

Starr-Mathews Financial, LLC d/b/a Starr-Mathews Employee Benefits Wrap Fee Program Brochure

This brochure provides information about the qualifications and business practices of Starr-Mathews Financial, LLC. If you have any questions about the contents of this brochure, please contact us at (706) 624-4081 or by email at: jholland@starrbenefits.com. 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 Starr-Mathews Financial, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Starr-Mathews Financial, LLC's CRD number is: 166199

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Registration does not imply a certain level of skill or training.

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Item 2: Material Changes

There are no material changes in this brochure from the last annual updating amendment to this Wrap Free Program Brochure on 02/14/2019. Material changes relate to Starr-Matthews Financial, LLC's policies, practices or conflicts of interests only.

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Item 4: Services Fees and Compensation

Starr-Mathews Financial, LLC (hereinafter "SM") offers the following services to advisory clients:

A. Description of Services

SM sponsors a wrap fee program for certain investment management service clients. This wrap fee program allows SM to manage client accounts for a single fee that includes portfolio management services and custodial costs. The fees schedule for this program is represented below:

Total Assets Under Management	Annual Fee
All Assets Under Management	1.50

These fees are negotiable depending upon the needs of the client and complexity of the situation, and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Fees are paid monthly in arrears, and clients may terminate their contracts with ten days' written notice. Because fees are charged in arrears, no refund policy is necessary. Clients may terminate their accounts without penalty within 5 business days of signing the advisory contract. Advisory fees are withdrawn directly from the client's accounts with client written authorization.

At the discretion of Starr-Mathews Financial, investment supervisory services fees may be charged on a fixed fee basis. These fees are negotiable and will depend on the complexity of the situation, and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Fees are paid monthly in arrears, and clients may terminate their contracts with ten days' written notice. Because fees are charged in arrears, no refund policy is necessary. Clients may terminate their accounts without penalty within 5 business days of signing the advisory contract. Advisory fees may be withdrawn directly from a client's designated account or the client may be invoiced and billed directly monthly in arrears.

B. Contribution Cost Factors

The program may cost the client more or less than purchasing such services separately. There are several factors that bear upon the relative cost of the program including the cost of the services if provided separately and the trading activity in the client's account.

C. Additional Fees

Clients who participate in the wrap fee program will not have to pay for transaction or trading fees. However, clients are still responsible for all other account fees; such as annual IRA fees to the custodian, termination fees if the account is moved to another broker, or third party adviser fees.

D. Compensation of Client Participation

Neither SM, nor any representatives of SM receive any additional compensation for the participation of client's in the wrap fee program. However, compensation received may be more than what would have been received if client paid separately for investment advice, brokerage, and to other services. Therefore, SM may have a financial incentive to recommend the wrap fee program to clients.

Item 5: Account Requirements and Types of Clients

SM generally provides its wrap fee program services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Pension and Profit Sharing Plans

Minimum Account Size

There is no account minimum.

Item 6: Portfolio Manager Selection and Evaluation

A. Selecting/Reviewing Portfolio Managers

SM will not select any outside portfolio managers for management of this wrap fee program. Jason Edward Holland will be the sole portfolio manager for this wrap fee program.

1. Standards Used to Calculate Portfolio Manager Performance

SM will use industry standards to calculate SM's performance as portfolio manager.

2. Review of Performance Information

Performance information may not be calculated on a uniform and consistent basis as each account covered under this wrap program is a separately managed account where custodial transaction charges are included within the fee structure of the account. As such, performance reviews are conducted one on one with the client and not on a combined basis with other accounts.

B. Related Persons

Jason Holland is the portfolio manager of the wrap account. When an adviser offers a wrap account that they are also the portfolio manager of the potential conflict of interest is that the manager is directing a client into an account where there is a higher overall fee and the adviser is also the manager of the account. This wrap account, offered by SM, does not present that type of conflict as the wrap account has the same type of separately managed account services traditionally offered by SM at the same stated management fee structure but the wrap account charges include the custodial transaction charges ending up in a net benefit to the client versus the traditional account management offered by SM.

C. Advisory Business

SM offers investment supervisory services to its wrap fee program participants as detailed in Section 4 above. SM generally limits its investment advice and/or money management to mutual funds, equities, bonds, fixed income, ETFs, real estate, REITs, insurance products including annuities, and government securities. SM may use other securities as well to help diversify a portfolio when applicable.

Investment Supervisory Services

SM offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. SM creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan (the Investment Policy Statement) to aid in the selection of a portfolio that matches each client's specific situation. Investment Supervisory Services include, but are not limited to, the following:

- | | |
|-----------------------|--------------------------------|
| • Investment strategy | • Personal investment policy |
| • Asset allocation | • Asset selection |
| • Risk tolerance | • Regular portfolio monitoring |

SM evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. SM will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning, life insurance; tax concerns; retirement planning; college planning; and debt/credit planning. These services are based on fixed fees or hourly fees and the final fee structure and services to be performed are documented in the Financial Planning Agreement.

Performance-Based Fees and Side-By-Side Management

SM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client. SM does manage accounts for clients in either a wrap account or non-wrap account basis. All accounts are separately managed accounts based on the investment policy statement associated with each account. The wrap account is offered to clients based on discussions with the client and the benefit the wrap account will offer the client based on their individual investment policy statement and portfolio strategy.

Client Tailored Services and Client Imposed Restrictions

SM offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

Wrap Fee Programs

SM participates in wrap fee programs; which is an investment program where the investor pays one stated fee that includes management fees and transaction costs. SM does manage the investments in the wrap fee program. SM does not manage those wrap fee accounts any differently than non-wrap fee accounts. A portion of the fees paid to the wrap account program will be given to SM as a management fee.

Amounts Under Management

SM has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$105,370,177.00	\$3,387,516.00	December 2020

Methods of Analysis and Risk of Loss

SM's method of analysis includes fundamental analysis.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Investment Strategies and Risk of Loss

SM uses long term trading strategies.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Long term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Voting Client Proxies

SM will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 7: Client Information Provided to Portfolio Managers

Jason Edward Holland is the portfolio manager for this wrap fee program. All client information that is collected, including basic information, risk tolerance, sophistication level, and income level will be collected by Jason Edward Holland. As that information changes and is updated, Jason Edward Holland will have immediate access to that information once collected.

Item 8: Client Contact with Portfolio Managers

SM places no restrictions on client ability to contact its portfolio managers. Jason Edward Holland can be contacted during regular business hours and their contact information is on the cover page of their ADV 2B supplement brochure documents.

Item 9: Additional Information

A. Disciplinary Action and Other Financial Industry Activities

Criminal or Civil Actions

There are no criminal or civil actions to report.

Administrative Proceedings

There are no administrative proceedings to report.

Self-regulatory Organization (SR) Proceedings

There are no self-regulatory organization proceedings to report.

Registration as a Broker/Dealer or Broker/Dealer Representative

Neither SM nor its representatives are registered as or have pending applications to become a broker/dealer or as representatives of a broker/dealer.

Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither SM nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

James Starr Mathews is a licensed insurance agent in the state of Georgia. Daniel Payne maintains a life insurance license in Georgia. Jason Holland and Daniel Payne both also offer tax preparation services to investment and non-investment clients through a separate entity, Holland Capital Advisors, Inc. Additionally, Daniel Payne is a property and casualty licensed agent. From time to time, they will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. SM always acts in the best interest of the client, including with respect to the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of SM in such individual's outside capacities.

Selection of Other Advisors or Managers and How This Adviser is Compensated for Those Selections

SMF does not utilize nor select other advisers or third party managers. All assets are managed by SMF management.

B. Code of Ethics, Client Referrals and Financial Information

Code of Ethics

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

Investing Personal Money in the Same Securities as Clients

From time to time, representatives of SM may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of SM to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. SM will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold.

Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Client accounts are reviewed at least quarterly only by Jason Edward Holland, Managing Member. Jason Edward Holland is the chief advisor and is instructed to review clients' accounts with regards to their investment policies and risk tolerance levels. All accounts at SM are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Jason Edward Holland, Managing Member. There is only one level of review and that is the total review conducted to create the financial plan.

Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

Content and Frequency of Regular Reports Provided to Clients

Each client will receive at least quarterly from the custodian, a written report that details the client's account including assets held and asset value which will come from the custodian.

Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

SM does not receive any economic benefit, directly or indirectly from any third party for advice rendered to SM clients.

Compensation to Non – Advisory Personnel for Client Referrals

SM may, via written arrangement, retain third parties to act as solicitors for SM's investment management services. All compensation with respect to the foregoing will be fully disclosed to each client to the extent required by applicable law. SM will ensure each solicitor is properly registered in all appropriate jurisdictions.

Balance Sheet

SM does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither SM nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

Bankruptcy Petitions in Previous Ten Years

SM has not been the subject of a bankruptcy petition in the last ten years.