



S.C. Financial Services, Inc.

Form ADV Part 2A – Disclosure Brochure

Effective: March 10, 2021

This Form ADV Part 2A ("Disclosure Brochure") provides information about the qualifications and business practices of S.C. Financial Services, Inc. ("SCFS" or the "Advisor"). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (480) 214-9596 or by email at info@scfinancialservices.com.

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

Additional information about SCFS and its Advisory Persons is available on the SEC's website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 127012.

S.C. Financial Services, Inc.
12568 E. Silver Spur Street
Scottsdale, AZ 85259
Phone: (480) 214-9596 * Fax: (888) 268-9908
www.scfinancialservices.com

Item 2 – Material Changes

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

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

Material Changes

The following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

- The Advisor has amended its fee schedule for strategic financial planning services. Please see Item 5.A for additional details.

Future Changes

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

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 127012. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (480) 214-9596 or by email at info@scfinancialservices.com.

Item 3 – Table of Contents

Item 1 – Cover Page	1
Item 2 – Material Changes	2
Item 3 – Table of Contents	3
Item 4 – Advisory Services	4
A. Firm Information	4
B. Advisory Services Offered	4
C. Client Account Management	6
D. Wrap Fee Programs	6
E. Assets Under Management	6
Item 5 – Fees and Compensation	7
A. Fees for Advisory Services	7
B. Fee Billing	8
C. Other Fees and Expenses	9
D. Advance Payment of Fees and Termination	9
E. Compensation for Sales of Securities	10
Item 6 – Performance-Based Fees and Side-By-Side Management	10
Item 7 – Types of Clients	10
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	10
A. Methods of Analysis	10
B. Risk of Loss	11
Item 9 – Disciplinary Information	12
Item 10 – Other Financial Industry Activities and Affiliations	12
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	12
A. Code of Ethics	12
B. Personal Trading with Material Interest	13
C. Personal Trading in Same Securities as Clients	13
D. Personal Trading at Same Time as Client	13
Item 12 – Brokerage Practices	13
A. Recommendation of Custodian[s]	13
B. Aggregating and Allocating Trades	14
Item 13 – Review of Accounts	14
A. Frequency of Reviews	14
B. Causes for Reviews	14
C. Review Reports	14
Item 14 – Client Referrals and Other Compensation	15
A. Compensation Received by SCFS	15
B. Client Referrals from Solicitors	15
Item 15 – Custody	15
Item 16 – Investment Discretion	16
Item 17 – Voting Client Securities	16
Item 18 – Financial Information	16
Form ADV Part 2B – Brochure Supplement	17
Form ADV Part 2B – Brochure Supplement	20
Form ADV Part 2B – Brochure Supplement	22
Privacy Policy	24

Item 4 – Advisory Services

A. Firm Information

S.C. Financial Services, Inc. ("SCFS" or the "Advisor") is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). The Advisor is organized as a Corporation under the laws of the State of Arizona. SCFS was founded in April 2003 and is owned and operated by Sharlee Cretors (President and Chief Compliance Officer) and Kurt Cretors (Vice-President). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by SCFS.

B. Advisory Services Offered

SCFS offers investment advisory services to individuals, high net worth individuals, and businesses (each referred to as a "Client").

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

Wealth Management Services

Wealth Management involves delivering both continuous investment management services and ongoing strategic financial planning to a Client, based on their individual needs. At the beginning of a new wealth management relationship, the Advisor learns the goals and objectives of the client through the Advisors strategic financial planning process. The Advisor then will agree with the client on an investment policy, which guides the Advisor in its investing advisory services. Through the ongoing Strategic Financial Planning process, combined with the Advisor's Investment Management Service, the Advisor is able to continually monitor and update the Client's plan, develop strategies and recommend actions to accomplish their goals and objectives

Wealth Management Services are provided to clients in three levels:

1. Personal CFO Program Level I:
Level 1 Wealth Management Services include ongoing investment management and financial planning. This service includes coordination with the Advisors advisory team, attending meetings as requested, preparation of personal financial statements, consulting on outside investments as it relates to their overall financial picture. Quarterly meetings are offered but not required. Quarterly reporting of investments managed will be provided.
2. Personal CFO Program Level II:
Level II Wealth Management Services offers all of the services of Level 1 as well as assistance with alternative investments, business consulting as it relates to the personal net worth of the client, strategic tax planning and coordination with their tax advisor, and asset protection review and implementation with the appropriate resources. Concierge services such as assistance with purchase/leasing of vehicles, travel, or other related items as needed. Financial education and financial planning are also offered to the family members of Level II clients.

Typically, the difference between Level I and Level II services is the complexity of the client's financial picture, quantity of hours required for implementation of the Client's plan as well as oversight of the Clients alternative investments and/or personal business ownership as it relates to their personal financial plan. The Advisor finds individuals with net worth in excess of \$7MM typically fall into the Level II service.
3. Financial Foundations Program:
After the completion of a financial plan, SCFS offers an introductory level of ongoing investment management and basic financial planning services. These include rebalancing of the portfolio as needed

or at a minimum annually as well as availability to discuss basic financial planning topics with no set requirement but more on an as needed/requested basis.

Investment Management Services

SCFS provides customized investment advisory solutions for its Clients, either as a component of wealth management services or pursuant to an investment advisory agreement. This is achieved through continuous personal Client contact and interaction while providing discretionary and non-discretionary investment management and related advisory services. SCFS works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. SCFS will then construct a custom investment portfolio which may consist of professionally constructed models offered by outside investment firms as well as additional holdings of low-cost, diversified mutual funds and/or exchange-traded funds ("ETFs") to achieve the Client's investment goals. The Advisor may also utilize individual stocks, bonds, alternative investments or options contracts to meet the needs of its Clients. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

SCFS will select, recommend and/or retain mutual funds on a fund by fund basis. Due to specific custodial and/or mutual fund company constraints, material tax consideration, and/or systematic investment plans, SCFS will select, recommend and/or retain a mutual fund share class that does not have trading costs, but do have higher internal expense ratios than institutional share classes. SCFS will seek to select the lowest cost share class available that is in the best interest of each Client and will ensure the selection aligns with the Client's financial objectives and stated investment guidelines.

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

SCFS evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. SCFS may recommend, on occasion, redistributing investment allocations to diversify the portfolio. SCFS may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. SCFS may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

At no time will SCFS accept or maintain custody of a Client's funds or securities, except for the limited authority as outlined in Item 15 - Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the advisory agreement. Please see Item 12 – Brokerage Practices.

Use of Independent Managers

SCFS will recommend that Clients utilize one or more unaffiliated investment managers or investment platforms (collectively "Independent Managers") for all or a portion of a Client's investment portfolio, based on the Client's needs and objectives. In certain instances, the Client may be required to authorize and enter into an investment management agreement with the Independent Manager[s] that defines the terms in which the Independent Manager[s] will provide its services. The Advisor will perform initial and ongoing oversight and due diligence over each Independent Manager to ensure the strategy remains aligned with Clients' investment objectives and overall best interests. The Advisor will also assist the Client in the development of the initial policy recommendations and managing the ongoing Client relationship. The Client, prior to entering into an agreement with an Independent Manager, will be provided with the Independent Manager's Form ADV Part 2A - Disclosure Brochure (or a brochure that makes the appropriate disclosures).

Strategic Financial Planning

SCFS will typically provide a variety of financial planning and consulting services to Clients, either as a component of investment management services or pursuant to a written financial planning agreement. Services are offered in several areas of a Client's financial situation, depending on their goals and objectives.

Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client's financial goals and objectives. Strategic Financial Planning generally includes financial forecasting, cash flow analysis, risk analysis, estate planning review, wealth transfer discussions, and philanthropic planning.

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

SCFS may also refer Clients to an accountant, attorney or other specialists, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six (6) months of contract date, assuming all information and documents requested are provided promptly.

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

C. Client Account Management

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

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

D. Wrap Fee Programs

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

E. Assets Under Management

As of December 31, 2020, SCFS manages \$148,398,693 in Client assets, all of which are managed on a discretionary basis. Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

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

A. Fees for Advisory Services

Wealth Management Service Fees

The fees for the Advisor's three Wealth Management Service levels are:

1. Personal CFO Program Level I

Fees are paid quarterly in advance of each calendar quarter pursuant to the terms of the wealth management agreement. Fees are based on the market value of assets under management at the end of the prior calendar quarter.

Level I of the personal CFO program is billed as follows: \$1250/month for up to \$1.5mm in investment assets and \$7mm net worth. Additional managed assets are charged at a rate of .80%.

2. Personal CFO Program Level II

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

Level II of the personal CFO program is billed as follows: \$2500/month for up to \$5mm in investment assets and over \$7mm net worth. Additional managed assets are charged at a rate of .50%.

Should the client prefer the service level of Personal CFO Program II with no assets or less than 5MM to manage, the client can enroll in this service at the base fee of \$30,000 annually. Alternatively, if the client seeks the Personal CFO Program I Service level and has less than \$1.5M of assets for us to manage, the corresponding fee would be the \$15,000 base fee.

3. Financial Foundations Program

Fees for the Financial Foundations program are paid quarterly in advance of each calendar quarter pursuant to the terms of the wealth management agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior calendar quarter. The annual fee for the Financial Foundations Program is 1.25% of the portfolio value up to \$1mm with a minimum of \$4,000 per year. For portfolio values greater than \$1mm the annual fee is 1.00%. There is a \$6,000 planning fee for new clients which covers the initial financial plan and the new client implementation phase including but not limited to paperwork, consultations, rebalancing and follow through.

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

The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees, and other related costs and expenses described in Item 5.C below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

Investment Management

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

Assets Under Management (\$)	Annual Rate (%)
\$0 to \$1,000,000	1.25%
\$1,000,001 and above	1.00%

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

The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees, and other related costs and expenses described in Item 5.C below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio utilizing one or more Independent Managers. To eliminate any conflict of interest, the Advisor does not earn any compensation from an Independent Manager. The Advisor will only earn its investment advisory fee as described above. Independent Managers typically do not offer any fee discounts but may have a breakpoint schedule which will reduce the fee with an increased level of assets placed under management with an Independent Manager. The terms of such fee arrangements are included in the Independent Manager's disclosure brochure and applicable contract[s] with the Independent Manager. The total blended fee, including the Advisor's fee and the Independent Manager's fee, will not exceed 2.00% annually.

Strategic Financial Planning

SCFS offers financial planning services for a fixed fee as part the Advisor's Strategic Financial Planning program. Hourly engagements may be considered but are not typical. Hourly services are billed at \$400 per hour. An estimate for total hours and total costs will be provided to the Client prior to engaging for these services. Fixed fees are generally billed between \$3,500 and \$6,000 for the first two months of engagement. Should the engagement take longer than two months to complete, the Client will be billed an additional fee of up to \$2500 per month for each additional month needed to complete the planning process may be charged after mutual agreement between all parties. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. For clients who enter into a wealth management agreement within 6 months of receiving Strategic Financial Planning Services from the Advisor, the fees for strategic financial planning will be applied towards the client's Wealth Management fees.

B. Fee Billing

Wealth Management and Investment Management Services

Investment advisory fees and wealth management fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning of the respective quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with SCFS at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting advisory fees to be deducted by SCFS to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

Use of Independent Managers

For Client accounts implemented through an Independent Manager, the Advisor and the Independent Manager will each assume the responsibility for calculating and deducting their respective fees from the Client's account[s].

Strategic Financial Planning Services.

Strategic financial planning fees may be invoiced up to fifty percent (50%) of the expected total fee upon execution of the financial planning agreement. The balance shall be invoiced upon completion of the agreed upon deliverable[s].

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than SCFS, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all securities execution and custody fees charged by the Custodian, if applicable. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodian typically charges for mutual funds and other types of investments. The Client is responsible for all custody and securities execution fees charged by the Custodian.

In addition, all fees paid to SCFS for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of SCFS, but would not receive the services provided by SCFS which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by SCFS to fully understand the total fees to be paid. Additionally, as noted above, SCFS will select share classes which do not have trading costs, but do have higher internal expense ratios than institutional share class. Please refer to Item 12 – Brokerage Practices for additional information.

D. Advance Payment of Fees and Termination

Wealth Management and Investment Management Services

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

Use of Independent Managers

In the event that the Advisor has determined that an Independent Manager is no longer in the Client's best or a Client should wish to terminate their relationship with the Independent Manager, the terms for termination will be set forth in the respective agreements between the Client or the Advisor and the Independent Manager. SCFS will assist the Client with the termination and transition as appropriate.

Strategic Financial Planning Services

SCFS requires an advance deposit as described above. Either party may terminate the financial planning agreement by providing advance written notice to the other party. The Client may also terminate the financial planning agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be billed for actual hours logged on the planning project times the contractual hourly rate or in the case of a fixed fee engagement, the percentage of the engagement scope completed by the Advisor. The Advisor will refund any unearned, prepaid financial planning fees from the effective date of termination. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

S.C. Financial Services, Inc.

12568 E. Silver Spur Street, Scottsdale, AZ 85259

Phone: (480) 214-9596 * Fax: (888) 268-9908

<http://www.scfinancialservices.com>

E. Compensation for Sales of Securities

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

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

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

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

Item 7 – Types of Clients

SCFS offers investment advisory services to individuals, high net worth individuals, and businesses. The amount of each type of Client is available on SCFS's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. SCFS generally does not impose a minimum relationship size but does have a minimum annual fee for each service. The minimum fees are:

- Financial Foundations – \$3,000 per year
- Personal CFO Program Level I – \$15,000
- Personal CFO Program Level II – \$30,000

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

A. Methods of Analysis

SCFS primarily employs a fundamental analysis method in developing investment strategies for its Clients. Research and analysis from SCFS are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others. SCFS also utilizes research and asset allocation recommendations provided by third parties as part of their investment approach.

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

SCFS's investment activities are generally defined by principles that are collectively known as Modern Portfolio Theory. The primary tenets of Modern Portfolio Theory are the ideas that (1) the future cannot be predicted, and neither can stock prices. (2) a portfolio composed of several asset classes will experience fewer price movements and volatility than more concentrated portfolios (i.e. large holding in one stock or industry). (3) A diversified portfolio has been shown to perform better than a non-diversified portfolio over time.

As noted above, SCFS generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. SCFS will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, SCFS may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

B. Risk of Loss

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

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

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

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

Market Risks

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

ETF Risks

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

Bond ETF Risks

Bond ETFs are subject to specific risks, including the following: (1) interest rate risks, i.e. the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e. the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e. the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e. the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e. the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e. the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

Mutual Fund Risks

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

Alternative Investment (Limited Partnerships) Risks

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. Client should only have a portion of their assets in these investments.

Real Estate Investment Trust Risks

Investing in Real Estate Investment Trusts ("REITs") involves certain distinct risks in addition to those risks associated with investing in the real estate industry in general. For Example, equity REITs may be affected by changes in the value of the underlying property owned by the REITs, while mortgage REITs may be affected by the quality of credit extended. REITs are subject to heavy cash flow dependency, default by borrowers and self-liquidation. REITs, especially mortgage REITs, are also subject to interest rate risk (i.e., as interest rates rise, the value of the REIT may decline).

Oil and Gas Interests

Investing oil and gas interest whether directly or as part of a fund/ETF involves distinct risks. The price of oil and gas interests may fluctuate to a greater degree than other securities and contain additional risks based on the supply and demand for oil and gas. Some of these additional risks include, the ability to obtain reliable oil and gas supply, oil and gas reserve estimates, the ability to locate markets for oil and gas, fluctuations in prices. The values of oil and gas interests are subject to market risk by a range of variables that could cause trends to differ materially.

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

Item 9 – Disciplinary Information

There are no material legal, regulatory or disciplinary events involving SCFS Financial or its owners that require disclosure. Securities laws require an advisor to disclose any instances where the Advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

You may independently view the background of the Advisor on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 127012.

Item 10 – Other Financial Industry Activities and Affiliations

The sole business of SCFS is to provide financial planning and investment advisory services to its Clients. SCFS does not maintain any affiliations with other firms, other than contracted service providers to assist with the servicing of its Client's accounts

Use of Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio with one or more Independent Managers. The Advisor does not receive any compensation, nor does this present a material conflict of interest. The Advisor will only earn its investment advisory fee as described in Item 5.A.

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

A. Code of Ethics

SCFS has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with SCFS ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to the Client. SCFS and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation

of SCFS's Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (480) 214-9596 or via email at info@scfinancialservices.com.

B. Personal Trading with Material Interest

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

C. Personal Trading in Same Securities as Clients

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

D. Personal Trading at Same Time as Client

While SCFS allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterward. **At no time will SCFS, or any Supervised Person of SCFS, transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

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

Where SCFS does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by SCFS. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. SCFS may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and its reputation and/or the location of the Custodian's offices.

SCFS will generally recommend that Clients establish their account[s] at Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer and member SIPC. Schwab will serve as the Client's "qualified custodian". SCFS maintains an institutional relationship with Schwab, whereby the Advisor receives economic benefits from Schwab. Please see Item 14 below.

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

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

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

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

B. Aggregating and Allocating Trades

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

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

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Sharlee Cretors, Chief Compliance Officer of SCFS. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

B. Causes for Reviews

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

C. Review Reports

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

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by SCFS

SCFS is a fee-only advisory firm, that is compensated solely by its Clients and not from any investment product. SCFS does not receive commissions or other compensation from product sponsors, broker-dealers or any unrelated third party. SCFS may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, SCFS may receive non-compensated referrals of new Clients from various third-parties.

Participation in Institutional Advisor Platform

SCFS has established an institutional relationship with Schwab through its “Schwab Advisor Services” unit, a division of Schwab dedicated to serving independent advisory firms like SCFS. As a registered investment advisor participating on the Schwab Advisor Services platform, SCFS receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Services that Benefit the Client – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

Services that May Indirectly Benefit the Client – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients but may not directly benefit all Clients.

Services that May Only Benefit the Advisor – Schwab also offers other services to SCFS that may not benefit the Client including: educational conferences and events,, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a conflict of interest. SCFS believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

B. Client Referrals from Solicitors

SCFS does not engage paid solicitors for Client referrals.

Item 15 – Custody

SCFS does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a “qualified custodian”. Clients are required to engage the Custodian to retain their funds and securities and direct SCFS to utilize that Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by SCFS to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements, the Custodian and the Advisor

have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

Item 16 – Investment Discretion

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

Item 17 – Voting Client Securities

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

Item 18 – Financial Information

Neither SCFS, nor its management, have any adverse financial situations that would reasonably impair the ability of SCFS to meet all obligations to its Clients. Neither SCFS, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. SCFS is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.



Form ADV Part 2B – Brochure Supplement
for

Sharlee L. Cretors
President and Chief Compliance Officer

Effective: March 10, 2021

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Sharlee L. Cretors (CRD# 1705242) in addition to the information contained in the S.C. Financial Services, Inc. (“SCFS” or the “Advisor”, CRD# 127012) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the content of the SCFS Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (480) 214-9596 or by email at info@scfinancialservices.com.

Additional information about Ms. Cretors is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 1705242.

Item 2 – Educational Background and Business Experience

Sharlee L. Cretors, born in 1967, is dedicated to advising Clients of SCFS as the President and Chief Compliance Officer. Ms. Cretors earned a Masters in Business Administration from Arizona State University - W.P. Carey School of Business in 1993. Ms. Cretors also earned a Bachelor of Arts from University of California, San Diego in 1988. Ms. Cretors also earned a Masters in Financial Planning from College of Denver in 2005. Additional information regarding Ms. Cretors's employment history is included below.

Employment History:

President and Chief Compliance Officer, S.C. Financial Services, Inc.	05/2005 to Present
Owner, Optimized Business Transitions	06/2010 to Present

CERTIFIED FINANCIAL PLANNER™ ("CFP®")

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP® Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Item 3 – Disciplinary Information

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

You may independently view the background of Ms. Cretors on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 1705242.

Item 4 – Other Business Activities

Optimized Business Transitions, LLC

This consulting company is owned by Kurt and Sharlee Cretors. Optimized Business transitions LLC specializes in assisting business owners with understanding their options for business transition and coordinating this transition process with the other members of their advisory team. The fees for these services are quoted and received separate from any fees as they relate to services rendered by SC Financial Services, Inc., or any of its other subsidiaries. Ms. Cretors spends approximately 5% of her time per month on this activity.

Item 5 – Additional Compensation

Ms. Cretors has an additional business activity where compensation is received that is detailed in Item 4 above.

Item 6 – Supervision

Ms. Cretors serves as the President and Chief Compliance Officer of SCFS. Ms. Cretors can be reached at (480) 214-9596.

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



Form ADV Part 2B – Brochure Supplement

for

**Kurt N. Cretors
Vice President**

Effective: March 10, 2021

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Kurt N. Cretors (CRD# 4943742) in addition to the information contained in the S.C. Financial Services, Inc. (“SCFS” or the “Advisor”, CRD# 127012) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the content of the SCFS Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (480) 214-9596 or by email at info@scfinancialservices.com.

Additional information about Mr. Cretors is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 4943742.

Item 2 – Educational Background and Business Experience

Kurt N. Cretors, born in 1964, is dedicated to advising Clients of SCFS as the Vice President. Mr. Cretors earned a Masters of Business Administration in Finance from Arizona State University - W.P. Carey School of Business in 1989. Mr. Cretors also earned a Bachelor of Science in Economics from University of California, San Diego in 1986. Additional information regarding Mr. Cretors's employment history is included below.

Employment History:

Vice President, S.C. Financial Services, Inc.	06/2005 to Present
Owner, Optimized Business Transitions	06/2010 to Present

Item 3 – Disciplinary Information

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

However, we do encourage you to independently view the background of Mr. Cretors on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 4943742.

Item 4 – Other Business Activities

Optimized Business Transitions, LLC

This consulting company is owned by Kurt and Sharlee Cretors. Optimized Business transitions LLC specializes in assisting business owners with understanding their options for business transition and coordinating this transition process with the other members of their advisory team. The fees for these services are quoted and received separate from any fees as they relate to services rendered by SC Financial Services, Inc., or any of its other subsidiaries. Mr. Cretors spends approximately 20% of his time per month on this activity.

Item 5 – Additional Compensation

Mr. Cretors has an additional business activity where compensation is received that is detailed in Item 4 above.

Item 6 – Supervision

Mr. Cretors serves as the Vice President of SCFS and is supervised by Sharlee Cretors, the Chief Compliance Officer. Ms. Cretors can be reached at (480) 214-9596.

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



Form ADV Part 2B – Brochure Supplement
for

Tiffany E. Venditti
Investment Advisor Representative

Effective: March 10, 2021

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Tiffany E. Venditti (CRD# 2512829) in addition to the information contained in the S.C. Financial Services, Inc. (“SCFS” or the “Advisor”, CRD# 127012) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the content of the SCFS Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (480) 214-9596 or by email at info@scfinancialservices.com.

Additional information about Ms. Venditti is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 2512829.

Item 2 – Educational Background and Business Experience

Tiffany E. Venditti, born in 1971, is dedicated to advising Clients of SCFS as an Investment Advisor Representative. Ms. Venditti earned B.A. in Psychology from Lafayette College in 1993. Ms. Venditti earned Additional information regarding Ms. Venditti's employment history is included below.

Employment History:

Investment Advisor Representative, S.C. Financial Services, Inc.	03/2007 to Present
--	--------------------

Item 3 – Disciplinary Information

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

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

However, we do encourage you to independently view the background of Ms. Venditti on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 2512829.

Item 4 – Other Business Activities

Ms. Venditti is dedicated to the investment advisory activities of SCFS's Clients. Ms. Venditti does not have any other business activities.

Item 5 – Additional Compensation

Ms. Venditti is dedicated to the investment advisory activities of SCFS's Clients. Ms. Venditti does not receive any additional forms of compensation.

Item 6 – Supervision

Ms. Venditti serves as an Investment Advisor Representative of SCFS and is supervised by Sharlee Cretors, the Chief Compliance Officer. Ms. Cretors can be reached at (480) 214-9596.

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

Privacy Policy

Effective: March 10, 2021

Our Commitment to You

S.C. Financial Services, Inc. ("SCFS" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

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

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

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

Why you need to know?

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

What information do we collect from you?

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

What Information do we collect from other sources?

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

How do we protect your information?

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

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

How do we share your information?

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

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

California	In response to a California law, to be conservative, we assume accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties, except as permitted by California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws.
------------	--

Changes to our Privacy Policy

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

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

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (480) 214-9596 or via email at info@scfinancialservices.com.