

**Item 1 – Cover Page For  
Part 2A of Form ADV  
Firm Brochure  
Dated January 25, 2021  
For CRD #122314**

**Rainier Financial Group, Inc.  
4022 Stone Way N, Suite 100  
Seattle, WA 98103  
206-417-5600**

**Firm Contact: Grant E. Hartvigson, Chief Compliance Officer  
Firm Website: [www.rainierfinancial.com](http://www.rainierfinancial.com)**

This Brochure provides information about the qualifications and business practices of RAINIER FINANCIAL GROUP, INC. If you have any questions about the contents of this Brochure, please contact us at 206.417.5600. 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.

RAINIER FINANCIAL GROUP, INC. is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about RAINIER FINANCIAL GROUP, INC. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 – Material Changes**

**Rainier Financial Group** is required to advise you of any material changes to our Firm Brochure (“Brochure”) from our last annual update, identify those changes on the cover page of our Brochure or on the page immediately following the cover page, or in a separate communication accompanying our Brochure. We must state clearly that we are discussing only material changes since the last annual update of our Brochure, and we must provide the date of the last annual update of our Brochure.

Since our last amendment, which was filed on 01/2020, we have no material changes.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge. RAINIER FINANCIAL GROUP has been in business since July 8, 2003. The principal owners are Grant E. Hartvigson and Chad A. Hartvigson.

Currently, our Brochure may be requested by contacting GRANT E. HARTVIGSON, MANAGING PARTNER at 206.417.5600 or [GRANT@RAINIERFINANCIAL.COM](mailto:GRANT@RAINIERFINANCIAL.COM).

Additional information about RAINIER FINANCIAL GROUP, INC. is also available via the SEC’s web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC’s web site also provides information about any persons affiliated with RAINIER FINANCIAL GROUP, INC. who are registered, or are required to be registered, as investment adviser representatives of RAINIER FINANCIAL GROUP, INC.

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#### **Item 4 – Advisory Business**

Rainier Financial Group, Inc. (RFG) offers Financial Planning and Consulting Services as well as Investment Advisory Services and LPL Financial Sponsored Advisory Services. RFG clients consist of individuals, pension and profit sharing plans, trusts, charitable organizations and business entities. Our firm has been in business as a Registered Investment Advisor since July 2003 and is equally owned by Grant E. Hartvigson and Chad A. Hartvigson. Grant E. Hartvigson acts as Managing Partner and runs the day to day operations of the firm whereas Chad A. Hartvigson is not involved in day to day operations nor does he work directly with advisory clients.

#### **FINANCIAL PLANNING AND CONSULTING SERVICES**

RFG provides its clients with a broad range of financial planning and consultation services. RFG will charge an hourly fee or a fixed fee for these services. RFG's financial planning and consulting fees are negotiable but are currently \$275 on an hourly basis and \$5,000 on a fixed fee basis.

Financial Planning and Consulting services may include investment review, estate planning, retirement planning, tax reduction strategies, education planning and/or other financial issues. Prior to engaging RFG to provide financial planning services and/or consultation services, the client will generally (i.e. depending upon the level and/or scope of services to be provided) be required to enter into a *Financial Planning and Consulting Agreement* with RFG setting forth the terms and conditions of the engagement and describing the scope of the services to be provided. In the event the client terminates RFG's *Financial Planning and Consulting Agreement*, any unearned fee shall be refunded to the client. In performing its services, RFG shall not be required to verify any information received from the client or from the client's other professionals (i.e., attorney, accountant, insurance agent, etc.), and is expressly authorized to rely thereon. If requested by the client, RFG shall recommend the services of other professionals for implementation purposes. The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendations from RFG.

Clients are encouraged to renew RFG's *Financial Planning and Consulting Agreement* on an annual basis for the purpose of reviewing/updating RFG's previous recommendations and/or services. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify RFG if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising RFG's previous recommendations and/or services.

Upon completion of the initial services, RFG may provide clients with ongoing financial planning and/or investment advisory services. The scope of the ongoing annual financial planning and/or related consultation services to be rendered as part of the combined service is intended to be generally limited to reviewing/evaluating/revising of RFG's previous financial planning recommendations are relative to a change in the client's financial situation or investment objectives. In the event that a client requires unforeseen additional financial planning and/or consultation services, RFG may determine to charge for such additional services, the dollar amount of which shall be set forth a separate written notice to the client. When additional changes are made or charged the client must sign an amendment to the existing contract and agree to any additional charges.

RFG provides Financial Planning and Consulting services generally in the following areas:

1. Investment Policy Statement - This document is a description of the goal of the portfolio. It addresses eight sections: Background Information, Return Requirements, Risk Tolerance, Liquidity Requirements, Time Horizon, Legal Restrictions, Asset Allocation and Monitoring Procedures.

2. Investment Planning/Portfolio Analysis - This involves advice with respect to asset allocation, tax-efficiency and investment income accumulation techniques. These techniques are implemented principally through no load mutual funds and annuities. Evaluations are made of existing investments in terms of their economic and tax characteristics as well as their suitability for meeting the clients' objectives. Tax consequences and their implications are identified and evaluated.
3. Retirement Planning - This involves advice with respect to alternatives and techniques for accumulating wealth for retirement income or advice relative to appropriate distribution of assets following retirement. Tax consequences and their implications are identified and evaluated.
4. Estate Planning - This involves advice with respect to property ownership, distribution strategies, estate tax reduction, and tax payment techniques. It involves a discussion of gifts, trusts, etc., and the disposition of business interests. Tax consequences and their implications are identified and evaluated.
5. Long-Term Care Assessment - This involves advice with respect to long-term care insurance alternatives and strategies. This process evaluates the clients' financial situation with respect to long-term healthcare costs. Evaluations are made of long-term care insurance carriers and their suitability for meeting the clients' objectives. Comparisons are drawn between different insurance carriers and a plan is recommended for the client.
6. Education Planning - This involves advice and consultation regarding advanced education funding strategies. Evaluations are made of potential vehicles and their suitability for meeting the clients' objectives.
7. Charitable Planning - This involves advice and consultation regarding advanced charitable giving techniques. Evaluations are made based on the goals and objectives of the client. Tax consequences and their implications are identified and evaluated.
8. Business Succession Planning - This includes alternatives and strategies with respect to the continuity or disposition of the business upon the business owner's retirement, death, disability, or decision to sell. Tax consequences and their implications are identified and evaluated.

#### **MISCELLANEOUS**

Neither RFG nor the client may assign the *Financial Planning and Consulting Agreement* without the prior written consent of the other party. Transactions that do not result in a change of actual control or management of RFG shall not be considered an assignment.

A copy of RFG's written disclosure statement as set forth on Part 2 of Form ADV shall be provided to each client prior to or contemporaneously with the execution of the *Financial Planning and Consulting Agreement*. Any client who has not received a copy of RFG's written disclosure statement at least forty-eight (48) hours prior to executing the *Financial Planning and Consulting Agreement* shall have five (5) business days subsequent to executing the agreement to terminate RFG's services without penalty. After the first anniversary of their initial *Financial Planning and Consulting Agreement*, clients may wish, or RFG may suggest, that their contract(s) be renewed. This will require a signed amendment or a new contract.

The client may elect to have a written summary prepared or have RFG provide continuous advisory services.

### **INVESTMENT ADVISORY SERVICES**

The following are the types of advisory services we offer:

1. **Asset Management:**

We emphasize continuous and regular account supervision. As part of our asset management service, we generally create a portfolio, consisting of individual stocks or bonds, exchange traded funds ("ETFs"), options, mutual funds and other public and private securities or investments. The client's individual investment strategy is tailored to their specific needs and may include some or all of the previously mentioned securities. Each portfolio will be initially designed to meet a particular investment goal, which we determine to be suitable to the client's circumstances. Once the appropriate portfolio has been determined, we review the portfolio at least quarterly and if necessary, rebalance the portfolio based upon the client's individual needs, stated goals and objectives. Each client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio.

2. **LPL Financial Sponsored Advisory Programs:**

We may provide advisory services through certain programs sponsored by LPL Financial Corporation ("LPL"), a registered investment adviser and broker-dealer. Below is a brief description of each LPL advisory program available to us. For more information regarding the LPL programs, including more information on the advisory services and fees that apply, the types of investments available in the programs and the potential conflicts of interest presented by the programs please see the LPL Financial Form ADV Part II or applicable client agreement. LPL's applicable paperwork and client agreement shall not become effective until acceptance by us as evidenced by the signature of an authorized representative.

Advisory Programs:

#### **Optimum Market Portfolios Program (OMP)**

OMP offers clients the ability to participate in a professionally managed asset allocation program using Optimum Funds Class I shares. Under OMP, client will authorize LPL on a discretionary basis to purchase and sell Optimum Funds pursuant to investment objectives chosen by the client. We will assist the client in determining the suitability of OMP for the client and assist the client in setting an appropriate investment objective. We will have discretion to select a mutual fund asset allocation portfolio designed by LPL consistent with the client's investment objective. LPL will have discretion to purchase and sell Optimum Funds pursuant to the portfolio selected for the client. LPL will also have authority to rebalance the account.

A minimum account value of \$15,000 is required for OMP.

#### **Manager Access Select Program (MAS)**

Manager Access Select provides clients access to the investment advisory services of professional portfolio management firms for the individual management of client accounts. Adviser will assist client in identifying a third-party portfolio manager (Portfolio Manager) from a list of Portfolio Managers made available by LPL. The Portfolio Manager manages client's assets on a discretionary basis. Adviser will provide initial and ongoing assistance regarding the Portfolio Manager selection process. A minimum

account value of \$100,000 is required for Manager Access Select, however, in certain instances, the minimum account size may be lower or higher.

## **Newsletters**

RAINIER FINANCIAL GROUP, INC provides a variety of newsletter options. The newsletters are accessible via our website and are provided on a weekly, monthly, quarterly and/or periodic basis. Each online newsletter allows the recipient the opportunity to opt out of for future receipt.

## **Potential Conflicts of Interest**

Transactions in LPL advisory program accounts are generally affected through LPL as the executing broker-dealer.

We receive compensation as a result of a client's participation in an LPL program. Depending on, among other things, the size of the account, changes in its value over time, the ability to negotiate fees or commissions, and the number of transactions, the amount of this compensation may be more or less than what we would receive if the client participated in other programs, whether through LPL or another sponsor, or paid separately for investment advice, brokerage and other services.

In accordance with CCR Section 260.235.2 we are required to furnish a written statement to our financial planning clients when a conflict of interest exists between our interests and the interests of our client. In accordance with the aforementioned Section, we disclose that:

- (a) A conflict exists between our interests and the interests of our client,
- (b) Our client is under no obligation to act upon our recommendation, and
- (c) If the client elects to act on any of the recommendations, the client is under no obligation to affect the transaction through our firm.

We hereby disclose that all material conflicts of interest under CCR Section 260.238 (k) are disclosed regarding our firm, our representatives or any of our employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

### **(i) Individual Tailoring of Advice to Clients:**

We offer individualized investment advice to clients utilizing the following services offered by our firm: Asset Management and LPL Financial Sponsored Advisory Programs. Additionally, we offer general investment advice to clients utilizing our Financial Planning and Consulting services.

### **(ii) Ability of Clients to Impose Restrictions on Investing in Certain Securities or Types of Securities:**

We usually do not allow clients to impose restrictions on investing in certain securities or types of securities due to the level of difficulty this would entail in managing their account. In the rare instance that we would allow restrictions, it would be limited to the following services: Asset Management. We do not manage assets through our other services.

### **(iii) Wrap Fee Programs:**

We do not offer wrap fee programs.

(iv) Disclosure of the amount of client assets we manage on a discretionary basis and the amount of client assets we manage on a non-discretionary basis as of January 25, 2021:

RAINIER FINANCIAL GROUP, INC managed approximately \$381,760,097 in assets, of which approximately \$363,809,026 was managed on a discretionary basis and approximately \$17,951,071 was managed on a non-discretionary basis.

### **Item 5 – Fees and Compensation**

We are required to describe our brokerage, custody, fees and fund expenses so you will know how much you are charged and by whom for our advisory services provided to you. Our fees are negotiable and are determined based on the needs of the client and the complexity of the situation. In accordance with CCR Section 260.238(j), our firm hereby discloses that lower fees for comparable services may be available from other sources.

A. Description of how we are compensated for our advisory services provided to you.

#### **1. Asset Management:**

Annual fees are negotiated and will not exceed 1.25% based upon complexity. These fees are negotiable depending upon the needs of the client and complexity of the situation, and the final fee is outlined on the client account application. Since clients are charged in advance, management fees will be retroactively adjusted should there be contributions or withdrawals from the account. Refunds are given on a prorated basis, based on the number of days remaining in a quarter at the point of termination. The fee refunded will be the balance of the fees collected in advance minus the daily rate\* times the number of days in the quarter up to the termination date. (\*The daily rate is calculated by dividing the quarterly fee rate by 90 days). Clients may terminate their contract without penalty, for a full refund, within 5 business days of signing the advisory contract.

\*Our firm's fees are billed on a pro-rata annualized basis quarterly in advance based on the value of your account on the last day of the previous quarter. Fees will generally be automatically deducted from your managed account. As part of this process, you understand and acknowledge the following:

- a) LPL Financial as your custodian sends statements at least quarterly to you showing all disbursements for your account, including the amount of the advisory fees paid to us;
- b) You provide authorization permitting fees to be directly paid by these terms;
- c) LPL Financial calculates the advisory fees for all flat fee schedules and deducts them from your account.
- e) Investment fees are negotiable depending on the needs of the client and the complexity of the situation. The final fee will be stated on the account application.

\*In rare cases, we will agree to directly bill clients.

#### **2. LPL Financial Sponsored Advisory Programs:**

The account fee charged to the client for each LPL advisory program is negotiable, subject to the following maximum account fees:

Manager Access Select	3.0%
OMP	2.5%



RFG and LPL may share in the account fee and other fees associated with program accounts. Associated persons of RFG may also be registered representatives of LPL.

LPL serves as program sponsor, investment adviser and broker-dealer for the LPL advisory programs. Adviser and LPL share in the account fee and other fees associated with program accounts. Our firm's associated persons may also be registered representatives of LPL. For more information regarding the LPL programs, including more information on the advisory services and fees that apply, the types of investments available in the programs and the potential conflicts of interest presented by the programs please see the LPL Financial Form ADV Part 2 or applicable client agreement.

### 3. Financial Planning and Consulting:

RFG provides its clients with a broad range of financial planning and consultation services. RFG will charge an hourly fee or a fixed fee for these services. RFG's financial planning and consulting fees are negotiable but are currently \$275 on an hourly basis and \$5,000 on a fixed fee basis.

### 4. Other Fees:

In addition to the fees discussed above, you may also pay custodial fees, charges imposed directly by a mutual fund, index fund, or exchange traded fund (such as fund management fees, distribution fees, service fees ("trails") and other fund expenses, each of which shall be disclosed in the fund's prospectus), mark-ups and mark-downs, spreads paid to market makers, wire transfer fees, electronic fund transfer fees and other fees and taxes on brokerage accounts and securities transactions. These fees are not included within the fee you are charged by our firm. Any service fees ("trails") will be retained by LPL Financial.

### 5. Commissionable securities sales:

Advisory Persons of RFG are also registered representatives of LPL Financial LLC ("LPL Financial"), a securities broker-dealer, and a member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). In one's separate capacity as a registered representative of LPL Financial, an Advisory Person may implement securities transactions under LPL Financial and not through RFG. In such instances, an Advisory Person will receive commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by an Advisory Person in one's capacity as a registered representative is separate and in addition to RFG's advisory fees. This practice presents a conflict of interest because Advisory Persons who are registered representatives have an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on the Client. RFG mitigates this conflict in two ways. First, Clients always have the right to choose whether or not to purchase securities products through one of our Advisory Persons. Second, RFG will not charge an ongoing investment advisory fee on any assets implemented in the separate capacity of one of our Advisory Persons. Please see Item 10.

Certain Advisory Persons are also licensed as independent insurance professionals. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to Clients. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because Advisory Persons who are also insurance agents may have an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on a Client's needs. However, to mitigate this conflict, Clients always have the right to choose whether or not to purchase insurance products through any person affiliated with our RFG.

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

RAINIER FINANCIAL GROUP, INC does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

## **Item 7 – Types of Clients and Account Requirements**

RAINIER FINANCIAL GROUP, INC provides portfolio management services to individuals, high net worth individuals, and profit-sharing plans, charitable institutions, foundations, endowments, trust programs, and other U.S. and international institutions.

Our requirements for opening and maintaining accounts or otherwise engaging us generally require a minimum account balance of \$500,000 for our asset management service. The minimum account balance may be negotiable in certain circumstances. LPL sponsored programs require a minimum account balance as previously stated in section 4.

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

Investment Planning/Portfolio Analysis - This involves advice with respect to asset allocation, tax-efficiency and investment income accumulation techniques. These techniques are implemented principally through no load mutual funds, equities, ETF's and annuities. Evaluations are made of existing investments in terms of their economic and tax characteristics as well as their suitability for meeting the clients' objectives. Tax consequences and their implications are identified and evaluated. The method of analysis is a culmination of evaluating underlying management expenses, past performance, peer performance, tracking error, comparison of alpha/beta of underlying managers as well as third party analysis. No load mutual funds, ETF's and annuities all have the potential of substantial market value loss. Investing in securities involves risk of loss that clients should be prepared to bear. The following is a list of the various risks:

Accuracy of Public Information Risk – RFG recommends investments, in part, on the basis of information and data filed by issuers with various government regulators or made publicly available by the issuers or through sources other than the issuers. Although RFG evaluates this information and data and ordinarily seeks independent corroboration as appropriate and reasonably available, RFG is not in a position to confirm the completeness, genuineness or accuracy of such information and data, and in some cases, complete and accurate information is not available.

Counterparty Risk - Counterparty risk is the risk to each party of a contract that the counterparty will not live up to its contractual obligations. Should counterparty fail to fulfill its obligations to RFG, clients could potentially incur a loss as a result of counterparty credit exposure.

Equity Securities Risk - Stock markets are volatile. The price of equity securities fluctuates based on changes in a company's financial condition and overall market and economic conditions.

Foreign Securities Risk- Securities of foreign issuers, including depository receipts, are subject to special risks associated with foreign investments not typically associated with investing in U.S. markets including:

Political and Economic Risk- Investing in foreign securities is subject to the risk of political, social or economic instability in the country of the issuer of a security, variation in international trade patterns, the Possibility of the imposition of exchange controls, expropriation, confiscatory taxation, limits on movement of currency or other assets and nationalization of assets

Currency Risk - RFG may recommend a portion of its assets in equity securities and other investments denominated in currencies other than the U.S. dollar and in other financial instruments, the prices of which

are determined with reference to currencies other than the U.S. dollar. RFG, however, will value securities and other assets in U.S. dollars. To the extent unhedged, the value of a portfolio's assets will fluctuate with U.S. dollar exchange rates as well as with price changes of the portfolio's investments in the various local markets and currencies. Thus, an increase in the value of the U.S. dollar in comparison to the other currencies in which the portfolio may make its investments will reduce the effect of increases and magnify the effect of decreases in the prices of the portfolios securities and other investments in their local markets. Conversely, a decrease in the value of the U.S. dollar will have the opposite effect of magnifying the effect of increases and reducing the effect of decreases in the prices of the portfolio's non-U.S. dollar securities or other investments. The portfolios may use futures, forward currency contracts and options to hedge against currency fluctuations in its non-U.S. dollar denominated portfolio, but there can be no assurance that any such hedging transactions will be effective.

**Information Risk-** Non-U.S. companies in certain countries may not be subject to uniform accounting, auditing and financial reporting standards or to other regulatory requirements that are similar to those applicable to U.S. companies.

**Foreign Tax Risk-** Income from foreign issuers may be subject to non-U.S. withholding taxes. Portfolios also may be subject to taxes on trading profits and, on certain securities transactions, transfer or stamp duties tax.

**Foreign Securities Market Risk-** Securities of many non-U.S. companies may be less liquid and their prices more volatile than securities of comparable U.S. companies and therefore may involve greater risks.

**Portfolio Turnover Risk-** There may be risks related to portfolio turnover. High rates of portfolio turnover could lower performance of the portfolio through increased brokerage and other transaction costs and taxes.

**Concentration/Non-diversification Risk-** Certain portfolios may be concentrated in only a few industries, countries or geographic regions, or may be concentrated in other ways. This investment strategy could expose investors to greater risk than if the portfolios were to diversify its investments.

**Sector Focus Risk-** A portfolio may be more heavily invested in certain sectors, which may cause the value of the portfolio's shares to be especially sensitive to factors and economic risks that specifically affect those sectors. This may cause the value of the portfolio to fluctuate more widely than a comparative benchmark.

**Market Risk-** The market value of a security may fluctuate, sometimes rapidly and unpredictably. The prices of securities change in response to many factors, including the historical and prospective earnings of the issuer, the value of its assets, general economic conditions, interest rates, investor perceptions and market liquidity.

**Small Company Risk-** Securities of small companies are often less liquid than those of large companies and this could make it difficult to sell a small company security at a desired time or price. As a result, small company stocks may fluctuate relatively more in price. In general, smaller capitalization companies are also more vulnerable than larger companies to adverse business or economic developments and they may have more limited resources.

## **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of RAINIER FINANCIAL GROUP, INC or the

integrity of RAINIER FINANCIAL GROUP, INC's management. RAINIER FINANCIAL GROUP, INC has no information applicable to this Item.

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

The associated persons of RFG may refer clients to LPL Financial. Grant Hartvigson, James Simone and Kimberly Arnesen are all registered representatives with LPL Financial. LPL Financial is a FINRA-registered broker/dealer and is also licensed as a broker/dealer with the states in which Rainier Financial Group or its representatives offer securities to clients. LPL Financial registered representatives may act as the advisory client's representative in the execution of securities transactions on a normal and customary basis. LPL transaction fees for equities, bonds, mutual funds, etc. may range between \$5 to \$250 and the registered rep may receive a commission split ranging between 1% to 20%. The brokerage commission charge by LPL maybe higher or lower than those charged by other broker/dealers. The extent of exact fees and commissions is available upon request. Clients are advised that they are under no obligation to implement the plan or its recommendations through RFG's advisor(s) in his/her capacity as a registered representative or licensed insurance agent. All potential conflicts of interest relating to compensation have also been disclosed.

The associated persons of RFG spend the majority of their time on their work with RFG. RFG may refer clients to LPL Financial due to their independent unbiased research, reasonableness of commissions and the registered representative's affiliation. In the event that financial planning recommendations are given that the client should seek the services of a broker/dealer to purchase products involving insurance or investments the client may select a broker or RFG and its advisors may suggest that clients implement recommendations set forth in the financial plan through LPL in his/her capacity as a registered representative or an insurance agent. If the client chooses to do so, this would present a conflict of interest to the extent that the advisor(s) would receive a normal and customary commission as a registered representative or licensed insurance agent resulting from any securities or insurance transactions. Clients are advised that they are under no obligation to implement the plan or its recommendations through RFG's advisor(s) in his/her capacity as a registered representative or licensed insurance agent. All potential conflicts of interest relating to compensation have also been disclosed.

Grant E. Hartvigson, Kimberly Arnesen and James Simone are licensed life and health insurance brokers and may receive customary commissions on insurance products sold.

#### **Item 11 – Code of Ethics**

RAINIER FINANCIAL GROUP, INC has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients.

The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at RAINIER FINANCIAL GROUP, INC must acknowledge the terms of the Code of Ethics annually, or as amended. RAINIER FINANCIAL GROUP, INC anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which

RAINIER FINANCIAL GROUP, INC has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which RAINIER FINANCIAL GROUP, INC its affiliates and/or clients, directly or indirectly, have a position of interest. RAINIER FINANCIAL GROUP, INC's employees and persons associated with RAINIER FINANCIAL GROUP, INC are required to follow RAINIER FINANCIAL GROUP, INC's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of RFG and its affiliates may trade for their own accounts

in securities which are recommended to and/or purchased for RAINIER FINANCIAL GROUP, INC's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of RAINIER FINANCIAL GROUP, INC will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of RAINIER FINANCIAL GROUP, INC's clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between RAINIER FINANCIAL GROUP, INC and its clients.

It is RAINIER FINANCIAL GROUP, INC's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. RAINIER FINANCIAL GROUP, INC will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account.

A copy of the RFG Code of Ethics will be available upon request.

#### **Item 12 – Brokerage Practices**

The associated persons of RFG may refer clients to LPL Financial due to their independent unbiased research, reasonableness of commissions and the registered representative's affiliation. In the event that financial planning recommendations are given that the client should seek the services of a broker/dealer to purchase products involving insurance or investments the client may select a broker or RFG and its advisors may suggest that clients implement recommendations set forth in the financial plan through LPL in his/her capacity as a registered representative or an insurance agent. If the client chooses to do so, this would present a conflict of interest to the extent that the advisor(s) would receive a normal and customary commission as a registered representative or licensed insurance agent resulting from any securities or insurance transactions. Clients are advised that they are under no obligation to implement the plan or its recommendations through RFG's advisor(s) in his/her capacity as a registered representative or licensed insurance agent. All potential conflicts of interest relating to compensation have also been disclosed.

The associated persons of RFG may refer clients to LPL Financial. Grant Hartvigson, James Simone and Kimberly Arnesen are registered representatives with LPL Financial. LPL Financial is a FINRA-registered broker/dealer and is also licensed as a broker/dealer with the states in which Rainier Financial Group or its representatives offer securities to clients. LPL Financial registered representatives may act as the advisory client's representative in the execution of securities transactions on a normal and customary basis. LPL transaction fees for equities, bonds, mutual funds, etc. may range between \$5 to \$250 and the registered rep may receive a commission split ranging between 1% to 20%. The brokerage commission charge by LPL maybe higher or lower than those charged by other broker/dealers. The extent of exact fees and commissions is available upon request. Clients are advised that they are under no obligation to implement the plan or its recommendations through RFG's advisor(s) in his/her capacity as a registered representative or licensed insurance agent. All potential conflicts of interest relating to compensation have also been disclosed.

The associated persons of RFG may receive “soft dollars” for example marketing support, due diligence incentives along with periodic lunches, dinners and trinkets from various mutual fund companies and insurance companies in which they do business with.

The RFG Policy and Procedures is to do business with the various companies based on their individual merits and product offerings. Any soft dollars received are appreciated, but not expected and not sought out. These types of payments can be seen as a conflict of interest; thus, they are fully disclosed to clients and are discussed in our Code of Ethics.

### **Item 13 – Review of Accounts**

We review accounts on at least a quarterly basis for our clients subscribing to our Investment Advisory Services. Third Party Money Management clients receive at least quarterly reviews. The nature of these reviews is to learn whether clients’ accounts are in line with their investment objectives, appropriately positioned based on market conditions, and investment policies, if applicable. Our Financial Advisors, Grant E. Hartvigson, Kimberly Arnesen and James Simone will conduct reviews. Reviews can be held in person or via telephone.

Financial planning clients do not receive reviews of their written plans unless they take action to schedule a financial consultation with us. Typically, we will meet with clients on a quarterly or semi-annual basis. We do not provide ongoing services to financial planning clients, but are willing to meet with such clients upon their request to discuss updates to their plans, changes in their circumstances, etc.

We may review client accounts more frequently than described above. Among the factors which may trigger an off-cycle review are major market or economic events, the client’s life events, requests by the client, etc.

Clients will receive account statements from LPL Financial on a monthly or quarterly basis depending upon the underlying investment advisory service.

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

RAINIER FINANCIAL GROUP, INC and its related affiliates do not directly or indirectly compensate any person for client referrals.

We *may* receive from LPL or a mutual fund company, without cost and/or at a discount support services and/or products, to assist us to better monitor and service client accounts maintained at such institutions. Included within the support services we may receive investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by us to assist us in our investment advisory business operations.

Our clients do not pay more for investment transactions effected and/or assets maintained at LPL as result of this arrangement. There is no commitment made by us to LPL or any other institution as a result of the above arrangement.



### **Item 15 – Custody**

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. RAINIER FINANCIAL GROUP, INC urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you.

All of our clients receive at least quarterly account statements directly from their custodians. Upon opening an account with a qualified custodian on a client's behalf, we promptly notify the client in writing of the qualified custodian's contact information. If we decide to also send account statements to clients, such notice and account statements include a legend that recommends that the client compare the account statements received from the qualified custodian with those received from our firm.

LPL is the qualified custodian and maintains custody of client funds and securities in a separate account for each client under the client's name. LPL as a qualified custodian sends account statements showing all transactions, positions, and all deposits and withdrawals of principal and income. LPL sends account statements monthly when the account has had activity or quarterly if there has been no activity. Clients should carefully review those account statements.

Although most securities available in program accounts are custodied at LPL, there are certain securities managed as part of the account that are held at third parties, and not at LPL. For example, variable annuities, non-traded real estate investment trusts, BDC's, hedge funds and managed futures are often held directly with the investment sponsor. For those outside positions, client will receive confirmations and statements directly from the investment sponsor.

### **Item 16 – Investment Discretion**

RAINIER FINANCIAL GROUP, INC usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account. When selecting securities and determining amounts, RAINIER FINANCIAL GROUP, INC observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, RAINIER FINANCIAL GROUP, INC's authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made. Investment guidelines and restrictions must be provided to RAINIER FINANCIAL GROUP, INC in writing.

### **Item 17 – Voting Client Securities**

As a matter of firm policy and practice, RAINIER FINANCIAL GROUP, INC may be given the authority to vote proxies on behalf of advisory clients. Clients can choose this option via the account application or at a later date. For clients retaining the right to vote their proxies RAINIER FINANCIAL GROUP, INC may provide advice to clients regarding the clients' voting of proxies.

### **Item 18 – Financial Information**

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about RAINIER FINANCIAL GROUP, INC's financial condition. RAINIER FINANCIAL GROUP, INC has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

## **Item 19 – Requirements for State-Registered Advisers**

### **EDUCATION AND BUSINESS BACKGROUND**

All Investment Adviser Representatives of RFG must satisfy, at a minimum, the experience and education requirements set out by the individual states where they intend to offer or recommend services. All individuals that give wealth management advice on the behalf of RFG must have earned a college degree and/or have substantive financial-related experience. This requires the Investment Advisor Representative to pass the Securities and Exchange Commission (SEC) and the New York Stock Exchange (NYSE), Series 7 General Securities Exam. Often times, this will require the Investment Advisor Representative to pass the North American Securities Administrators Association, Inc.'s Series 65 Uniform Investment Adviser Law Examination, the Series 66 Uniform Investment Adviser Law Examination, or earn the Certified Financial Planner ("CFP") designation or the Chartered Financial Analyst ("CFA") designation. The Certified Financial Planner designation CFP® certificants are required to complete 30 hours of CE each reporting period:

- 2 hours from a CFP Board-approved program on CFP Board's *Code of Ethics and Professional Responsibility (Code of Ethics)* and/or *Financial Planning Practice Standards (Practice Standards)*.
- 28 hours from one or more of the accepted subject topics.

The Certified Financial Analyst designation CFA Institute members are required to complete 20 hours of CE each reporting period:

- 20 hours from one or more learning topics derived from the CFA Institute.
- With a minimum of 2 hours in the topics of Standards, Ethics, and Regulations.

**Grant E. Hartvigson**, Wealth Advisor, Rainier Financial Group, Inc.

Birthdate: 04/24/1974

Formal Education:

University of Washington, B.A. in Business Finance, 1996

Business Background:

Rainier Financial Group, Inc., Wealth Advisor, 11/2002 to Present

LPL Financial, Registered Representative, 11/02 to Present

Thrivent Financial, Financial Associate, 7/02 - 11/02

Lutheran Brotherhood Securities Corp., District Representative, 6/96 - 6/02

Examinations and Professional Designations:

CERTIFIED FINANCIAL PLANNER® 12/2002

Chartered Life Underwriter 12/2002

NASD Series 6 07/1996

NASD Series 7 06/2002

NASD Series 24 06/2003

NASD Series 63 07/1996

NASD Series 65 07/2002

State of Washington Life Insurance License 06/1996

State of Washington Health Insurance License 06/1996

Outside Business Activities:

We have nothing to disclose in this regard

**Kimberly Arnesen**, Financial Advisor and Operations Manager, Rainier Financial Group, Inc.

Birthdate: 01/11/1984

Formal Education:

Shoreline Community College, Associates Degree, 2005



**Business Background:**

LPL Financial, Registered Representative, 06/2012 to Present

Rainier Financial Group, Inc., Financial Advisor, 02/2012 to Present

Rainier Financial Group, Inc., Operations Manager, 02/2009 to Present

Rainier Financial Group, Inc., Administrative Assistant, 03/2007 to 02/2009

**Examinations and Professional Designations:**

Chartered Financial Consultant 4/20/2015

NASD Series 65 04/2013

NASD Series 7 06/2009

NASD Series 63 08/2009

State of Washington Life Insurance License 11/2007

State of Washington Health Insurance License 11/2007

**Outside Business Activities:**

We have nothing to disclose in this regard

**James Simone**, Financial Advisor, Rainier Financial Group, Inc.

Birthdate: 04/01/1966

**Formal Education:**

Brown University, B.A., 1988

**Business Background:**

Rainier Financial Group, Inc., Financial Advisor, 11/2018 to Present

LPL Financial, Registered Representative, 11/2018 to Present

Ameriprise Financial Services, Inc., Financial Advisor, 03/2017 – 10/2018

WHV Investments, Inc., Director of Research/Portfolio Manager, 01/2006 – 07/2016

Sound Capital Partners, Managing Director/Co-Chief Investment Officer, 01/1998 – 12/2005

Bank of America Capital Management, Analyst/Portfolio Manager, 1992 – 1998

Security Pacific Bank S.A., Assistant Portfolio Manager, 1988 - 1992

**Examinations and Professional Designations:**

Chartered Financial Analyst 06/1996

Certified Financial Planner 12/2016

NASD Series 7 05/2017

NASD Series 66 06/2017

State of Washington Life Insurance License 06/2017

State of Washington Health Insurance License 06/2017

**Outside Business Activities:**

We have nothing to disclose in this regard

**Chad A. Hartvigson**, Partner, Rainier Financial Group, Inc.

Birthdate: 12/15/1970

**Formal Education:**

University of Washington, B.A., 1994

**Business Background:**

Sportswear, Inc., CEO, 7/2005 – Present

Rainier Financial Group, Inc., Partner, 7/2002 to Present

Rainier Financial Group, Inc., Wealth Advisor, 7/2002 to 1/2011

LPL Financial, Registered Representative, 7/02 to 1/2011

Lutheran Brotherhood Securities Corp., District Representative, 1/00 - 6/02

**Examinations and Professional Designations:**

- NASD Series 7 06/2002
- NASD Series 63 10/1999

- NASD Series 6 10/1999

Outside Business Activities:

Chad spends the majority of his time as the CEO of Sportswear, Inc.

**Performance Based Fees**

RAINIER FINANCIAL GROUP, INC does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

**Disciplinary Information**

We have nothing to disclose in this regard

**Any Additional Securities Relationships**

We have nothing to disclose in this regard