twelfth (1/12) of the total annual investment advisory fee amount, prorated according to the date of execution of the CAA ("inception date"), will be payable at the end of the calendar quarter or month in which the CAA was executed. The remaining three quarterly portions or eleven monthly portions of the annual fee will be individually due and payable by the client at the end of each subsequent calendar quarter or month and such arrangements will continue in effect unless the CAA is properly terminated or otherwise.

If any advisory relationship begins after the first day of a quarter or month or terminates before the last day of a quarter or month, fees are prorated accordingly.

Fixed Fees (Non-Annual)

In certain circumstances, SFG may charge a fixed fee for its advisory services where the service may involve a specialized function like the creation of a written financial plan or some other sort of project that does not involve ongoing investment supervisory services. Such fees are generally set as a pre-determined, one-time (i.e. not a fee for annual service) fixed fee. All such fixed fees are determined on a case by case basis and will vary upon the specific factors associated with the requested service. All fixed fees will be specified in the CAA or other agreement used to cover such services.

Assessment of Non-Annual Fixed Fees:

Upon the determination of a non-annual fixed fee arrangement, SFG may request advance payment of one half of the entire fixed fee amount prior to performing the agreed upon advisory services. Upon completion of the services any unpaid portion of the initially agreed upon fixed fee shall be due within fifteen (15) calendar days of the date of the invoice provided to the client.

<p>Item 1.D (continued)</p>	<p>In the event of termination of the CAA, the client will receive a pro rata refund of any pre-paid fees attributable to any period after the date of termination.</p> <p><i>Hourly Fees:</i></p> <p>SFG may charge an hourly fee for its advisory services. SFG's hourly fees are negotiable, but generally range from \$85 to \$350 on an hourly basis, depending upon the level and scope of the services required.</p> <p>SFG's hourly rate is determined based on anticipated work to be done. Since SFG cannot accurately determine the hourly fee amount until learning about client's financial circumstances, it is SFG's practice to provide an initial, no obligation, no cost meeting in order to become familiar with the client's circumstances.</p> <p>The services that may correspond to the designated hourly fee amount may vary. SFG is unable to forecast the exact services that may be involved for a client who is charged \$85 as opposed to \$350 for SFG's services on an hourly-fee basis. As such, the determination of the hourly-fee amount will vary based upon any number of factors that may be specific to each individual client's set of circumstances and it will be based upon the rate generally charged by the Investment Adviser Representative or analyst performing the work. SFG will always try to assign the most appropriate individual(s) to perform the work based on that person's knowledge and experience. Advisory services that are anticipated to be more complex will generally warrant a higher hourly-fee amount. Less complex services may generally result in a lower hourly-fee amount.</p> <p>There is no set group of services that may be obtained at the \$85 level nor any particular set of services that may be obtained at the \$350 level. The hourly-fees will be based on the complexity of the service that is anticipated to be necessary for the particular client(s).</p> <p>SFG will obtain information from the client verbally and on any current information gathering documents approved for use by SFG. The information gathered during this session will assist SFG in determining the most appropriate course of action for the client's financial and investment activity.</p> <p><i>Assessment of hourly fees:</i></p> <p>Hourly fee(s) will be billed in arrears, as specific services are performed. Hourly fees shall be calculated by multiplying the number of hours of service performed by the designated hourly rate (i.e. # of hours times designated hourly rate). SFG shall bill in increments of fifteen (15) minutes.</p> <p>In most cases, an invoice shall be presented to the client at the point of service and payment shall be due and payable at that time. In cases where the client does not satisfy an outstanding hourly fee amount at a point of service, an invoice shall be generated and submitted to the client. Such invoices shall generally be prepared not later than the fifth business day of the calendar month following the month in which the service(s) was performed that resulted in the fee. The invoice shall be payable within fifteen (15) days of the date on the invoice.</p> <p><i>Other Fee Considerations:</i></p> <p><i>Billing by custodian.</i> Contemporaneously with the execution of the CAA, the client may be asked to sign an authorization that will allow the custodian of any of his/her accounts to debit such account(s) the amount of certain service fees owed to SFG and remit such to SFG. The authorization shall remain valid until a written revocation of the authorization is received by SFG. In connection with this fee deduction process, the custodian shall send to the client a statement, at least quarterly, indicating:</p> <ul style="list-style-type: none"> • all amounts disbursed from the account, and • the amount of advisory fees paid directly to SFG.
---------------------------------	--

Item 1.D (continued)	<p><i>Direct billing.</i> If so desired, the client may choose to be billed directly by SFG for SFG’s fees. If so chosen, the client shall be invoiced by the fifth business day of the month subsequent to the most recently ended calendar quarter. Payments shall be due on or by the final business day of the month in which the invoice is generated.</p> <p>SFG, in its sole discretion, may charge a lesser or no advisory fee based upon certain criteria (i.e. anticipated future earnings capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with the client, etc.). No increase in SFG’s fees shall be effective without prior written notification of at least thirty (30) days to the client.</p> <p>SFG may charge an annual maintenance fee of \$50 per year per account. This annual maintenance fee shall be assessed at the same time for all client accounts, however, in the case where a client terminates SFG’s CAA, the annual maintenance fee is expected to be assessed at that time.</p> <p>In addition to SFG’s investment advisory fees, the client may be assessed other fees by parties independent from SFG. The client may also incur, relative to certain investment products (such as mutual funds), charges imposed directly at the investment product level (e.g. advisory fees, administrative fees, and other fund expenses). Brokerage fees/commissions charged to the client for securities trade executions may be billed to the client by the broker-dealer or custodian of record for the client account, not SFG. Any such fees are exclusive of, and in addition SFG’s compensation. The client acknowledges he/she will be solely and directly responsible for fees, including other than SFG’s fees billed directly to the client.</p> <p>CAA Termination</p> <p>Either party may terminate the services described above, with written thirty-day notice to the other. Any charges incurred prior to termination will be charged pro rata based upon the period covered. Termination requests may be sent to SFG at the following address:</p> <p style="text-align: center;">Strategic Financial Group, LLC 101 East 90th Drive, Merrillville, IN 46410</p> <p>At termination, the Adviser may charge a \$100 termination fee for each account which will be deducted from any refund due to the Client for fees paid in advance. All termination fees due to Adviser will be netted against any possible refund of prepaid fees from all accounts of Client and any remaining termination fee due to the Adviser will be billed directly to Client.</p>																					
Item 5	Any associated person of SFG providing investment advice to be delivered to or used on behalf of a client is required to meet the specific state registration and licensing/examination requirements in order to provide such advice. This licensing typically involves the Series 65 or the combination of the Series 66 plus the Series 7 or obtaining one or more professional certifications, such as the CFA, CFP®, PFS, etc.																					
Item 6	<p>Education and Business Background</p> <table><tr><td>Name:</td><td colspan="2">Chad Hassinger, CFP®</td></tr><tr><td>Year of Birth:</td><td colspan="2">1970</td></tr><tr><td colspan="3">Formal education after high school.</td></tr><tr><td>Institution</td><td>Degree / Major</td><td>Years</td></tr><tr><td>College of Financial Planning</td><td>CERTIFIED FINANCIAL PLANNER™</td><td>1993-1995</td></tr><tr><td>Valparaiso University</td><td>BS, Business Administration</td><td>1988-1992</td></tr><tr><td colspan="3">Business background for the preceding five years.</td></tr></table>	Name:	Chad Hassinger, CFP®		Year of Birth:	1970		Formal education after high school.			Institution	Degree / Major	Years	College of Financial Planning	CERTIFIED FINANCIAL PLANNER™	1993-1995	Valparaiso University	BS, Business Administration	1988-1992	Business background for the preceding five years.		
Name:	Chad Hassinger, CFP®																					
Year of Birth:	1970																					
Formal education after high school.																						
Institution	Degree / Major	Years																				
College of Financial Planning	CERTIFIED FINANCIAL PLANNER™	1993-1995																				
Valparaiso University	BS, Business Administration	1988-1992																				
Business background for the preceding five years.																						

Item 6
(continued)

Entity	From	To
IMAT, LLC	03/2009	Present
SII Investments, Inc.	10/2007	Present
Advantis Mortgage Consulting LLC	01/2007	01/2008
Chandana Group	10/1999	Present
Dunegrass, LLC	09/1999	Present
Strategic Financial Group, LLC	04/1996	Present
United Planners Financial Services of America	04/1996	10/2007
HK Management, LLC	01/1996	Present
Lakepoint Properties	09/1994	Present
HK Foods, Inc.	09/2003	12/2006

Name:	Michael Jankowske, CFP®	
Year of Birth:	1952	
Formal education after high school.		
Institution	Degree / Major	Years
College of Financial Planning	CERTIFIED FINANCIAL PLANNER™	1990-1992
Valparaiso University	BA, Marketing and Finance	1970-1974
Business background for the preceding five years.		
Entity	From	To
SII Investments, Inc.	10/2007	Present
Advantis Mortgage Consulting LLC	01/2007	01/2008
Hamelind Foundation	01/2004	Present
Dunegrass, LLC	01/1999	Present
Strategic Financial Group, LLC	04/1996	Present
United Planners Financial Services of America	04/1996	10/2007

Name:	Robert Kammerer, CFP®	
Year of Birth:	1967	
Formal education after high school.		
Institution	Degree / Major	Years
College of Financial Planning	CERTIFIED FINANCIAL PLANNER™	1996-1998
Valparaiso University	BS, Business Administration	1989-1990
DePauw University	N/A	1987-1988
Business background for the preceding five years.		
Entity	From	To
IMAT, LLC	03/2009	Present
SII Investments, Inc.	10/2007	Present
Advantis Mortgage	01/2007	01/2008
Great Lakes Food Distributing	01/2007	Present

Item 6 (continued)	Company, Inc.		
	Chandana Apartments LLC	06/2006	Present
	HK Management LLC	01/2000	Present
	Chandana Group	10/1999	Present
	Dunegrass, LLC	01/1998	Present
	Strategic Financial Group, LLC	04/1996	Present
	United Planners Financial Services of America	04/1996	10/2007
	Lakepoint Properties	09/1994	Present
	Name:	Rena Noe, CFP®	
	Year of Birth:	1965	
	Formal education after high school.		
	Institution	Degree / Major	Years
	Purdue University	BS, Financial Counseling and Planning	1996-1999
	Ivy Tech State College	AS, Accounting	1994-1996
	Purdue University	BA, Elementary Education	1983-1987
	Business background for the preceding five years.		
	Entity	From	To
	Strategic Financial Group, LLC	04/2000	Present
	SII Investments, Inc.	10/2007	Present
	Advantis Mortgage	01/2007	01/2008
	United Planners Financial Services of America	04/2000	10/2007
	Name:	Deborah Sarkey, CPA	
	Year of Birth:	1958	
	Formal education after high school.		
	Institution	Degree / Major	Years
	DePaul University	MS, Taxation	1984-1988
	State of Indiana Board of Accountancy	Certified Public Accountant	1983
	Purdue University	BS, General Management (Accounting and Finance)	1976-1980
	Business background for the preceding five years.		
	Entity	From	To
	Strategic Financial Group, LLC	12/2001	Present
Item 7.A, 7.B, and 7.C	In addition to being an investment advisory firm, SFG is also a CPA firm and is engaged in business consulting. SFG’s accounting and business consulting services are also available to advisory clients. Individuals that provide investment advisory services on behalf of SFG may also be involved in SFG’s accounting and/or consulting practices.		
Item 9	<u>Code of Ethics</u>		

<p>Item 9 (continued)</p>	<p>At SFG, we take great pride in our commitment to serving our clients' needs and the integrity with which we conduct our business. In our recent history, the financial services industry has come under significant scrutiny, especially in the area of the inherent responsibility of financial professionals to behave in the best interests of their clients.</p> <p>SFG has developed a Code of Ethics ("Code") as a means of memorializing our vision of appropriate and professional conduct in carrying out the business of providing investment advisory services. Our Code addresses issues such as the following:</p> <ul style="list-style-type: none"> • Standards of conduct and compliance with applicable laws, rules, and regulations • Protection of material non-public information • The addressing of conflicts of interest • Employee disclosure and reporting of personal securities holdings and transactions • The firm's IPO and private placement policy • The reporting of violations of the Code • Educating employees about the Code • Enforcement of the Code <p>Each of SFG's representatives has been furnished with a copy of our Code and has signed their names to a written acknowledgement attesting to their understanding of the Code and acceptance of its terms. A copy of our Code is available to all clients upon request.</p>
<p>Item 9.B</p>	<p>Individuals associated with SFG may also be associated with SII Investments, Inc. ("SII"), Member FINRA/SIPC. SFG and SII are not affiliated companies. SII offers general securities products, which will be offered separately from SFG's investment advisory services. As a result of certain investment-related recommendations (or other investment advisory services) provided to its clients, individuals associated with SFG who are also properly qualified/licensed and registered on behalf of SII may facilitate certain securities transactions related to SFG's advisory services, on behalf of such clients through SII. Any such transactions may be facilitated through SII, in its capacity as a registered broker-dealer. All such activities are considered "brokerage activities" for the purposes of this disclosure document. To the extent allowed by applicable law and/or regulation, individuals associated with SFG may receive compensation for both their investment advisory activities under SFG as well as their brokerage activities under SII.</p>
<p>Item 9.E</p>	<p>SFG or its personnel may invest for their own accounts or have a financial interest in the same securities or other investments that SFG recommends or acquires for the accounts of the client, and may engage in transactions that are the same as or different than transactions recommended to or made for the client's accounts. Such transactions are permitted if effected, pre-cleared and reported in compliance with SFG's Policy on personal securities transactions. Generally, personal securities transactions will not be pre-cleared when an order for the same or a related security is pending for the account of the client. SFG's Designated Principal reviews reports of personal transactions in securities by SFG personnel quarterly or more frequently if required.</p> <p><u>Investment Policy</u></p> <p>None of SFG's investment advisory representatives may effect for himself or herself or for his or her immediate family (i.e. spouse, minor children, etc.; collectively, "Covered Persons") any transactions in a security which is being actively recommended to any of SFG's clients, unless in accordance with the following Firm Procedures.</p> <p><u>Firm Procedures</u></p> <p>In order to implement SFG's Investment Policy, the following procedures have been put into place with respect to SFG and its Covered Persons:</p> <ol style="list-style-type: none"> 1. If the Firm is recommending that any of its clients buy any security, no Covered Persons may

	<p>purchase that security prior to the client's purchase of that security; and</p> <p>2. If the Firm is recommending that any of its clients sell any security, no Covered Persons may sell that security prior to the client's sale of that security.</p> <p>It is the primary intent of the preceding procedures is to ensure that the best interests of the Firm's clients are always served over that of the Firm's. Trading by or on behalf of the Firm and/or its Covered Persons that results in the interests of the Firm or its Covered Persons being served over that of its clients could be considered a breach of the Firm's fiduciary duty and thus, is aggressively discouraged.</p>
Item 11.A	<p>The Firm will review the client's accounts annually . The Designated Principal or his/her designee shall review the client accounts for best execution, suitability, and service. The Designated Principal will review the performance and cost basis for the client's transactions. The client's objectives are used to review for suitability. Quarterly, transactions are reviewed referencing clients' objectives for any transaction that may not fit the client's stated objectives, or SFG's understanding of the client's objectives will be flagged and reviewed with the investment adviser representative placing the trade.</p> <p>Events that may trigger further client account reviews in addition to the standard annual review process may include, but would not be limited to, a notable increase in the volume of requests by the client to effect transactions in his/her accounts, where such transactions may appear to be inconsistent with the client's previously stated investment objectives. Other factors may include requests by the client to liquidate certain securities positions/contracts where such transactions may appear to be inconsistent with the client's previously stated investment objectives. Additional triggering factors could be the performance on an individual account being an outlier to the performance of accounts with similar investment objectives, and a very important trigger would be customer complaints. This last trigger would be a prime example of a trigger for an intermittent review of a client account.</p> <p>Number of reviewers: 8 Name and title of Reviewers:</p> <ul style="list-style-type: none"> • Rena Noe, Chief Compliance Officer/Director of Operations • Chad Hassinger, CEO • Robert Kammerer, COO • Mike Jankowski, Executive Vice President • Doug Hoover, IAR • Steve Barret, IAR • Steve Gronceski, IAR • Susan Kuczera, IAR <p>Each reviewer will employ the procedures noted above for the client's accounts subject to SFG's investment advisory services.</p>
Item 11.B	<p>Statements will be provided no less frequently than quarterly by the custodian, not by SFG. Account statements will identify account positions, balances, and transaction details. Upon the client's request, a quarterly account appraisal may be created for the client as well as an annual year-end statement.</p>
Item 12.A	<p>SFG may exercise discretion over the following areas/items.</p> <ol style="list-style-type: none"> 1) 12.A(1): The specific securities to be bought or sold on the client's behalf; 2) 12.A(2): The amount of securities to be bought or sold on the client's behalf; and 3) 12.A(3): The particular broker or dealer to be used for arranging client securities transactions. <p>SFG will have authority to exercise its full discretion on the above named factors without restriction. If</p>

	<p>done so on a non-discretionary basis, SFG shall make certain recommendations that must be authorized by the client prior to SFG’s facilitation of any such transactions that may have been recommended. SFG shall observe any other specific limitations that may be imposed by the client in relation to this discretionary authority.</p> <p>Transactions for the client’s account generally will be effected independently, unless SFG decides to purchase or sell the same securities for several clients at approximately the same time. SFG may (but is not obligated to) combine or “batch” such orders to obtain best execution, to negotiate more favorable transaction rates. To the extent that SFG elects to aggregate client orders for the purchase or sale of securities, including securities in which SFG’s principals and/or associated persons may invest, SFG shall generally do so in accordance with the parameters set forth in SEC No-Action Letter, <i>SMC Capital, Inc.</i> SFG shall not receive any additional compensation or remuneration as a result of the aggregation.</p>
Item 12.B	<p>From time to time, SFG may refer the client to broker-dealers for the purposes of the effecting of securities transactions. For details as to what factors SFG may consider in selecting such broker-dealers, see below.</p>
Item 12.B (continued)	<p>SFG is not a broker-dealer. Unless the client directs otherwise, SFG shall generally recommend that all the client’s accounts be maintained at, by, or through certain other firms that are unaffiliated with SFG. Such firms shall generally be broker-dealers that may also maintain registrations that allow such firms to engage in other types of businesses outside of their broker-dealer activities.</p> <p>Any such other firm may act in the capacity of “broker of record” for the client’s accounts, in which case, another firm may serve as the custodian for the Client account(s). Alternatively, any such other firm may serve as both the “broker of record” and “custodian” for the client’s accounts. In no case shall SFG act or attempt to act in the capacity of “broker of record” or “custodian” of the client’s account, funds, or other assets.</p> <p>Although not all-inclusive, SFG may recommend the following brokerage firms or custodians:</p> <ol style="list-style-type: none"> 1) Curian Capital, LLC 2) Fidelity Brokerage Services, Inc 3) National Advisors Trust Company 4) Principal Funds 5) RiverNorth Capital Management, Inc. 6) SEI Private Trust Company 7) TD Ameritrade, Inc. <p>Factors that SFG considers in recommending certain broker-dealers or custodians to clients may include such entity’s financial strength, reputation, execution, pricing, and service. In return for effecting securities transactions through certain broker-dealers/custodians, SFG or certain of its representatives may receive certain support services that may assist SFG in its investment decision-making process for all of SFG’s clients.</p> <p>In seeking best execution, the determinative factor is not always the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of brokerage services, including factors such as execution capability, commission rates, and responsiveness. Accordingly, although SFG will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for the client’s account transactions.</p> <p>The client may direct SFG to use a particular broker-dealer (subject to SFG’s right to decline and/or terminate the engagement) to execute some or all transactions for the client’s account. In such an event, the client will negotiate terms and arrangements for the account with that broker-dealer, and SFG will not seek better execution services or prices from other broker-dealers or be able to “batch” the client’s transactions for execution through other broker-dealers with orders for other accounts managed by SFG.</p>

