

# Form ADV 2B Brochure Supplements

## For Supervised Persons of



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Culver City, CA 90230-7612  
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[www.vfgroup.net](http://www.vfgroup.net)  
IARD # 150370

Last Updated: November 30, 2014

*This brochure provides information about the qualifications and business practices of Supervised Persons of VFG Advisors, Inc. ("VFGA"). If you have any questions about the contents of this brochure, please contact Tuan Ngo at (310) 410-8341 and/or via email at [compliance@vfgroup.net](mailto:compliance@vfgroup.net). 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 VFGA also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

*Although VFGA may use the term "registered investment adviser" or use the term "registered" through each Form ADV Part 2B, the use of these terms is not intended to imply a certain level of skill or training.*



## VFG Advisors, Inc.

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## Form ADV Part 2B: Brochure Supplement

For Supervised Person:

### Jason B. Vanclef

CRD# 5096529

Last Updated: November 30, 2014

*This brochure supplement provides information about Jason Vanclef, a Supervised Person, that supplements VFGA's ADV Part 2A Disclosure Brochure. You should have received a copy of that Brochure. Please contact Tuan Ngo at (310) 410-8341 and/or via email at [compliance@vfgroup.net](mailto:compliance@vfgroup.net) if you did not receive VFGA's Disclosure Brochure or if you have any questions about the contents of this supplement.*

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*Although VFGA may use the term "registered investment adviser" or use the term "registered" through this Form ADV Part 2B, the use of these terms is not intended to imply a certain level of skill or training.*

## Item 2. Educational Background and Experience

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VFG requires certain licensing standards as well as a certain level of business experience for giving investment advice to clients. For example, all advisers must be professionals with relevant industry experience in order to adequately demonstrate a certain level of expertise in securities management and analysis. VFG requires that all investment adviser representatives maintain the minimum licensing qualifications in accordance with all federal, state, and self-regulatory organization (SRO) rules and regulations.

Name: Jason B. Vanclef

Year of Birth: 1971

Education: Cal Poly San Luis Obispo; B.S. in Biological Chemistry (1994)

Background: VFG Advisors, Inc.; President (04/2009-Present)  
VFG Securities, Inc. Registered Principal/Advisory Rep. (10/2009- Present)  
Vanclef Financial Group, Inc.; President/CEO (01/2002-Present)  
Madison Avenue Securities, Inc. Registered Rep./Advisory Rep. (02/2007-10/2009)  
Sigma Financial Corp. Registered Representative (02/2006-02/2007)

Licenses: FINRA Series 7 & 24; NASAA Series 66  
California Life, Health and Variable Insurance Licensed

Designations: Certified Estate Planner (CEP)  
Registered Financial Consultant (RFC)

### Use of Professional Designations

**Certified Estate Planner (CEP®).** The National Institute of Certified Estate Planners (NICEP) is an Indiana not-for-profit corporation, and a tax-exempt entity under Internal Revenue Code 501(c)(6). It is established as a supporting organization for the purpose of educating primarily financial, legal, and tax professionals in matters of estate planning.

The NICEP provides sufficient educational courses and examinations to certify those professionals that successfully complete these programs with either the certification CEP® (Certified Estate Planner™), or MCEP® (Master Certified Estate Planner™).

These trademark certifications are nationally recognized as a standard for estate planning excellence, and are used by permission of the NICEP alone. They may only be used by those who satisfactorily complete the coursework and qualifying examinations, maintain their annual certification fees and continuing education requirements, and adhere to a strict code of professional ethics.

**Registered Financial Consultant (RFC).** The International Association of Registered Financial Consultants (IARFC) is a non-profit credentialing organization of proven financial professionals formed to foster public confidence in the financial planning profession, to help financial advisors exchange planning techniques, and to give deserved recognition to those practitioners who are truly committed to ethical standards and continuous professional education.

The primary purpose of the IARFC is to provide the public with a convenient access to a pool of well-qualified practitioners from which to choose a personal financial advisor.

The Registered Financial Consultant (RFC) is a professional designation awarded by the IARFC to those financial advisors who can meet the high standards of education, experience and integrity that are required of all its members.

Minimum Requirements for Registered Financial Consultant includes:

- i. **Experience.** Must have a minimum of four years of experience as a full-time practitioner in the field of financial planning or financial services.
- ii. **Education.** Applicant must possess a baccalaureate or graduate degree in financial planning services or hold one of the following professional degrees or designation: AAMS, CFA, CFP, ChFC, CLU, CPA, EA, JD. Alternatively, a candidate may complete a CFP-equivalent course at an accredited institution or an IARFC approved curriculum and passed a written examination. Each applicant must have at least four years of professional experience in the field of financial planning or financial services, meet local licensing requirements, and adhere to the RFC Code of Ethics. The RFC designation requires 40 hours of Continuing Education every year, including two hours of business ethics every two years.
- iii. **Examination.** The educational curriculum must have included an examination process. If not, an experienced candidate must pass on RFC challenge examination.
- iv. **Licensing.** Applicant must have met local licensing requirements securities, life and health insurance; or an applicant who is a fee-only planner and is not licensed must submit information on the applicant's RIA or ARIA affiliation or business conduct procedures.
- v. **Conduct.** Applicant must have a sound record of business integrity with no suspension or revocation of any profession licenses.
- vi. **Ethics.** Applicant must subscribe and adhere to the RFC Code of Ethics.

### Item 3. Disciplinary Information

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We have a duty to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our investment advisor representatives and management.

#### Criminal or Civil Action

There are no disclosure events involving a criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which Jason Vanclef is involved.

#### Administrative Proceeding (SEC/Federal/State)

There are no disclosure events involving a SEC or Federal administrative proceeding in which Mr. Vanclef is involved.

There is one disclosure event involving a State administrative proceeding in which VFGA and its principal (Mr. Jason Vanclef) is involved. In 2011, VFGA was served notice of a complaint by the State of Colorado's Department of Regulation Agency (DORA) against VFG Advisors, Inc. ("VFGA"), VFG Securities, Inc. ("VFGS"), and Jason Vanclef as firm principal for the employment of an unlicensed supervised person / investment adviser representative. VFGA, VFGS, and their associated persons were ordered to withdraw their respective registrations from the State of Colorado, and to refrain from conducting any securities or advisory business within the State of Colorado with or for residents in Colorado for a period of 3 years, or until the State of Colorado re-approves VFGA, VFGS and Vanclef's registrations in their state.

More details of the case can be found on the Investment Advisor's Public Disclosure site (IAPD) at [www.Adviserinfo.sec.gov](http://www.Adviserinfo.sec.gov), or the BrokerCheck link, which is [www.finra.org/brokercheck](http://www.finra.org/brokercheck).

#### Administrative Proceeding (SRO)

There are no disclosure events involving a self-regulatory organization (SRO) proceeding in which Mr. Vanclef is involved.

#### Other Disclosure Events

In the interest of full disclosure, and the fact that the following disclosure may be considered by even one customer as material to the integrity of our management, VFGA makes the following disclosure.

In April, 2009, Mr. Vanclef received a civil complaint from a customer while associated with prior broker-dealer. The customer alleged misrepresentation and breach of written contract concerning a third-party managed account. No compensatory damages were claimed. In September, 2009, the hearing judge denied plaintiff/customer's request for civil proceedings and compelled customer to arbitration, granting Mr. Vanclef a stay of proceeding. Mr. Vanclef and the firm he was associated with believed the civil claims to be frivolous and completely without merit, containing false statements and inaccurate information about the events in question. Neither Mr. Vanclef nor his prior broker dealer ever heard from said customer again, and no arbitration complaint was ever filed in this matter.

Mr. Vanclef has been the subject of 6 customer-initiated complaints received between 2012 - 2014. Each of these disputes involve customer purchases of non-traded real estate investment trust investments or tenant-in-common real estate purchases, and specifically include claims that the investment recommendations were not suitable. Mr. Vanclef and VFGA believe that each dispute is more of a result of the real estate market crisis, than a result of any wrong doing by Mr. Vanclef. Each dispute has been settled. There are no other disclosure events for Mr. Vanclef or any other VFGA Management Personnel. This information may be considered material due to the fact that Mr. Vanclef may still on occasion recommend these products to be included in a client's portfolio, based on a client's individually stated investment objectives, risk tolerance and suitability.

The details of these cases can be found on the Investment Advisor's Public Disclosure site (IAPD). Clients can access IAR disciplinary history by clicking on the IAPD link, which is [www.Adviserinfo.sec.gov](http://www.Adviserinfo.sec.gov), or the BrokerCheck link, which is [www.finra.org/brokercheck](http://www.finra.org/brokercheck).

### **Use of BrokerCheck**

If this supplement is delivered electronically, and any supervised person under the firm has a disciplinary history, the details of any disclosure may be found on either the Financial Industry Regulatory Authority's (FINRA) BrokerCheck system ([www.finra.org/brokercheck](http://www.finra.org/brokercheck)) or the IAPD ([www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)).

There is no other *proceeding* in which a professional attainment, designation, or license of any of the supervised persons as part of this Brochure Supplement was revoked or suspended because of a violation of rules relating to professional conduct, nor were there any incidents where any of the supervised persons as part of this Brochure Supplement resigned (or otherwise relinquished his attainment, designation, or license) in anticipation of such a *proceeding*.

## **Item 4. Other Business Activities**

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### **Other Related Investment Business**

Mr. Vanclef is not a futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated *person* of an FCM, CPO, or CTA.

### **Other Business Activity**

#### **VFG Securities, Inc. ("VFGS")**

In addition to his role as owner, Principal, CEO, President, and a Series 66 Investment Adviser Representative of VFG Advisors, Inc., Jason B. Vanclef is a Series 7 Registered Representative and Series 24 General Securities Principal of VFG Securities, Inc. ("VFGS"), a registered broker-dealer, member of FINRA and SIPC. As such, Mr. Vanclef may recommend securities products for a commission. This could present a potential conflict of interest in that Mr. Vanclef could receive fees and commissions if the client chooses to implement recommendations made in his capacity as a registered representative. However, the client is under no obligation to purchase products that Mr. Vanclef may recommend, or to purchase products through VFGS. All material conflicts of interest are disclosed regarding VFGS which could be reasonably expected to impair the rendering of unbiased and objective advice.

#### **Vanclef Financial Group, Inc.**

Jason B. Vanclef, President and CEO of VFG Advisors, Inc., also performs executive duties as President and CEO of Vanclef Financial Group, a licensed life insurance agency. Mr. Vanclef is a licensed life insurance agent in the state of California and offers insurance products through carriers in which he is appointed and for which he may be paid a commission, and in such capacity, may recommend, on a fully disclosed basis, the purchase of certain insurance-related products which may present a potential conflict of interest between VFG's interests and those of its advisory clients. However, clients are under no obligation to purchase products VFG or its management and supervised persons may recommend, or to purchase products or services through VFG or its management and supervised persons.

#### **Real Estate Done 4U ("RED4U")**

Based on results from certain VFGA client portfolio reviews, including suitability, risk tolerance and investment objectives, Mr. Vanclef may recommend that clients include real estate in their portfolios in an effort to meet their stated objectives. Mr. Vanclef may refer VFGA clients to RED4U, a real property investment company, for which he may be paid a referral fee. However, clients are under no obligation to purchase real estate through RED4U, which Mr. Vanclef may recommend, or to purchase products or services through VFGA, its affiliated companies, its supervised persons or its management persons.

#### **SDC Energy (Sandview Development Corporation)**

Based on results from certain VFGA client portfolio reviews, including suitability, risk tolerance and investment objectives, Mr. Vanclef may recommend that clients include solar energy in their portfolios in an effort to meet their stated objectives. Mr. Vanclef may refer clients to SDC Energy (Sandview Development Corporation or "SDC"), a real property investment company, for which he may be paid a referral fee. However, clients are under no obligation to talk to or invest with SDC Energy, which Mr. Vanclef may recommend.

Mr. Vanclef is also a licensed life, health and disability insurance agent and Notary Public in the State of California.

### **Item 5. Additional Compensation**

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Mr. Vanclef does not receive any "economic benefit" as that term is defined (e.g. sales awards and other prizes) from a non-client for providing advisory services.

### **Item 6. Supervision**

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Tuan Ngo is the designated supervisor for VFGA IARs, responsible for providing supervisory oversight regarding VFGA's advisory business and its management and supervised persons. Mr. Ngo's contact information is (310) 410-8341, or [compliance@vfgroup.net](mailto:compliance@vfgroup.net). All supervision is performed on a regular and continuous basis where all transactional activity is reviewed by Tuan Ngo, as well as a review of ongoing management of investment advice.

### **Item 7. Requirements for State-Registered Advisers**

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#### **Disclosure Events**

Mr. Vanclef has not been involved in any disclosure event where he was *found liable* in an arbitration claim alleging damages in excess of \$2,500, or found liable in a civil, self-regulatory organization, or administrative proceeding; nor has he been the subject of a bankruptcy petition.

However, Mr. Vanclef has been *the subject* of arbitration claims or complaints. These disclosures are made previously in this brochure supplement under **Item 3**.



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## Form ADV Part 2B: Brochure Supplement

For Supervised Person:

### David R. Bishop

CRD #1524035  
6049 Renaissance Place, Suite H  
Toledo, OH 43623  
Office: (419) 851-0056  
Fax: (419) 851-0058  
Email: [Dave@vfgroup.net](mailto:Dave@vfgroup.net)

Last Updated: November 30, 2014

*This brochure supplement provides information about David Bishop, a Supervised Person, that supplements VFGA's ADV Part 2A Disclosure Brochure. You should have received a copy of that Brochure. Please contact Tuan Ngo at (310) 410-8341 and/or via email at [compliance@vfgroup.net](mailto:compliance@vfgroup.net) if you did not receive VFGA's Disclosure Brochure or if you have any questions about the contents of this supplement.*

*Additional information about VFGA is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) or its own website at [www.vfgroup.net](http://www.vfgroup.net).*

*Although VFGA may use the term "registered investment adviser" or use the term "registered" through this Form ADV Part 2B, the use of these terms is not intended to imply a certain level of skill or training.*

## Item 2. Educational Background and Experience

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VFG requires certain licensing standards as well as a certain level of business experience for giving investment advice to clients. For example, all advisers must be professionals with relevant industry experience in order to adequately demonstrate a certain level of expertise in securities management and analysis. VFG requires that all investment adviser representatives maintain the minimum licensing qualifications in accordance with all federal, state, and self-regulatory organization (SRO) rules and regulations.

Name: David R. Bishop

Year of Birth: 1962

Education: Cleveland State University (1980-1981)  
Owens Community College (1982-1984)

Background: VFG Securities, Inc., Registered Representative (10/2011 – Present)  
VFG Advisors, Inc., Investment Adviser Representative (10/2011 – Present)  
Sunshine Financial Group, DBA Bishop Wealth Planning, Insurance Sales (2011 – Present)  
Sun Shine Investment Consultants LLC, Insurance Sales (07/2011 – 08/2012)  
W&S Brokerage Services Inc., Registered Representative (09/2000 – 01/2007)  
W&S Brokerage Services Inc., Registered Representative (09/2008 – 07/2011)  
Western Southern Life, Insurance Sales Rep/Sales Manager (02/1996 – 07/2011)  
Capital Analysts, Inc., Registered Representative (07/1996 – 09/2000)

Licenses: FINRA Series 6 & Series 7  
Ohio Life, Health and Annuity Insurance License

## Item 3. Disciplinary Information

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### Criminal or Civil Action

There are no disclosure events involving a criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which Mr. Bishop is involved.

### Administrative Proceeding (SEC/Federal/State)

There are no disclosure events involving an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which Mr. Bishop is involved.

### Administrative Proceeding (SRO)

There are no disclosure events involving a self-regulatory organization (SRO) proceeding in which Mr. Bishop is involved.

### Use of BrokerCheck

If this supplement is delivered electronically, and any supervised person under the firm has a disciplinary history, the details of any disclosure may be found on either the Financial Industry Regulatory Authority's (FINRA) BrokerCheck system ([www.finra.org/brokercheck](http://www.finra.org/brokercheck)) or the IAPD ([www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)).

There is no other proceeding in which a professional attainment, designation, or license of any of Mr. Bishop was revoked or suspended because of a violation of rules relating to professional conduct, nor were there any incidents where Mr. Bishop resigned (or otherwise relinquished his attainment, designation, or license) in anticipation of such a proceeding.



## **Item 4. Other Business Activities**

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### **Other Related Investment Business**

David Bishop is not a futures commission merchant (“FCM”), commodity pool operator (“CPO”), commodity trading advisor (“CTA”), or an associated *person* of an FCM, CPO, or CTA.

### **Other Business Activity**

Mr. Bishop is a Registered Representative of VFG Securities, Inc., a registered broker/dealer, member FINRA/SIPC, and as such, Mr. Bishop may recommend securities products for a commission. This could present a potential conflict of interest in that Mr. Bishop could receive fees and commissions if the client chooses to implement recommendations made in his capacity as a registered representative. However, the client is under no obligation to purchase products that Mr. Bishop may recommend, or to purchase products through VFGS. All material conflicts of interest are disclosed regarding VFG which could be reasonably expected to impair the rendering of unbiased and objective advice.

Mr. Bishop also performs management duties for his DBA/shell company, Sunshine Financial Group, DBA Bishop Wealth Planning. This entity was created and exists to manage Mr. Bishop’s business financial affairs, including his insurance business. It is not a registered financial institution.

Mr. Bishop is also a licensed life insurance agent in the State of Ohio and offers insurance products through carriers in which he is appointed and for which he may be paid a commission, and in such capacity, may recommend, on a fully disclosed basis, the purchase of certain insurance-related products which may present a potential conflict of interest between VFGA’s interests and those of its advisory clients. However, clients are under no obligation to purchase products VFGA or its management or supervised persons may recommend, or to purchase products or services through VFGA or its management or supervised persons, including Mr. Bishop.

## **Item 5. Additional Compensation**

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Mr. Bishop does not receive any “economic benefit” as that term is defined (e.g. sales awards and other prizes) from a non-client for providing advisory services.

## **Item 6. Supervision**

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Tuan Ngo is the Director of Operations and designated principal supervisor for VFGA and its supervised persons, including David Bishop, responsible for providing supervisory oversight regarding VFGA’s advisory business. Mr. Ngo’s contact information is (310) 410-8341, [compliance@vfgroup.net](mailto:compliance@vfgroup.net). All supervision is performed on a regular and continuous basis where all transactional activity is reviewed by Tuan Ngo, as well as a review of ongoing management of investment advice. Compliance oversight is provided by Mr. Edward Price, the firm’s Chief Compliance Officer. Mr. Price’s contact information is (310) 410-8341, [compliance@vfgroup.net](mailto:compliance@vfgroup.net).

## **Item 7. Requirements for State-Registered Advisers**

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### **Disclosure Events**

Mr. Bishop has not been involved in any disclosure event where he was found liable in an arbitration claim alleging damages in excess of \$2,500, or found liable in a civil, self-regulatory organization, or administrative proceeding.

However, Mr. Bishop was the subject of a Chapter 7 bankruptcy petition in April, 2001, which was discharged in August, 2001. Because this disclosure event was more than 10 years ago, the details of this case will not be found on the Investment Advisor's Public Disclosure site (IAPD). Clients can access IAR disciplinary history by clicking on the IAPD link, which is [www.Adviserinfo.sec.gov](http://www.Adviserinfo.sec.gov), or the BrokerCheck link, which is [www.finra.org/brokercheck](http://www.finra.org/brokercheck).



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## Form ADV Part 2B: Brochure Supplement

For Supervised Person:

### Mark A. Trewitt, CFP<sup>®</sup>, CLU, ChFC

*Chartered Advisor In Philanthropy<sup>®</sup>  
Certified Financial Planner<sup>™</sup>  
Accredited Estate Planner<sup>®</sup>*

CRD# 1364490  
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Last Updated: November 30, 2014

*This brochure supplement provides information about Mark A. Trewitt, a Supervised Person, that supplements VFGA's ADV Part 2A Disclosure Brochure. You should have received a copy of that Brochure. Please contact Tuan Ngo at (310) 410-8341 and/or via email at [compliance@vfgroup.net](mailto:compliance@vfgroup.net) if you did not receive VFGA's Disclosure Brochure or if you have any questions about the contents of this supplement.*

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## Item 2. Educational Background and Experience

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Name: **Mark A. Trewitt, CFP<sup>®</sup>, CLU<sup>®</sup>, ChFC<sup>®</sup>**

Year of Birth: 1960

Education: American College of Financial Planning (1990-1992)

Background: VFG Advisors, Inc.; Investment Adviser Representative, (11/2010-Present)  
VFG Securities, Inc. Registered Representative (11/2010- Present)  
Integrated Financial Services Group; President/CEO (01/2002-Present)  
Madison Avenue Securities, Inc. Registered Rep./Advisory Rep. (09/2006-11/2010)

Licenses: FINRA Series 6, 22, 26, 62; NASAA Series 63  
Life, Health and Annuity Insurance Sales License - State of Texas

Designations: Chartered Life Underwriter (CLU<sup>®</sup>)  
Chartered Financial Consultant (ChFC<sup>®</sup>)  
Certified Financial Planner<sup>™</sup> (CFP<sup>®</sup>)  
Chartered Advisor In Philanthropy<sup>®</sup>  
Accredited Estate Planner<sup>®</sup>

### Use of Professional Designations

**Chartered Life Underwriter (CLU<sup>®</sup>).** The CLU<sup>®</sup> is widely considered to be the most respected insurance designation in the industry. This designation was created in 1927 by the American College in Bryn Mawr, PA. The CLU<sup>®</sup> has traditionally been pursued by agents who wish to specialize in life insurance for business or estate-planning purposes.

The current course curriculum for the CLU<sup>®</sup> includes five required courses plus three elective courses. The required courses include the following:

- Fundamentals of Insurance Planning
- Life Insurance Law
- Individual Life Insurance
- Fundamentals of Estate Planning
- Planning for Business Owners and Professionals

The three elective courses can be chosen from such subjects as the following:

- Financial Planning: Process and Environment
- Individual Health Insurance
- Income Taxation
- Group Benefits
- Planning for Retirement Needs
- Investments
- Estate Planning Applications

**Chartered Financial Consultant (ChFC<sup>®</sup>).** The Chartered Financial Consultant<sup>®</sup> (ChFC<sup>®</sup>) credential was introduced in 1982 as an alternative to the CFP<sup>®</sup> mark. This designation has the same core curriculum as

the CFP® designation, plus two or three additional elective courses that focus on various areas of personal financial planning. The biggest difference is that it does not require candidates to pass a comprehensive board exam, as with the CFP®.

Due to the number of courses that overlap both the ChFC® and CFP®, the ChFC® and CLU marks are often taken by individuals seeking in-depth knowledge of both financial planning and insurance, but who wish to avoid a lengthy board exam.

**Certified Financial Planner (CFP®).** The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

**Chartered Advisor In Philanthropy (CAP®).** The advisor earning the CAP® designation has taken three courses in philanthropy covering various impacts of planning for family wealth, charitable giving, and gift planning for non-profits. The courses are offered through the Irwin Graduate School of The American College.

To achieve the CAP® designation advisers must;

1. complete three graduate-level courses: *Planning for Impact in the Context of Family Wealth; Charitable Strategies*; and *Gift Planning in a Nonprofit Context*.
2. complete three-years of full-time, relevant business experience.
3. adhere to The American College's Code of Ethics, which includes the following professional pledge: "I shall, in light of all conditions surrounding those I serve, which I shall make every conscientious effort to ascertain and understand, render that service which, in the same circumstances, I would apply to myself."
4. Candidates must also subscribe to at least one of the following:
  - The Code of Ethical Principles and Standards of Professional Practice of the Association of Fundraising Professionals (AFP)
  - The Model Standards of Practice for the Charitable Gift Planner adopted by the National Committee on Planned Giving (NCPG) and The American Council on Gift Annuities (ACGA).

CAP® designees must also subscribe in writing to the provisions of The Donor Bill of Rights.

The CAP® examination requires three closed-book, course-specific, two-hour proctored exams.

CAP® designees must complete 15 hours of continuing education every two years in course work directly related to the material required to obtain the CAP® designation.

CAP® designation may be removed for unethical conduct through the certification committee of The American College's Board of Trustees.

**Accredited Estate Planner (AEP®).** The AEP® designation is awarded by the National Association of Estate Planners & Councils (NAEPC) to recognized estate planning professionals who meet special requirements of education, experience, knowledge, professional reputation, and character.

An Accredited Estate Planner® applicant must meet ALL of the following requirements as established by the National Association of Estate Planners & Councils:

1. Credential requirement. To be eligible to be considered for the AEP® designation, the applicant must provide documentation of being currently licensed to practice law as an Attorney (JD) or to practice as a Certified Public Accountant (CPA), or of being currently designated as a Chartered Life Underwriter® (CLU®), Chartered Financial Consultant® (ChFC®), Certified Financial Planner (CFP®), or Certified Trust & Financial Advisor (CTFA), in any jurisdiction of the United States of America.
2. Professional discipline engaged in estate planning requirement. The applicant must be presently and significantly engaged in "estate planning activities" as an attorney, an accountant, an insurance professional and financial planner, or a trust officer.

A minimum of five (5) years of experience engaged in estate planning and estate planning activities is required in one or more of the professional disciplines described above to apply for the designation. To be exempt from the education requirements described below, an applicant must have a minimum of fifteen (15) years of experience engaged in estate planning and estate planning activities in one or more of the professional disciplines described above. Applicants with fifteen (15) years of experience must apply using the application for those qualifying under our experience exception.

The National Association of Estate Planners & Councils (NAEPC) has designated The American College as the primary provider of the education courses required to earn the AEP® designation.

### **Item 3. Disciplinary Information**

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#### **Criminal or Civil Action**

There are no disclosure events involving a criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which Mr. Trewitt is involved.

#### **Administrative Proceeding (SEC/Federal/State)**

There are no disclosure events involving an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which Mr. Trewitt is involved.

#### **Administrative Proceeding (SRO)**

There are no disclosure events involving a self-regulatory organization (SRO) proceeding in which Mr. Trewitt is involved.

#### **Use of BrokerCheck**

If this supplement is delivered electronically, and any supervised person under the firm has a disciplinary history, the details of any disclosure may be found on either the Financial Industry Regulatory Authority's (FINRA) BrokerCheck system ([www.finra.org/brokercheck](http://www.finra.org/brokercheck)) or the IAPD ([www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)).

There is no other *proceeding* in which a professional attainment, designation, or license of Mr. Trewitt's was revoked or suspended because of a violation of rules relating to professional conduct, nor were there any incidents where Mr. Trewitt resigned (or otherwise relinquished his attainment, designation, or license) in anticipation of such a *proceeding*.

### **Item 4. Other Business Activities**

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#### **Other Related Investment Business**

Mr. Trewitt is not a futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated *person* of an FCM, CPO, or CTA.

#### **Other Business Activity**

##### **VFG Securities, Inc.**

Mark A. Trewitt is a Registered Representative with VFG Securities, Inc. ("VFGS"), a registered broker/dealer, member FINRA/SIPC. As such, Mr. Trewitt may recommend securities products for a commission. This could present a potential conflict of interest in that Mr. Trewitt could receive fees and commissions if the client chooses to implement recommendations made in his capacity as a registered representative. However, the client is under no obligation to purchase products that Mr. Trewitt may recommend, or to purchase products through VFGS. All material conflicts of interest are disclosed regarding VFGS which could be reasonably expected to impair the rendering of unbiased and objective advice.

##### **Independent Insurance Agent/Broker**

Mr. Trewitt is a licensed life insurance agent in the State of Texas and offers insurance products through various insurance carriers in which he is appointed and for which he may be paid a commission, and in such capacity, may recommend, on a fully disclosed basis, the purchase of certain insurance-related products which may present a potential conflict of interest between VFGA's interests and those of its advisory clients. However, clients are under no obligation to purchase products VFGA or its associated and supervised persons may recommend, or to purchase products or services through VFGA or its associated and supervised persons.

##### **Integrated Marketing Solutions, LLC and Integrated Financial Solutions Group (IFSG Ltd)**

Mark Trewitt also performs executive duties as part owner with Integrated Marketing Solutions, LLC. In this role, Mr. Trewitt conducts business marketing services for IFSG Ltd., DBA Integrated Financial Solutions Group, LLC.

**Insurance Funding Solutions, LLC**

Mark Trewitt also performs executive duties as owner and Managing Partner with Insurance Funding Solutions, LLC, which holds managing partner interest in IFSG Ltd., DBA as Integrated Financial Services Group, a licensed life insurance agency.

**First Financial Reources**

Mr. Trewitt is also contracted directly through First Financial Resources, an insurance agency, both as a member and insurance agent. As such, this could present a potential conflict of interest in that Mr. Trewitt receives insurance commissions directly from them if a client chooses to implement recommendations made in his capacity as an insurance agent. However, the client is under no obligation to purchase products that Mr. Trewitt may recommend.

**Exceptional Risk Advisors and The Plus Group**

Mr. Trewitt, through his insurance license, also brokers specialty disability policies through Exceptional Risk Advisors, LLC and The Plus Group, insurance agencies, and is paid insurance commissions directly from them for doing so. As such, this could present a potential conflict of interest in that Mr. Trewitt receives insurance commissions directly from them if a client chooses to implement recommendations made in his capacity as an insurance agent. However, the client is under no obligation to purchase products that Mr. Trewitt may recommend.

**First Life Funding and Succession Capital Alliance**

Mr. Trewitt, through his insurance license, is appointed with First Life Funding and Succession Capital Alliance, which are sources for premium finance lending for life insurance coverage for customers and is paid insurance commissions directly from them for doing so. As such, this could present a potential conflict of interest in that Mr. Trewitt receives insurance commissions directly from them if a client chooses to implement recommendations made in his capacity as an insurance agent. However, the client is under no obligation to purchase products that Mr. Trewitt may recommend.

**Stop the Wealth Leakage, LLC**

Mr. Trewitt is also the owner of "Stop the Wealth Leakage, LLC", trustee of Member Managed LLC. This entity is set up to receive royalty payments in conjunction with its ownership of website domains, trademarks and patents pertaining to [www.stopthewealthleakage.com](http://www.stopthewealthleakage.com) (domain).

**SDC Energy (Sandview Development Corporation)**

And finally, based on results from certain VFGA client portfolio reviews, including suitability, risk tolerance and investment objectives, Mr. Trewitt may recommend that clients include solar energy in their portfolios in an effort to meet their stated objectives. Mr. Trewitt may refer clients to SDC Energy (Sandview Development Corporation or "SDC"), a real property investment company, for which he may be paid a referral fee. However, clients are under no obligation to talk to or invest with SDC Energy, which Mr. Trewitt may recommend.

**Item 5. Additional Compensation**

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Mr. Trewitt has not receive any "economic benefit" as that term is defined (e.g. sales awards and other prizes) from a non-client for providing advisory services.

**Item 6. Supervision**

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Tuan Ngo is the designated Director of Operations and designated principal supervisor for VFG and its supervised persons, including Mark Trewitt, responsible for providing supervisory oversight regarding VFGA's advisory business. Mr. Ngo's contact information is (310) 410-8341, [compliance@vfgroup.net](mailto:compliance@vfgroup.net). All supervision is performed on a regular and continuous basis where all transactional activity is reviewed by Tuan Ngo, as well as a review of ongoing management of investment advice. Compliance oversight is provided by Mr. Edward Price, the firm's Chief Compliance Officer. Mr. Price's contact information is (310) 410-8341, [compliance@vfgroup.net](mailto:compliance@vfgroup.net).



## **Item 7. Requirements for State-Registered Advisers**

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### **Disclosure Events**

Mark Trewitt has not been involved in any disclosure event where he was found liable in an arbitration claim alleging damages in excess of \$2,500, or found liable in a civil, self-regulatory organization, or administrative proceeding; nor has he been the subject of a bankruptcy petition.



## VFG Advisors, Inc.

100 Corporate Pointe, Suite 382

Culver City, CA 90230-7612

Tel: 310-410-8341

Fax: 310-410-8340

[www.vfgroup.net](http://www.vfgroup.net)

## Form ADV Part 2B: Brochure Supplement

For Supervised Person:

### **Brian Lehner, CFP<sup>®</sup>, CEP<sup>®</sup>**

CRD# 1985449

830 W. South Boundary St.

Perrysburg, OH 43551

(419) 872-1650

[brian@vfgroup.net](mailto:brian@vfgroup.net)

Last Updated: November 30, 2014

*This brochure supplement provides information about Brian Lehner that supplements VFGA's Part 2A Brochure. You should have received a copy of that Brochure. Please contact Tuan Ngo at (310) 410-8341 and/or via email at [compliance@vfgroup.net](mailto:compliance@vfgroup.net), if you did not receive VFGA's Brochure or if you have any questions about the contents of this supplement.*

*Additional information about VFGA and Mr. Lehner is also available on the SEC's public disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and on its own website at [www.vfgroup.net](http://www.vfgroup.net).*

*Although VFGA may use the term "registered investment adviser" or use the term "registered" through this Form ADV Part 2B, the use of these terms is not intended to imply a certain level of skill or training.*

## Item 2. Educational Background and Experience

VFG requires certain licensing standards as well as a certain level of business experience for giving investment advice to clients. For example, all advisers must be professionals with relevant industry experience in order to adequately demonstrate a certain level of expertise in securities management and analysis. VFG requires that all investment adviser representatives maintain the minimum licensing qualifications in accordance with all federal, state, and self-regulatory organization (SRO) rules and regulations. Here is a summary of Mr. Lehner's qualifications:

Name: Brian Lehner

Year of Birth: 1965

Education: University of Iowa, Economics, 1989  
Bowling Green State University, Certificate of Financial Planning, 2003  
National Institute of Estate Planners, Graduate Estate Planning Certificate, 2003  
Certified Financial Planner Designation, 2004  
Certified Estate Planner Designation, 2014

Background: VFG Advisors, Inc.; Investment Adviser Representative, (10/2011 - Present)  
VFG Securities, Inc.; Registered Representative (10/2011 - Present)  
Lehner Capital Management, LLC, President, Owner (04/2013 – Present)  
Perrysburg Growth Properties, LLC, Property Owner/Manager (04/2008 – Present)  
W&S Brokerage Services, Inc., Registered Representative (10/2010 – 08/2011)  
Cambridge Investment Research Advisors, Inc., Investment Adviser Representative (02/2010 – 06/2010)  
Cambridge Investment Research, Inc., Registered Representative (02/2010 – 06/2010)  
LPL Financial Corporation, Registered Representative (10/2000 – 03/2010)

Licenses: FINRA Series 6, 7, 24; NASAA Series 66  
Ohio Life, Health and Annuity Insurance License

Designations: CFP®, CEP®

### Use of Professional Designations

**Certified Financial Planner (CFP®).** The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;

- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

**Certified Estate Planner (CEP®).** The National Institute of Certified Estate Planners (NICEP) is an Indiana not-for-profit corporation, and a tax-exempt entity under Internal Revenue Code 501(c)(6). It is established as a supporting organization for the purpose of educating primarily financial, legal, and tax professionals in matters of estate planning.

The NICEP provides sufficient educational courses and examinations to certify those professionals that successfully complete these programs with either the certification CEP® (Certified Estate Planner™), or MCEP® (Master Certified Estate Planner™).

These trademark certifications are nationally recognized as a standard for estate planning excellence, and are used by permission of the NICEP alone. They may only be used by those who satisfactorily complete the coursework and qualifying examinations, maintain their annual certification fees and continuing education requirements, and adhere to a strict code of professional ethics.

### Item 3. Disciplinary Information

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#### **Criminal or Civil Action**

There are no disclosure events involving a criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which Mr. Lehner is involved.

#### **Administrative Proceeding (SEC/Federal/State)**

There are no disclosure events involving an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which Mr. Lehner is involved.

#### **Administrative Proceeding (SRO)**

There are no disclosure events involving a self-regulatory organization (SRO) proceeding in which Mr. Lehner is involved.

#### **Use of BrokerCheck**

If this supplement is delivered electronically, and any supervised person under the firm has a disciplinary history, the details of any disclosure may be found on either the Financial Industry Regulatory Authority's (FINRA) BrokerCheck system ([www.finra.org/brokercheck](http://www.finra.org/brokercheck)) or the IAPD ([www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)). There is no other proceeding in which Mr. Lehner's professional attainment, designation, or license was revoked or suspended because of a violation of rules relating to professional conduct, nor were there any incidents where Mr. Lehner resigned (or otherwise relinquished his attainment, designation, or license) in anticipation of such a proceeding.

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#### **Item 4. Other Business Activities**

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##### **Other Related Investment Business**

Mr. Lehner is not a futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA.

##### **Other Business Activity**

Brian Lehner is a Registered Representative VFG Securities, Inc., a registered broker/dealer, member FINRA/SIPC. As such, Mr. Lehner may recommend securities products for a commission. This could present a potential conflict of interest in that Mr. Lehner could receive fees and commissions if the client chooses to implement recommendations made in his capacity as a registered representative. However, the client is under no obligation to purchase products that Mr. Lehner may recommend, or to purchase products through VFGS. All material conflicts of interest are disclosed regarding VFGS which could be reasonably expected to impair the rendering of unbiased and objective advice.

Brian Lehner also performs executive duties as President and Owner of Lehner Capital Management, a licensed life insurance agency. Mr. Lehner is a licensed life insurance agent in the state of Ohio and offers insurance products through carriers in which he is appointed and for which he may be paid a commission, and in such capacity, may recommend, on a fully disclosed basis, the purchase of certain insurance-related products which may present a potential conflict of interest between VFGA's interests and those of its advisory clients. However, clients are under no obligation to purchase products VFG or its associated persons may recommend, or to purchase products or services through VFG or its associated persons.

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#### **Item 5. Additional Compensation**

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Mr. Lehner does not receive any "economic benefit" as that term is defined (e.g. sales awards and other prizes) from a non-client for providing advisory services.

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#### **Item 6. Supervision**

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Tuan Ngo is the designated Director of Operations and designated principal supervisor for VFGA and its supervised persons, including Brian Lehner, responsible for providing supervisory oversight regarding VFGA's advisory business. Mr. Ngo's contact information is (310) 410-8341, [compliance@vfgroup.net](mailto:compliance@vfgroup.net). All supervision is performed on a regular and continuous basis where all transactional activity is reviewed by Tuan Ngo, as well as a review of ongoing management of investment advice. Compliance oversight is provided by Mr. Edward Price, the firm's Chief Compliance Officer. Mr. Price's contact information is (310) 410-8341, [compliance@vfgroup.net](mailto:compliance@vfgroup.net).

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#### **Item 7. Requirements for State-Registered Advisers**

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##### **Disclosure Events**

Brian Lehner has not been involved in any disclosure event where he was found liable in an arbitration claim alleging damages in excess of \$2,500, or found liable in a civil, self-regulatory organization, or administrative proceeding; nor has he been the subject of a bankruptcy petition.



## VFG Advisors, Inc.

100 Corporate Pointe, Suite 382

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Tel: 310-410-8341

Fax: 310-410-8340

[www.vfgroup.net](http://www.vfgroup.net)

## Form ADV Part 2B: Brochure Supplement

### For Supervised Person:

## Christopher Dukes

CRD# 4712873

21201 Victory Blvd, Suite 130

Canoga Park, CA 91303

[christopher@dukesfinancial.com](mailto:christopher@dukesfinancial.com)

(818) 456-4844 Office

(818) 914-4898 Fax

Last Updated: November 30, 2014

*This brochure supplement provides information about Christopher Dukes that supplements VFGA's Part 2A Brochure. You should have received a copy of that Brochure. Please contact Tuan Ngo at (310) 410-8341 and/or via email at [compliance@vfgroup.net](mailto:compliance@vfgroup.net), if you did not receive VFGA's Brochure or if you have any questions about the contents of this supplement.*

*Additional information about VFGA and Mr. Dukes is also available on the SEC's public disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and on its own website at [www.vfgroup.net](http://www.vfgroup.net).*

*Although VFGA may use the term "registered investment adviser" or use the term "registered" through this Form ADV Part 2B, the use of these terms is not intended to imply a certain level of skill or training.*

## **Item 2. Educational Background and Experience**

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VFG requires certain licensing standards as well as a certain level of business experience for giving investment advice to clients. For example, all advisers must be professionals with relevant industry experience in order to adequately demonstrate a certain level of expertise in securities management and analysis. VFG requires that all investment adviser representatives maintain the minimum licensing qualifications in accordance with all federal, state, and self-regulatory organization (SRO) rules and regulations. Here is a summary of Mr. Dukes' qualifications:

Name: Christopher Dukes

Year of Birth: 1972

Education: University of Nebraska at Omaha, BA in Fine Arts (1994)

Background: VFG Advisors, Inc.; Investment Adviser Representative, (11/2010-Present)  
VFG Securities, Inc.; Registered Representative (11/2010- Present)  
Dukes Wealth Management, Inc. DBA Dukes Financial and Insurance Services (08/2008-Present)

Licenses: FINRA Series 7 and 62; NASAA Series 66  
Life and Health Insurance Agent in California

## **Item 3. Disciplinary Information**

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### **Criminal or Civil Action**

There are no disclosure events involving a criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which Mr. Dukes is involved.

### **Administrative Proceeding (SEC/Federal/State)**

There are no disclosure events involving an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which Mr. Dukes is involved.

### **Administrative Proceeding (SRO)**

There are no disclosure events involving a self-regulatory organization (SRO) proceeding in which Mr. Dukes is involved.

### **Use of BrokerCheck**

If this supplement is delivered electronically, and any supervised person under the firm has a disciplinary history, the details of any disclosure may be found on either the Financial Industry Regulatory Authority's (FINRA) BrokerCheck system ([www.finra.org/brokercheck](http://www.finra.org/brokercheck)) or the IAPD ([www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)).

There is no other proceeding in which Mr. Dukes' professional attainment, designation, or license was revoked or suspended because of a violation of rules relating to professional conduct, nor were there any incidents where Mr. Dukes resigned (or otherwise relinquished his attainment, designation, or license) in anticipation of such a proceeding.

## **Item 4. Other Business Activities**

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### **Other Related Investment Business**

Mr. Dukes is not a futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA.

### **Other Business Activity**

Christopher Dukes is a Registered Representative with VFG Securities, Inc. ("VFGS"), a registered broker/dealer, member FINRA/SIPC. As such, Mr. Dukes may recommend securities products for a commission. This could present a potential conflict of interest in that Mr. Dukes could receive fees and commissions if the client chooses to implement recommendations made in his capacity as a registered representative. However, the client is under no obligation to purchase products that Mr. Dukes may recommend, or to purchase products through VFGS. All material conflicts of interest are disclosed regarding VFGS which could be reasonably expected to impair the rendering of unbiased and objective advice.

Mr. Dukes is licensed life insurance agent in the State of California and offers insurance products through carriers in which he is appointed and for which he may be paid a commission, and in such capacity, may recommend, on a fully disclosed basis, the purchase of certain insurance-related products which may present a potential conflict of interest between VFGA's interests and those of its advisory clients. However, clients are under no obligation to purchase products VFGA or its associated persons may recommend, or to purchase products or services through VFGA or its associated persons.

Mr. Dukes also performs executive duties as Owner, President and CEO of Dukes Wealth Management, Inc. DBA Dukes Financial and Insurance Services. Mr. Dukes conducts his insurance business through this entity. However, Dukes Wealth Management, Inc. DBA Dukes Financial and Insurance Services is not a registered financial institution.

Mr. Dukes has worked in television and films since 1995 as a day-player, actor and stunt-person. He is filming, in general, 1 to 2 days per month and this business should not represent any conflicts of interest to customers.

### **Item 5. Additional Compensation**

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Mr. Dukes does not receive any "economic benefit" as that term is defined (e.g. sales awards and other prizes) from a non-client for providing advisory services.

### **Item 6. Supervision**

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Tuan Ngo is the designated Director of Operations and designated principal supervisor for VFGA and its supervised persons, including Christopher Dukes. Mr. Ngo is responsible for providing supervisory oversight regarding VFGA's advisory business. Mr. Ngo's contact information is (310) 410-8341, [compliance@vfgroup.net](mailto:compliance@vfgroup.net). All supervision is performed on a regular and continuous basis where all transactional activity is reviewed by Tuan Ngo, as well as a review of ongoing management of investment advice. Compliance oversight is provided by Mr. Edward Price, the firm's Chief Compliance Officer. Mr. Price's contact information is (310) 410-8341, [compliance@vfgroup.net](mailto:compliance@vfgroup.net).

### **Item 7. Requirements for State-Registered Advisers**

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#### **Disclosure Events**

Christopher Dukes has not been involved in any disclosure event where he was found liable in an arbitration claim alleging damages in excess of \$2,500, or found liable in a civil, self-regulatory organization, or administrative proceeding; nor has he been the subject of a bankruptcy petition.





## VFG Advisors, Inc.

100 Corporate Pointe, Suite 382  
Culver City, CA 90230-7612  
Tel: 310-410-8341  
Fax: 310-410-8340  
[www.vfgroup.net](http://www.vfgroup.net)

## Form ADV Part 2B: Brochure Supplement

For Supervised Person:

### Linda Wimsatt

CRD# 1401802  
2173 Salk Ave., Suite 250  
Carlsbad, CA 92008  
(760) 599-6558

Last Updated: November 30, 2014

*This brochure supplement provides information about Linda Wimsatt that supplements VFGA's Part 2A Brochure. You should have received a copy of that Brochure. Please contact Tuan Ngo at (310) 410-8341 and/or via email at [compliance@vfgroup.net](mailto:compliance@vfgroup.net), if you did not receive VFGA's Brochure or if you have any questions about the contents of this supplement.*

*Additional information about VFGA and Ms. Wimsatt is also available on the SEC's public disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and on its own website at [www.vfgroup.net](http://www.vfgroup.net).*

*Although VFGA may use the term "registered investment adviser" or use the term "registered" through this Form ADV Part 2B, the use of these terms is not intended to imply a certain level of skill or training.*

## **Item 2. Educational Background and Experience**

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VFGA requires certain licensing standards as well as a certain level of business experience for giving investment advice to clients. For example, all advisers must be professionals with relevant industry experience in order to adequately demonstrate a certain level of expertise in securities management and analysis. VFGA requires that all investment adviser representatives maintain the minimum licensing qualifications in accordance with all federal, state, and self-regulatory organization (SRO) rules and regulations. Here is a summary of Ms. Wimsatt's qualifications:

Name: Linda Wimsatt

Year of Birth: 1963

Education: California State University, Long Beach – Bachelor of Science, Finance and Investments, 1985

Background: VFG Advisors, Inc.; Investment Adviser Representative, (09/2014-Present)  
VFG Securities, Inc.; Registered Representative (09/2014- Present)  
Sagepoint Financial, Inc.; Registered Representative (1/2009 – 9/2014)  
AIG Financial Advisors, Inc.; Registered Representative (10/2005 – 1/2009)  
SunAmerica Securities, Inc.; Registered Representative (12/1998 – 10/2005)  
Griffin Financial Services; Registered Representative (6/1997 – 12/1998)

Licenses: FINRA Series 7 and 24; NASAA Series 63 and 65  
Life and Health Insurance Agent in California

## **Item 3. Disciplinary Information**

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### **Criminal or Civil Action**

There are no disclosure events involving a criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which Ms. Wimsatt is involved.

### **Administrative Proceeding (SEC/Federal/State)**

There are no disclosure events involving an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which Ms. Wimsatt is involved.

### **Administrative Proceeding (SRO)**

There are no disclosure events involving a self-regulatory organization (SRO) proceeding in which Ms. Wimsatt is involved.

### **Use of BrokerCheck**

If this supplement is delivered electronically, and any supervised person under the firm has a disciplinary history, the details of any disclosure may be found on either the Financial Industry Regulatory Authority's (FINRA) BrokerCheck system ([www.finra.org/brokercheck](http://www.finra.org/brokercheck)) or the IAPD ([www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)).

There is no proceeding in which Ms. Wimsatt's professional attainment, designation, or license was revoked or suspended because of a violation of rules relating to professional conduct, nor were there any incidents where Ms. Wimsatt resigned (or otherwise relinquished his attainment, designation, or license) in anticipation of such a proceeding.

## **Item 4. Other Business Activities**

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## Other Related Investment Business

Ms. Wimsatt is not a futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA.

## Other Business Activity

Linda Wimsatt is a Registered Representative VFG Securities, Inc. ("VFGS"), a registered broker/dealer, member FINRA/SIPC. As such, Ms. Wimsatt may recommend securities products for a commission. This could present a potential conflict of interest in that Ms. Wimsatt could receive fees and commissions if the client chooses to implement recommendations made in her capacity as a registered representative. However, the client is under no obligation to purchase products that Ms. Wimsatt may recommend, or to purchase products through VFGS. All material conflicts of interest are disclosed regarding VFGS which could be reasonably expected to impair the rendering of unbiased and objective advice.

Linda Wimsatt also performs executive duties as Owner, President and CEO of Choice Financial Group (an insurance agency). Ms. Wimsatt is a licensed life insurance agent in the State of California and offers insurance products through carriers in which she is appointed and for which she may be paid a commission, and in such capacity, may recommend, on a fully disclosed basis, the purchase of certain insurance-related products which may present a potential conflict of interest between VFGA's interests and those of its advisory clients. However, clients are under no obligation to purchase products VFG or its associated persons may recommend, or to purchase products or services through VFGA or its associated persons.

Linda Wimsatt also performs executive duties as Owner, President and CEO of Choice Homes and Loans (real estate services). Ms. Wimsatt is a licensed real estate agent in the State of California and offers real estate services to purchase or sell real estate for which she may be paid a commission, and in such capacity, may recommend, on a fully disclosed basis, the purchase or sale of real estate properties. These services may present a potential conflict of interest between VFGA's interests and those of its advisory clients. However, clients are under no obligation to purchase real estate VFGA or its associated persons may recommend, or to purchase products or services through VFGA or its associated persons.

## Item 5. Additional Compensation

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Ms. Wimsatt does not receive any "economic benefit" as that term is defined (e.g. sales awards and other prizes) from a non-client for providing advisory services.

## Item 6. Supervision

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Tuan Ngo is the designated Director of Operations and designated principal supervisor for VFGA and its supervised persons, including Linda Wimsatt. Mr. Ngo is responsible for providing supervisory oversight regarding VFGA's advisory business. Mr. Ngo's contact information is (310) 410-8341, [compliance@vfgroup.net](mailto:compliance@vfgroup.net). All supervision is performed on a regular and continuous basis where all transactional activity is reviewed by Tuan Ngo, as well as a review of ongoing management of investment advice. Compliance oversight is provided by Mr. Edward Price, the firm's Chief Compliance Officer. Mr. Price's contact information is (310) 410-8341, [compliance@vfgroup.net](mailto:compliance@vfgroup.net).

## Item 7. Requirements for State-Registered Advisers

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### Disclosure Events

VFGA is required to disclose any disclosure event where a supervised person was *found liable* in an arbitration claim alleging damages in excess of \$2,500, or found liable in a civil, self-regulatory organization, or administrative proceeding, or has been the subject of a bankruptcy petition.

Linda Wimsatt has not been *found liable* in an arbitration claim alleging damages in excess of \$2,500, however, Ms. Wimsatt was *the subject of* one customer complaint in June, 2010 which evolved into a FINRA arbitration case in July, 2010. The subject of the dispute was related to allegations that Ms. Wimsatt recommended an unsuitable investment to a customer, and that said customer was not adequately informed of the liquidity risk of a REIT investment. Ms. Wimsatt denies all claims made and contends that all risks were fully disclosed, recommendations were suitable when made, and any losses experienced were the result of market forces beyond her control. The parties settled the dispute in October, 2010 at the advice of legal counsel to avoid the prolonged time and cost of arbitration proceedings.

In January, 2009, Ms. Wimsatt received notice of a \$6,000 civil claim filed by a plumbing company. This plumbing company attempted to complete work ordered by Ms. Wimsatt, and the work was not completed correctly. Ms. Wimsatt was forced to hire another plumber to correct the work from the prior plumber, which she was able to prove to the judge in this case. In July, 2009 the judge ordered a partial payment of \$1,107 to the claimant plumber. Ms. Wimsatt paid the judgment amount immediately.

Ms. Wimsatt was also found liable in a small civil claim made in June, 2009 which is still outstanding due to her failed attempts to locate the claimant to make reparation payment.

Additional details of Ms. Wimsatt's disclosure events can be found on the Investment Advisor's Public Disclosure site (IAPD). Clients can access IAR disciplinary history by clicking on the IAPD link, which is [www.Adviserinfo.sec.gov](http://www.Adviserinfo.sec.gov), or the FINRA BrokerCheck link, which is [www.finra.org/brokercheck](http://www.finra.org/brokercheck).

Linda Wimsatt has not been involved in any other disclosure events.

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Fax: 310-410-8340

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## Form ADV Part 2B: Brochure Supplement

### For Supervised Person:

## John M. Brady, Jr.

CRD# 2119657

1820 Preston Park Blvd., Suite 1155

Plano, TX 75093

Office: (972) 312-1337

Fax: (214) 291-5830

Email: [john@ifsgllc.com](mailto:john@ifsgllc.com)

Last Updated: November 30, 2014

*This brochure supplement provides information about John Brady that supplements VFGA's Part 2A Brochure. You should have received a copy of that Brochure. Please contact Tuan Ngo at (310) 410-8341 and/or via email at [compliance@vfgroup.net](mailto:compliance@vfgroup.net). if you did not receive VFGA's Brochure or if you have any questions about the contents of this supplement.*

*Additional information about VFGA and Mr. Brady is also available on the SEC's public disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and on its own website at [www.vfgroup.net](http://www.vfgroup.net).*

*Although VFGA may use the term "registered investment adviser" or use the term "registered" through this Form ADV Part 2B, the use of these terms is not intended to imply a certain level of skill or training.*

## **Item 2. Educational Background and Experience**

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VFG Advisors, Inc. ("VFGA") requires certain licensing standards as well as a certain level of business experience for giving investment advice to clients. For example, all advisers must be professionals with relevant industry experience in order to adequately demonstrate a certain level of expertise in securities management and analysis. VFGA requires that all investment adviser representatives maintain the minimum licensing qualifications in accordance with all federal, state, and self-regulatory organization (SRO) rules and regulations. Here is a summary of Mr. Brady's qualifications:

Name: John Martin Brady, Jr.

Year of Birth: 1960

Education: University of North Texas, BBA (Cum Laude) – 1985

Background: VFG Advisors, Inc.; Investment Adviser Representative, (11/2010 - Present)  
VFG Securities, Inc.; Registered Representative (11/2010 - Present)  
Integrated Financial Solutions Group; Insurance Agent (2008 – Present)  
Madison Avenue Securities; Registered Representative/IAR (9/2008 – 11/2010)  
Madison Avenue Advisors; Investment Adviser Representative/IAR (10/2008 - 3/2009)

Licenses: FINRA Series 6 and 7; NASAA Series 63 and 65  
Life, Health and Disability Insurance Agent in Texas

## **Item 3. Disciplinary Information**

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### **Criminal or Civil Action**

There are no disclosure events involving a criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which Mr. Brady is involved.

### **Administrative Proceeding (SEC/Federal/State)**

There are no disclosure events involving an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which Mr. Brady is involved.

### **Administrative Proceeding (SRO)**

There are no disclosure events involving a self-regulatory organization (SRO) proceeding in which Mr. Brady is involved.

### **Use of BrokerCheck**

If this supplement is delivered electronically, and any supervised person under the firm has a disciplinary history, the details of any disclosure may be found on either the Financial Industry Regulatory Authority's (FINRA) BrokerCheck system ([www.finra.org/brokercheck](http://www.finra.org/brokercheck)) or the IAPD ([www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)).

There is no proceeding in which Mr. Brady's professional attainment, designation, or license was revoked or suspended because of a violation of rules relating to professional conduct, nor were there any incidents where Mr. Brady resigned (or otherwise relinquished his attainment, designation, or license) in anticipation of such a proceeding.

## **Item 4. Other Business Activities**

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### **Other Related Investment Business**

Mr. Brady is not a futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA.

### **Other Business Activity**

#### **VFG Securities, Inc.**

John Brady is a Registered Representative VFG Securities, Inc. ("VFGS"), a registered broker/dealer, member FINRA/SIPC. As such, Mr. Brady may recommend securities products for a commission. This could present a potential conflict of interest in that Mr. Brady could receive fees and commissions if the client chooses to implement recommendations made in his capacity as a registered representative. However, the client is under no obligation to purchase products that Mr. Brady may recommend, or to purchase products through VFGS. All material conflicts of interest are disclosed regarding VFGS which could be reasonably expected to impair the rendering of unbiased and objective advice.

#### **Leadership Financial Group**

Mr. Brady operates a sole proprietorship doing business as Leadership Financial Group. Mr. Brady operates his sales and services of insurance and employee benefit plan products through Leadership Financial Group.

#### **Independent Insurance Agent**

Mr. Brady is a licensed life, health and disability insurance agent in the State of Texas and offers insurance products through carriers in which he is appointed and for which he may be paid a commission, and in such capacity, may recommend, on a fully disclosed basis, the purchase of certain insurance-related products which may present a potential conflict of interest between VFGA's interests and those of its advisory clients. However, clients are under no obligation to purchase products VFGA or its affiliated persons may recommend, or to purchase products or services through VFGA or its affiliated persons.

#### **Integrated Financial Services Group**

John Brady may also offer insurance product consulting to customers as a Consultant through Integrated Financial Services Group, an insurance agency. In such capacity, Mr. Brady may recommend, on a fully disclosed basis, the purchase of certain insurance-related products which may present a potential conflict of interest between VFGA's interests and those of its advisory clients. However, clients are under no obligation to purchase products Mr. Brady may recommend, or to purchase products or services through VFGA or its affiliated persons.

#### **SDC Energy**

Based on results from certain VFGA client portfolio reviews, including suitability, risk tolerance and investment objectives, Mr. Brady may recommend that clients include solar energy in their portfolios in an effort to meet their stated objectives. Mr. Brady may refer clients to SDC Energy (Sandview Development Corporation or "SDC"), a solar energy investment company, for which he may be paid a referral fee. However, clients are under no obligation to talk to or invest with SDC Energy, which Mr. Brady may recommend.

### **Item 5. Additional Compensation**

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John Brady does not receive any "economic benefit" as that term is defined (e.g. sales awards and other prizes) from a non-client for providing advisory services.

### **Item 6. Supervision**

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Tuan Ngo is the designated Director of Operations and designated principal supervisor for VFGA and its supervised persons, including John Brady. Mr. Ngo is responsible for providing supervisory oversight regarding VFGA's advisory business. Mr. Ngo's contact information is (310) 410-8341, [compliance@vfgroup.net](mailto:compliance@vfgroup.net). All supervision is performed on a regular and continuous basis where all transactional activity is reviewed by Tuan Ngo, as well as a review of ongoing management of investment

advice. Compliance oversight is provided by Mr. Edward Price, the firm's Chief Compliance Officer. Mr. Price's contact information is (310) 410-8341, [compliance@vfgroup.net](mailto:compliance@vfgroup.net).

## **Item 7. Requirements for State-Registered Advisers**

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### **Disclosure Events**

Mr. Brady has not been involved in any disclosure event where he was found liable in an arbitration claim alleging damages in excess of \$2,500, or found liable in a civil, self-regulatory organization, or administrative proceeding; nor has he been the subject of a bankruptcy petition.





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## Form ADV Part 2B: Brochure Supplement

For Supervised Person:

### Demetrio J. Munoz, III

CRD# 2401195

Last Updated: November 30, 2014

*This brochure supplement provides information about Demetrio Munoz that supplements VFGA's Part 2A Brochure. You should have received a copy of that Brochure. Please contact Tuan Ngo at (310) 410-8341 and/or via email at [compliance@vfgroup.net](mailto:compliance@vfgroup.net), if you did not receive VFGA's Brochure or if you have any questions about the contents of this supplement.*

*Additional information about VFGA and Mr. Munoz is also available on the SEC's public disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and on its own website at [www.vfgroup.net](http://www.vfgroup.net).*

*Although VFGA may use the term "registered investment adviser" or use the term "registered" through this Form ADV Part 2B, the use of these terms is not intended to imply a certain level of skill or training.*

## **Item 2. Educational Background and Experience**

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VFG Advisors, Inc. ("VFGA") requires certain licensing standards as well as a certain level of business experience for giving investment advice to clients. For example, all advisers must be professionals with relevant industry experience in order to adequately demonstrate a certain level of expertise in securities management and analysis. VFGA requires that all investment adviser representatives maintain the minimum licensing qualifications in accordance with all federal, state, and self-regulatory organization (SRO) rules and regulations. Here is a summary of Mr. Munoz's qualifications:

Name: Demetrio J. Munoz, III

Year of Birth: 1961

Education: University of Southern California, 1985 – Majored in Social Sciences and Economics, no degree achieved

Background: VFG Advisors, Inc.; Investment Adviser Representative, (01/2013 - Present)  
VFG Securities, Inc.; Registered Representative (08/2012 - Present)  
ProEquities, Inc.; Registered Representative (03/2012 - 09/2012)  
BrokersXpress, LLC; Registered Representative (11/2006 - 12/2011)  
Equity Services, Inc.; Registered Representative (08/2002 – 09/2006)

Licenses: FINRA Series 6 and 7; NASAA Series 63 and 65  
California Life and Health Insurance Agent

## **Item 3. Disciplinary Information**

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### **Criminal or Civil Action**

There are no disclosure events involving a criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which Mr. Munoz is involved.

### **Administrative Proceeding (SEC/Federal/State)**

There are no disclosure events involving an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which Mr. Munoz is involved.

### **Administrative Proceeding (SRO)**

There are no disclosure events involving a self-regulatory organization (SRO) proceeding in which Mr. Munoz is involved.

### **Use of BrokerCheck**

If this supplement is delivered electronically, and any supervised person under the firm has a disciplinary history, the details of any disclosure may be found on either the Financial Industry Regulatory Authority's (FINRA) BrokerCheck system ([www.finra.org/brokercheck](http://www.finra.org/brokercheck)) or the IAPD ([www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)).

There is no proceeding in which Mr. Munoz's professional attainment, designation, or license was revoked or suspended because of a violation of rules relating to professional conduct, nor were there any incidents where Mr. Munoz resigned (or otherwise relinquished his attainment, designation, or license) in anticipation of such a proceeding.

## **Item 4. Other Business Activities**

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## **Other Related Investment Business**

Mr. Munoz is not a futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA.

## **Other Business Activity**

Demetrio Munoz is a Registered Representative VFG Securities, Inc. ("VFGS"), a registered broker/dealer, member FINRA/SIPC. As such, Mr. Munoz may recommend securities products for a commission. This could present a potential conflict of interest in that Mr. Munoz could receive fees and commissions if the client chooses to implement recommendations made in his capacity as a registered representative. However, the client is under no obligation to purchase products that Mr. Munoz may recommend, or to purchase products through VFGS. All material conflicts of interest are disclosed regarding VFGS which could be reasonably expected to impair the rendering of unbiased and objective advice.

Mr. Munoz is a licensed life insurance agent in the State of California and offers insurance products through carriers he is appointed with and for which he may be paid a commission, and in such capacity, may recommend, on a fully disclosed basis, the purchase of certain insurance-related products which may present a potential conflict of interest between VFGA's interests and those of its advisory clients. However, clients are under no obligation to purchase products VFGA or its associated persons may recommend, or to purchase products or services through VFGA or its associated persons.

## **Item 5. Additional Compensation**

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Mr. Munoz does not receive any "economic benefit" as that term is defined (e.g. sales awards and other prizes) from a non-client for providing advisory services.

## **Item 6. Supervision**

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Tuan Ngo is the designated Director of Operations and designated principal supervisor for VFG and its supervised persons, including Demetrio Munoz. Mr. Ngo is responsible for providing supervisory oversight regarding VFGA's advisory business. Mr. Ngo's contact information is (310) 410-8341, [compliance@vfgroup.net](mailto:compliance@vfgroup.net). All supervision is performed on a regular and continuous basis where all transactional activity is reviewed by Tuan Ngo, as well as a review of ongoing management of investment advice. Compliance oversight is provided by Mr. Edward Price, the firm's Chief Compliance Officer. Mr. Price's contact information is (310) 410-8341, [compliance@vfgroup.net](mailto:compliance@vfgroup.net).

## **Item 7. Requirements for State-Registered Advisers**

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### **Disclosure Events**

Mr. Demetrio Munoz has not been involved in any disclosure event where he was found liable in an arbitration claim alleging damages in excess of \$2,500, or found liable in a civil, self-regulatory organization, or administrative proceeding; nor has he been the subject of a bankruptcy petition.



## VFG Advisors, Inc.

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## Form ADV Part 2B: Brochure Supplement

For Supervised Person:

### Scot A. Clevenger

CRD# 5614142

1820 Preston Park Blvd., Suite 1155

Plano, TX 75093

Office: (972) 312-1337

Fax: (214) 291-5830

Email: [scot@ifsgllc.com](mailto:scot@ifsgllc.com)

Last Updated: November 30, 2014

*This brochure supplement provides information about Scot Clevenger that supplements VFGA's Part 2A Brochure. You should have received a copy of that Brochure. Please contact Tuan Ngo at (310) 410-8341 and/or via email at [compliance@vfgroup.net](mailto:compliance@vfgroup.net), if you did not receive VFGA's Brochure or if you have any questions about the contents of this supplement.*

*Additional information about VFGA and Mr. Clevenger is also available on the SEC's public disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and on its own website at [www.vfgroup.net](http://www.vfgroup.net).*

*Although VFGA may use the term "registered investment adviser" or use the term "registered" through this Form ADV Part 2B, the use of these terms is not intended to imply a certain level of skill or training.*

## **Item 2. Educational Background and Experience**

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VFGA requires certain licensing standards as well as a certain level of business experience for giving investment advice to clients. For example, all advisers must be professionals with relevant industry experience in order to adequately demonstrate a certain level of expertise in securities management and analysis. VFGA requires that all investment adviser representatives maintain the minimum licensing qualifications in accordance with all federal, state, and self-regulatory organization (SRO) rules and regulations. Here is a summary of Mr. Clevenger's qualifications:

Name: Scot A. Clevenger

Year of Birth: 1959

Education: BS, Accounting, Southwestern Oklahoma State University, 1981  
Masters of Business Administration (MBA), University of Oklahoma, Price School of Business, 1986

Background: VFG Advisors, Inc.; Investment Adviser Representative, (05/2014 - Present)  
VFG Securities, Inc.; Registered Representative (05/2014 - Present)  
Integrated Financial Solutions Group, Managing Director (02/2012 – Present)  
Capital Funding Strategies Group, Owner, Finance Consultant (11/2005 – Present)  
VFG Securities, Inc., Non-registered Branch Associate (05/2013 – 05/2014)  
VFG Securities, Inc., Registered Representative (01/2012 – 05/2013)  
Rainier Capital Management, Vice President (08/2008 – 01/2012)  
Heritage Financial Systems, Inc. Insurance Agent (02/2011 – 12/2011)  
Cullum & Burks Securities, Inc., Registered Representative (02/2009 – 05/2010)

Licenses: FINRA Series 7; NASAA Series 63 and 65

## **Item 3. Disciplinary Information**

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### **Criminal or Civil Action**

There are no disclosure events involving a criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which Mr. Clevenger is involved.

### **Administrative Proceeding (SEC/Federal/State)**

There are no disclosure events involving an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which Mr. Clevenger is involved.

### **Administrative Proceeding (SRO)**

There are no disclosure events involving a self-regulatory organization (SRO) proceeding in which Mr. Clevenger is involved.

### **Use of BrokerCheck**

If this supplement is delivered electronically, and any supervised person under the firm has a disciplinary history, the details of any disclosure may be found on either the Financial Industry Regulatory Authority's (FINRA) BrokerCheck system ([www.finra.org/brokercheck](http://www.finra.org/brokercheck)) or the IAPD ([www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)).

There is no proceeding in which Mr. Clevenger's professional attainment, designation, or license was revoked or suspended because of a violation of rules relating to professional conduct, nor were there any incidents where Mr. Clevenger resigned (or otherwise relinquished his attainment, designation, or license) in anticipation of such a proceeding.

## **Item 4. Other Business Activities**

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### **Other Related Investment Business**

Mr. Clevenger is not a futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA.

### **Other Business Activity**

#### **VFG Securities, Inc.**

Mr. Clevenger is a Registered Representative with VFG Securities, Inc. ("VFGS"), a registered broker/dealer, member FINRA/SIPC. As such, Mr. Clevenger may recommend securities products for a commission. This could present a potential conflict of interest in that Mr. Clevenger could receive fees and commissions if the client chooses to implement recommendations made in his capacity as a registered representative. However, the client is under no obligation to purchase products that Mr. Clevenger may recommend, or to purchase products through VFGS. All material conflicts of interest are disclosed regarding VFGS which could be reasonably expected to impair the rendering of unbiased and objective advice.

#### **Life Insurance Agent - Integrated Financial Solutions Group**

Mr. Clevenger serves as Managing Director, offers Life, Health and Disability Insurance at Integrated Financial Solutions Group, an insurance agency. Mr. Clevenger is also an independently licensed life insurance agent in the State of Texas and offers insurance products through carriers in which he is appointed and for which he may be paid a commission. In such capacity, Mr. Clevenger may recommend, on a fully disclosed basis, the purchase of certain insurance-related products which may present a potential conflict of interest between VFGA's interests and those of its advisory clients. However, clients are under no obligation to purchase products VFGA or its supervised and affiliated persons may recommend, or to purchase products or services through VFGA or its supervised and affiliated persons.

#### **Integrated Tax Reduction Solutions, LLC**

Mr. Clevenger serves as a referral partner for Integrated Tax Reduction Solutions, LLC, a business development company. Mr. Clevenger receives a fee from Integrated Tax Reduction Solutions, LLC for referring prospective professionals and individuals who might be interested in asset protection or tax consulting services. Integrated Tax Reduction Solutions, LLC provides asset protection and income tax consulting services to individuals who might have an interest in, and could potentially benefit from these services. In such capacity, Mr. Clevenger may recommend, on a fully disclosed basis, the services offered by Integrated Tax Reduction Solutions, LLC which may present a potential conflict of interest between VFGA's interests and those of its advisory clients. However, clients are under no obligation to purchase products or services VFGA or its supervised and affiliated persons may recommend.

#### **The Barnabas Group DFW**

Mr. Clevenger serves as the Vice President, Membership Development and Board Member of The Barnabas Group DFW, a non-profit ministry that serves faith-based business professionals and other faith-based ministries. Mr. Clevenger is assisting with the start-up of the local Plano, Texas chapter in membership and organizational development.

#### **Capital Funding Strategies Group (CFSG)**

Mr. Clevenger is the owner and a business development consultant with Capital Funding Strategies Group. Mr. Clevenger may receive a fee for non-investment related business development advice. This business is not associated with VFGA, and it should not create a conflict of interest with VFGA customers.

#### **SDC Energy (Sandview Development Corporation)**

Based on results from certain VFGA client portfolio reviews, including suitability, risk tolerance and investment objectives, Mr. Clevenger may recommend that clients include solar energy in their portfolios in an effort to meet their stated objectives. Mr. Clevenger may refer clients to SDC Energy (Sandview Development Corporation or "SDC"), a solar energy investment company, for which he may be paid a

referral fee. However, clients are under no obligation to talk to or invest with SDC Energy, which Mr. Clevenger may recommend.

## **Item 5. Additional Compensation**

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Mr. Clevenger does not receive any "economic benefit" as that term is defined (e.g. sales awards and other prizes) from a non-client for providing advisory services.

## **Item 6. Supervision**

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Tuan Ngo is the designated Supervising Principal for VFGA. He is responsible for providing supervisory oversight of Mr. Clevenger and VFGA's advisory business. Mr. Ngo's contact information is (310) 410-8341 and/or email at [compliance@vfgroup.net](mailto:compliance@vfgroup.net). All supervision is performed on a regular and continuous basis where all transactional activity is reviewed by Mr. Ngo, as well as a review of ongoing management of investment advice. Compliance oversight is provided by Mr. Edward Price, the firm's Chief Compliance Officer. Mr. Price's contact information is (310) 410-8341, [compliance@vfgroup.net](mailto:compliance@vfgroup.net).

## **Item 7. Requirements for State-Registered Advisers**

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### **Disclosure Events**

Mr. Scot Clevenger has not been involved in any disclosure event where he was found liable in an arbitration claim alleging damages in excess of \$2,500, or found liable in a civil, self-regulatory organization, or administrative proceeding.

However, Mr. Clevenger was the subject of a Chapter 7 bankruptcy petition in May 2004, which was subsequently discharged in October, 2004. Because this disclosure event was more than 10 years ago, the details of this case will not be found on the Investment Advisor's Public Disclosure site (IAPD). Clients can access IAR disciplinary history by clicking on the IAPD link, which is [www.Adviserinfo.sec.gov](http://www.Adviserinfo.sec.gov), or the BrokerCheck link, which is [www.finra.org/brokercheck](http://www.finra.org/brokercheck).