

SENIOR TAX ADVISORY GROUP, INC.

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FORM ADV PART 2A FIRM BROCHURE MARCH 30, 2023

This brochure provides information about the qualifications and business practices of Senior Tax Advisory Group, Inc. If you have any question about the contents of this brochure, please contact us at (719) 596-4844. 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.

Senior Tax Advisory Group, Inc. is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training.

Additional information about Senior Tax Advisory Group, Inc. is available on the SEC's website www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Senior Tax Advisory Group, Inc.'s CRD number is 318058.

Item 2 - Material Changes

We have the following material change to report since our inception date on February 9, 2022:

- None

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Item 4 – Advisory Business

OWNERSHIP/ADVISORY HISTORY

Senior Tax Advisory Group, Inc. (“We”) was founded in January 2007. We became registered with the Securities and Exchange Commission (“SEC”) in February 2022. We are a multistate advisor that is required to be notice filed in Arizona, California, Colorado, Florida, Georgia, Illinois, Iowa, Maryland, Michigan, Missouri, New Mexico, Pennsylvania, South Dakota, Texas, Utah, Wyoming, and Virginia. Darian Andreson is President of the firm. Kathleen Larouere is the Chief Compliance Officer and investment adviser representative.

ADVISORY SERVICES OFFERED

RECOMMENDATION AND MONITORING OF THIRD-PARTY INVESTMENT ADVISER SERVICES

We will recommend the services of a third-party investment adviser (“Co-adviser”) to manage your account(s). We work with you to select a model portfolio based upon your objectives, time frame risk parameters, and other investment considerations. Once we have this suitability information, we will recommend one or several of the Co-adviser’s model portfolios to you. You are never obligated to use a recommended Co-Adviser.

Before recommending the Co-adviser, we review the following factors fees, reputation, performance, financial strength, management, price, reporting capabilities, and your financial situation, goals, needs, and investment objectives. After we engage the Co-advisor, we continue to monitor them and your financial situation.

With a Co-advisor relationship, the Co-adviser is responsible for portfolio management, best execution, portfolio reporting, trading, trade error resolution, fee billing and custodian reconciliations. We maintain our relationship with you by monitoring the status of your accounts with the Co-adviser, making recommendation about the Co-adviser, meeting with you in person or by telephone on annually, and acting as your primary financial adviser. Additionally, we retain the discretion to establish or termination the Co-adviser and any model on their platforms.

When you are referred to a Co-adviser, you will receive full disclosure, including services rendered and fee schedules, at the time of the referral, by delivery of a copy of the relevant Co-adviser’s Form ADV Part 2A or equivalent disclosure document before receiving investment advisory services from the Co-adviser. The Co-adviser offers separate services that are outlined in their ADV Part 2A.

USE OF SUB-ADVISERS

We also recommend the services of a Sub-adviser to manage some or all of your assets on a discretionary basis. In these situations, we provide consulting and advisory services in overseeing such Sub-Advisers. We make recommendations regarding the use of a Sub-adviser and their investment style based on, but not limited to, your financial needs, long-term goals, and investment objectives.

The Sub-adviser offers multiple model portfolios. Once a Sub-adviser is selected, we continue to monitor them to ensure that they adhere to the philosophy and investment style for which they were selected. We will retain discretionary authority to hire and fire the Sub-adviser and, when

necessary reallocate your assets to a new Sub-adviser. A complete description of the Sub-adviser's services and fees will be disclosed in the Sub-adviser' Form ADV Part 2A or equivalent brochure which will be provided to you. Our recommended Sub-adviser we primarily use is SEI Investment Management Corp (CRD #105146).

TAILORED SERVICES

We document your goals and objectives before any investing takes place. You may impose restrictions on investing in certain securities or types of securities.

WRAP PROGRAM

We do not sponsor a wrap program.

CLIENT ASSETS MANAGED

As of February 6, 2023, , we manage approximately \$50,086,638 in client assets on a discretionary basis.

Item 5 – Fees and Compensation

RECOMMENDATION AND MONITORING OF THIRD-PARTY INVESTMENT ADVISER & USE OF SUB-ADVISER SERVICES

We charge an annual management fee based on a percentage of assets under management in your account. Our annual fee ranges from 0.10% to 2.00%. The Co-adviser or Sub-adviser's fee will be included in our management. The fee is negotiable and varies based on the size of the account. The management fee is calculated and billed by the Co-adviser or Sub-adviser monthly in arrears based upon the average daily balance of the assets held in the account over the calendar month. We will rely upon the valuations provided by the custodian without independent verification.

We will ask you to authorize the Co-adviser or Sub-adviser to instruct the custodian to withdraw our management fee and the Co-adviser's or Sub-adviser's management fee directly from your account. You may terminate this authorization at any time. Please see Item 15 for additional details regarding fee deduction.

Our management fee does not include brokerage commissions, transaction fees, or other related costs and expenses that are incurred by you. You may incur certain charges imposed by custodians, brokers, third-party investment advisers, and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. These charges, fees, and commissions are exclusive of and in addition to our fee and we will not receive any portion of these charges, fees, or commissions.

TERMINATION OF SERVICES

You may terminate our any service for any reason with the first five (5) business days after signing the contract without any cost or penalty. Thereafter, the contract may be terminated at any time by giving ten (10) days' written notice to Senior Tax Advisory Group, Inc., 6775 Rangewood Dr.,

Colorado Springs, CO 80918 or you may contact the Co-adviser or Sub-adviser directly at the address located on its ADV Part 2A and Investment Management Agreement. You will be charged the fee up to and including the date of termination on a prorate basis.

OTHER SECURITIES COMPENSATION

As established in Item 10.D – Other Industry Affiliations, earning commissions for the sale of insurance products creates a conflict of interest for the firm. The commissions a financial incentive to recommend and sell you the insurance products. We attempt to mitigate the conflict of interest to the best of our ability by placing your interests ahead of our own and through the implementation of policies and procedures that address the conflict.

RETIREMENT ROLLOVER CONFLICTS OF INTEREST

When we recommend you rollover a retirement account for us to manage, this creates a financial incentive because we charge a fee for our services. We attempt to mitigate the conflict of interest by acting in your best interest and applying an impartial conduct standard to all rollovers. Please note that you are not under any obligation to roll over a retirement account to an account managed by us.

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

We do not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of your assets) or provide side by side management.

Item 7 – Types of Clients

We offer our services to individuals and high net worth individuals. We do not require a minimum account size.

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

METHODS OF ANALYSIS AND INVESTMENT STRATEGIES

We use asset allocation as our investment strategy to create your portfolio. Asset allocation is an investment strategy that aims to balance risk and reward by apportioning a portfolio's assets according to an individual's goals, risk tolerance and investment horizon. The asset classes typically include exchange-traded funds that consist of equities, fixed-income, international equity or fixed-income securities, or cash and equivalents. The benefit of asset allocation is that each class have different levels of risk and return, so each will behave differently over time. The risk associated with asset allocation is that there is no guarantee that diversification among asset classes will grow a portfolio.

INVESTMENT RISKS

All investment programs have certain risks that are born by you and **investing in securities involves risk of loss that you should be prepared to bear**. Our goal is to reduce the risk of loss, but not at the expense of portfolio growth. A recommended subadvisor's investment strategies seek to balance risks and rewards to achieve your investment objectives. You should feel free to ask us questions about risks that you do not understand.

RECOMMENDED SECURITIES

Several types of securities will be used in your account. These include, but are not limited to, exchange traded funds (ETFs). Risks associated with these types of securities include:

- **Credit Risk:** This is the risk that an issuer of a bond in an exchanged traded fund could suffer an adverse change in financial condition that results in a payment default, security downgrade, or inability to meet a financial obligation.
- **Inflation Risk:** This is the risk that inflation will undermine the performance of an investment or the future purchasing power of your assets.
- **Interest Rate Risk:** The chance that bond prices overall will decline because of rising interest rates.
- **International Investing Risk:** Investing in the securities of non-U.S. companies involves special risks not typically associated with investing in U.S. companies. Foreign securities tend to be more volatile and less liquid than investments in U.S. securities, and may lose value because of adverse political, social, or economic developments overseas or due to changes in the exchange rates between foreign currencies and the U.S. dollar. In addition, foreign investments are subject to settlement practices, as well as regulatory and financial reporting standards, that differ from those of the U.S.
- **Exchange Traded Funds (ETFs) Risk:** ETFs are typically investment companies that are legally classified as open end mutual funds or UITs, however, they differ from traditional mutual funds because ETF shares are listed on a securities exchange. Shares can be bought and sold through the trading day like shares of other publicly traded companies. ETF shares may trade at a discount or premium to their net asset value. This difference between the bid price and the asking price is often referred to as the “spread”. The spread varies overtime based on the ETF’s trading volume and market liquidity and is generally lower if the ETF has a lot of trading volume and market liquidity and higher if the ETF has little trading volume and market liquidity. Although, many ETFs are registered as investment companies under the Investment Company Act of 1940 like traditional mutual funds, some ETFs, including those that investment in commodities or alternative investments, are not registered as investment companies.
- **Manager Risk:** The chance that the proportions allocated to the various securities will cause your account to underperform relevant to benchmarks or other accounts with a similar investment objective.
- **Stock market risk:** The chance that stock prices overall will decline. Stock markets tend to move in cycles, with periods of rising stock prices and periods of falling stock prices.

Item 9 – 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 each supervised person providing investment advice. We do not have information applicable to this item.

Item 10 – Other Financial Industry Activities and Affiliations

BROKER DEALER AFFILIATION

We are not affiliated with a broker-dealer.

FUTURES/COMMODITIES FIRM AFFILIATION

We are not affiliated with a futures or commodities broker.

OTHER INDUSTRY AFFILIATIONS

Our owners and associates are licensed insurance agents of Andreson Financial Planning, Inc. dba Senior Tax Advisory, a licensed insurance agency. Through Andreson Financial Planning, Inc. they may offer insurance products to you. This other business activity pays them commissions that are separate from the fees describe in Item 5 above. The commissions give them a financial incentive to recommend and sell you insurance products. However, they attempt to mitigate any conflicts of interest to the best of their ability by acting in your best interest and by implementing policies and procedures that address the conflict. Additionally, we inform you that you always have the right to choose whether to act on the recommendation and that you always have the right to purchase recommended insurance through any licensed insurance agent or agency.

RECOMMENDATION AND SELECTION OF THIRD-PARTY INVESTMENT ADVISERS

We recommend the services of Co-advisers and Sub-advisers. This information can be found under Items 4 and 5.

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

DESCRIPTION

Our Code of Ethics establishes ideals for ethical conduct based upon fundamental principles of openness, integrity, honesty, and trust. We will provide a copy of our Code of Ethics to you and any prospective client upon request.

Our Code of Ethics covers all supervised persons and it describes our high standard of business conduct and fiduciary duty to you. The Code of Ethics includes, among other things, provisions relating to the confidentiality of your information, a prohibition on insider trading, a prohibition on rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures. All supervised persons must acknowledge the terms of the Code of Ethics annually or as amended.

MATERIAL INTEREST IN SECURITIES

We do not have a material interest in any securities.

INVESTING IN OR RECOMMENDING THE SAME SECURITIES

We do not invest in or recommend the same securities.

Item 12 – Brokerage Practices

RECOMMENDATION CRITERIA

All brokerage and custodian recommendations are handled by the Co-adviser or Sub-adviser. Please refer to the recommended their ADV Part 2A, Item 12 for additional information.

SOFT DOLLARS

“Soft dollars” are defined as a form of payment investment firms can use to pay for goods and services such as news subscriptions or research. When an investment firm gives its business to a particular brokerage firm, the brokerage firm in return can agree to use some of its revenue to pay for these types of services. Because the Co-adviser or Sub-adviser may require TD Ameritrade, Inc. for its custodial services, we may receive some benefits through TD Ameritrade’s Institutional program. Please see the other adviser’s ADV Part 2A, Item 14 for more information regarding their participation in the Program.

TRADE AGGREGATION

All trades are conducted by a Co-adviser or Sub-adviser. Please refer to the recommended Co-adviser ADV Part 2A, Item 12 for additional information.

Item 13 – Review of Accounts

PERIODIC REVIEWS

Ms. Larouere and our associates will conduct no less than quarterly reviews of all accounts. They will attempt to meet with you annually either in person or by telephone to conduct a review and update your investment profile statement.

OTHER REVIEWS

Additional reviews are conducted periodically depending on market conditions, economic, or political events, or by changes in your financial situation (such as retirement, termination of employment, physical move, or inheritance).

REPORTS

You will receive at least quarterly account-statements from the account’s custodian. Subadvisor will provide through its client portal system a quarterly performance report.

Item 14 – Client Referrals and Other Compensation

OTHER COMPENSATION

We do not receive any other compensation.

CLIENT REFERRALS

We do not pay for client referrals or use solicitors.

Item 15 – Custody

We require that your funds, securities, and accounts are held at a qualified custodian. We do not take possession of your assets. However, you will be asked to authorize Co-adviser or Sub-adviser with the ability to instruct the custodian to deduct our management fee and the Co-adviser or Sub-adviser's management fee directly from your account. This authorization applies to our management fee, the Co-adviser and/or Sub-adviser's management fee only; you may terminate this authorization at any time. We urge you to carefully review these statements and compare them to the reports you receive from the Co-adviser or Sub-adviser. Please notify us immediately of any discrepancies.

Item 16 – Investment Discretion

We retain discretionary authority to establish and/or terminate a relationship with a Co-adviser and move accounts between models for the purposes of managing the account or a portion of the account determined by us, the Co-adviser, or Sub-adviser. You will also grant us, the Co-adviser, or Sub-adviser with discretionary authority to reallocate the amount of funds within the account that are in a particular model managers model portfolio; under no circumstances will we have discretionary authority to transfer funds or assets outside of the account.

Item 17 – Voting Client Securities

We do not vote proxy votes for any client. All proxy materials are mailed or emailed directly to you from the account's custodian. Any proxy materials received by us will be forwarded to you for response and voting. In the event you have a question about a proxy solicitation, feel free to contact us.

Item 18 – Financial Information

BALANCE SHEET

We do not require or solicit prepayment of more than \$1200 in fees per client, six months or more in advance. Therefore, we are not required to provide a balance sheet.

FINANCIAL CONDITION

We are required in this Item to provide you with certain financial information or disclosures about our financial condition if we have a financial commitment that impairs our ability to service you. We do not have a financial commitment that impairs our ability to service you.

BANKRUPTCY

We have not been the subject of a bankruptcy proceeding.