

Form ADV Part 2B

Investment Adviser Brochure Supplement

Supervisor: Jeffrey J. Gritis

Supervised Persons:
Michael J. Gritis ("MJG")

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. You may search this site using a unique identifying number, known as a CRD number for each Supervised Person. Michael J. Gritis' CRD Number is 4664399.

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

www.bentleyfinancialgroup.com

Educational Background and Business Experience

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.

Michael J. Gritis
CRD #4664399

Born 1972

Employment History:

Bentley Financial Group, Inc.
Investment Advisor Representative

2014 - Present

LPL Financial, LLC
Wealth Manager

2009 - Present

Waterstone Financial Group, Inc.
Registered Representative

2003 - 2009

Formal Education after High School:

Keller Graduate School of Management, MBA
Indiana University, Bachelor of Arts

1996 - 1998
1990 - 1995

Professional Designations

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.

Certified Public Accountant – CPA®

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination.

To maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees and serve the public interest when providing financial services.

In addition to the Code of Professional Conduct, AICPA members who provide personal financial planning services are required to follow the Statement on Standards in Personal Financial Planning Services (the Statement). Most state boards of accountancy define financial planning as the practice of public accounting and therefore have jurisdiction over CPAs practicing in this discipline; state boards would likely look to the Statement as the authoritative guidance in this practice area regardless of specific or blanket adoption of AICPA standards.

Disciplinary Information

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

Other Business Activities

MJG 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.

MJG is solely responsible for investment advice rendered. In addition to its investment advisory activities, MJG 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. MJG generally conducts investment advisory activities separately and apart from the advisory activities of LPL. MJG 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, MJG 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 MJG's compensation is included in the advisory fee charged by such Independent Managers. MJG 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

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 MJG various products and services designed to assist MJG in managing and administering client accounts. Many of these products and services may be used to service all or a substantial number of MJG'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 MJG's fees from its clients' accounts; and assist with back-office functions, recordkeeping, and client reporting.

LPL also makes available to MJG other services intended to help MJG manage and further develop the business. Some of these services assist MJG to better monitor and service program accounts maintained at LPL; however, many of these services benefit only MJG, for example, services that assist MJG 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 MJG 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 MJG to cover the cost of such services, reimburse MJG for the cost associated with the services, or pay the third-party vendor directly on behalf of MJG.

The products and services described above are provided to MJG as part of its overall relationship with LPL. MJG has a fiduciary duty to act in its clients' best interests; however, the receipt of these benefits creates a conflict of interest because MJG's recommendation that clients custody their assets at LPL is based in part on the benefit to MJG 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. MJG's receipt of some of these benefits may be based on the amount of advisory assets custodied on the LPL platform.

Supervision

Jeffrey J. Gritis, Chief Compliance Officer, supervises MJG. Jeffrey J. Gritis may be contacted at (630) 541-6363.