

# CSP Financial Group LLC

## Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of CSP Financial Group LLC. If you have any questions about the contents of this brochure, please contact us at (480) 600-9626 or by email at: [charles@cspfgllc.com](mailto:charles@cspfgllc.com). 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 CSP Financial Group LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). CSP Financial Group LLC's CRD number is: 310819.*

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*Registration as an investment adviser does not imply a certain level of skill or training.*

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## **Item 2: Material Changes**

The material changes in this brochure from the last annual updating amendment of CSP Financial Group LLC on 03/02/2023 are described below. Material changes relate to CSP Financial Group LLC's policies, practices or conflicts of interests.

- CSP Financial Group LLC has transitioned to registration with the United States Securities and Exchange Commission from its prior registration at the state level.
- CSP Financial Group LLC has updated its phone number and email address. (Cover Page)
- CSP Financial Group LLC does not offer advisory services to Pension or Profit-Sharing clients. (Item 7).
- CSP Financial Group LLC has updated its office location. (Cover Page)

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## **Item 4: Advisory Business**

### **A. Description of the Advisory Firm**

CSP Financial Group LLC (hereinafter “CSPFGLLC”) is a Limited Liability Company organized in the State of Arizona. The firm was formed in April 2020, became registered as an investment advisor in November 2020, and the principal owner is Charles Arthur Pettit.

### **B. Types of Advisory Services**

#### ***Selection of Other Advisers***

CSPFGLLC will recommend Matson Money, a third-party investment adviser. CSPFGLLC conducts due diligence on the third-party investment adviser which includes the following: phone calls, meetings and review of the third-party adviser's performance and investment strategy. CSPFGLLC will assist a client to engage with Matson Money by referring the client to Matson Money, the third-party adviser. CSPFGLLC will review the ongoing performance of the third-party adviser. CSPFGLLC will direct clients to Matson Money, Inc.

Matson Money offers two advisory programs: (1) the Matson Fund Platform; and (2) Private Account Asset Allocation. Under the Matson Fund Platform, Matson money will invest Client assets primarily through the Free Market Funds. Under the Frontier Adjusted Portfolio program, Client assets are generally allocated to any one or a combination of the three affiliated Free Market Funds and participating Client portfolios are required to be adjusted annually to reduce their risk profile over time. In Private Account Asset Allocation, Client assets are primarily allocated within a family of no-load mutual funds managed by Dimensional Fund Advisors, LP (“DFA”), an unaffiliated, registered investment adviser. DFA mutual funds are generally not available to individual investors with small accounts except through the services of an investment adviser like Matson Money. CSPFGLLC will deliver the client a copy of the Part 2A brochure for Matson Money which describes the services offered in greater detail.

#### ***Portfolio Analysis (MRI) Services***

CSPFGLLC performs a portfolio “MRI” service; an analogy used to describe looking deeply into the holdings of a client’s existing portfolio. Specifically, CSPFGLLC will outline the client’s current financial situation, including annual income, savings, tax levels, and risk tolerance levels. CSPFGLLC will then prepare a report for the client and work with the client to ensure that investments match the client’s risk tolerance, goals, and time horizon.

## ***Financial Planning***

Financial plans and financial planning include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

In offering financial planning, a conflict exists between the interests of the investment adviser and the interests of the client. The client is under no obligation to act upon the investment adviser's recommendation, and, if the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through the investment adviser. This statement is required by California Code of Regulations, 10 CCR Section 260.235.2.

## ***Pension Planning Services***

CSPFG LLC planning services through Ubiquity Retirement & Savings. CSPFG LLC will use Ubiquity's CensiblyYours (CY) Custom Index Portfolios. These Portfolios are powered by Kaye Capital Management (KCM) which are low-cost index-based investment options with the backing of 3(38) investment fiduciary.

## ***Seminars and Workshops***

CSPFG LLC holds seminars and workshops to educate the public on different types of investments and the different services they offer. The seminars are educational workshops on finance and no specific investment or tax advice is given. These seminars are attended by individuals and/or business owners ranging in age from 25-65 who are seeking education on how the markets work. Seminars are offered to all Clients.

## ***Services Limited to Specific Types of Investments***

CSPFG LLC generally limits its investment advice to mutual funds, fixed income securities, insurance products including annuities, equities and ETFs. CSPFG LLC will use other securities as well to help diversify a portfolio when applicable.

## **C. Client Tailored Services and Client Imposed Restrictions**

CSPFG LLC offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels). Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

## D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. CSPFGLLC does not participate in any wrap fee programs.

## E. Assets Under Management

CSPFGLLC does not have assets under management.

# Item 5: Fees and Compensation

## A. Fee Schedule

### *Selection of Other Advisers Fees*

Lower fees for comparable services may be available from other sources.

CSPFGLLC will direct clients to Matson Money, Inc. CSPFGLLC will assist the client to select a manager or managers and an appropriate allocation model. CSPFGLLC will assist the client to complete applications and any forms required to establish an account and engage the third party manager. At least annually, CSPFGLLC will meet with the client to review their account, discuss changes to the client's financial situation, suitability of the model allocation and manager, and discuss any other financial issues. Generally, Matson is responsible for portfolio management, portfolio design, best execution, portfolio reporting, trading, trade error resolution, and custodian reconciliations. Our agreement with Matson Money requires us to maintain a relationship with the client. Matson Money requires us to ensure that information about your specific goals, financial situation and risk preference remain current, assist you in determining appropriate allocation models, review account activity periodically, meet with you annually, and respond to your inquiries.

The annual fee schedule is as follows:

Fees will not exceed .99% and will be at CSPFGLLC discretion based on the nature of the client relationship.

### **Co-Adviser Compensation: Fees** (as % of assets under management)

The first \$1,000,000 \_\_\_\_\_ .99%

The next \$3,000,000 \_\_\_\_\_ .75%

The remainder over \$4,000,000 \_\_\_\_\_ .50%

The value of the account as of the last business day of the quarter is used for purposes of calculating the advisory fee. The advisory fee is charged quarterly in advance. Matson

collects an advisory fee of up to .50% in advance of the prior quarter (i.e. at the beginning of January, April, July, and October) directly from the clients' account.

Matson also collects CSPFGLLC co-advisor fee of up to .99% in advance and sends that to CSPFGLLC directly. These fees are negotiable and are separate from the expense ratio (0.50% annually) associated with the Matson Money funds in which the portfolio will be invested. Matson Money does not receive any advisory fee directly; it is compensated solely via the 0.50% internal management fee associated with its mutual funds. All clients will invest in the mutual funds run by Matson Money. The aggregate management fees charged by CSPFGLLC and Matson Money will not exceed 1.49% annually. These fees are negotiable.

*The combination of fees for CSPFGLLC and Matson Money will not exceed the industry standard of excessive fees, which is 3%.*

### ***Portfolio Analysis (MRI) Fees***

The Portfolio MRI service will be offered to all clients, including those using CSPFGLLC's other advisory services. Clients will pay a one-time (non-recurring) fixed fee of \$500 for the MRI service.

### ***Financial Planning Fees***

#### **Fixed Fees**

The negotiated fixed rate for creating client financial plans is up to \$700. The fixed fee is based upon the complexity of the plan, the hourly rate, the estimated amount of time to be used for creating a financial plan. Fixed fees relate to financial plans and financial planning that may include, without limitation: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning, each service as further detailed above.

It is anticipated that each financial planning service listed above will take approximately 2-4 hours of financial planning and therefore the time to complete a financial plan will depend on the services required by the client. For example, the financial plan for a client requiring only investment planning, retirement, and life insurance planning will usually require 6-12 hours.

#### **Hourly Rate**

The hourly rate for financial planning is \$200 per hour.

The fees are negotiable and the final fee schedule will be attached as Exhibit II of the Financial Planning Agreement. CSPFGLLC and the client will ultimately determine the negotiated fixed fee depending on the specific financial planning services (listed above) that the client requires, the need to take into account dependents or other individuals, the

diversity of client assets to be addressed by the financial plan, as well as conversations with the client. Fixed fees will be offered to all clients. Clients may terminate their contracts without penalty within five business days of signing the advisory contract. In the case of early termination prior to completion of the plan, CSPFG LLC will deliver upon termination that portion of the plan that has been prepared.

Clients may terminate the agreement without penalty, for full refund of CSPFG LLC's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

### ***Pension Planning Services Fees***

Fees will not exceed .99%. Ubiquity will direct the plan custodian to liquidate the compensation from the plan assets to cover the compensation to CSPFG LLC.

### ***Seminars and Workshops***

Seminars and workshops are offered free of charge.

## **B. Payment of Fees**

### ***Payment Selection of Other Advisers Fees***

Fees are withdrawn directly from the client's accounts with client's written authorization. Matson Money calculates and withdraws the fee based on the negotiated rate memorialized in the client contract; Matson Money does not bill clients directly. CSPFG LLC does not directly deduct the advisory fees. Fees are paid quarterly in advance. The client will receive a statement directly from the custodian. The client will receive an invoice either from Matson Money or CSPFG LLC.

### ***Portfolio Analysis (MRI) Fees***

The MRI fee is paid in advance via check. This fee is negotiable and is charged to all prospective clients unless reduced or waived in CSPFG LLC's sole discretion.

### ***Payment of Financial Planning Fees***

Financial planning fees are paid via check and wire.

Fixed and hourly financial planning fees are paid 50% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

### ***Payment of Pension Planning Services Fees***

Fees are paid in arrears, each calendar quarter at the close of market on the last day of each quarter.



### ***Seminars and Workshops***

Seminars and workshops are offered free of charge.

### **C. Client Responsibility For Third Party Fees**

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by CSPFGLLC. Please see Item 12 of this brochure regarding broker-dealer/custodian.

### **D. Prepayment of Fees**

CSPFGLLC collects fees in advance. Refunds for fees paid in advance but not yet earned will be refunded on a prorated basis and returned within fourteen days to the client via check, or return deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate\* times the number of days elapsed in the billing period up to and including the day of termination. (\*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

### **E. Outside Compensation For the Sale of Securities to Clients**

Charles Arthur Pettit in his outside business activities (see Item 10 below) is licensed to accept compensation for the sale of insurance products to CSPFGLLC clients. This presents a conflict of interest and gives the supervised person an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending insurance products for which the supervised persons receives compensation, CSPFGLLC will document the conflict of interest in the client file and inform the client of the conflict of interest. Clients always have the right to decide whether to purchase CSPFGLLC-recommended products and, if purchasing, have the right to purchase those products through other agents that are not affiliated with CSPFGLLC.

## **Item 6: Performance-Based Fees and Side-By-Side Management**

CSPFGLLC does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## Item 7: Types of Clients

CSPFGLLC generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Charitable Organizations
- ❖ Corporations or Business Entities

There is no account minimum for any of CSPFGLLC's services.

## Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

### A. Methods of Analysis and Investment Strategies

#### *Methods of Analysis*

CSPFGLLC's methods of analysis include Modern portfolio theory.

**Modern portfolio theory** is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

#### *Investment Strategies*

CSPFGLLC uses long term trading.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### B. Material Risks Involved

#### *Methods of Analysis*

**Modern portfolio theory** assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio

exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

### ***Investment Strategies***

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### **C. Risks of Specific Securities Utilized**

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature.

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100%

loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the index being tracked. With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs. Additionally, regular trading to beneficially “time the market” is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed income investments (as applicable). Foreign securities in particular are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another and losses may be magnified if no liquid market exists for the ETF’s shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

**Annuities** are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

**Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9: Disciplinary Information**

### **A. Criminal or Civil Actions**

There are no criminal or civil actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

### **C. Self-regulatory Organization (SRO) Proceedings**

There are no self-regulatory organization proceedings to report.

## **Item 10: Other Financial Industry Activities and Affiliations**

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Neither CSPFGLLC nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

### **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither CSPFGLLC nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Charles Arthur Pettit Jr is a licensed insurance agent. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. CSP Financial Group LLC always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of CSP Financial Group LLC in their capacity as a licensed insurance agent.

Charles Arthur Pettit Jr is Partner of Ed 4 Feds, a training company used to provide seminars for federal employees of the federal government to educate them about their pension system and their retirement benefits.

Mark Alan Flanagan is an accountant. From time to time, he will offer clients advice or products from this activity. CSP Financial Group LLC always acts in the best interest of the client. Clients are in no way required to utilize the services of any representative of CSP Financial Group LLC in their capacity as an accountant.

Mark Alan Flanagan is a licensed insurance agent. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. CSP Financial Group LLC always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of CSP Financial Group LLC in their capacity as a licensed insurance agent.

Felicia Caldwell Gopaul is a licensed insurance agent. From time to time, she will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. CSP Financial Group LLC always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of CSP Financial Group LLC in their capacity as a licensed insurance agent.

Felicia Caldwell Gopaul manage a financial education company.

Mark Vincent Mollon is a licensed insurance agent. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. CSP Financial Group LLC always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of CSP Financial Group LLC in their capacity as a licensed insurance agent.

James Cossett Anderson IV is a licensed insurance agent. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products

can conflict with the fiduciary duties of a registered investment adviser. CSP Financial Group LLC always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of CSP Financial Group LLC in their capacity as a licensed insurance agent.

Tonya Shyree White is a licensed insurance agent. This activity creates a conflict of interest since there is an incentive to recommend insurance products based on commissions or other benefits received from the insurance company, rather than on the client's needs. Additionally, the offer and sale of insurance products by supervised persons of CSP Financial Group LLC are not made in their capacity as a fiduciary, and products are limited to only those offered by certain insurance providers. CSP Financial Group LLC addresses this conflict of interest by requiring its supervised persons to act in the best interest of the client at all times, including when acting as an insurance agent. CSP Financial Group LLC periodically reviews recommendations by its supervised persons to assess whether they are based on an objective evaluation of each client's risk profile and investment objectives rather than on the receipt of any commissions or other benefits. CSP Financial Group LLC will disclose in advance how it or its supervised persons are compensated and will disclose conflicts of interest involving any advice or service provided. At no time will there be tying between business practices and/or services (a condition where a client or prospective client would be required to accept one product or service conditioned upon the selection of a second, distinctive tied product or service). No client is ever under any obligation to purchase any insurance product. Insurance products recommended by CSP Financial Group LLC's supervised persons may also be available from other providers on more favorable terms, and clients can purchase insurance products recommended through other unaffiliated insurance agencies.

Tonya Shyree White is a sales consultant of Doterra International.

James Matthew Sanford is a licensed insurance agent. This activity creates a conflict of interest since there is an incentive to recommend insurance products based on commissions or other benefits received from the insurance company, rather than on the client's needs. Additionally, the offer and sale of insurance products by supervised persons of CSP Financial Group LLC are not made in their capacity as a fiduciary, and products are limited to only those offered by certain insurance providers. CSP Financial Group LLC addresses this conflict of interest by requiring its supervised persons to act in the best interest of the client at all times, including when acting as an insurance agent. CSP Financial Group LLC periodically reviews recommendations by its supervised persons to assess whether they are based on an objective evaluation of each client's risk profile and investment objectives rather than on the receipt of any commissions or other benefits. CSP Financial Group LLC will disclose in advance how it or its supervised persons are

compensated and will disclose conflicts of interest involving any advice or service provided. At no time will there be tying between business practices and/or services (a condition where a client or prospective client would be required to accept one product or service conditioned upon the selection of a second, distinctive tied product or service). No client is ever under any obligation to purchase any insurance product. Insurance products recommended by CSP Financial Group LLC's supervised persons may also be available from other providers on more favorable terms, and clients can purchase insurance products recommended through other unaffiliated insurance agencies.

James Matthew Sanford works as a consult homeowner on their home remodel projects.

Nicholas Ryan Der is a registered representative. From time to time, he will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. CSP Financial Group LLC always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients always have the right to decide whether or not to utilize the services of any representative of CSP Financial Group LLC in such individual's outside capacities.

Nicholas Ryan Der is a project manager for sales and operational calls.

Jacqueline Jo French is a real estate broker or dealer. From time to time, she will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. CSP Financial Group LLC always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of CSP Financial Group LLC in their capacity as a real estate dealer or broker.

Mandi Hering is a licensed insurance agent. This activity creates a conflict of interest since there is an incentive to recommend insurance products based on commissions or other benefits received from the insurance company, rather than on the client's needs. Additionally, the offer and sale of insurance products by supervised persons of CSP Financial Group LLC are not made in their capacity as a fiduciary, and products are limited to only those offered by certain insurance providers. CSP Financial Group LLC addresses this conflict of interest by requiring its supervised persons to act in the best interest of the client at all times, including when acting as an insurance agent. CSP Financial Group LLC periodically reviews recommendations by its supervised persons to assess whether they are based on an objective evaluation of each client's risk profile and



investment objectives rather than on the receipt of any commissions or other benefits. CSP Financial Group LLC will disclose in advance how it or its supervised persons are compensated and will disclose conflicts of interest involving any advice or service provided. At no time will there be tying between business practices and/or services (a condition where a client or prospective client would be required to accept one product or service conditioned upon the selection of a second, distinctive tied product or service). No client is ever under any obligation to purchase any insurance product. Insurance products recommended by CSP Financial Group LLC's supervised persons may also be available from other providers on more favorable terms, and clients can purchase insurance products recommended through other unaffiliated insurance agencies.

Mandi Hering works as an Agent in United Healthcare Medicare Advantage Plans.

Monica Michelle Boulter is a licensed insurance agent. This activity creates a conflict of interest since there is an incentive to recommend insurance products based on commissions or other benefits received from the insurance company, rather than on the client's needs. Additionally, the offer and sale of insurance products by supervised persons of CSP Financial Group LLC are not made in their capacity as a fiduciary, and products are limited to only those offered by certain insurance providers. CSP Financial Group LLC addresses this conflict of interest by requiring its supervised persons to act in the best interest of the client at all times, including when acting as an insurance agent. CSP Financial Group LLC periodically reviews recommendations by its supervised persons to assess whether they are based on an objective evaluation of each client's risk profile and investment objectives rather than on the receipt of any commissions or other benefits. CSP Financial Group LLC will disclose in advance how it or its supervised persons are compensated and will disclose conflicts of interest involving any advice or service provided. At no time will there be tying between business practices and/or services (a condition where a client or prospective client would be required to accept one product or service conditioned upon the selection of a second, distinctive tied product or service). No client is ever under any obligation to purchase any insurance product. Insurance products recommended by CSP Financial Group, LLC's supervised persons may also be available from other providers on more favorable terms, and clients can purchase insurance products recommended through other unaffiliated insurance agencies.

Monica Michelle Boulter works as a foreign affairs officer for the U.S Department of State.

All material conflicts of interest under Section 260.238 (k) of the California Corporations Code are disclosed regarding the investment adviser, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

#### **D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections**

CSPFGLLC has entered into a co-advisory agreement with Matson Money, an unaffiliated money manager, under which it recommends on a nondiscretionary basis that clients open an account in an advisory program offered by Matson Money. In using third party advisers, there is a conflict of interest in that CSPFGLLC would have an incentive to direct clients to third-party investment advisers that provide CSPFGLLC with a larger fee split. This is mitigated because Matson Money charges no separate advisory fee of its own for the asset allocation services it provides to accounts participating in the Matson Fund Platform. Instead, Matson Money will be compensated via the expense ratio associated with the Matson Fund Platform; Matson Money also collects CSPFGLLC's advisory fee directly from the custodian and then remits that advisory fee to CSPFGLLC. Moreover, CSPFGLLC will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. CSPFGLLC will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where CSPFGLLC is recommending the adviser to clients.

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

#### **A. Code of Ethics**

CSPFGLLC has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. CSPFGLLC's Code of Ethics is available free upon request to any client or prospective client.

#### **B. Recommendations Involving Material Financial Interests**

CSPFGLLC does not recommend that clients buy or sell any security in which a related person to CSPFGLLC or CSPFGLLC has a material financial interest.

#### **C. Investing Personal Money in the Same Securities as Clients**

CSPFGLLC will not recommend to clients securities in which the firm or its representatives also invest.

## **D. Trading Securities At/Around the Same Time as Clients' Securities**

Please see Item 11.C above.

## **Item 12: Brokerage Practices**

### **A. Factors Used to Select Custodians and/or Broker/Dealers**

CSPFGLLC does not trade client's accounts or recommend broker/custodians. CSPFGLLC does not trade client's accounts and therefore receives no research, product, or services from a broker-dealer ("soft dollar benefits"). CSPFGLLC does not have the ability to block trade purchases across accounts. CSPFGLLC receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

## **Item 13: Review of Accounts**

CSPFGLLC will review and monitor client accounts managed by Matson Money, Inc. at least annually with the client.

All financial plans prepared are reviewed upon financial plan creation and plan delivery by Charles Arthur Pettit Jr, Investment Adviser Representatives of CSPFGLLC. Financial planning clients are provided a one-time financial plan concerning their financial situation. With respect to financial plans, CSPFGLLC's services will conclude upon delivery of the written financial plan. Clients may request additional plans or reports for an additional fee. After the presentation of the plan, there are no further reports.

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

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

Other than its compensation for its recommendation and engagement of third party investment advisers, CSPFGLLC does not receive any economic benefit, directly or indirectly from any third party for advice rendered to CSPFGLLC's clients.

### **B. Compensation to Non - Advisory Personnel for Client Referrals**

CSPFGLLC does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

## **Item 15: Custody**

Matson Money calculates and withdraws the fee based on the negotiated rate memorialized in the client contract; Matson Money does not bill clients directly. CSPFGLLC does not directly deduct the advisory fees. Fees are paid quarterly in advance. The client will receive a statement directly from the custodian. The client will receive an invoice either from Matson Money or CSPFGLLC. When advisory fees are deducted directly from client accounts by Matson Money at client's custodian, Matson Money will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

## **Item 16: Investment Discretion**

CSPFGLLC does not have discretion over client accounts at any time.

## **Item 17: Voting Client Securities (Proxy Voting)**

CSPFGLLC will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

## **Item 18: Financial Information**

### **A. Balance Sheet**

CSPFGLLC neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither CSPFGLLC nor its management has any financial condition that is likely to reasonably impair CSPFGLLC's ability to meet contractual commitments to clients.

### **C. Bankruptcy Petitions in Previous Ten Years**

CSPFGLLC has not been the subject of a bankruptcy petition in the last ten years.