

## Form ADV Part 2B

### Investment Adviser Brochure Supplement

**Supervisor:** Markus Rutz

**Supervised Persons:**  
Jeffrey J. Gritis (“JJG”)

January 2021

This supplement to the BFG Investment Adviser Brochure provides information about the Firm’s Supervised Persons. If you have any questions about the contents of this supplement, please contact Jeffrey J. Gritis, Chief Compliance Officer. Additional information about the Firm’s Supervised Persons is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You may search this site using a unique identifying number, known as a CRD number for each Supervised Person. Jeffrey J. Gritis' CRD Number is 4636597.

1385 Warren Ave., Ste. A  
Downers Grove, IL 60515  
(630) 541-6363  
[jeffrey.gritis@lpl.com](mailto:jeffrey.gritis@lpl.com)

[www.bentleyfinancialgroup.com](http://www.bentleyfinancialgroup.com)

## Educational Background and Business Experience

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Bentley Financial Group, Inc. ("BFG" or the "Firm") generally requires that its Investment Advisor Representatives (IARs) have a bachelor's degree or equivalent experience and further coursework demonstrating knowledge of financial planning and tax planning. Additionally, advisers must have work experience that demonstrates their aptitude for financial planning and investment management.

*Jeffrey J. Gritis*  
CRD #4636597

Born 1978

### Employment History:

Bentley Financial Group, Inc. Principal & Investment Advisor Representative	2014 - Present
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LPL Financial, LLC Wealth Manager	2009 - Present
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Waterstone Financial Group, Inc. Licensed administrator	2006 - 2009
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### Formal Education after High School:

University of Iowa, Business Administration	1997 - 2001
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## Professional Designations

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### 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.

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, administered in 10 hours over a two-day period, 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.

### **Enrolled Agent - EA**

An enrolled agent is a person who has earned the privilege of representing taxpayers before the Internal Revenue Service by either passing a three-part comprehensive IRS test covering individual and business tax returns, or through experience as a former IRS employee. Enrolled agent status is the highest credential the IRS awards. Individuals who obtain this elite status must adhere to ethical standards and complete 72 hours of continuing education courses every three years.

## **Disciplinary Information**

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Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of BFG or the integrity of BFG's management persons. JJG has no information to disclose applicable to this Item.

## Other Business Activities

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JJG is a Dually Registered Person. LPL, member FINRA/SIPC, is a broker-dealer that is independently owned and operated and is not affiliated with BFG.

JJG is solely responsible for investment advice rendered. In addition to its investment advisory activities, JJG offers retail brokerage services through its Registered Representatives who are affiliated with LPL. Products include stocks, bonds, mutual funds, ETFs, 529 plans, retirement plans, and other investments. JJG generally conducts investment advisory activities separately and apart from the advisory activities of LPL. JJG is required to keep and maintain certain records and perform other compliance functions in relation to the advisory activities.

Certain Investment Advisor Representatives (“IAR”s) of BFG are appointed with several insurance companies and are able to receive separate compensation for transactions implemented through various insurance companies. Clients are not obligated to use any company for insurance product purchases and can work with any insurance agent they choose. Insurance compensation will be separate and distinct from financial planning and asset management fees charged by BFG.

As discussed above, JJG recommends that certain clients authorize the active discretionary management of a portion of their assets by and/or among certain Independent Managers. In certain circumstances JJG’s compensation is included in the advisory fee charged by such Independent Managers. JJG will recommend these Independent Managers only if it is in the best interest of their clients.

These Outside Business Activities do not create a material conflict of interest with clients.

## Additional Compensation

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Dually Registered Persons are incented to join and remain affiliated with LPL and to recommend that clients establish accounts with LPL, often through the provision of Transition Assistance. The receipt of any such compensation creates a financial incentive for the investment advisor representative to recommend LPL as custodian for the assets in a client’s advisory account. We encourage clients to discuss any such conflicts of interest with their representative before deciding to custody their assets at LPL.

LPL makes available to JJG various products and services designed to assist JJG in managing and administering client accounts. Many of these products and services may be used to service all or a substantial number of JJG’s accounts, including accounts not held with LPL. These include software and other technology that provide access to client account data (such as trade confirmation and account statements); facilitate trade execution (and aggregation and allocation of trade orders for multiple client accounts); provide research, pricing information, and other market data; facilitate payment of JJG’s fees from its clients’ accounts; and assist with back-office functions, recordkeeping, and client reporting.

LPL also makes available to JJG other services intended to help JJG manage and further develop the business. Some of these services assist JJG to better monitor and service program accounts maintained at LPL; however, many of these services benefit only JJG, for example, services that assist JJG in

growing the business. These support services and/or products are provided without cost, at a discount, and/or at a negotiated rate, and include practice management-related publications; consulting services; attendance at conferences and seminars, meetings, and other educational and/or social events; marketing support; and other products and services used by JJG in furtherance of the operation and development of the investment advisory business.

Where such services are provided by a third-party vendor, LPL will either make a payment to JJG to cover the cost of such services, reimburse JJG for the cost associated with the services, or pay the third-party vendor directly on behalf of JJG.

The products and services described above are provided to JJG as part of its overall relationship with LPL. JJG has a fiduciary duty to act in its clients' best interests; however, the receipt of these benefits creates a conflict of interest because JJG's recommendation that clients custody their assets at LPL is based in part on the benefit to JJG of the availability of the foregoing products and services and not solely on the nature, cost, or quality of custody or brokerage services provided by LPL. JJG's receipt of some of these benefits may be based on the amount of advisory assets custodied on the LPL platform.

## Supervision

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Markus Rutz, Regional Supervisory Principal, supervises JJG. Markus Rutz may be contacted at (800) 877-7210 ext. 111769.