

**ITEM 1. Cover Page**

**STRATFORD INVESTMENT ADVISORY GROUP, INC.**

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DECEMBER 31, 2022

**DISCLOSURE BROCHURE (ADV Part 2A)**

This brochure provides information about the qualifications and business practices of Stratford Investment Advisory Group, Inc. (SIAG). If you have any questions about the content of this Brochure, please contact us at 847-577-7003. The information in this Brochure has not been approved or verified by the US Securities and Exchange Commission or by any state securities authority.

Additional information about Stratford Investment Advisory Group, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

SIAG will provide you with a Brochure as necessary based on changes or new information, at any time, without charge. A Brochure may be requested by contacting Art Busby, President, at 847-577-7003, free of charge.

CRD No.111-363

SEC File No. 801-36259

## **ITEM 2. Material Changes**

There have not material changes made to this ADV Part 2A. Brochure since the March 30, 2022 annual update filing.

Stratford Investment Advisory Group, Inc.'s Chief Compliance Officer, Arthur Busby, remains available to address any questions that a client or prospective client may have about this brochure.

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## **ITEM 4 - ADVISORY BUSINESS**

### **History**

SIAG was founded in 1990 by Arthur Busby, Jr. and is based in Mount Prospect, Illinois. SIAG is an employee owned, independent investment management firm. Since 1990, managing assets has been SIAG's only business. The clients that entrust the management of their assets to SIAG include individuals, high net-worth individuals, family trusts, and pension/profit sharing accounts. All share the similar investment objectives of achieving consistent investment returns that best fit their respective risk comfort factors.

### **Principles**

SIAG was created with the ideal of providing conservative, high quality investment management services that our clients can trust, at a fair and reasonable fee. SIAG places a strong focus on preservation of capital and invests exclusively in high quality investment vehicles.

### **Services**

In general, SIAG's provides customized investment management services for its clients. This is achieved through continuous personal contact with clients to assess their cash flow needs and risk tolerance to market volatility to determine an appropriate asset allocation strategy. SIAG may hold certain investments based on portfolio fit and/or tax considerations of clients.

SIAG's investment approach is primarily long-term focused but may buy/sell positions held less than a year in order to meet the objectives of clients or due to market volatility. Generally, SIAG will construct a portfolio consisting of individual stocks, exchange traded funds and bonds. In addition, to these types of securities, SIAG may invest in government bonds, tax-free bonds, mutual funds, money market instruments, and other such securities that we may select, unless expressly limited by written direction or client guidelines.

The investment strategy used for a client's portfolio is continually reviewed as to the various factors that may affect the financial markets and, in turn, the client portfolio. The factors reviewed may include: macroeconomic trends, Federal Reserve policy, inflation, yield curve slope, currency trends, investor psychology, and historical valuation measurements for markets and market sectors.

For some clients, SIAG has discretionary authority to make determinations regarding the securities that are to be bought and sold, as well as the quantities of such securities. SIAG also manages non-discretionary portfolios where recommended action is made to the client and whose approval is received before recommended action is taken. Clients can impose restrictions on investing in certain securities or types of securities. Within client guidelines and instructions, decisions can be made as to the nature and quantity of securities to be bought or sold.

The management of SIAG client portfolios is led by Arthur Busby, Jr. Mr. Busby is the founder of SIAG, the principle owner and the President. Mr. Busby has compiled extensive experience in the investment world through over 25 years of managing investment portfolios.

#### **ITEM 5 - Fees and Compensation**

SIAG generally computes fees quarterly based upon the valuation of assets under management on the last day of the quarter end. Some clients may be billed a fixed annual or semi-annual amount. Depending on certain circumstances (another existing account relationship with a client, dramatic account growth, special conditions, etc.) fees are open to negotiations. SIAG's fee schedule is as follows:

##### **Fixed Income / Balanced Accounts**

On the first \$ 500,000 in assets	1/2 of 1%
On the next \$4,500,000 in assets	1/3 of 1%
On the next \$5,000,000 in assets	1/4 of 1%
On assets over \$10,000,000	1/8 of 1%

SIAG does not have custody of client assets. Therefore, each client must appoint a custodian and may be required to pay custodian fees. Also, clients will generally incur brokerage and other transaction costs in the course of SIAG's management of their accounts (see the section in this brochure entitled "Brokerage Practices"). Also, mutual funds and exchange traded funds also charge internal management fees. SIAG shall not receive any portion of these brokerage commissions, fees and any other cost. SIAG's only form of compensation is the fee billed to the client.

SIAG does not participate in any wrap or solicitation programs, and as such, does not pay or bill clients any such fee. To date SIAG has never entertained requests by certain "qualified clients" (as defined by Rule 205-3(d) under the Investment Advisers Act of 1940) to enter into an advisory contract that provides for compensation on the basis of a share of the capital gains upon, or the capital appreciation of, the qualified client's account (commonly referred to as a "performance fee").

SIAG may change fees after written notice to client. In the event of the termination of SIAG services, fees will be billed on a prorated basis. A client may terminate an agreement with SIAG at any time by 30 day written notice.

#### **ITEM 6 - Performance Based Fees & Side by Side Management**

SIAG fees are based on market value as explained in Item 5 above. SIAG has never accepted a performance based fee client.

#### **ITEM 7 - Types of Clients**

SIAG provides investment advisory services to a variety of clients including individuals, high net-worth individuals, family trusts, and pension/profit sharing accounts. SIAG's will generally accept accounts that are \$250,000 or greater in size, though smaller accounts may be accepted.

**ITEM 8 - Methods of Analysis, Investment Strategies and Risk of Loss**

SIAG utilizes a variety of methods of analysis in the management of client portfolios such as fundamental, technical and cyclical. Fundamental analysis is used to evaluate a security by examining related economic, financial and other qualitative and quantitative factors that may affect the security's future value. Technical analysis uses historical and present data such as price and volume to help determine a security's attractiveness. Cyclical analysis refers to the monitoring of the economic cycle and its potential impact on different types of securities.

Generally, our investment strategies are to make long-term (held longer than one year), low risk investments. SIAG works hard to preserve client capital and achieve real growth of client wealth. No investment strategy can guarantee a client positive gains in their portfolio. Investing in securities involves risk of loss that clients should be prepared to bear. Investment risk may include market risk typified by a drop in a security's price due to a company specific event or general market activity.

**ITEM 9 - Disciplinary Information**

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that are material to the integrity of the Advisor. To date, SIAG nor its management has been the subject of a legal or disciplinary action.

**ITEM 10 - Other Financial Industry Activities or Affiliations**

SIAG and its employees do not have any other financial industry activities or affiliations.

**ITEM 11 - Code of Ethics, Participation or Interest in Client Transactions & Personal Trading**

SIAG has adopted a Code of Ethics for all employees describing its high standard of business conduct, and fiduciary duty to its clients, a copy of which is available upon request. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, and personal securities trading procedures, among other things. All employees must acknowledge the terms of the Code of Ethics annually, or as amended.

Neither SIAG nor any related person of SIAG recommends, buys, or sells for client accounts, securities in which SIAG or any related person of SIAG has a material financial interest.

Employees of SIAG or any related person may buy or sell securities at or around the same time as those securities are bought or sold for clients. All security trades made in the accounts of SIAG employees or related persons are monitored by the Chief Compliance Officer to ensure that there is no conflict of interest. SIAG has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each SIAG employee's accounts.

#### **ITEM 12 - Brokerage Practices**

In general, SIAG will select the brokers with which to make client transaction unless a client makes a request to use a specific broker. Considerations for selecting a broker are financial strength; reputation; ability to provide the best execution of desired trade; best execution price; reasonableness of commission paid; 4) other services such as market and economic research. Generally, SIAG's clients receive fair and reasonable commissions for overall brokerage services.

SIAG does not use soft dollars arrangements with any broker or custodian. All brokers and custodians provide SIAG with some level of research or other services (such as duplicate trade confirmations, account statements, support services, etc.) that assist SIAG in the managing and administering client accounts. SIAG is not compensated in any form by client brokers or custodians and clients do not pay higher fees because of the research or other services provided by brokers or custodians. There is no corresponding commitment by SIAG to any broker or custodian to invest any specific amount or percentage of client portfolios in any specific security or investment product offered by a broker or custodian providing research or other services. SIAG does not receive referrals from brokers or custodians.

#### **ITEM 13 - Review of Accounts**

SIAG reviews client accounts on a continuing basis and will meet with clients for formal reviews on a frequency agreed to by the client. All clients are advised that it remains their responsibility to advise SIAG to any changes in their investment objectives and/or financial situation. Outside of regular reviews, reviews may be triggered by client request. Other triggers may include major economic events or a change in a client's financial situation.

Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the client's broker or custodian. SIAG may also provide periodic written reports summarizing account activity and performance.

#### **ITEM 14 - Client Referrals and Other Compensation**

Neither SIAG nor its employees compensate any persons or firms for client referrals.

#### **ITEM 15 - Custody**

SIAG requires each client select a qualified custodian to hold its assets. SIAG will not serve in this capacity. Each client's qualified custodian (bank or broker-dealer) will send monthly or quarterly statements directly to SIAG clients. SIAG may also provide a written periodic report summarizing account activity and performance. SIAG recommends that clients carefully review these statements.

#### **ITEM 16 - Investment Discretion**

SIAG provides investment management services on a discretionary and non-discretionary basis. Prior to SIAG assuming discretionary authority over a client's account, clients are required to execute an Account Agreement, stating SIAG's full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name. Any limitations on this discretionary authority shall be included in the written agreement and may be changed or amended in writing at any time.

**ITEM 17 - Voting Client Securities**

Unless the client directs otherwise, SIAG has authority to vote proxies for securities held in client accounts. SIAG's goal and intent is to vote in the client's best interest and in accordance with our Proxy Voting Policy. SIAG's complete written proxy voting procedures may be obtained by calling Art Busby at 847-577-7003. Individual clients can also contact Art Busby to find out how SIAG voted any proxy on their behalf.

**ITEM 18 - Financial Information**

SIAG always bills fees in arrears, there are no prepayment of fees. SIAG does not believe it has any financial condition that would impair its ability to meet commitments to clients. SIAG and its principal have never been the subject of a bankruptcy proceeding.