



STILES FINANCIAL SERVICES
I N C O R P O R A T E D

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March 2021

**Form ADV 2A and 2Bs for
Corporate Retirement Plan
Consulting Services**

This Brochure provides information about the qualifications and business practices of Stiles Financial Services Incorporated (SFSI). If you have any questions about the contents of this Brochure, please contact us at info@stilesfinancial.com or 952-988-0452. 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 SFSI is also available on the SEC's website at www.adviserinfo.sec.gov. To access this information, you can make an inquiry using our name or our CRD number, which is 117023. Registration of an Investment Adviser does not imply any level of skill or training.

Item 2 – Material Changes

Since the date of Stiles Financial Services Incorporated's (SFSI) last annual Brochure in January 2020, there has been a material change to our business and service offerings:

Advisory services previously provided by Cambridge Investment Research Advisor are now being offering by SFSI through a wrap program. Please review our Form ADV Wrap Brochure for a complete review of that program.

SFSI will provide our clients with a new Brochure as necessary based on changes or new information, at any time, without charge. Currently, our Brochures may be requested by contacting us at 952-988-0452 or info@stilesfinancial.com.

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Item 4 – Advisory Business

SFSI, established in 2000, is wholly owned and managed by Susan M. Stiles and has \$499,197,000 in assets under advisement as of December 31, 2020. SFSI provides (i) Corporate Retirement Plan Consulting Services for defined contribution and defined benefit plans, both qualified and non-qualified and (ii) prepares and delivers individual Financial Plan Consulting Services. As of December 31, 2020, SFSI provides \$206,599,000 in assets under management in our Portfolio Management advisory service offered through SFSI's wrap program. Please reference the Brochures specific to individual financial planning and our SFSI wrap program for additional information on those services.

Corporate Retirement Plan Consulting Services

SFSI's Corporate Retirement Plan Consulting Services provide fiduciary consulting, investment monitoring and Plan oversight through the delivery of a process driven implementation of fiduciary and industry best practices for the Plan Sponsor. Typically this is accomplished through the investment or benefits committee and or the trustee(s). These services often include:

- Performance monitoring, analysis and benchmarking,
- Investment screening, reporting and asset class review,
- Extensive fee analysis, disclosure, negotiating and benchmarking,
- Plan benchmarking,
- Vendor search including conversion services,
- Vendor service negotiation,
- Guidance and fiduciary education on formalization of the investment committee and implementation of an investment policy statement,
- Participant education services, along with development and monitoring of risk-based asset class managed strategy portfolios and in some cases, with age banded glide paths.

Ongoing services will generally include a self-assessment of plan operations review, 404(c) compliance review, fiduciary audit file annual checklist and implementation and documentation of industry best practices and procedures. Participant services can include group-based education seminars and one on one personalized meetings in person, over the phone or through webinars. SFSI will generally accept fiduciary responsibility either under ERISA 3(21) or 3(38). SFSI will often coordinate with other professionals including attorneys, actuaries, accountants and plan vendors.

Item 5 – Fees and Compensation

Corporate Retirement Plan Consulting Services

There are two distinct ways to engage SFSI for Corporate Retirement Plan Consulting; through an ongoing regular fiduciary advisory and consulting engagement and/or for project-related services. Examples of project-related work might include: requests for proposal (RFP) vendor and advisor searches, Plan conversion quarterbacking to a new platform, fund menu analysis and redesign, fee benchmarking and restructuring including vendor renegotiation, Plan design consultation and new Plan startup planning strategy and guidance, and employee financial planning workshops and seminars. Generally, the Corporate Retirement Plan Consulting fee is established by considering the size of the plan in assets and the number of participants, asset flow, the number of company plans, the complexity and breadth of the services being rendered and the extent of the engagement and required services. In addition, fees can vary based on the extent and level of SFIS's fiduciary status in relation to the Plan under ERISA 3(21) and 3(38).

As full compensation for its services, SFSI receives a negotiated fee, which may be based on a percentage of assets under advisory management, a fixed fee, a hybrid fee that includes a portion based on percentage of assets under management and a portion that is a flat fee, and under specific circumstances an hourly rate. Fees can be paid by the Plan Sponsor, the Plan or a combination. The specific manner in which fees are charged by SFSI is established in a client's written agreement with SFSI. Generally, Retirement Plan Consulting fees are

billed on a quarterly basis in advance and in some circumstances in arrears each calendar quarter, as specified by agreement.

SFSI's fees are separate and distinct from all other fees that may be charged to operate and administer a Plan. Examples of other fees that Plans may incur include: custodial fees, trustee fees, recordkeeping and operational fees charged by the vendor and third party administrative fees, legal fees, audit fees, and investment management fees. All of these operational and administrative fees are completely separate from and in addition to SFSI's advisory and consulting fee. In some cases the Plan Sponsor pays the fees directly to the service provider which may include SFSI. In other cases, the Plan pays the provider fees from Plan assets which essentially means the participants bear the cost of maintaining the Plan. In some cases fees are paid utilizing a combination of both approaches. Part of SFSI's consulting services is to educate the Plan Sponsor on the fees incurred, disclose the fees and help determine the reasonableness of the fees by conducting thoughtful discussion around how the fees should be paid.

For ongoing engagements, fees are typically charged quarterly in advance on an ongoing basis. For one-time projects, 50% of the fee is charged up-front and is non-refundable with the remainder due upon completion of the project. Additionally, a fee ranging from \$175 to \$350 per hour can be charged for special activities and projects. All fees are determined in advance and prior to signing the agreement.

The agreement continues until it is terminated by either party by giving written notice to the other, which can be received in email form. SFSI prepares client specific bills following the terms in the signed agreement and mails and or emails the bill directly to the client for payment. Advisory fees paid in advance would be pro-rated and refunded to the client, as outlined in the advisory agreement.

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

SFSI 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) or side-by-side management fees (where

competing fee arrangements may create a conflict in the advisory services offered to clients).

Item 7 – Types of Clients

SFSI provides retirement plan consulting to defined contribution and defined benefit plans, both qualified and non-qualified.

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

SFSI provides Retirement Plan Investment Committees with insight into investment principles and practices that are educational and informative, especially in volatile markets when performance can fluctuate dramatically. SFSI's investment discipline is an analytical approach with a qualitative overlay that generally emphasizes diversification, asset allocation and risk management. With a combination of technology, research and experience, SFSI searches the universe of available managers, mutual funds, investments and securities considering areas such as:

- Overall returns, return consistency, expected returns and risk-adjusted returns
- Peer group comparisons and manager history, including investment objectives, philosophy, guidelines and expense ratios.
- Index and benchmark performance standards

Portfolio construction considers sectors relative to benchmarks and industries, and risk relative to benchmarks. Investing in securities involves risk of loss that Plans must understand and be prepared to bear. Recommended investment strategies tend to center on long-term investing that will generally follow a buy and hold strategy, updated periodically to reflect changes in the Plan's investment objectives and/or risk tolerance.

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 the client's evaluation of SFSI or the integrity of the Firm's management. SFSI has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

SFSI is also a Minnesota-registered insurance agency and an employee also acts as licensed insurance agent, selling life, disability, long term care and fixed annuities. Insurance purchases through SFSI agent's result in commissions paid to the agency, in addition to the advisory fees that may be paid by the client. Clients are under no obligation to purchase insurance products through SFSI. Insurance products do not fall under advisory fees.

Investment Advisor Representatives may also be Registered Representatives with LaSalle St. Securities, LLC (member FINRA/SIPC), a registered Broker/Dealer. Clients are under no obligation to purchase or sell securities through the LaSalle St. Securities. LaSalle St. Securities is not affiliated with SFSI. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds, exchange traded funds or alternative investments which are described in each fund's prospectus. These fees can include a management fee and other fund expenses. However, SFSI will credit any 12b1 fees received back to the client where LaSalle St. Securities is the broker of record.

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

SFSI has adopted a Code of Ethics for all employees describing its high standard of business conduct, and our fiduciary duty to clients. SFSI acknowledges the fiduciary duty that is our responsibility according to both the Advisers Act, as well as the more recent DOL Fiduciary Rule. 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 SFSI must acknowledge the terms of the Code of Ethics annually, or as amended.

SFSI anticipates that, in appropriate circumstances, it will cause accounts over which SFSI has advisement authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which SFSI clients or employees, directly or indirectly, have a position of interest. SFSI employees are required to follow SFSI's Code of Ethics. Subject to satisfying this policy and applicable laws, employees of SFSI may trade for their own accounts in securities which are recommended to SFSI clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of advisory employees 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 interests of clients. 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 Plan or client in a security held by an employee. Employee trading is monitored to reasonably prevent conflicts of interest between SFSI and its clients.

Clients or prospective clients may request a copy of the firm's Code of Ethics by contacting us at 952-988-0452 or info@stilesfinancial.com.

Item 12 – Brokerage Practices

A discussion of Brokerage Practices is not relevant to SFSI's Corporate Retirement Plan Consulting Services.

Item 13 – Review of Accounts

For Corporate Retirement Plan Consulting Services, SFSI employs a best-practices fiduciary process in developing and presenting Plan reviews that are delivered quarterly, semi-

annually or annually. SFSI's fiduciary plan reviews follow a standardized format that is outlined in the agreement entered into with the Plan Sponsor. These review reports include thorough investment analysis and monitoring, fee disclosure and benchmarking, economic and financial market commentary, and an overview of plan statistics, data and information regarding management of the Plan. These review reports are presented to the Retirement Plan Committee representing the Plan Sponsor. SFSI follows a fiduciary best practices model in developing and presenting formal Plan reviews.

Item 14 – Client Referrals and Other Compensation

SFSI does not participate in any referral arrangements or accept revenue sharing with custodians or plan platform sponsors.

Item 15 – Custody

Custody is a term used to describe the role of the entity that maintains and reports on investment assets held in separate client accounts. These services are typically provided by brokerage firms or banks. The role of a qualified custodian is highly specialized, independently protecting each client's assets in a role that compliments the responsibilities of an advisory firm like SFSI.

For Corporate Retirement Plan Consulting, SFSI does not provide custody but develops Plan or client reports and periodic reviews from the information provided by custodians and/or broker-dealers. SFSI urges all clients to carefully and regularly review official custodial records and statements.

Item 16 – Investment Discretion

SFSI contractually receives discretionary authority. With discretionary authority, SFSI will have authorization to execute investment decisions without prior approval from the Plan. This is known as a Section 3(38) investment manager. Alternatively, SFSI may be contracted in a co-fiduciary status where the Plan Sponsor/Trustee retains ultimate decision-making authority for the investments in a Plan and may accept or reject the

recommendations provided by SFSI. This is known as a Section 3(21) investment manager. In both cases, an investment policy statement is generally executed and approved by the Retirement Plan Benefits Committee and provided to SFSI.

Item 17 – Voting Client Securities

SFSI does not vote proxies.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide the client with certain financial information or disclosures about their respective Firm's financial condition. SFSI 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.

Biography Supplement – Form ADV Part 2B for Susan M. Stiles, born 1959

Education and Professional Designations

Susan M. Stiles graduated from Cornell University, Johnson School of Management with a MBA in Finance and Accounting in 1991 and from Cornell University, School of Hotel Administration with a BS in 1981.

Ms. Stiles attained her CFP® (Certified Financial Planner) designation in 1997. This is a certification awarded by the Certified Financial Plan Board of Standards. To earn the CFP® certification, candidates must: (1) have an associate's degree (or higher) from an accredited college or university; (2) have at least three years of full-time personal financial planning experience, and (3) must complete a CFP® board registered program. To maintain the designation, 30 hours of continuing education are required every two years including 2 hours of code of ethics education.

Ms. Stiles attained her Chartered Financial Consultant™ (ChFC®) designation in July 2007. This designation is awarded by The American College and requires three years of full-time business experience within the preceding five years and the completion of nine courses (that are the equivalent of 27 semester credit hours) with a final closed-book exam for each course. 30 hours of continuing education are required every two years.

Ms. Stiles earned the Accredited Investment Fiduciary™ (AIF®) in 2006. This is a designation offered and recognized by the Center for Fiduciary Studies. Candidates must meet a point-based threshold based on a combination of education, relevant industry experience and/or professional development. Each candidate must complete an educational program and pass a final exam. To maintain this designation, six hours of continuing education are required per year.

Ms. Stiles earned the Certified Plan Fiduciary Advisor (CPFA) designation in 2017. This is a designation that is issued by the National Association of Plan Advisors. There are no prerequisites but candidates must successfully complete a final proctored certification exam. There are 20 credits of continuing education required every two years.

Business Experience

- Stiles Financial Services Incorporated as President since 2000.
- Landmark Financial Advisors as a Partner from March 1999 to July 2000.
- Symmetric Investments, Inc. as a Financial Advisor from April 1993 to March 1999.

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 each supervised person providing investment advice. No information is applicable to this Item.

Other Business Activities

Ms. Stiles is also a Registered Representative with LaSalle St. Securities, LLC (member FINRA/SIPC).

Ms. Stiles is licensed insurance agent with SFSI.

Additional Compensation

Ms. Stiles may receive commissions for trades executed or insurance products purchased through the broker-dealer and/or insurance company which whom she is registered which are transferred to SFSI.

Supervision

Ms. Stiles, as President and Chief Compliance Officer is responsible for the activities and operation of the Firm. She should be contacted directly with any questions at the mailing address, email address or contact information provided on the cover of this Brochure.

Biography Supplement – Form ADV Part 2B for Debra Rosenberg, born 1957

Education and Professional Designations

Debra Rosenberg graduated from Gustavus Adolphus College, St. Peter, MN with a BA in Business and a minor in Psychology in 1979.

Ms. Rosenberg attained her CEBS (Certified Employee Benefit Specialist) from the Wharton School of the University of Pennsylvania and the International Foundation of Employee Benefit Plans in 1985. To earn the designation at the time, candidates must have completed ten required courses from the CEBS curriculum, successfully completing a computer-based test for each course. To maintain the designation, 30 hours of continuing education are required every two years.

Ms. Rosenberg earned the Accredited Investment Fiduciary™ (AIF®) in 2013. This is a designation offered and recognized by the Center for Fiduciary Studies. Candidates must meet a point-based threshold based on a combination of education, relevant industry experience and/or professional development. Each candidate must complete an educational program and pass a final exam. To maintain this designation, six hours of continuing education are required per year.

Ms. Rosenberg earned the Certified Plan Fiduciary Advisor (CPFA) designation in 2016. This is a designation that is issued by the National Association of Plan Advisors. There are no prerequisites but candidates must successfully complete a final proctored certification exam. There are 20 credits of continuing education required every two years.

In addition, Ms. Rosenberg has attained a Fellowship with the International Society of Employee Benefit Specialists and completes coursework every two years, followed by an exam.

Business Experience

- Stiles Financial Services Incorporated as Director of Retirement Plan Consulting since 2012.

- M&I Institutional Trust Services (now BMO) as a Vice President and Regional Sales Director from 2004 to 2012.
- Prior employers include Watson Wyatt (now Willis Towers Watson), first Trust (now US Bank, and Norwest (now Wells Fargo).

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 each supervised person providing investment advice. No information is applicable to this Item.

Other Business Activities

Ms. Rosenberg is also a Registered Representative with LaSalle St. Securities, LLC (member FINRA/SIPC).

Additional Compensation

Ms. Rosenberg does not receive commissions through LaSalle St. Securities.

Supervision

Ms. Stiles, as President and Chief Compliance Officer is responsible for the activities and operation of the Firm. She should be contacted directly with any questions about Ms. Rosenberg's activities for Stiles Financial Services Incorporated at the mailing address, email address or contact information provided on the cover of this Brochure.

Biography Supplement – Form ADV Part 2B for Keighley J. Spott, born 1975

Education

Keighley J. Spott graduated from the University of Minnesota, Twin Cities with a BA in English Literature in 1998.

Ms. Spott attained her Chartered Retirement Planning Counselor, CRPC® designation in 2016. This designation is awarded by the College for Financial Planning and requires completion of an online instructor led or self-study course with a final proctored closed-book exam. There are 16 hours of continuing education required every two years to maintain the designation.

Ms. Spott earned the Behavioral Financial Advisor™ designation in 2018. This designation is awarded by Kaplan Financial Education and requires completion of two courses related to behavioral finance as well as a certification exam. There are twenty hours of continuing education required every two years.

Business Experience

- Stiles Financial Services Incorporated as a Financial Planner since September 2017.
- LPL Financial LLC as a Vice President, Financial Consultant from November 2013 to September 2017.
- Morgan Stanley as a Registered Sales Assistant from 2007 to 2013.

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 each supervised person providing investment advice. No information is applicable to this Item.

Other Business Activities

Ms. Spott is also a Registered Representative with LaSalle St. Securities, LLC (member FINRA/SIPC).

Additional Compensation

Ms. Spott does not receive commissions through LaSalle St. Securities.

Supervision

Ms. Stiles, as President and Chief Compliance Officer is responsible for the activities and operation of the Firm. She should be contacted directly with any questions about Ms. Spott's activities for Stiles Financial Services Incorporated at the mailing address, email address or contact information provided on the cover of this Brochure.

Biography Supplement – Form ADV Part 2B for Paul E. Tichy, born 1961

Education

Paul E. Tichy graduated from DePaul University with a MBA in 1992 and from Northwestern University with a BA in 1984.

Business Experience

- Stiles Financial Services Incorporated as Investment Analyst and Portfolio Manager since May 2016.
- Fisher Investments as a Regional Vice President from March 2015 to March 2016.
- Anchor Bank as a Private Wealth Advisor from 2013 to 2014.
- Merrill Lynch as a Financial Advisor from 2011 to 2013.
- Cowen & Company in Institutional Sales from 2010 to March 2011.
- RBC Capital Markets Corporation in Institutional Sales from 2009 to 2010.
- Merrill Lynch in Institutional Sales from 2003 to 2009.

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 each supervised person providing investment advice. No information is applicable to this Item.

Other Business Activities

Mr. Tichy is also a Registered Representative with LaSalle St. Securities, LLC (member FINRA/SIPC).

Additional Compensation

Mr. Tichy does not receive commissions through LaSalle St. Securities.

Supervision

Ms. Stiles, as President and Chief Compliance Officer is responsible for the activities and operation of the Firm. She should be contacted directly with any questions about Mr. Tichy's activities for Stiles Financial Services Incorporated at the mailing address, email address or contact information provided on the cover of this Brochure.

Biography Supplement – Form ADV Part 2B for Kristine E. Iten, born 1984

Education

Kristine E. Iten graduated from the University of Minnesota – Twin Cities with a BA in English in 2006.

Ms. Iten attained her Accredited Asset Management Specialist (AAMS) designation in 2011. This designation is awarded by the College for Financial Planning and requires a series of 10 self-study modules, followed by a closed-book proctored exam. There are 16 hours of continuing education required every two years to maintain the designation.

Business Experience

- Stiles Financial Services Incorporated a Retirement Plan Specialist since September 2019.
- Cornerstone Private Asset Trust Company as a Retirement Plan Specialist from June 2009 to September 2019.
- Cornerstone Private Asset Trust Company as a Trust Operations Supervisor from June 2009 to September 2019.

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 each supervised person providing investment advice. Ms. Iten declared Bankruptcy in 2019.

Other Business Activities

Ms. Iten has no other reportable business activity.

Additional Compensation

Mr. Iten does not receive any additional compensation.

Supervision

Ms. Stiles, as President and Chief Compliance Officer is responsible for the activities and operation of the Firm. She should be contacted directly with any questions about Ms. Iten's activities for Stiles Financial Services Incorporated at the mailing address, email address or contact information provided on the cover of this Brochure.

Brochure Supplement – Privacy Policy and Practices of Stiles Financial

Protecting the privacy of the investor is important to us. This notice describes the practices and policies through which we maintain the confidentiality and protect the security of your non-public personal information.

Gathering Information

In the course of providing services to you, we may collect “non-public personal information” about you. This may include information we receive from you on suitability questionnaires, subscription agreements or other forms, such as your name, address, social security number and birth date. As well, we may collect information about your investment transactions with us and others, as well as other account data.

“Non-public personal information” is non-public information about you that we obtain in connection with providing a financial product or service to you, such as the information described in the above examples.

Disclosing Information

We do not disclose non-public personal information about you or any of our former clients to anyone, except as permitted by law. We are permitted by law to share any of the information we collect in the normal course of serving clients with companies that perform various services such as custodians and broker-dealers. These companies will use this information only for the services for which we hired them and as allowed by applicable law.

Confidentiality and Security Procedures

To protect your personal information, we permit access only by authorized personnel. We maintain physical, electronic and procedural safeguards that comply with federal standards to protect the confidentiality, integrity and security of your non-public personal information.

We will continue to adhere to the privacy policies and practices in this notice even after your contract has been terminated.

Questions

For questions about our policy, or additional copies of this notice, please contact our office at (952) 988-0452 or contact Susan M. Stiles at info@stilesfinancial.com.