

**Item 1 – Cover Page**



**SFG Wealth Advisors, LLC**  
(IARD#: 307368)

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This Brochure provides information about the qualifications and business practices of SFG Wealth Advisors, LLC ("SFG", "Firm", "We"). If the reader has any questions about the contents of this Brochure, please contact the Chief Compliance Officer via telephone at (813) 251-9095. 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 SFG is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Registration as an Investment Adviser does not imply any level of skill or training. The oral and written communications of an adviser provide information about which a prospective client might determine to hire or retain an adviser.

**Date: May 27, 2021**  
**Form ADV Part 2a**  
**Disclosure Brochure**

## Item 2 – Material Changes

This disclosure brochure (“Brochure”) was last updated on March 30, 2021. This filing is to initiate an application for registration as an investment adviser with the U.S. Securities and Exchange Commission. There are no other material changes to report at this time.

In the future, we will ensure that clients of the Firm will receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of the firm’s fiscal year.

**DISCLOSURES:** SFG may, at any time, update this Brochure. A copy of the Brochure or an offer to send a copy of this Brochure (either by electronic means (e-mail) or in hard copy form) may be sent if a material change occurs in the future. A person may view the current Brochure on-line at the SEC’s Investment Adviser Public Disclosure website: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select the option for a “Firm” search and enter 307368 (SFG’s CRD number) in the field labeled “Firm Name or CRD/SEC#”. This will provide access to Form ADV Part 1 and Part 2a Brochures.

A person may request a copy of this Brochure at any time by contacting the Chief Compliance Officer via telephone at (813) 251-9095. There is no charge for this service.

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## Item 4 – Advisory Business

### COMPANY HISTORY & PRINCIPALS

**SFG Wealth Advisors, LLC** (“SFG or the “Firm” “we” or “us”) is a limited liability company formed in the State of Florida. SFG is an investment advisory and financial planning firm serving active retirees, business owners, and young professionals throughout the nation. Since 1985, Bruce Snyder and the Snyder Financial Group have provided investment management, comprehensive financial planning, insurance solutions, and consulting to his clients. B. Donald (“Don”) Snyder joined his father in the financial business in 2001 and serves as Vice President. SFG was formed in 2020 to be a new independent registered investment adviser. SFG’s goals are not merely to help their clients accumulate wealth but to help them figure out their individual purpose in gaining wealth. In May 2021, SFG applied for registration with the U.S. Securities and Exchange Commission.

The owners of SFG are as follows:

Bruce Snyder  
B. Donald Snyder Jr.  
Heather Snyder

### INVESTMENT ADVISORY SERVICES

SFG provides investment advisory services to individuals and families as well as for their trusts, estates and small businesses through actively managed accounts. Services are provided by a registered investment adviser representative (“IAR”) of the Firm directly to a client. Continuous advice is provided to a client regarding the investment of client funds and is based on the recommendations outlined in the client’s investment proposal based on their objectives and risk tolerance.

We manage these advisory accounts on a discretionary basis. Account supervision is guided by the client's stated objectives (i.e., capital appreciation, growth, income, or growth and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. In managing your investment portfolio, we consider your financial situation, risk tolerance, investment horizon, liquidity needs, tax considerations, investment objectives, and any other issues important to your financial affairs. Clients should notify us promptly if there are any changes in their financial situation, investment objectives, or restrictions upon the management of your account.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer, investment adviser, or insurance company and may include advice regarding the following types of securities: exchange-listed securities, securities traded over-the-counter, foreign issuers, corporate debt securities (other than commercial paper), commodities, municipal securities, mutual fund (institutional shares), United States governmental securities, options, alternative investments and/or annuities. Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability. We typically utilize the services of a third-party money manager (“Money Manager”) for the ongoing management of our client portfolios.

### THIRD-PARTY MONEY MANAGER

The Money Managers selected by SFG are chosen for their unique approach in building portfolios that are designed to mitigate downside risk, offer consistency over time, and offer values-based options as well when applicable. Generally, multiple strategies are available through managers employed and care is taken for the selection of manager and appropriate strategy to meet client’s needs. Assets may be managed through a model portfolio that is applied universally to all accounts invested in the model (the “Investment Strategies”). The Money Manager will oversee the Investment Strategies on a discretionary basis, which means they will purchase and sell securities for client account(s) without first consulting with or obtaining specific authorization from the client or his/her adviser. The Money Manager manages the Investment Strategies in accordance with its stated investment objectives, not according to the client’s investment goals. The Money Manager will monitor the Investment Strategies on an ongoing basis. Money Managers may have minimum account balance requirements in order to invest in the Investment Strategies.

When working with a Money Manager, SFG will be responsible for determining the suitability of the services to be provided by Money Manager and assisting clients in determining which Money Manager services are appropriate for their accounts based on the client’s specific investment goals and objectives, now and in the future. We will monitor performance and are available to our clients to discuss the selected third-party investment adviser's strategy and/or performance. Clients recommended for these programs will receive complete program descriptions, including services, fees, payment structures,

and termination features, all of which are found in the respective disclosure brochures, investment advisory agreements, and account opening documents, as well as related solicitor disclosure notices. The selected third-party investment manager will be responsible for securities selection according to the strategy selected. The client will be provided with the disclosure documents for any third-party investment adviser selected for investment in the client's accounts. Money Managers will be accessed through a platform provider ("Platform Provider").

#### Current Platform Providers:

*Frontier Asset Management* ("Frontier"), an independently owned investment adviser registered with the U.S. Securities and Exchange Commission ("SEC") and based in Wyoming. Since 2005, Snyder Financial Group has worked as a solicitor for Frontier. When working with SFG, Frontier will serve as co-advisor along with SFG. Frontier offers a selection of their own in-house Investment Strategies which focuses on broad range of assets classes utilizing mutual funds and exchanged traded funds. They do not utilize any proprietary assets in their Investment Strategies.

### FINANCIAL PLANNING SERVICES

SFG begins every client relationship by offering financial planning services to its clientele. Financial planning is an evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. Through the financial planning process, all questions, information and analysis are considered as they impact and are impacted by the entire financial and life situation of the client. We gather required information through in-depth personal interviews. Information gathered typically includes the client's current financial status, tax status, future goals, returns objectives and attitudes towards risk. Clients who engage SFG for these services will receive a written report providing the client with a detailed financial plan designed to assist the client in achieving stated financial goals and objectives.

In the course of developing a core financial plan, many areas are addressed through our process, such as; survivorship analysis, retirement projections, asset protection, cashflow and budgeting, insurance coverage, charitable giving, and historical tax review. Annuities, real estate, alternative assets, oil and gas, and other non-security related matters may also be discussed.

### IRA ROLLOVER CONSIDERATIONS

As part of SFG's consulting and advisory services, we may provide a client with recommendations and advice concerning their employer retirement plan or other qualified retirement account. We may recommend that the client withdraw the assets from their employer's retirement plan or other qualified retirement account and roll the assets over to an individual retirement account ("IRA") that we will manage. If the client elects to roll the assets to an IRA under our management, we will charge the client an asset-based fee as described in Item 5. This practice could present a conflict of interest because our IARs may have an incentive to recommend a rollover to the client for the purpose of generating fee-based compensation. However, as a fiduciary, SFG will make investment decisions based on a client's needs. A client is under no obligation, contractually or otherwise, to complete the rollover. Furthermore, if a client does complete the rollover, they are under no obligation to have their IRA assets managed by us.

### ASSETS UNDER MANAGEMENT

As of April 30, 2021, SFG manages client assets in the sum of \$137,742,375 on a discretionary basis and \$2,469,295 on a non-discretionary basis.

## Item 5 – Fees and Compensation

### INVESTMENT ADVISORY SERVICE FEES

Asset-based “Annual Advisory Fees” are assessed and collected directly from client accounts. Typically, fees are invoiced and collected quarterly in advance. However, if a client’s assets are managed with a third-party Platform Provider, the frequency of billing may be different. Further detail about fee billing for each Platform Provider is listed below. Many factors determine proposed fees rates, including size, complexity and composition of the services to be provided. While fees are negotiable based upon these factors, SFG’s investment advisory fee structure is based on assets under management.

Clients are required to have a minimum household balance of \$250,000 to have assets managed by SFG but exceptions may apply. For those clients with assets managed by or held with our affiliate, Snyder Financial Group, these holdings will count toward defining the CLIENT’s “Asset Level” in order to determine the Annual Advisory Fee percentage to be applied. The Asset Level will not include oil and gas limited partnerships/programs or other mutually agreed upon unmanaged assets.

Generally, as your household account balance reaches each tier, the Advisory Fee assessed declines as follows:

#### Annual Advisory Fee:

Asset Levels	Annual Advisory Fee (Linear)
\$0.00 to \$250,000	1.50%
\$250,000 to \$750,000	1.25%
\$750,000 to \$1.5 million	1.00%

  

Assets Above 1.5 million	Annual Advisory Fee (Blended)
\$0.00 to \$1.5 million	1.00%
\$1.5 million to \$3.0 million	0.80%
\$3.0 million to \$5.0 million	0.60%
\$5.0 million to \$10.0 million	0.40%
Above \$10.0 million	0.25%

“Linear” – Annual Advisory Fees will be charged one rate, which will be the fee rate associated with the client’s total assets under management.

“Blended” – Annual Advisory Fees will be charged at the rate defined for each tier, and then the total dollar amount of the fee calculated for each tier will be added together to equal the total fee due to SFG.

A client’s Annual Advisory Fees will be outlined in the Investment Advisory Agreement signed by both parties. Upon execution of the agreement, the initial prorated fee for the remainder of the billing period will be assessed and collected. The fee to be paid is determined by the client’s assets under management. For new client accounts that are onboarded during the middle of a quarter, the asset-based advisory fees will be prorated, and the client will only be charged for the remaining days in the quarter. SFG Wealth will not charge a partial quarterly fee on new deposits to existing accounts.

### THIRD-PARTY MONEY MANAGER & PLATFORM FEES

Each billing period, the Money Manager will collect all applicable fees and distribute them to the appropriate party. The Money Managers recommended by the Firm collect their own investment advisory fee and SFG’s advisory fee. Fee billing is the responsibility of the Money Manager. Billing cycles will vary as determined by the Platform Provider through which a client’s accounts are managed.

**Frontier:** If a client’s accounts are managed on the Frontier platform, all fees are assessed and collected quarterly in advance within 30 days of the quarter end (in January, April, July and October). The fee is based on the account balance in the client’s accounts as on the last day of the previous calendar quarter (December 31<sup>st</sup>, March 31<sup>st</sup>, June 30<sup>th</sup>, September 30<sup>th</sup>). Frontier has a minimum account size requirement of \$100,000 for a mutual fund strategy and \$20,000 for an ETF strategy. The Money Manager’s advisory fees on the Frontier Platform will range between 0.20% to .50% per annum. The Platform Provider’s fee schedule is as follows:

<u>Total Assets Under Management</u>	<u>Annual Fee</u>
First \$500,000	0.50% per year
Over \$500,000 to \$1,000,000	0.30% per year
Over \$1,000,000 to \$5,000,000	0.25% per year
Above \$5,000,000	0.20% per year

#### FINANCIAL PLANNING SERVICE FEES

The fee for Financial Planning Services may be a fixed flat fee or may be based on an hourly charge. Fees for financial planning are negotiable. A client's fee depends on several factors including time spent with SFG, number of meetings, complexity of the client's situation, amount of research, services requested, staff resources, as well as whether the client engages SFG for ongoing monitoring of their financial plan. The completed financial plan will be delivered within three months of the signing of an agreement with SFG.

If a fixed fee is negotiated, the fee will be payable in two installments with 50% due upon signing the agreement and the balance due upon delivery of the completed financial plan. The maximum fixed fee for financial planning services is \$10,000 per review. If an hourly rate has been negotiated, the fee will be payable monthly in arrears. The maximum hourly rate for financial planning services is \$250 per hour for IARs, and \$125 per hour for Support Staff. All financial planning fees are subject to negotiation at the Firm's discretion.

If a client terminates the financial planning engagement within five (5) business days of signing the agreement, client shall receive a full refund of all fees and expenses. If terminated after five (5) business days of signing an agreement, upon client's request, the prepaid fees will be prorated. The client will be responsible for those hours already spent on the engagement and billed at the hourly rate reflected in the agreement. The unused portion will be returned to client.

#### FEE TERMS

The following terms apply to client accounts with asset-based fees. ***All advisory fees and household minimums are subject to negotiation.*** SFG may offer discounted rates to its employees and their families as well as to institutional and high-net-worth clients with substantial account balances.

Advisory fees are not inclusive of brokerage commissions, transactions fees and other related costs and expenses which shall typically be incurred in a client's account(s). Client accounts are primarily held with Fidelity Clearing & Custody Solutions, a division of Fidelity Investments Inc. as well as Charles Schwab & Co., Inc. (the "Custodians"), registered broker-dealers, members of SIPC. Since November 2019, the Custodians have not been charging a transaction fee for the sale or purchase of stocks or exchange traded funds. However, there may be a transaction fee for the sale and purchase of mutual funds. There is no guarantee that this arrangement will be permanent.

Mutual funds, exchanged traded funds, and annuities all charge internal management fees and other expenses, which are disclosed in a fund's or annuity's prospectus or equivalent disclosure document and are directly deducted from the value of such investment vehicles. SFG does not retain 12b-1 fees or other sales charges and commissions on the accounts of advisory clients.

Upon termination of any client relationship, any prepaid, unearned fees will be refunded, and any earned, unpaid fees will be due and payable. If Client terminates their relationship with SFG *within* five (5) business days of signing the Investment Advisory Agreement, Client shall receive a full refund of all fees and expenses. If Client terminates their relationship with SFG *after* five (5) business days of signing the Investment Advisory Agreement, upon Client's request, any prepaid fees will be prorated, and the unused portion be returned to Client. SFG Wealth will not refund fees on partial withdrawals taken during any quarter.

The client will provide written authorization permitting the fees to be paid directly from client accounts held by the qualified custodian. Further, the qualified custodian agrees to deliver an account statement at least quarterly directly to the client, indicating all the amounts deducted from the account, including all advisory fees. Clients are encouraged to review their account statements for accuracy.

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

SFG will not charge performance-based fees where an adviser's fee would be based on a share of capital gains or capital appreciation of the client assets. As such, there are no conflicts of interest to disclose currently.

## Item 7 – Types of Clients

As described in Item 4, SFG provides investment advisory services to individuals, couples and families as well as their trusts and estates. Clients are typically required to have a minimum household balance of \$250,000 to have assets managed by SFG. *All advisory fees and household minimums are subject to negotiation.*

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

### INVESTMENT PHILOSOPHY

SFG primarily employs a cash flow based financial planning process to drive investment recommendations for our clients. We manage discretionary portfolios for clients based on the objectives of their financial plans and/or long-term investment objectives. In these portfolios we primarily use a combination of mutual funds and exchange-traded funds.

SFG seeks to construct an overall asset mix that is tailored to the investor's risk tolerance, addresses long-term required returns in a diversified manner, and incorporates client's other needs. SFG may use third-party asset managers, custom portfolios, individual mutual funds, and alternative investments to satisfy a desired asset mix. SFG may select alternative investments because they are viewed to be non-correlated to other assets held by the client and/or because of possible risk/reward criteria. Our strategies seek a balance between maximizing long-term returns and achieving reliable income, all according to our clients' financial plan.

### METHODS OF ANALYSIS

SFG may use any of the following methods of analysis in formulating their investment advice and/or managing client assets.

**Asset Allocation.** Rather than focusing primarily on securities selection, we attempt to identify an appropriate ratio of securities, fixed income and cash suitable to the client's investment goals and risk tolerance. A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

**Model Manager Selection.** Our fund selection and allocation process takes into account a broad range of variables including manager tenure, risk metrics, historical performance, diversification, correlation factors, and ratings when appropriate. SFG may research historical asset allocation, performance, risk, performance in specific market types, management tenure, management process, and management style to select mutual fund and/or ETF strategies. Shared values in the way a fund selects investments or in the way the management company acts in its own right may influence decision process as well, assuming other asset allocation needs, fundamentals, and risk metrics are in line with strategy needs.

**Mutual Fund / ETF Analysis.** We look at the experience and track record of the manager to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in an attempt to determine if there is significant overlap in the underlying investments held in other fund(s) in the client's portfolio. We also monitor the funds to determine if they are continuing to follow their stated investment strategy. A risk of Mutual Fund / ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund, which could make the holding(s) less suitable for the client's portfolio.



**Alternative Investments.** Alternative Assets are generally incorporated as a diversifying or income producing asset. Strategies that exhibit low correlations to traditional asset classes, consistent risk measurements across different market periods, and consistent positive returns are favored.

**Fundamental Analysis.** We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell). Fundamental analysis does not attempt to anticipate market movements. Doing so presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

**Quantitative Analysis.** We use mathematical models in an attempt to obtain more accurate measurements of a company's quantifiable data, such as the value of a share price or earnings per share and predict changes to that data. A risk in using quantitative analysis is that the models used may be based on assumptions that prove to be incorrect.

**Qualitative Analysis.** We subjectively evaluate non-quantifiable factors such as quality of management, labor relations, and strength of research and development factors not readily subject to measurement and predict changes to share price based on that data. A risk in using qualitative analysis is that our subjective judgment may prove incorrect.

Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly available sources of information about these securities are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

#### INVESTMENT STRATEGIES

SFG may use any of the following strategy(ies) in managing client accounts, provided that such strategy(ies) are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance and time horizon.

**Long-term purchases.** SFG may purchase securities with the idea of holding them in the client's account for a year or longer. Typically, we employ this strategy when we believe the securities to be currently undervalued, and/or we want exposure to a particular asset class over time, regardless of the current projection for this class. A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

**Tactical asset allocation.** With this strategy, the Money Managers selected by SFG may use a range of percentages in each asset class; minimum and maximum percentages permit clients to take advantage of market conditions within these parameters. The percentages are guidelines only.

**Strategic asset allocation.** SFG will set target allocations with this strategy, which will be periodically rebalanced to maintain desired allocation percentages. The allocation may change over time as clients' objectives change.

#### SFG WEALTH ADVISOR STRATEGIES

**SFG Portfolios** first seek to attain desired asset allocation mix for the given strategy through the selection of mutual fund and/or ETF strategies. Each strategy is diversified across asset classes and will incorporate domestic large cap equity, domestic mid cap equity, domestic small cap equity, international equity, emerging markets equity, diversified fixed income exposure, diversified alternative strategy exposure, and cash. Depending on strategy, long-term bonds, intermediate-term bonds, short-term bonds, commodities, or other alternative strategy funds may be utilized. SFG Portfolios will tend to use active managers that seek to outperform their given benchmarks. However, passive mutual funds and/or ETF strategies will be utilized when advantageous to diversify management process as well as reduce overall strategy expenses.

#### THIRD-PARTY MONEY MANAGERS STRATEGIES

**Frontier Asset Management** is a third-party asset manager often utilized by SFG. Frontier builds diversified, active investment strategies that are managed to well-defined performance objectives that include a long-term return target and limits on downside risk. Frontier seeks to create value in its strategies in two ways- (1) tactical asset allocation decisions in

the given strategy and (2) by selecting superior managers that satisfy the allocation need in the given strategy. Frontier uses a proprietary screening process to find skilled managers. The process has both qualitative and quantitative aspects as they have found both are required to identify managers who are skilled. Returns-based style analysis is the heart of Frontier's quantitative analysis and helps them identify managers that have truly demonstrated skill and can do so again in the future.

## RISK OF LOSS

Based upon SFG's analysis of the client's financial situation and/or the client's financial plan, the Firm will recommend an appropriate investment strategy for the client's accounts; however, all investment strategies have a risk of loss. Investing in securities involves certain risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. While risk can be, and by common industry practice often is, measured by the degree of unpredictability of a given portfolio's return in any given period, it also includes the possibility of losing some or all an original investment. Even the most conservative investment strategy is subject to risk.

***All investment programs carry the risk of loss and there is no guarantee that any recommended investment strategy will meet its objectives.***

All investment strategies inherently expose our clients to various types and varying degrees of risk. Below, we discuss those risks in greater detail:

- **Political Risks.** Most investments have a global component, even domestic stocks. Political events anywhere in the world may have unforeseen consequences to markets around the world.
- **General Market Risks.** Markets can go up or down after various news releases or for no understandable reason at all. This sometimes means that the price of specific securities could go up or down without real reason and may take some time to recover any lost value. Adding additional securities does not help to minimize this risk since all securities may be affected by market fluctuations.
- **Currency Risk.** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Derivatives Risk.** Investments in futures and options are considered "derivative" investments. A small investment in derivatives could have a potentially large impact on performance. The use of derivatives involves risks different from or possibly greater than the risks associated with investing directly in the underlying assets. Derivatives can be highly volatile, illiquid and difficult to value. There is the risk that the hedging technique will fail if changes in the value of a derivative held do not correlate with the portfolio securities being hedged.
- **Regulatory Risk.** Changes in laws and regulations from any government can change the value of a given company and its accompanying securities. Certain industries are more susceptible to government regulation. Changes in zoning, tax structure or laws impact the return on these investments.
- **Risks Related to Investment Term.** If a client requires a liquidation of their portfolio during a period in which the price of the security is low, the client may not realize as much value as they might have had the investment had the opportunity to regain its value, as investments frequently do, or had it been able to be reinvested in another security.
- **Purchasing Power Risk.** Purchasing power risk is the risk that an investment's value will decline as the price of goods rises (inflation). The investment's value itself does not decline, but its relative value does. Inflation can happen for a variety of complex reasons, including a growing economy and a rising money supply.
- **Business Risk.** Many investments, including many Index Funds and Target-Date Funds, contain interests in operating businesses. Business risks are risks associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

- **Liquidity Risk.** Liquidity is the ability to readily convert an investment into cash. For example, Treasury Bills are highly liquid, while real estate properties are not. Some securities are highly liquid while others are highly illiquid. Illiquid investments carry more risk because it can be difficult to sell them.

- **Financial Risk.** Many investments, including many Index Funds and Target-Date Funds, contain interests in operating businesses. Excessive borrowing to finance a business' operations decreases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

- **Default Risk.** This risk pertains to the ability of a company to service their debt. Ratings provided by several rating services help to identify those companies with more risk. Obligations of the U.S. government are said to be free of default risk.

- **Management Risk.** Investments may vary with the success and failure of investment strategies selected and implemented by the management of this Firm. If investment strategies do not produce the expected returns, the value of investments may decrease.

- **Risks Associated with Private Placement Offerings.** Because private placement offerings are exempt from registration requirements at both the state and federal level, no regulator has reviewed the offerings to make sure the risks associated with the investment and all material facts about the entity raising money are adequately disclosed. Securities offered through private placements are generally illiquid, meaning there are limited opportunities to resell the security.

- **Risks Associated with Alternative Investments.** Alternative investment products, including real estate investments, notes & debentures, hedge funds and private equity involve a high degree of risk, often engage in leveraging and other speculative investment practices that may increase the risk of investment loss, can be highly illiquid, are not required to provide periodic pricing or valuation information to investors, may involve complex tax structures and delays in distributing important tax information, are not subject to the same regulatory requirements as mutual funds, often charge high fees which may offset any trading profits, and, in many cases, the underlying investments are not transparent and are known only to the investment manager. Alternative investment performance can be volatile. An investor could lose all or a substantial amount of the investment. Often, alternative investment funds and account managers have total trading authority over their funds or accounts; the use of a single adviser applying generally similar trading programs could mean lack of diversification and, consequently, higher risk. There is often no secondary market for an investor's interest in alternative investments, and none is expected to develop. There may be restrictions on transferring interests in any alternative investment. Alternative investment products often execute a substantial portion of their trades on non-U.S. exchanges. Investing in foreign markets may entail risks that differ from those associated with investments in U.S. markets. Additionally, alternative investments often entail commodity trading, which involves substantial risk of loss.

## Item 9 – Disciplinary Information

SFG does not have any legal, financial, or other disciplinary item to report. We are obligated to disclose any disciplinary event that could be material to a client or perspective client when evaluating to initiate a relationship with us, or to continue a relationship with our Firm. This statement applies to SFG and all registered IARs of the Firm.

## Item 10 – Other Financial Industry Activities and Affiliations

### SNYDER FINANCIAL GROUP/Strategic Financial Alliance

The IARs of SFG are registered representatives of Strategic Financial Alliance ("Strategic"), a registered broker/dealer, member FINRA/SIPC, as well as an IAR. When recommending that a client place their investments in a brokerage account at Strategic, commissions will be earned by your IAR on the brokerage side as well as any financial planning fees paid through SFG. In addition, the financial advisor may be entitled to a portion of the internal expense fees (such as 12b-1 fees) charged by mutual funds. Until all advisory accounts are transitioned from Strategic to SFG, your IAR will remain dually registered as an IAR for both Strategic and SFG.

## INSURANCE AGENTS

The IARs of SFG are independently licensed insurance agents that can sell insurance products like life, long term care, and disability insurance as well as fixed or variable annuities. We will recommend such products to a client if appropriate for a particular client's financial or investment related needs. Your IAR will provide advice on the appropriate underlying investment in an insurance product as part of our ongoing services. Advisory clients are under no obligation to use these products. IARs receive compensation as insurance agents including commissions, bonuses and ongoing commission trails. If a commission is collected from the sale of an insurance product, then no advisory fee will be billed on the asset balance.

## THIRD-PARTY MONEY MANAGERS

When recommending third-party money managers, SFG does not receive any compensation for the placement of client accounts with the Money Manager.

## OTHER PROVIDERS

SFG maintains professional business relationships with various legal, accounting, recordkeeping, third-party administrators (TPAs) and other investment advisory and consulting firms both locally and around the country. These informal relationships are created to share industry information and insight. We do not receive a referral fee for this recommendation.

## SOLICITATION ARRANGEMENTS

SFG does not currently participate in any solicitation arrangements.

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

The employees of SFG have committed to a Code of Ethics that establishes a high standard of integrity and professional ethics when conducting business with the Firm, its clients and its business vendors and partners. All employees are required to review and sign a formal Code of Ethics adopted to comply with Rule 204(A)-1 of the Advisers Act.

Our Code of Ethics provides for 1) a high ethical standard of conduct; 2) compliance with all federal and state securities laws; and 3) policies and procedures for the reporting of personal securities transactions on a quarterly basis. The Chief Compliance Officer reviews on a regular basis all employee reportable personal trading accounts. The Chief Compliance Officer's trades are reviewed by the Chief Executive Officer or his designee. These reviews help ensure that the personal trading of employees complies with the Firm's Code of Ethics.

SFG does not recommend to clients any securities in which the Firm or its related persons have a material financial interest. It should be noted that some employees of SFG can be considered clients of the Firm and will have their personal trading accounts managed by the Firm alongside its client's accounts. We do not feel this presents a conflict of interest because the minimal exposure that SFG's overall ownership of these securities (through client and employee accounts) would not have a significant impact on their pricing given the large capitalization and market liquidity of the securities recommended.

A copy of the Code of Ethics is available to our advisory clients upon written request to our office by calling the Chief Compliance Officer via telephone at (813) 251-9095.

### **Item 12 – Brokerage Practices**

For SFG's advisory clients, the Firm will recommend a custodian who is a nationally known, qualified custodian. The Firm will not maintain custody of client accounts. The primary factors that will determine our recommending a custodian to a client are, in no specific order, 1) Commission cost; 2) Automation and technology; 3) Services for independent RIAs; 4) Proper registration with SRO; 5) Execution capabilities, and 6) Client preferences. We are not affiliated with any custodian who we have recommended.

We will recommend custodians to clients of the Firm in need of these services. We will normally only recommend those custodians where the Firm has a business relationship that enables efficient and cost-effective access to brokerage services to

facilitate the discretionary portfolio management services of the Firm. No client is obligated to use any recommended custodian. In circumstances where a client wants to remain with their current custodian, not a recommended custodian of SFG, we will provide advisory services to such a client but on a non-discretionary basis. There is no advisory fee surcharge for any operational inconvenience to us.

At this time, for SFG's advisory clients, the recommended custodians will be Fidelity Clearing & Custody Solutions, a division of Fidelity Investments Inc. as well as Charles Schwab & Co., Inc. (the "Custodians"), registered broker-dealers, members of SIPC, who will maintain custody of clients' assets and effect trades for their accounts.

#### RESEARCH AND OTHER SOFT DOLLAR BENEFITS

SFG's advisory business does not have any formal or informal arrangements or commitments to obtain any research or research-related products or services on a soft-dollar basis. However, due to the institutional relationships we have with our recommended custodian, we do receive services that assist us in managing and administering clients' accounts. These services may include software and other technology that (i) provide access to client data; (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of fees from its client accounts; and (v) assist Portfolio Operations with back-office functions, recordkeeping and client reporting. Additionally, recommended custodians may provide third-party research, publications, access to educational conferences, roundtables and webinars or practice management resources.

#### BROKERAGE FOR CLIENT REFERRALS

SFG does not receive client referrals from its custodians.

#### CLIENT DIRECTED BROKERAGE

SFG does not permit client directed brokerage. All advisory clients should understand that any custodian recommendation made by the Firm is a conflict of interest as we anticipate continual operational relationships with the custodians that we recommend. SFG does limited due diligence reviews of these firms, all of which are well-established, nationally recognized broker-dealer/custodians; we recommend them as a convenience to our clients.

#### OTHER ECONOMIC BENEFITS

SFG's recommended custodian will maintain custody of clients' assets and will be engaged to effect trades for client accounts. The final decision of who to custody assets with is at the discretion of the client, including those accounts under ERISA or IRA rules and regulations, in which case the client is acting as either the plan sponsor or IRA accountholder.

SFG is independently owned and operated and not affiliated with any custodian. The recommended custodian provides us with access to its institutional trading and custody services, which are typically not available to retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a minimum required balance in clients' assets are maintained in accounts at that custodian. Institutional custody services include brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For client accounts maintained in its custody, the custodian generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fee.

Custodians also make available to an adviser other products and services that benefit the adviser but may not benefit its clients' accounts. These benefits may include national, regional or educational events organized and/or sponsored by Schwab Advisor Services. Benefits may include occasional business entertainment of personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other products and services assist the Firm in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of advisory fees from its clients' accounts, and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of our client accounts.

Additional services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, human capital consultants, insurance and marketing. In addition, the custodian may make available, arrange and/or pay vendors for these types of services rendered to an adviser by independent third parties. The custodian may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to us. While, as a fiduciary, SFG endeavors to act in its clients' best interests, the recommendation that clients maintain their assets in accounts with the recommended custodian may be based in part on the benefit to us, the availability of some of the foregoing products and services and other arrangements and not solely on the nature, cost or quality of custody and brokerage services provided by the custodian, which may create a potential conflict of interest.

#### **TRADE AGGREGATION**

All trading in client accounts is under the discretion of the underlying Money Manager in which they are invested. Transactions for each client account generally will be executed independently unless the Money Manager decides to purchase or sell the same securities for several clients at approximately the same time. The Money Manager can, but is not obligated to, combine or "batch" such orders in an effort to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among its clients' differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and transaction costs and will be allocated among the clients in proportion to the purchase and sale orders placed for each client account on any given day. If the Money Manager cannot obtain execution of all the combined orders at prices or for transactions costs that it believes are desirable, they will allocate the securities that it does buy or sell as part of the combined orders by following order allocation procedures.

#### **TRADING AWAY/STEP-OUT TRADES**

Step-out trading or "trading away" occurs when the Money Manager determines it is in the best interest of the strategy to execute a trade with a broker-dealer other than the recommended custodian. The purpose of stepping out a trade is to seek to improve the overall execution quality on the trade. In selecting a broker-dealer, Money Managers will consider, among other things, the broker's or dealer's execution capabilities, reputation, and access to the markets for the securities being traded. Additional fees will be charged by the custodian and the broker-dealer for a step-out transaction. The broker-dealer engaged to implement the trade may have a markup which includes the broker-dealer's fee. Money Managers recommended by SFG do not permit step-out trades in a client account unless the client has granted the SFG and the underlying Money Manager authority to do so. This is reflected in the advisory agreement signed by the client.

### **Item 13 – Review of Accounts**

#### **RECONCILIATION OF CLIENT ACCOUNTS**

SFG regularly monitors the investments in client accounts and performs at least quarterly reviews of account holdings for all clients. Client accounts are reviewed for consistency with client investment strategy and objectives, compliance with investment restrictions provided by the client, asset allocation, risk tolerance and performance relative to the appropriate benchmark. More frequent reviews may be triggered by changes in a clients' personal, tax or financial status.

We monitor on a continuous basis the securities and the Money Managers we have recommended for client's portfolios. Clients will receive monthly statements from the custodian for each household account held by the custodian. If the client's account has no activity, the custodian, at a minimum, will provide a quarterly statement. The custodian's statement will include information about the assets held in the account, the current value of each asset, as well as reflect the deduction of any fees from the client's account. Clients are encouraged to review their statements for discrepancies.

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

As a matter of policy and practice, SFG does not compensate any third-party persons, either individuals or entities, for the referral of advisory clients to the firm.

## **Item 15 – Custody**

Client accounts will be held with a qualified custodian who will maintain custody of the client accounts. SFG will not maintain custody of clients' funds or securities, apart from deducting the adviser fee from client(s)' accounts as authorized by the client in the executed advisory agreement. We are not affiliated with any third-party custodian and are not responsible for the errors made by the custodian.

Clients will receive monthly statements for each household account held by a custodian. If the client's account has no trading activity in a given month, the custodian will at a minimum provide a quarterly statement. The custodian's statement will include information about the assets held in the account, the current value of each asset, and will reflect the deduction of all advisory fees from the client's account. Clients are encouraged to review their statements for discrepancies. The method of delivery for accounts statements.

## **Item 16 – Investment Discretion**

SFG receives discretionary authority from most of its clients at the outset of an advisory relationship to select the types of securities as well as the allocation of those securities in a client's account(s). This is documented via a client's execution of a written agreement between the parties. Additionally, the custodian will require the client to execute a limited power of attorney ("LPOA") when opening or turning over the custodial account to our management. The LPOA will grant us the authority to 1) trade securities on the client's behalf in the account, 2) authorize the disbursement of the quarterly investment advisory fee and 3) authorize us to instruct the custodian to disburse a check or money electronic transfers from the client's custodial account to their address of record or, with additional paperwork signed by the client, to a bank account registered in the client's name. In the event a client requires the Firm to manage an account on a non-discretionary basis, we will not be able to trade a client's account without the client's written consent.

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

As a matter of firm policy and practice, SFG does not accept any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in accounts. All proxy notices are forwarded directly to the clients by the account custodians as has been indicated on the client's custodial account application. Within our written agreements, proxy voting responsibility remains specifically with the client. A complete copy of our proxy voting policy can be obtained by sending a request to the Chief Compliance Officer via telephone at (813) 251-9095. If a client has a question regarding a proxy notice that they have received, they should speak with their Financial Adviser to review the content of the proxy. However, the decision as to how to vote a proxy will remain with the client. For those clients invested with a Money Manager, the Money Manager may have a different policy from SFG.

## **Item 18 – Financial Information**

Registered Investment Advisers are required in this Item to provide certain financial information or disclosures about their financial condition. SFG has no financial commitment or condition that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

A balance sheet is not required to be provided because we do not serve as a custodian for client funds or securities. In addition, we do not require prepayment of fees of more than \$1200 per client six months or more in advance.

## Privacy Policy & Notice

March 2020

**GUIDING PRINCIPLES:** SFG Wealth Advisors LLC (“SFG”) places a high value on the relationships we have with our clients and prospective clients. We have adopted policies and procedures to protect the non-public personal information we have access to. We strive to maintain our clients’ trust and confidence in our company, an essential aspect of which is our commitment to protecting their personal information to the best of our ability. We believe that our clients and prospective clients value their privacy, so we have established this Privacy Policy and Notice to help us ensure that information about our clients and prospective clients will be handled in an appropriate manner. As a general rule, we will not disclose your personal information to anyone outside of SFG unless it is a fully vetted third party service provider who assists us in providing services to you or it is otherwise permitted by law.

**WHY YOU HAVE RECEIVED THIS NOTICE:** The reason you have received this notice is that you are either a current client, or you have contacted us about the services that we provide. This notice describes our practices and policies concerning how we handle information about you.

**THE PERSONAL INFORMATION THAT WE COLLECT, MAINTAIN, AND DISCLOSE:** SFG collects and maintains your personal information so we can provide investment advisory, financial planning and family wealth services to you. The types and categories of information we collect and maintain include personally identifiable financial information about you that we obtain in connection with providing financial services to you, including:

- Information we receive from you to open an account or provide investment advice to you (such as your home address, telephone number, and financial information).
- Information that we generate to service your account (such as trade tickets and account statements).
- Information about your transactions with us; and
- Information that we may receive from third parties with respect to you or your account (such as trade confirmations from brokerage firms or information from consumer reporting agencies).

**CATEGORIES OF NON-PUBLIC PERSONAL INFORMATION DISCLOSED:** SFG regards non-public personal information to be data such as your name, address, telephone/fax numbers, e-mail addresses, Social Security number, assets, income, investment objectives, risk tolerance, account numbers, account balances, transaction history, beneficiary information, bank account information, credit card information as well as any health and medical information.

**UNAFFILIATED THIRD PARTIES TO WHOM NON-PUBLIC PERSONAL INFORMATION IS DISCLOSED:** In order to assist us in servicing your account, there are non-affiliated third-party providers with whom we share your non-public personal information. These parties may include financial service providers (such as companies that perform services on our behalf, including securities broker-dealers), non-financial companies (such as our technology consultants who assist us in maintaining our computer systems or entities that assist us in mailing your account materials to you), and other non-affiliated third parties to whom disclosure of non-public personal information is permitted by law (such as the Internal Revenue Service for tax purposes).

As we only share your non-public personal information as permitted by current federal and/or state statutes and law, and as we will not share your non-public personal information with non-affiliates, we have not provided an Opt-Out form.

**CATEGORIES OF INFORMATION ABOUT FORMER CLIENTS THAT ARE DISCLOSED TO NON-AFFILIATES:** If you choose to close your account(s) or become an inactive client, we will adhere to this Privacy Policy with respect to your non-public personal information. Non-public personal information about former clients will not be treated any differently than information about our current clients.

**HOW WE PROTECT OUR CLIENTS’ PERSONAL INFORMATION:** SFG will make every effort to ensure that client and company-related information remains confidential. Staff is expected to refrain from discussing client relationships outside of the office. Physical client files will be kept in an organized and secure fashion. Employees are expected to make every effort to keep client-specific information out of plain sight of office visitors. Except where required by law or whenever deemed necessary to transact business on behalf of the client, SFG and its employees are not to disclose any detailed “personally identifiable information” to any individual, group or reporting agency without the consent of the client. SFG operates a cloud-based work environment.

If you have any questions regarding our privacy policy, please do not hesitate to call and the Firm’s Chief Compliance Officer via telephone at (813) 251-9095. We thank you for your continued patronage.