



Arthur Stein Financial LLC

Form ADV Part 2A – Disclosure Brochure

Effective: March 11, 2020

This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Arthur Stein Financial LLC (“ASF” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (301) 377-9407.

ASF is a registered investment advisor located in the State of Maryland. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information regarding ASF to assist you in determining whether to retain the Advisor.

Additional information about ASF and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov by searching with the Advisor’s firm name or CRD # 160627.

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Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of ASF. For convenience, the Advisor has combined these documents into a single disclosure document.

ASF believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. ASF encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

Material Changes

There have been no material changes to this Disclosure Brochure since the last filing and distribution to Clients.

Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs in the business practices of ASF.

At any time, the Advisor may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 160627. You may also request a copy of this Disclosure Brochure at any time, by contacting the Advisor at (301) 377-9407.

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Item 4 – Advisory Services

A. Firm Information

Arthur Stein Financial LLC (“ASF” or the “Advisor”) is a registered investment advisor with the State of Maryland. The Advisor is organized as a Limited Liability Company (“LLC”) under the laws of Maryland. ASF was founded in January 2012, and is owned and operated by Arthur Stein (Managing Member and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by ASF.

B. Advisory Services Offered

ASF offers portfolio management solutions and financial planning services to individuals and high net worth individuals (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. ASF’s fiduciary commitment is further described in the Advisor’s Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Portfolio Management Services

ASF provides customized portfolio management solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary portfolio management services. ASF works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to construct a customized portfolio. ASF’s customized portfolios consist primarily of mutual funds, exchange-traded funds (“ETFs”), bonds, and individual securities to achieve the Client’s investment goals.

ASF’s investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. ASF will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

ASF evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. ASF may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

ASF will provide portfolio management services and related services. At no time will ASF accept or maintain custody of a Client’s funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the Client investment advisory agreement. Please see Item 12 – Brokerage Practices.

Financial Planning Services

ASF will typically provide a variety of financial planning services to individuals and families, pursuant to a written financial planning agreement. Services are offered in several areas of a Client’s financial situation, depending on their goals and objectives.

Generally, such financial planning services will involve preparing a financial plan based on the Client’s financial goals and objectives. This planning may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, insurance needs, and other areas of a Client’s financial situation.

A financial plan developed for the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or

charitable giving programs. ASF may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For ad-hoc engagements, the Advisor may not provide a written summary. Plans are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning recommendations poses a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the amount of advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

C. Client Account Management

Prior to engaging ASF to provide portfolio management services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – ASF, in connection with the Client, will develop a strategy that seeks to achieve the Client's goals and objectives.
- Asset Allocation – ASF will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance of risk for each Client.
- Portfolio Construction – ASF will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Portfolio Management and Supervision – ASF will provide portfolio management and ongoing oversight of the Client's investment portfolio.

D. Wrap Fee Programs

ASF does not manage or place Client assets into a wrap fee program. Portfolio management services are provided directly by ASF.

E. Assets Under Management

As of December 31, 2019, ASF managed \$54,362,967 in Client assets, all of which are managed on a discretionary basis. Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into one or more written agreements with the Advisor.

A. Fees for Advisory Services

Portfolio Management Services

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior calendar quarter.

Investment advisory fees are based upon the value of the Portfolio being managed by Advisor. One of the following two schedules is used:

| Investment Portfolios Over \$1 million | Annual Fee |
|--|-------------------|
| \$0 to \$1,000,000 | 1.00% |
| \$1,000,001 to \$2,000,000 | 0.75% |
| \$2,000,001 to \$3,000,000 | 0.50% |
| \$3,000,001 to \$4,000,000 | 0.40% |
| | |
| Investment Portfolios Under \$1 million | Annual Fee |
| \$0 to \$500,000 | 1.50% |
| \$501,000 to \$750,000 | 1.25% |
| \$750,001 to \$1,000,000 | 1.00% |

The minimum investment is \$750,000. ASF reserves the right to raise or lower the minimum investment on a case-by-case basis.

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by ASF will be independently valued by the Custodian. ASF will not have the authority or responsibility to value portfolio securities.

For Clients with less than \$750,000 in assets under management, ASF offers investment management and ongoing financial planning as separate services. The investment management fee is at an annual rate of up to 1.50%.

Financial Planning Services

ASF offers financial planning services on an hourly basis or for a fixed fee. Hourly fees range up to \$400. Fixed fees range up to \$7,500. Fees may be negotiable depending on the nature and complexity of each Client's circumstances. An estimate for total hours and/or total costs will be provided to the Client prior to engaging for these services. Fees for ongoing financial planning services are offered for a fixed annual fee, payable monthly or quarterly, at a rate of up to \$10,000. Ongoing financial planning fees will be based on the complexity of services, frequency of Client interactions and other factors. Financial planning fees are negotiable at the sole discretion of the Advisor.

B. Fee Billing

Portfolio Management Services

Investment advisory fees are calculated by the Advisor and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the respective quarter-end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with ASF at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. In addition, the Advisor will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the custodian's brokerage statement, as the Custodian does not assume this responsibility. Clients provide written authorization permitting ASF to be paid directly from their accounts held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

Financial Planning Services

Financial planning fees may be invoiced up to fifty percent (50%) upon execution of the financial planning agreement. The balance shall be invoiced upon completion of the agreed upon deliverable[s]. Fees for ongoing financial planning services are invoiced in advance, either monthly or quarterly, pursuant to the terms of the financial planning agreement.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than ASF, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian, if applicable. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in Client accounts, but typically charges for mutual funds and other types of investments. The investment advisory fee charged by ASF is separate and distinct from these custody and execution fees.

In addition, all fees paid to ASF for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of ASF, but would not receive the services provided by ASF which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by ASF to fully understand the total fees to be paid.

D. Advance Payment of Fees and Termination

Portfolio Management Services

ASF is compensated for its services in advance of the quarter in which investment advisory services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. In addition, the Client may terminate the agreement within five (5) business days of signing the Advisor's investment advisory agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client shall be responsible for investment advisory fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

Financial Planning Services

ASF is compensated for its financial planning services at the start of the engagement. Either party may terminate a planning agreement, at any time, by providing written notice to the other party. The Client may also terminate the financial planning agreement within five (5) business days of signing the Advisor's financial planning agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Advisor will refund any unearned, prepaid financial planning fees from to the effective date of termination. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

E. Compensation for Sales of Securities

ASF does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Certain Advisory Persons are also licensed as independent insurance professionals. As an independent insurance professional, an Advisory Person may earn commission-based compensation for selling insurance products, including insurance products they sell to Clients. Insurance commissions earned by an Advisory Person are separate and in addition to advisory fees. This practice presents a conflict of interest because a person providing investment advice on behalf of the Advisor who is also an insurance agent has an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on Client needs. However, Clients are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with the Advisor. Please see Item 10 – Other Financial Industry Activities and Affiliations.

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

ASF does not charge performance-based fees for its investment advisory services. The fees charged by ASF are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

ASF does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

ASF provides portfolio management solutions and financial planning services to individuals and high net worth individuals. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. ASF generally requires a minimum relationship size of \$750,000, but may reduce this minimum at its sole discretion.

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

A. Methods of Analysis

ASF primarily employs a fundamental analysis, Modern Portfolio Theory and dollar-cost averaging techniques in developing investment strategies for its Clients. Research and analysis from ASF is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

The Advisor may also implement the *Modern Portfolio Theory* ("MPT") for the management of its Client's portfolios. MPT is the analysis of a portfolio of stock as opposed to selecting stocks based on their unique investment opportunity. The objectives of MPT is to determine the preferred level of risk of the Client and then construct a portfolio that seeks to maximize the expected return for the given level of risk. The following five (5) basic premises of this investment methodology are derived from the MPT:

1. The Client is inherently risk-averse
2. The markets are basically efficient
3. The focus of attention is shifted away from individual securities analysis to consideration of portfolios as a whole, predicated on explicit risk-reward parameters.
4. For any level of risk that you are willing to accept, there is a rate of return that should be targeted.
5. Portfolio diversification is not so much a function of how many issues are involved, but more a function of the relationship and proportions of each asset to other correlating assets.

The Advisor may also utilize the *dollar-cost averaging technique* for its Clients. Dollar-cost averaging is the technique of buying a fixed dollar amount of securities at regularly scheduled intervals, regardless of the price per share. This will gradually, over time, decrease the average share price of the security. Dollar-cost averaging lessens the risk of investing a large amount in a single investment at the wrong time.

As noted above, ASF generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. ASF will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, ASF may also

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buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. ASF will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process.

Following are some of the risks associated with the Advisor's investment approach:

Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving ASF or any of its Supervised Persons. ASF values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor and its Advisory Persons are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 160627. You may also research the background of Arthur Stein by searching with his full name or his Individual CRD# 2104896.

Item 10 – Other Financial Industry Activities and Affiliations

Insurance Agency Affiliations

As noted in Item 5, Mr. Stein is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from his role with ASF. As an insurance professional, Mr. Stein will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Stein is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Stein or the Advisor.

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

A. Code of Ethics

ASF has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with ASF ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to the Client. ASF and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of ASF Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (301) 377-9407.

B. Personal Trading with Material Interest

ASF allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. ASF does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. ASF does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

ASF allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities, that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor have adopted a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, employees of ASF may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by ASF requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") by conducting a coordinated review of personal accounts and the accounts of the Clients. The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

While ASF allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At**

no time will ASF, or any Supervised Person of ASF, transact in any security to the detriment of any Client.

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

ASF does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize ASF to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, ASF does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where ASF does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by ASF. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not utilized. ASF may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, its reputation, and/or the location of the Custodian's offices. ASF does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other brokers/custodians.

ASF will generally recommend that Clients establish their account[s] at TD Ameritrade Institutional, a division of TD Ameritrade, Inc. ("TD Ameritrade"), a FINRA-registered broker-dealer and member SIPC. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer. TD Ameritrade offers to independent investment Advisors services, which include custody of securities, trade execution, clearance and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the program. Please see Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with the broker-dealer/custodian in exchange for research and other services. **ASF does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from TD Ameritrade. Please see Item 14 below.**

2. Brokerage Referrals - ASF does not receive any compensation from any third party in connection with the recommendation for establishing an account.

3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis", where ASF will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). ASF will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. ASF will execute its transactions through the Custodian as directed by the Client.

ASF may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Clients' accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Portfolio Management

Securities in Client accounts are monitored on a regular and continuous basis by Mr. Stein, Managing Member of ASF. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

Financial Planning

The Advisor and Mr. Stein will work closely with the Client to be sure the action points identified in a financial plan have been or are being properly executed. Once the action points have been completed, the financial plan will be reviewed at least annually. Material changes in the Client's lifestyle choices, personal circumstances, the general economy, or tax law changes can trigger more frequent reviews. However, it is the responsibility of the Client to communicate any changes to the Advisor, so that the Advisor can make the appropriate adjustments to the Client's financial plan.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify ASF if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by ASF

Participation in Institutional Advisor Platform

As disclosed under Item 12 – Brokerage Practices, the Advisor participates in TD Ameritrade's institutional customer program and the Advisor may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between the Advisor's participation in the program and the investment advice it gives to its Clients, although the Advisor receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving the Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to the Advisor by third party vendors. TD Ameritrade may also have paid for business consulting and

professional services received by the Advisor's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit the Advisor but may not benefit its Client accounts. These products or services may assist the Advisor in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help the Advisor manage and further develop its business enterprise. The benefits received by the Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, the Advisor endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by the Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

B. Client Referrals from Solicitors

ASF does not engage paid solicitors for Client referrals.

Item 15 – Custody

ASF does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees and certain money movement authority as described below. All Clients must place their assets with a "qualified custodian". Clients are required engage the Custodian to retain their funds and securities and direct ASF to utilize that the Custodian for the Client's security transactions. ASF encourages Clients to review statements provided by the Custodian. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

Item 16 – Investment Discretion

ASF generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by ASF. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by ASF will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

ASF does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 18 – Financial Information

Neither ASF, nor its management, have any adverse financial situations that would reasonably impair the ability of ASF to meet all obligations to its Clients. Neither ASF, nor any of its Advisory Persons, has been subject to a bankruptcy or financial compromise. ASF is not required to deliver a balance sheet along with this Disclosure Brochure, as the Advisor does not collect advance fees of \$500 or more for services to be performed six months or more in the future.

Item 19 – Requirements for State Registered Advisors

A. Educational Background and Business Experience of Principal Officer

The Managing Member of ASF is Arthur Stein. Information regarding the formal education and background of Mr. Stein is included in Item 2 of his Form ADV Part 2B below.

Arthur Stein Financial LLC
6701 Democracy Blvd, Suite 300, Bethesda, MD 20817
Phone: (301) 377-9407* Fax: (240) 986-9578
<http://ArthurSteinFinancial.com>

B. Other Business Activities of Principal Officer

Mr. Stein has additional business activities that are detailed in Item 10 – Other Financial Activities and Affiliations.

C. Performance Fee Calculations

ASF does not charge performance-based fees for its investment advisory services. The fees charged by ASF are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

D. Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding ASF or Mr. Stein. Neither ASF nor Mr. Stein has ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against ASF or Mr. Stein.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding ASF or Mr. Stein.***

E. Material Relationships with Issuers of Securities

Neither ASF nor Mr. Stein has any relationships or arrangements with issuers of securities.



Form ADV Part 2B – Brochure Supplement

For

**Arthur Stein, CFP®
Managing Member and Chief Compliance Officer**

Effective: March 11, 2020

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Arthur Stein, CFP®, (CRD# **2104896**) in addition to the information contained in the Arthur Stein Financial LLC ("ASF" or the "Advisor") (CRD # 160627) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the ASF Disclosure Brochure or this Brochure Supplement, please contact us at (301) 377-9407.

Additional information about Mr. Stein is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. or by searching with his full name or his individual CRD# 2104896.

Item 2 – Educational Background and Business Experience

Arthur Stein, CFP®, born in 1948, is dedicated to advising Clients of ASF in his role as the Managing Member and Chief Compliance Officer. Mr. Stein earned a Master of Arts degree in International Studies from John Hopkins School of Advance International Studies in 1972. In addition, Mr. Stein earned a Bachelor of Arts degree in Economics from Tulane University in 1970. Additional information regarding Mr. Stein's employment history is included below.

Employment History:

| | |
|--|--------------------|
| Managing Member and Chief Compliance Officer, Arthur Stein Financial LLC | 02/2012 to Present |
| Financial Advisor, SPC Financial, Inc. | 11/2009 to 01/2012 |
| Registered Representative, Raymond James Financial Services, Inc. | 12/2009 to 01/2012 |
| Investment Advisor Representative, MML Investors Services, Inc. | 12/2007 to 12/2009 |
| Financial Advisor, West Financial Group | 12/2007 to 11/2009 |
| Investment Advisor Representative, Park Avenue Securities, LLC | 04/2004 to 12/2007 |
| Financial Advisor, First Financial Group | 04/2004 to 12/2007 |

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 71,000 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 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.

Arthur Stein Financial LLC

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<http://ArthurSteinFinancial.com>

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.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Stein. Mr. Stein has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Stein.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Stein.***

However, we do encourage you to independently view the background of Mr. Stein on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2104896.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Mr. Stein is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from his role with ASF. As an insurance professional, Mr. Stein may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Stein is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Stein or the Advisor.

Mr. Stein is also an Adjunct Professor at Montgomery College, where he teaches courses on investments. There is no material conflict of interest with Clients of ASF that arises from this activity.

Item 5 – Additional Compensation

Mr. Stein has additional business activities where compensation is received. These business activities are detailed above in Item 4 above.

Item 6 – Supervision

Mr. Stein serves as the Managing Member and Chief Compliance Officer of ASF. Mr. Stein can be reached at (301) 377-9407.

ASF has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of ASF. Further, ASF is subject to regulatory oversight by various agencies. These agencies require registration by ASF and its Supervised Persons. As a registered entity, ASF is subject to examinations by regulators, which may be announced or unannounced. ASF is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Item 7 – Requirements for State Registered Advisors

Mr. Stein does not have any additional information to disclose.



Form ADV Part 2B – Brochure Supplement

for

**Tanya Rapacz, CFP®
Senior Financial Advisor**

Effective: March 11, 2020

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Tanya Rapacz, CFP®, (CRD# 4795967) in addition to the information contained in the Arthur Stein Financial, LLC ("ASF" or the "Advisor", CRD# 160627) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the ASF Disclosure Brochure or this Brochure Supplement, please contact us at (301) 377-9407.

Additional information about Ms. Rapacz is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 4795967.

Item 2 – Educational Background and Business Experience

Tanya Rapacz, CFP® born in 1970, is dedicated to advising Clients of ASF as a Senior Financial Advisor. Ms. Rapacz earned a Bachelor of Arts degree in Russian Studies with a minor in Economics from Wellesley College in 1992. Additional information regarding Ms. Rapacz's employment history is included below.

Employment History:

| | |
|---|--------------------|
| Senior Financial Advisor, Arthur Stein Financial, LLC | 01/2019 to Present |
| Owner, The Partnership Resource | 09/2012 to Present |
| On Demand Personal Financial Counselor, Zeiders Enterprises | 09/2018 to Present |
| Senior Financial Planner, Compass Wealth Management | 09/2015 to 12/2015 |
| Partner, Garnet Group, LLC | 08/2006 to 11/2009 |
| Homemaker, Homemaker | 11/2009 to 09/2012 |

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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 71,000 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 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.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Ms. Rapacz. Ms. Rapacz has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Rapacz.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Rapacz.***

However, we do encourage you to independently view the background of Ms. Rapacz on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 4795967.

Item 4 – Other Business Activities

Ms. Rapacz is the owner of The Partnership Resource where she provides consulting advice to business partners in the areas of conflict resolution, succession planning, and mergers. These services are separate and apart from Ms. Rapacz's role with ASF. Clients of ASF are not engaged in this service. Ms. Rapacz spends up to 8 hours a week on this activity.

Ms. Rapacz is employed as an on-demand personal financial counselor at Zeiders Enterprises, speaking at or providing one on one counseling at special events for US Service members on topics related to personal finance. These services are separate and apart from Ms. Rapacz's role with ASF. This activity takes up less than 10% of Ms. Rapacz's work hours

Item 5 – Additional Compensation

Ms. Rapacz has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Ms. Rapacz serves as a Senior Financial Advisor of ASF and is supervised by Arthur Stein, the Chief Compliance Officer. Arthur Stein can be reached at (301) 377-9407.

ASF has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of ASF. Further, ASF is subject to regulatory oversight by various agencies. These agencies require registration by ASF and its Supervised Persons. As a registered entity, ASF is subject to examinations by regulators, which may be announced or unannounced. ASF is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Item 7 – Requirements for State Registered Advisors

Ms. Rapacz does not have any additional information to disclose.

Privacy Policy

Effective: March 11, 2020

Our Commitment to You

Arthur Stein Financial LLC ("ASF" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your investment advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. ASF (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

ASF does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered investment advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

| | |
|--|---------------------------------|
| Social security or taxpayer identification number | Assets and liabilities |
| Name, address and phone number[s] | Income and expenses |
| E-mail address[es] | Investment activity |
| Account information (including other institutions) | Investment experience and goals |

What Information do we collect from other sources?

| | |
|---|---|
| Custody, brokerage and advisory agreements | Account applications and forms |
| Other advisory agreements and legal documents | Investment questionnaires and suitability documents |
| Transactional information with us or others | Other information needed to service account |

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect the Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

Arthur Stein Financial LLC

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Phone: (301) 377-9407* Fax: (240) 986-9578

<http://ArthurSteinFinancial.com>

How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

| Basis For Sharing | Do we share? | Can you limit? |
|---|--------------|----------------|
| Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting. | Yes | No |
| Marketing Purposes ASF does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where ASF or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes. | No | Not Shared |
| Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s]. | Yes | Yes |
| Information About Former Clients ASF does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients. | No | Not Shared |

Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (301) 377-9407.