

# DISCLOSURE BROCHURE

## REAP Financial Group, LLC

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This brochure provides information about the qualifications and business practices of REAP Financial Group, LLC. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 512-249-7300. 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 REAP Financial Group, LLC (CRD #144560) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

April 15, 2021

## **Item 2: Material Changes**

### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the firm's Brochure.

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### **Material Changes since the Last Update**

This Brochure dated April 15, 2021, represents the annual amendment to the firm Brochure. Since the filing of the firm's last annual update Brochure on March 06, 2020, subsequently amended November 05, 2020, we have made various minor changes, but no material changes were made.

### **Full Brochure Available**

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This Firm Brochure being delivered is the complete brochure for the Firm.

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#### **Brochure Supplements**

## Item 4: Advisory Business

### Firm Description

REAP Financial Group, LLC is a state registered adviser approved in Texas. The firm was formed in 2008. In 2018, REAP Financial Group, LLC reorganized by splitting its insurance business into a separate entity, REAP Insurance Group, LLC, with both entities being owned by a holding company, REAP Group, LLC. Currently, REAP Financial Group, LLC is owned by the holding company, REAP Group, LLC, which is owned by Sandra Newman, Hannah Heerlein, and Christopher Heerlein,

REAP Financial Group, LLC provides investment management primarily to individuals and trusts. REAP Financial Group, LLC specializes in financial and retirement planning, recommends financial products and acts as a solicitor for other unaffiliated registered investment advisers. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

REAP Financial Group, LLC is a fee based financial planning and investment management firm.

The firm's affiliate, REAP Insurance Group, LLC sells annuities, insurance, and other commissioned products.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) may be engaged directly by clients on an as-needed basis. Conflicts of interest which might exist will be disclosed to the client where applicable.

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### Types of Advisory Services

#### ASSET MANAGEMENT

##### AE Wealth Management

REAP Financial Group, LLC offers discretionary management services utilizing AE Wealth Management, LLC ("AE Wealth") as a sub-advisor. AE Wealth is a Registered Investment Advisor registered with the Securities and Exchange Commission.

AE Wealth primarily utilizes model portfolios managed by the AE Wealth as well as other model managers, portfolio managers, strategists, and third-party money managers that are available through AE Wealth's wealth management platform.

For engagement where AE Wealth functions as sub-advisor, AE Wealth will have the ability to select, hire and fire model managers without the prior consent of REAP or the client.

Additional information about AE Wealth can be found in AE Wealth's Form ADV Part 2 Disclosure Brochure which is available upon request.

##### FTJ FundChoice

REAP Financial Group, LLC offers discretionary management services through a program sponsored by FTJ FundChoice ("FTJ"). The terms and conditions under which the client shall engage FTJ FundChoice shall be set forth in separate written agreements between

the client and REAP Financial Group, LLC and (2) the client and FTJ FundChoice. REAP Financial Group, LLC shall continue to render advisory services to the client relative to the

ongoing monitoring and review of account performance, for which REAP Financial Group, LLC shall receive an annual advisory fee which is based upon a percentage of the market value of the assets being managed by FTJ FundChoice. Factors that REAP Financial Group, LLC shall consider in recommending FTJ FundChoice include the client's stated investment objective(s), management style, performance, reputation, financial strength, reporting, pricing, and research. The investment management fees charged by FTJ FundChoice are exclusive of, and in addition to, REAP Financial Group, LLC's investment advisory fee set forth above. In addition to REAP Financial Group, LLC's written disclosure statement, the client shall also receive the written disclosure statement of FTJ FundChoice. Clients should review FTJ FundChoice's ADV Part 2 Disclosure Brochure or Terms of Use for additional details regarding services.

#### TruAdvice, LLC

REAP Financial Group, LLC also offered non-discretionary asset management services by utilizing TruAdvice, LLC ("TruAdvice") as a sub-advisor. TruAdvice is a Registered Investment Advisor registered with the Securities and Exchange Commission.

TruAdvice offers an actively managed program of model portfolios. The fees will be disclosed to the client in the Investment Advisory Agreement and are negotiable.

#### ALTERNATIVE INVESTMENT DUE DILIGENCE

REAP may provide investment advice and due diligence about certain privately-issued securities for those clients who represent they are accredited investors and who otherwise meet certain investor standards. (To qualify as an accredited investor, you must have a net worth, not including your primary residence of at least \$1 million; or have an income exceeding \$200,000 in each of the two most recent years or joint income with a spouse exceeding \$300,000 for those years and a reasonable expectation of the same income level in the current year.) REAP will collect information such as marketing materials, auditing reports, balance sheets, offering memorandum, subscription agreements, historical records, etc. in order to assist in accessing such opportunities and their related risks.

The fees for these services will be based on a percentage of the initial investments detailed in Item 5 of this brochure.

#### FINANCIAL PLANNING AND CONSULTING

REAP Financial Group, LLC also offers non-management financial planning and consulting services customized to the needs of the client. For these types of services, the client will compensate REAP Financial Group, LLC on an hourly rate as described in detail under "Fees and Compensation" section of this brochure. Services include but are not limited to a review of applicable topics including wills, legacy plans, trusts, investments, taxes, and insurance.

Clients are under no obligation to act upon the firm's recommendations. Furthermore, if a client elects to act on any of the recommendations made by the firm, the client is under no obligation to effect the transaction through REAP Financial Group, LLC, its affiliates or its related persons. Financial plans will be completed and delivered inside of sixty (60) days. Clients may terminate advisory services with five (5) days written notice.

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**Client Tailored Services and Client Imposed Restrictions**

The goals and objectives for each client are documented in our client files. Investment strategies are created to reflect the stated goals and objective of the applicable client. Clients may impose restrictions on investing in certain securities or types of securities.

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**Wrap Fee Programs**

REAP Financial Group, LLC does not sponsor any wrap fee programs but some sub-advisors used by the firm may do so. For additional information about wrap fee programs offered or used by sub-advisors, please refer to the applicable sub-advisor's Form ADV Part 2 Disclosure Brochure which is available upon request.

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**Client Assets under Management**

As of January 31, 2021, REAP Financial Group, LLC had \$234,888,982 of client assets under management. \$234,845,587 of which was managed on a discretionary basis and \$43,395 of which was managed on a non-discretionary basis.

**Item 5: Fees and Compensation****Method of Compensation and Fee Schedule**ASSET MANAGEMENTAE Wealth Management

The client's fee for these services will be based on a percentage of assets under management as follows:

AE Wealth Management Fee Schedule		
Annual Advisory Fee	AE Wealth Management	REAP Financial Group, LLC
1.00% -2.00%	0.45% - 0.80%	Up to 1.55%

The above fees are negotiable and may vary. However, fees are established in advance and documented in the client agreement. Fees are assessed monthly in arrears based on the average daily balance of the assets managed during the billing period. All management fees are withdrawn from the client's account unless otherwise noted. REAP Financial will receive written authorization from the client for fees to be deducted from their account held by a qualified custodian. However, AE Wealth will actually calculate the fees, will deduct fees from the client's account, will retain the AE Wealth fee allocation, and pay REAP Financial Group, LLC its allocation of the fees. Clients may terminate their account within five business days of signing the investment advisory agreement with no obligation.

#### FTJ FundChoice

REAP Financial Group, LLC charges a 1% annual investment advisory fee based on the total assets under management with FTJ FundChoice. The annual fee may be negotiable. Accounts within the same household may be combined for a reduced fee. Lower fees for comparable services may be available from other sources. FTJ does not receive any portion of the advisory fee as it relates to the client account. The total annual fees for the FTJ FundChoice Program may not exceed 2% of assets under management. The fees are charged monthly in arrears and are based on the average daily account balance for the period for the prior month. Fees for FTJ services include Administration Fees (reporting and accounting services – ranging from 0.15% - 0.45%), Account Maintenance Fees (\$25 or \$50 per account annually), and Strategist Fees (range from 0.0% to 0.10%). Fees are automatically deducted from the client's account by FTJ; FTJ will pay REAP Financial Group, LLC their portion of the fees. REAP Financial Group, LLC does not have the ability to directly deduct their advisory fee from the client account.

Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation. For accounts closed mid-month, REAP Financial Group, LLC will be entitled to a pro rata fee for the days service was provided in the final month. Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

#### TruAdvice

The client's fee for these services will be based on a percentage of assets under management as follows:

<b>TruAdvice Fee Schedule</b>		
<b>Annual Advisory Fee</b>	<b>TruAdvice</b>	<b>REAP Financial Group, LLC</b>
1.00% - 2.00%	0.30%-0.70%	Up to 1.70%

The above fees are negotiable and may vary. However, fees are established in advance and documented in the client agreement. Fees are assessed quarterly in advance based on the amount of the assets managed as of the last business day of the previous quarter. All management fees are withdrawn from the client's account unless otherwise noted.

REAP Financial will receive written authorization from the client to deduct advisory fees from their account held by a qualified custodian. TruAdvice will calculate the fee and pay REAP Financial Group, LLC their share of the fees. REAP Financial Group, LLC does not have access to deduct client fees. Clients may terminate their account within five business days of signing the investment advisory agreement with no obligation. For terminations after the initial five business days, Client will be entitled to a pro-rata refund for the days service was not provided in the final quarter.

#### ALTERNATIVE INVESTMENT DUE DILIGENCE

REAP will charge clients a fixed fee up to 1% of the initial investible asset for the due diligence work on certain private placements. The fees are billed quarterly either in arrears or in advance depending on the platform. The sponsor of the investment will transfer the fee from the client's private placement account to an account held at a qualified custodian. REAP will then bill the client account via third party electronic fund transfer distribution.

#### FINANCIAL PLANNING and CONSULTING

Financial Planning Services are offered either on a fixed fee basis or based on a maximum hourly rate of \$400 depending on complexity and unique client needs. Prior to the planning process, the client will be provided a client agreement detailing either a fixed or estimated plan fee as applicable. REAP Financial Group, LLC may require an initial payment of 50% of the estimated fee at the time of engagement. The balance of the fee is due upon delivery of services or delivery of the plan (where applicable). Services are completed and delivered inside of sixty (60) days.

Client may cancel within five (5) business days of signing Agreement for a full refund. If the client cancels after five (5) business days, but before the delivery of the plan, the client will either paid any earned fees to REAP Financial Group, LLC for the work completed or client will receive a refund for the unearned fees paid. REAP Financial Group, LLC reserves the right to waive the fee if the client decides to implement the plan with REAP Financial Group, LLC.

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#### **Client Payment of Fees**

Investment management fees utilizing AE Wealth or FTJ as sub-advisor are deducted monthly in arrears by FTJ, meaning the amount will be deducted from the account after each one- month period.

Investment management fees utilizing TruAdvice as the sub-advisor are deducted quarterly in advance by the sub-adviser.

Fees for financial plans are payable with 50% of the estimated fee upfront with the balance due upon delivery of the plan. REAP Financial Group, LLC reserves the right to waive the fee if the client implements the plan with REAP Financial Group, LLC.

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#### **Additional Client Fees Charged**

Custodians may charge transaction fees on purchases or sales of certain mutual funds, equities and exchange-traded funds. These charges may include mutual fund transactions fees, postage and handling and miscellaneous fees (fee levied to recover

costs associated with fees assessed by self-regulatory organizations). These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

For more details on the brokerage practices, see Item 12 of this brochure.

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**Prepayment of Client Fees**

In some instances, REAP Financial Group, LLC may require 50% of the estimated financial planning fees in advance.

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**External Compensation for the Sale of Securities to Clients**

REAP Financial Group, LLC does not receive any external compensation for the sale of securities to clients, nor do any of the investment advisor representatives of REAP Financial Group, LLC.

## **Item 6: Performance-Based Fees and Side-by-Side Management**

### **Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

REAP Financial Group, LLC does not use a performance-based fee structure because of the conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

## **Item 7: Types of Clients**

### **Description**

REAP Financial Group, LLC generally provides investment advice primarily to individuals and trusts. Client relationships vary in scope and length of service.

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**Account Minimums**

Although REAP Financial Group, LLC does not impose account minimums, some Third Party Money Managers utilized by REAP Financial Group, LLC may have a minimum to open an account on their platform.

## **Item 8: Methods of Analysis, Investment Strategies and Risk of Loss**

### **Methods of Analysis**

Security analysis methods used by the firm may include fundamental analysis, technical analysis, and cyclical analysis. Investing in securities involves risk of loss that clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis involves evaluating a stock using real data such as company revenues, earnings, return on equity, and profits margins to determine underlying value and potential growth. Technical analysis involves evaluating securities based on past prices and volume. Cyclical analysis involves analyzing the cycles of the market.

For information about methods of analysis used by sub-advisors, please refer to the applicable sub-advisor's Form ADV Part 2 Disclosure Brochure which is available upon

request.

When creating a financial plan, REAP Financial Group, LLC utilizes fundamental analysis to provide review of insurance policies for economic value and income replacement. Technical analysis is used to review mutual funds and individual stocks. The main sources of information include Morningstar, client documents such as tax returns and insurance policies.

In developing a financial plan for a client, REAP Financial Group, LLC's analysis may include cash flow analysis, investment planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the client's specific situation.

The main sources of information include financial newspapers and magazines, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

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### **Investment Strategy**

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement, Risk Tolerance or similar form that documents their objectives and their desired investment strategy.

Other strategies used but the firm may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

For information about investment strategies used by sub-advisors, please refer to the applicable sub-advisor's Form ADV Part 2 Disclosure Brochure which is available upon request.

### **Security Specific Material Risks**

All investment programs have certain risks that are borne by the investor. Fundamental analysis may involve interest rate risk, market risk, business risk, and financial risk. Risks involved in technical analysis are inflation risk, reinvestment risk, and market risk. Cyclical analysis involves inflation risk, market risk, and currency risk.

The specific risks associated with financial planning include:

- Risk of Loss
  - Client fails to follow the recommendations of PWM resulting in market loss
  - Client has changes in financial status or lifestyle and therefore plan recommendations are no longer valid

The risks associated with utilizing Sub-Advisors include:

- Manager Risk
  - the Sub-Advisor fails to execute the stated investment strategy
- Business Risk
  - the Sub-Advisor has financial or regulatory problems

- The specific risks associated with the portfolios of the Sub-Advisor which are disclosed in the Sub-Advisors Form ADV Part 2.

Investors face the following investment risks and should discuss these risks with REAP Financial Group, LLC:

- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Market Risk:* The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Business Risk:* These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Financial Risk:* Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

## **Item 9: Disciplinary Information**

### **Criminal or Civil Actions**

The firm and its management have not been involved in any criminal or civil action.

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### **Administrative Enforcement Proceedings**

The firm and its management have not been involved in administrative enforcement proceedings.

### **Self-Regulatory Organization Enforcement Proceedings**

The firm and its management have not been involved in legal or disciplinary events that are material to a client's or prospective client's evaluation of REAP Financial Group, LLC or the integrity of its management.

## **Item 10: Other Financial Industry Activities and Affiliations**

### **Broker-Dealer or Representative Registration**

Neither REAP Financial Group, LLC nor any of its employees are registered representatives of a broker-dealer.

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### **Futures or Commodity Registration**

Neither REAP Financial Group, LLC nor its employees are registered or has an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

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### **Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

In some instances, REAP Financial Group may refer clients to its insurance affiliate, REAP Insurance Group, LLC. REAP Insurance Group, LLC provides various types of insurance to its customers.

This represents a conflict of interest because REAP Insurance Group, LLC and REAP Financial Group, LLC are under common ownership, and this gives us an incentive to recommend insurance based on the commission received. This conflict is mitigated by the fact that REAP Financial Group, LLC has a fiduciary duty to place the best interest of the client first, the fact that clients are informed of conflicts in advance, and the fact that clients are not required to act upon any recommendations.

In some instances, REAP Financial Group may refer clients to Noble Capital Group, LLC. Noble Capital, LLC services loans for private lenders. REAP Financial Group, LLC will receive a commission of 1% of the loan amount from Noble Capital, LLC.

This represents a conflict of interest because Noble Capital Group, LLC is owned by the son of Sandra Newman, Principal Owner of REAP Financial Group, LLC and it gives an incentive to recommend investment based on the commission received. This conflict is mitigated by the fact that REAP Financial Group, LLC has a fiduciary duty to place the best interest of the client first, the fact that clients are informed of conflicts in advance, and the fact that clients are not required to act upon any recommendations.

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### **Recommendations or Selections of Other Investment Advisors and Conflicts of Interest**

REAP Financial Group, LLC utilizes the services of a Sub-advisor to manage Clients' investment portfolios. Sub-advisors will maintain the models or investment strategies agreed upon between Sub-advisor and REAP Financial Group, LLC. Sub-advisors execute all trades on behalf of ABC in Client accounts. REAP Financial Group, LLC will be responsible for the overall direct relationship with the Client. REAP Financial Group, LLC retains the authority to terminate the Sub-advisor relationship at REAP Financial Group,

LLC's discretion.

In addition to the authority granted to REAP Financial Group, LLC under the Agreement, Client will grant REAP Financial Group, LLC full discretionary authority and authorizes REAP Financial Group, LLC to select and appoint one or more independent investment advisors ("Advisors") to provide investment advisory services to Client without prior consultation with or the prior consent of Client. Such Advisors shall have all of the same authority relating to the management of Client's investment accounts as is granted to REAP Financial Group, LLC in the Agreement. In addition, at REAP Financial Group, LLC's discretion, REAP Financial Group, LLC may grant such Advisors full authority to further delegate such discretionary investment authority to additional Advisors.

This practice represents a conflict of interest as REAP Financial Group, LLC may select Sub-advisors who charge a lower fee for their services than other Sub-advisors. This conflict is mitigated by disclosures, procedures, and by the fact that REAP Financial Group, LLC has a fiduciary duty to place the best interest of the Client first and will adhere to their code of ethics.

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

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### **Code of Ethics Description**

The employees of REAP Financial Group, LLC have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of REAP Financial Group, LLC employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of REAP Financial Group, LLC. The Code reflects REAP Financial Group, LLC and its supervised persons' responsibility to act in the best interest of their client.

One area the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our clients. We do not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our clients.

REAP Financial Group, LLC's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of REAP Financial Group, LLC may recommend any transaction in a security or its derivative to advisory clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non- public information regarding the security.

REAP Financial Group, LLC's Code is based on the guiding principle that the interests of the client are our top priority. REAP Financial Group, LLC's officers, directors, advisors, and other employees have a fiduciary duty to our clients and must diligently perform that duty to maintain the complete trust and confidence of our clients. When a conflict arises, it is our obligation to put the client's interests over the interests of either employees or the company.

The Code applies to "access" persons. "Access" persons are employees who have access to non-public information regarding any clients' purchase or sale of securities, or non-

public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to clients, or who have access to such recommendations that are non-public.

The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

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**Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

REAP Financial Group, LLC and its employees do not recommend to clients securities in which we have a material financial interest.

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**Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

REAP Financial Group, LLC and its employees may buy or sell securities that are also held by clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide REAP Financial Group, LLC with copies of their brokerage statements.

The Chief Compliance Officer of REAP Financial Group, LLC is Jessica Hinson. She reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment over employee transactions.

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**Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

REAP Financial Group, LLC does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist. However, employees may buy or sell securities at the same time they buy or sell securities for clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide REAP Financial Group, LLC with copies of their brokerage statements.

The Chief Compliance Officer of REAP Financial Group, LLC is Jessica Hinson. She reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment over employee transactions.

## **Item 12: Brokerage Practices**

### **Factors Used to Select Broker-Dealers for Client Transactions**

REAP Financial Group, LLC does not recommend a broker-dealer to clients and will use the broker-dealer required by the applicable sub-advisor. REAP Financial Group, LLC relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by REAP Financial Group, LLC.

- *Directed Brokerage*

REAP Financial Group, LLC does not allow client directed brokerage.

- *Best Execution*

Investment advisors who manage or supervise client portfolios on a discretionary basis have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is effected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. The firm does not receive any portion of the trading fees.

- *Soft Dollar Arrangements*

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by REAP Financial Group, LLC from or through a broker-dealer in exchange for directing client transactions to the broker-dealer. As permitted by Section 28(e) of the Securities Exchange Act of 1934, REAP Financial Group, LLC has no soft dollar arrangements.

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**Aggregating Securities Transactions for Client Accounts**

REAP Financial Group, LLC is not authorized to aggregate purchases and sales and other transactions.

## **Item 13: Review of Accounts**

### **Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved**

Accounts are generally reviewed quarterly but may be performed more frequently when market conditions dictate. Financial Plans are considered complete when recommendations are delivered to the client and a review is done only upon request of client.

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**Review of Client Accounts on Non-Periodic Basis**

Other conditions that may trigger a review of clients' accounts are changes in the tax laws, new investment information, and changes in a client's own situation.

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**Content of Client Provided Reports and Frequency**

For AE Wealth accounts, Clients receive account statements no less than quarterly for accounts and are issued by the Custodian. Client may receive additional reports from AE Wealth as disclosed in their Form ADV Part 2. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs.

For FTJ Fund Choice accounts, clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by FTJ's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs via the FTJ website for \$25/year or via mail for a \$50 annual fee payable to Custodian automatically deducted in monthly amounts from the client account.

Under financial planning services, the client will receive a one-time written financial plan.

## **Item 14: Client Referrals and Other Compensation**

### **Client Referrals**

REAP Financial Group, LLC does not compensate outside parties for client referrals.

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### **Other Compensation**

REAP Financial Group, LLC periodically hosts workshops and other educational events for client and prospective clients where a participation fee may be charged. Participation fees may be directed to or shared with event sponsors for their attendees, and any remaining participation fees are retained by REAP Financial Group, LLC.

## **Item 15: Custody**

### **Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to any reports prepared by the Third Party Money Managers.

## **Item 16: Investment Discretion**

### **Discretionary Authority for Trading**

REAP Financial Group, LLC accepts discretionary authority to manage securities accounts on behalf of clients. REAP Financial Group, LLC has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. However, REAP Financial Group, LLC consults with the client prior to each and every trade to obtain concurrence if a blanket trading authorization has not been given. REAP Financial Group, LLC may however delegate its authority to a sub-advisor with the client's consent.

The client approves the custodian to be used and the commission rates paid to the custodian. REAP Financial Group, LLC does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

## **Item 17: Voting Client Securities**

### **Proxy Votes**

REAP Financial Group, LLC does not vote proxies on securities. Clients are expected to vote their own proxies. The client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, REAP Financial Group, LLC will provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client.

For information about the proxy voting policies of sub-advisors, please refer to the sub-advisor's Form ADV Part 2 Disclosure Brochure which is available upon request.

## **Item 18: Financial Information**

### **Balance Sheet**

A balance sheet is not required to be provided because REAP Financial Group, LLC does not serve as a custodian for client funds or securities and REAP Financial Group, LLC does not require prepayment of fees of more than \$500 per client and six months or more in advance.

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### **Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients**

REAP Financial Group, LLC has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients. Although the firm believes this to be the

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case, the firm has taken preemptive financial measures in response to the COVID-19 pandemic and its possible economic consequences. Such measure include temporary expense reductions and participation in the Paycheck Protection Program under the Coronavirus Aid, Relief, and Economic Security (CARES) Act. The firm intends to continue to reevaluate as conditions change.

### **Bankruptcy Petitions during the Past Ten Years**

Neither REAP Financial Group, LLC nor its management has had any bankruptcy petitions in the last ten years.