



BENEFIT FIDUCIARY GROUP LLC

**Retirement Plan Clients
Form ADV Part 2A
Brochure**

Benefit Fiduciary Group LLC

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March 30, 2020

This brochure provides information about the qualifications and business practices of Benefit Fiduciary Group LLC. If you have any questions about the contents of this brochure, please contact us at (804) 457-2309. 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 Benefit Fiduciary Group LLC and its investment adviser representatives is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Benefit Fiduciary Group LLC is 291252.

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Material Changes

Form ADV Part 2A, Item 2

New Brochure Replaces Benefit Fiduciary Group Form ADV Part II and Schedule F

The BFG brochure is substantially modified from its prior version, and contains new information for the benefit of our clients. In this “Summary of Material Changes” we discuss only the material changes since the last annual update of this brochure in January 2019:

(1) **Redesign.** The Securities and Exchange Commission (“SEC”) recently published amendments to the rules for firm brochures. This brochure is redesigned in narrative format and is materially different in its structure. This brochure also contains new information now required by the SEC’s new rules.

(2) **Financial Advisor Biography.** Also included is the new Form ADV, Part 2B (each individual’s “Financial Advisor Biography”) for each investment advisory representative who directly provide advice to clients. Please refer to the Form ADV, Part 2B Financial Advisor Biography, included as a separate document accompanying this brochure.

(3) **Delivery of Amendments to this Brochure.** In the past Benefit Fiduciary Group LLC has offered or delivered information about the firm’s qualifications and business practices to clients on at least an annual basis. The brochure is updated at least annually, in order to ensure that it remains current. Pursuant to new SEC rules, Benefit Fiduciary Group LLC will provide each of its clients with a summary of any material changes for subsequent annual updates to brochures by April 30th of each year. You will be provided with a new Brochure as necessary based on changes or new information, at any time, without charge. Due to the changes to this brochure, it is suggested that clients review this document, in its entirety, upon receipt. Clients are also encouraged to review this brochure, and discuss any questions regarding this brochure with Benefit Fiduciary Group LLC’s Compliance Department.

You may request a copy of our brochure at any time by contacting our office at (804) 457-2309.

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Advisory Business

Form ADV Part 2A, Item 4

Benefit Fiduciary Group is a registered investment advisor, providing services to clients since 1998. BFG registered with the SEC as an independent registered investment advisor in 2018.

BFG provides the following services:

Direct Asset Management :

BFG will structure account portfolios to fit specific clients' objectives and needs utilizing various investment strategies by BFG Investment Advisory Representatives, “(IAR)”; within this context, and on an ongoing basis, provide asset allocation and buy and sell recommendations. Compensation to be provided to BFG will be based upon a percentage of the client assets under management. The determination of fees will be based on the type of account and type of assets in the portfolio as well as breakpoints established for the reduction of fees in relation to the increasing size of the account.

Fees will be payable in quarterly or monthly installments in arrears and will be based on the net of the market value on the date the fee accrues and becomes payable. If the investment advisory agreement is canceled, fees will be reimbursed to the client on a pro-rata basis.

Investment Management Basic Fee Schedule Assets Under Management Fee Per Annum

\$0-\$1,000,000 not to exceed 1.0%

\$1,000,000 to \$3,000,000 not to exceed .75%

\$3,000,000 and over not to exceed .50%

The annual fee schedule may be modified at the discretion of the Investment Advisory Representative (“IAR”). The client and IAR will agree to the fees in advance of any services provided. Multiple Accounts of the same client relationship will be aggregated for breakpoint purposes. The client may terminate the Investment Management Agreement without penalty within five business days from the date of the signing of the Investment Management Agreement or at any time thereafter by client or BFG upon thirty days written notice.

Asset Management Program Sponsors

IARs may recommend the use of other independent investment advisors or asset management program sponsors that provide specialized investment advisory services. These advisors will charge advisory fees, independent of BFG and a portion of that advisory fee may be paid to BFG. Each advisory client will receive documentation including a third party asset management agreement and disclosure of compensation, and will receive ADV Part II and schedule F from BFG and the third party provider. Accounts managed by these third party advisors will be subject to the cancellation policy of the particular third party asset manager. The asset management program sponsors utilized by BFG include, but are not limited to, Envestnet Asset Management,

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Inc., Genworth Financial, Lockwood Advisors, Inc., and SEI Investment Management Corporation.

Client Assets Managed by BFG

BFG has \$313,298,427 of regulatory assets under management as of December 31, 2019. \$39,785,145 is managed on a discretionary basis and \$273,513,282 is managed on a non-discretionary basis.

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Third Party Asset Management Fees:

Third Party Asset Managers will charge advisory fees, independent of BFG and a portion of the advisory fee will be paid to BFG. Each advisory client will receive documentation including a third party asset management agreement and disclosure of compensation, and will receive Part II of form ADV from FBFG and the third party asset manager. Accounts managed by third party asset managers will be subject to the cancellation policy of the particular third party asset manager.

Pension Plan Consulting:

BFG may provide comprehensive qualified retirement plan consulting, investment advice and fiduciary due diligence services, employee plan and investment education, asset allocation services, 401(k) proposal and vendor research and analysis to qualified retirement plan sponsors, and business entities. Fees for these services will be based on either the market value of the Plan Assets or a flat fee to be agreed upon by both the IAR and client. The fee range for these services is negotiable and may vary according to the facts and circumstances, including the scope of services to be provided, the duration of services and the size of the client (number of employees, plan or individual assets, and other demographic factors).

Hourly Consultation:

BFG will provide hourly consulting services to clients, which will include a limited analysis of the client information provided. These services will be billed at an hourly rate not to exceed \$350.00 and will be payable monthly, after services have been rendered.

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Fees for Retirement Plan Consulting Services

Fees are paid by the client (employer) directly, paid by the plan through revenue sharing from fund expenses, or debited directly from plan participant accounts. As of January 1, 2020, BFG has a total of \$345,000,000.00 on a non-discretionary basis and \$55,000,000.00 on a discretionary basis.

Conflicts of Interest

Form ADV Part 2A, Item 5

BFG IARs may also securities Registered Representatives and do not earn commissions on investment products in addition to receiving investment advisory fees. Additionally, no load mutual funds are routinely recommended. Clients are under no obligation to purchase investment products that IARs recommend. Clients have the option to purchase investment products that IARs through other brokers or agents that are not affiliated with BFG. Under certain circumstances BFG IARs may offset investment advisory fees with commissions earned depending upon the terms of the investment advisory contract. In cases where there is a commission or revenue share, those fees are used to offset the total disclosed fee collected for services.

Performance-Based Fees and Side-By-Side Management

Form ADV Part 2A, Item 6

Performance Based Fees: BFG does not charge fees based on a share of capital gains on or capital appreciation of the assets of a client.

Types of Clients

Form ADV Part 2A, Item 7

BFG provides investment advisory services to employers, pension and profit sharing plans, trusts, corporations and other business entities. BFG does not have a minimum account size however certain third party asset managers require a minimum investment to open an account. The specific amounts are detailed in the third party providers' agreements. Accounts below the stated minimums may be accepted on an individual basis at the discretion of BFG and the platform sponsor.

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Methods of Analysis, Investment Strategies and Risk of Loss

Form ADV Part 2A, Item 8

BFG utilizes methods of analysis and investment strategies, including charting, fundamental, cyclical and technical, in formulating investment advice or managing assets. Clients must be aware that investing in securities involves risk of loss.

Disciplinary Information

Form ADV Part 2A, Item 9

A. Neither BFG or a BFG IAR have been or are currently involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which BFG or the BFG IAR:

1. has been convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
2. has been the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
3. has been found to have been involved in a violation of an investment-related statute or regulation; or
4. was the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, your firm or a management person from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order.

B. Neither BFG or an BFG IAR have been involved in an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which BFG or a BFG IAR:

1. was found to have caused an investment-related business to lose its authorization to do business; or
2. was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority

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- (a) denying, suspending, or revoking the authorization of BFG or a BFGI IAR to act in an investment-related business;
- (b) barring or suspending BFG or a BFG IARs association with an investment-related business;
- (c) otherwise significantly limiting BFG or an BFG IARs investment-related activities; or
- (d) imposing a civil money penalty of more than \$2,500 on BFG or a BFG IAR.

C. Neither BFG or a BFG IAR have been the subject of a self-regulatory organization (SRO) proceeding in which BFG or a BFG IAR:

- 1. was found to have caused an investment-related business to lose its authorization to do business; or
- 2. was found to have been involved in a violation of the SRO's rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership;
- (ii) otherwise significantly limited from investment-related activities; or
- (iii) fined more than \$2,500. 00

Other Financial Industry Activities and Affiliations

Form ADV Part 2A, Item 10

A. Certain IARs are also securities Registered Representatives with BFG. As such, they are able to sell securities products to investment advisory clients.

B. BFG Advisor Representatives are not registered as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

C. Certain BFG IARs are involved in the following business activities:

- 1. independent investment adviser or financial planner
- 2. insurance company or agency
- 3. pension consultant

All activities are disclosed in writing, to the BFG Compliance Department. IARs may receive compensation from these activities. Clients are not obligated to obtain these services through BFG IARs.

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

Form ADV Part 2A, Item 11

A. BFG maintains a Code of Ethics that describes firm policies and procedures and how BFG conducts business with its clients. BFG clients depend on the firm to be trustworthy, honest and loyal to their interests as provided in BFG's agreements with them and disclosures in the BFG form ADV. Clients expect BFG to protect the confidentiality of their personal and financial information and to provide timely and professional advice in accordance with BFG agreements. Each IAR will receive a copy of the Code and must acknowledge in writing that he or she has received and read it. Each IAR is expected to strive to act at all time in accordance with fundamental principles of openness, integrity, and honesty. This is in addition to the legal obligations that BFG and its IARs all have to adhere to applicable federal securities laws including the rules and regulations adopted under the Investment Advisers Act.

B. BFG does not generally recommend to clients, or buys or sells for client accounts, securities in which BFG or a related person has a material financial interest, including acting as a general partner in a partnership in which BFG solicits client investments; or BFG or a related person acts as an investment adviser to an investment company that BFG recommend to clients.

C. Occasionally, BFG may recommend that clients buy a security in which BFG or an IAR has also invested in. Additionally, BFG or an associated person of BFG may purchase a security of the same class as securities held in a client's account. It is BFG's policy not to permit associated persons to trade in a manner that takes advantage of price movements caused by clients' transactions.

D. BFG, its officers and IARs may purchase the same securities that are recommended to clients. BFG will put its client's needs first and will follow all related securities regulations in executing the securities trades.

Brokerage Practices

Form ADV Part 2A, Item 12

A. Clients may specify which broker-dealer to use or the IAR may make recommendations. Generally, these recommendations are based on the IAR's perception of the breadth of services offered, and quality of execution. However, the client may pay commissions or fees that are higher or lower than those that may be obtained from other broker-dealers for similar services.

1. Research and Other Soft Dollar Benefits. BFG does not engage in soft dollar benefits. BFG does not use client brokerage commissions (or markups or markdowns) to obtain research or other products or services.

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2. Directed Brokerage. BFG does not routinely recommend, request or require that a client direct BFG to execute transactions through a specified broker-dealer.

B. BFG IARs don't generally aggregate orders as large blocks of securities aren't typically purchased or sold.

Review of Accounts

Form ADV Part 2A, Item 13

A. BFG may prepare individualized reports thereby, the nature and frequency are determined by client need and the services offered. However, as clients may request, BFG may provide quarterly or semi-annual reports.

B. Direct Asset Management accounts are reviewed on a quarterly or semi-annual basis. Any material changes to a client's investment option may trigger a review. Account reviews are conducted by the designated investment adviser professional primarily responsible for each account.

Client Referrals and Other Compensation

Form ADV Part 2A, Item 14

A. BFG does not engage in activity with non-clients to gain economic benefits including sales awards or other prizes.

B. BFG is a registered broker-dealer and an investment advisor. When making investment recommendations, an inherent conflict of interest may exist in that IARs may receive securities commissions in addition to investment advisory fees. Investment advisory fees may or may not be offset with commissions depending upon the terms of the investment advisory agreement. In addition to the fees charged by BFG, each mutual fund company in which a client's funds may be invested, utilizes fees paid by the investors that are deducted from the mutual fund's assets. These fees, called 12b-1 fees, pay for marketing and distribution expenses, such as brokers' commissions. The fees are categorized as annual operating expenses. Rule 12b-1 fees are disclosed in a mutual fund's prospectus and typically are less than 1 percent. Such fees may create a conflict of interest as the IAR may receive a 12b-1 fee in addition to the investment advisory fee. Fees will be fully disclosed to clients and clients are under no obligation to purchase these securities through the IAR or BFG.

C. BFG acts as a referring agent and may also pay referral fees to solicitors who recommend clients to BFG. These arrangements are fully disclosed to clients in writing.

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Custody

Form ADV Part 2A, Item 15

BFG does not maintain custody of client funds or securities.

Investment Discretion

Form ADV Part 2A, Item 16

BFG may maintain a limited power of attorney in certain client accounts. The limited power of attorney will allow BFG to purchase and sell securities in client accounts and to make a determination of the number of shares to be purchased or sold. BFG will discuss with clients in advance, their initial investment objectives and decisions regarding securities to be purchased. Thereafter, BFG, with the limited power of attorney, will make decisions regarding the appropriate time to purchase the securities according to the client's objectives

Voting Client Securities

Form ADV Part 2A, Item 17

A. BFG does not have nor will accept authority to vote client securities.

B. BFG requests that clients engage another party to determine how proxies should be voted. BFG does not provide proxy voting services to its clients.

Financial Information

Form ADV Part 2A, Item 18

BFG does not require or solicit pre-payment of fees in excess of \$1,200 and more than six months in advance. Therefore, BFG is not required to file financial information with the Securities & Exchange Commission.

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Requirements for State-Registered Advisers

Form ADV Part 2A, Item 19

(BFG is registered with the Securities & Exchange Commission and is Notice Filed in the state of Virginia.)

BFG and its IARs have not been involved in the following:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

BFG and its IARs have not been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

Additional Information

IARS will be required to meet the registration and qualification requirements required by the specific states where BFG conducts its advisory business. In accordance with federal requirements BFG maintains a Business Continuity Plan that describes what steps will be taken to ensure the continuity of our business operation in the event of an unanticipated disaster. The plan has been designed with procedures to ensure that client documentation will be accessible and that contact between BFG and its clients will be sustained. If you would like to receive a copy of the BFG Business Continuity Plan please contact your IAR.