



Form ADV Part 2A Appendix 1

*Strategic Blueprint Advisor Directed Program*  
**Wrap Fee Brochure**

This wrap fee brochure provides information about the qualifications and business practices of Strategic Blueprint, LLC ("Strategic Blueprint"). If you have any questions about the contents of this Brochure, please contact us at (678) 954-4130. 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.

Strategic Blueprint is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. Additional information about Strategic Blueprint (CRD #284840) also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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**November 15, 2023**

## ITEM 2 – MATERIAL CHANGES

The Strategic Blueprint, LLC (“Strategic Blueprint”) published its annual update of the Brochures on **March 31, 2023**.

Revisions since the previous annual update include:

1. On August 15, 2022, Risk Disclosures in Item 8 in ADV Part 2A and Item 6 of Appendix 1 were further enhanced.
2. On December 17, 2022, Item 14 in ADV Part 2A and Item 9 of Appendix 1 were revised to describe the availability of certain alternative investments for managed accounts, and to update the disclosure of Client Referrals.
3. In the March 31, 2023 version, Item 4 in ADV Part 2A were revised to reflect that investment management is not a service offered through a Subscription Agreement but is offered only through an Investment Management Agreement.
4. On April 21, 2023, Item 4 in Appendix 1 was updated to disclose that Fidelity levies a \$20 surcharge on certain funds that are designated “Non-Participating CUSIPs”. This is in addition to the customary \$20 transaction fee for mutual funds.
5. On September 5, 2023, Items 12 and 14 of ADV Part 2A and Item 9 of Appendix 1 were amended to reflect the qualified custodians we recommend.
6. On November 15, 2023, Item 4 in ADV Part 2A was revised to reflect the additional service being offered by a third-party order management system.
7. On November 15, 2023, Item 5 in ADV Part 2A and Item 4 of Appendix 1 were revised to include a new sub-adviser arrangement with Schwab Personalized Indexing <sup>TM</sup>.

### Annual Update

We will provide you a Summary of Material Changes to this and subsequent Brochures within 120 days of the close of our business fiscal year (December 31). We may provide other ongoing disclosure information about material changes as necessary.

### Brochure Availability

We will provide our most current Brochure upon request at any time, without charge. Our Brochure may be requested by contacting our Chief Compliance Officer at (678) 954-4130.

Additional information about Strategic Blueprint (CRD #284840) and its Advisory Representatives is available on the SEC’s web site at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

(Changes Rev. 11.15.2023)

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## ITEM 4 – SERVICES, FEES AND COMPENSATION

Strategic Blueprint, LLC (“Strategic Blueprint”) is an Investment Adviser registered with the Securities and Exchange Commission (“SEC”). Strategic Blueprint is an Atlanta-based Georgia corporation, formed in 2016, and a wholly owned subsidiary of SFA Holdings, Inc. (“SFAH”).

Through its network of independent Advisory Representatives, Strategic Blueprint offers a range of advisory services. Advisory Representatives will market their services under doing-business-as names (“DBAs”), as disclosed in their respective ADV Part 2B Supplements. They will use these DBAs and their respective logos in their marketing, reporting and communications.

As of December 31, 2022, Strategic Blueprint managed assets valued at approximately \$1.647 billion, with \$1.60 billion on a discretionary basis and approximately \$47 million on a non-discretionary basis. Additionally, Strategic Blueprint has approximately \$7 million in assets under advisement.

### **PROGRAM DESCRIPTION**

Strategic Blueprint offers portfolio management through its *Strategic Blueprint Advisor Directed Program* (“the Program”). Our Advisory Representatives work with you to develop long term, individualized strategies to help meet your investment goals through portfolio design, asset allocation, portfolio monitoring, and consolidated reporting.

You may invest in no-load or load-waived mutual funds, variable products, stocks, bonds, illiquid alternative investments, exchange traded funds, commercial paper, money market shares, and CDs, according to your needs, goals, objectives, and preferences. Your Advisory Representative may also recommend an independent, third-party asset manager or strategist to manage or sub-advise all or part of your portfolio. The Program is available to individual clients, high net worth individuals, pension and profit-sharing plans, corporations, trusts, estates, charitable organizations, and other business entities.

Before participating in the program, your Advisory Representative will consult with you to help determine your financial situation, including investment history, goals and objectives, risk tolerance, and special interests or concerns. Based on this consultation, your Advisory Representative will recommend a portfolio intended to meet your identified goals.

Your Advisory Representative will assist you in establishing a brokerage account with a qualified custodian which will provide clearing and custody for your account(s).

Your Advisory Representative will review the strategy periodically and may recommend changes in the asset allocation among securities as market conditions and/or your

circumstances change. It is important that you contact your Advisory Representative if your financial situation or objectives change.

Management of Participant Directed Accounts. Strategic Blueprint engages an unaffiliated third-party order management system to facilitate management of participant directed accounts, e.g., your 401(k), 403(b) account. This service is available for most, but not all, participant directed plans. Strategic Blueprint will not have custody of your funds or access to your personal log-in credentials. Management fees will be deducted from a separate non-qualified account specified by you. You will receive a link to connect your participant directed account to the platform which will then authorize your Advisory Representative to have access to trade in your account. Your Advisory Representative will review the current allocations and rebalance and/or reallocate consistent with your investment goals and risk tolerance and in accordance with the Investment Management Agreement. Your Advisory Representative cannot make withdrawals from or liquidate your account.

### **SUB-ADVISER MANAGERS**

Your Advisory Representative may recommend allocating all or a portion of your portfolio to be managed by a third-party asset manager. You may authorize your Advisory Representative to use discretion in selecting the manager, and the amount of your portfolio so allocated. There are generally additional costs associated with using the services of a sub-adviser. You will generally be required to grant trading authority in writing to the sub-adviser through the sub-adviser's or custodian's related documents. Certain asset managers make model portfolios available through the account custodian.

Strategic Blueprint has entered into agreements with the following asset managers to provide Sub-Advisory services:

- **BAM Advisor Services, LLC**

Firm may employ the services of BAM Advisor Services, LLC ("BAM") d/b/a Loring Ward ("Loring Ward") as a Strategist to develop and implement portfolio allocations or model portfolios using DFA Funds for all or part of a client's assets. If Advisory Representative recommends these services, Client will receive a copy of Loring Ward's ADV Part 2A Disclosure Brochure.

Client portfolios and/or allocations will be determined by the Advisory Representative based on the Client's stated objectives and financial profile. Services are paid for directly through advisory fees billed to the client or are indirectly paid by Strategic Blueprint, as disclosed in your *Investment Management Agreement*. Loring Ward is an unaffiliated investment adviser registered with the Securities and Exchange Commission.

Loring Ward does not have investment discretion over client assets and does not select the custodian for the accounts it sub-advises. Neither Strategic Blueprint nor Loring Ward seeks better execution services or prices from brokers or dealers other than the custodian chosen by the client, which may result in the client paying higher commissions, transaction costs or spreads, or receiving less favorable net prices on transactions for the client's account.

For certain retirement plans, Strategic Blueprint also works in coordination and support with Loring Ward whereby a retirement plan will engage both Strategic Blueprint and Loring Ward for services, including Loring Ward selecting plan investments according to the goals and objectives of the plan.

Loring Ward periodically sponsors educational seminars for the benefit of Strategic Blueprint and its clients. Such educational seminars provide Strategic Blueprint with access to information and ideas regarding practice development, client servicing, investment strategy, relationship management and financial planning. Attendance expenses associated with such educational seminars will generally be paid or reimbursed, either in whole or in part, by Loring Ward.

Loring Ward has an agreement with Strategic Blueprint's affiliate, SFA, to compensate SFA for its supervision and marketing opportunities for SFA's registered representatives who are associated with unaffiliated investment advisers based on the assets referred to Loring Ward by those representatives.

Strategic Blueprint may recommend, based on the client's objectives and risk tolerance, that client invest in shares of the SA Funds – Investment Trust (the "SA Funds"), a family of ten asset class mutual funds that are advised, managed, and administered by Loring Ward. The majority of SA Funds are sub-advised by DFA in the same asset classes as selected DFA Funds. The SA Worldwide Moderate Growth Fund is not subadvised as it invests in underlying SA funds. Loring Ward does not charge sub-adviser fees directly on investments into the SA Funds because Loring Ward, as adviser to the funds, receives certain fees and expenses directly from the SA Funds, as disclosed in each SA Fund's prospectus. Additionally, Loring Ward pays Strategic Blueprint five basis points (.05%) on the value of the SA Funds in your account, which offsets the platform fee charged by Strategic Blueprint for sub-advisers. This is paid from Loring Ward's proceeds and does not increase the cost of the SA Funds to you. Because Loring Ward does not charge a sub-adviser fee for assets allocated to SA Funds, you will pay a lower overall advisory fee, but the internal fees and expenses of the SA funds are generally higher than those of DFA funds. Please discuss with your Advisory Representative and review the prospectus carefully.

▪ **Frontier Asset Management (Frontier)**

Frontier develops and implements strategies based on return objectives and stated risk tolerance, using open-ended mutual funds and ETFs. Strategies include:

- Globally Diversified
- Alternative Strategies
- ETF Strategies
- Asset Allocation

Frontier is an unaffiliated investment adviser registered with the Securities and Exchange Commission. If your Advisory Representative recommends allocating all or a portion of your portfolio to one of the Frontier strategies, we will provide you with a copy of Frontier's ADV Part 2A Disclosure Brochure.

Frontier asset management is also made available through SMArtX (see below). While Frontier fees may be lower through SMArtX, the total costs will be slightly higher due to the additional costs and fees associated with utilizing the SMArtX platform.

▪ **SMArtX Advisory Solutions LLC (SMArtX)**

SMArtX is an unaffiliated investment adviser and technology platform which offers a selection of investment strategists and managers. Your portfolio will be allocated among one or more strategists in a unified managed account. The portion of your account managed by a strategist is called a sleeve within your portfolio. A portion of your portfolio can also be allocated to a sleeve which your Advisory Representative will manage with an allocation among stocks, bonds, funds and/or ETFs.

▪ **Symmetry Partners, LLC (Symmetry)**

Symmetry is an unaffiliated investment adviser which creates investment strategies and portfolio models utilizing open-end mutual funds and ETFs. Additionally, Symmetry advises the Symmetry Panoramic Funds, a group of mutual funds from which it directly receives a management fee.

▪ **55ip**

55ip is an investment strategy platform that focuses on tax efficiency. It is wholly owned by J.P. Morgan, which is unaffiliated with Strategic Blueprint. 55ip applies its tax efficiency trading strategies to Blackrock, Fidelity, and certain Frontier ETF models.

▪ **Zacks Investment Management, Inc.**

Zacks Investment Management, Inc. ("Zacks") is an unaffiliated investment adviser wholly owned by Zacks Investment Research. It offers ETF models and customized equity and debt SMAs using independent research.

▪ **Schwab Personalized Indexing™**

Schwab Personalized Indexing™ offers tax-efficient portfolio management to manage gains and losses at the individual holding level. Strategies include:

- Schwab 1000 Equity
- S&P Small Cap 600®
- MSCI KLD 400 Social
- MSCI EAFE International

Schwab Personalized Indexing™ is provided by Charles Schwab Investment Management, Inc., an unaffiliated investment adviser wholly owned by The Charles Schwab Corporation.

### **THIRD-PARTY MANAGED SEPARATELY MANAGED ACCOUNTS (“SMAs”)**

Separately managed accounts, or SMAs, are portfolios of individual securities managed by an investment adviser. When you invest in an SMA, you directly own all securities in the account. There are SMAs managed by third party asset managers available through the custodians which do not require a separate agreement between the asset manager and Strategic Blueprint in order for Advisory Representatives to recommend them.

When your Advisory Representative recommends one of these SMAs, you will receive the asset manager’s Form ADV, complete the respective asset manager’s application, and grant trading authorization to that manager.

### **FEES, BILLING AND COMPENSATION**

Strategic Blueprint offers two fee structures: an All-Inclusive Account (“Wrap Fee”) in which you pay an asset-based fee or a flat fee (“Advisory Fee”) that includes transactions costs; and a Non-Inclusive Account (“Non-Wrap Fee”) in which you pay the transactions costs in addition to the Advisory Fee. Advisory Fees are negotiable and are fully described in the *Investment Management Agreement* for services (“Agreement”).

#### **(1) Asset Based Fee**

The Asset Based Advisory Fee, as negotiated with your Advisory Representative, is based on an annualized percentage of the value of the billable assets in the Program Account. The fee will be assessed and billed monthly or quarterly (“billing period”) in arrears, as specified in your Agreement. The fee for any given billing period is debited by the custodian from your account at the beginning of the next billing period. It is calculated based on the average daily balance of the Program Account as determined by the custodian. The average daily billable balance is multiplied by the annual Advisory Fee specified in your Agreement, multiplied by the number of days in the billing period, then divided by 365 (number of days in the year). Your account statement will show the fee for the billing period.

The first fee will be billed at the beginning of the next billing period following execution of the Agreement and the funding of your account. The fee will be based upon the average daily balance for the number of days for which the Account was funded during the period.

#### **(2) Flat Fee, as negotiated with your Advisory Representative.**

Fees may also be charged as an annual Flat Fee, charged in equal monthly or quarterly payments in arrears, as negotiated with your Advisory Representative and specified in your Agreement. The annual Flat Fee will be negotiated based on your specific circumstances,

including the complexity of your financial situation, size and number of accounts. Your account statement will show the fee deduction for the billing period.

The fee will not decrease or increase because the value of the account fluctuates. Fees based on the assets under management are calculated on the average daily balance of the account. When paying a Flat Fee, Client may pay more, or less, than if the portfolio management fee were based on the daily value of the assets in the account, as described above.

If the account is funded at any time other than the first day of a billing period, the payment will be prorated based on the number of days in the billing period that the account was funded and calculated by multiplying the number of days by the total fee divided by 365 (the number of days in the year).

#### Additional Fee Information:

The Advisory Fee does not include the expenses associated with the underlying securities in your portfolio (e.g., internal expenses), fees charged by strategists or funds selected by sub-advisers, or the miscellaneous fees described below under "FEES NOT INCLUDED IN THE ADVISORY FEE."

The Advisory Fee is negotiated with your Advisory Representative for managing your Account(s). The Advisory Fee you pay may differ from the fees negotiated by other clients for similar services.

Through execution of the Agreement, you authorize us in writing to direct your custodian to pay the Advisory Fee directly to us by charging your account. Additionally, you acknowledge that securities will be liquidated to cover the Advisory Fee if the account does not have sufficient cash at the time the Advisory Fee is assessed.

Following are the maximum asset-based advisory fees assessed by Strategic Blueprint for this program:

#### **THE PROGRAM FEES**

<b>Account Value</b>	<b>All- Inclusive Maximum Annual Asset- Based Advisory Fee</b>	<b>Non-Inclusive Maximum Annual Asset- Based Advisory Fee</b>
First \$250,000	2.25%	2.15%
Next \$250,000 to \$500,000	2.15%	2.05%
Next \$500,000 to \$1,000,000	2.00%	1.90%
Next \$1,000,000 to \$2,000,000	1.75%	1.65%
Next \$2,000,000 to \$5,000,000	1.50%	1.40%
Above \$5,000,000	1.25%	1.15%
*All fees are negotiable.		

The annual Flat Fee for asset management will be negotiated based on the amount of assets, the complexity, and the range of services provided. All fees are negotiable.

*Please note that if you agree to different fee schedules for different accounts, you will not benefit from the breakpoints in the tiered schedule. Please review the fee schedule with your Advisory Representative.*

#### **Advisory Fees Charged to Variable Annuities**

- Some issuers will allow the deduction of advisory fees from the sub-accounts of the variable annuity.
- The maximum advisory fees charged to variable annuity assets is 1.5% of the contract's cash value.
- Advisory fees cannot be deducted from commission-based variable annuities.
- The advisory fees charged against an annuity contract must be for the services performed by the investment adviser for that contract only.
- Advisory fees are withdrawn first from the earnings of the annuity contract and will not reduce the cost basis.

#### **Advisory Fees Charged to Participant Directed Accounts**

- The order management system platform fee is charged to Strategic Blueprint which passes this cost to your Advisory Representative.
- The Advisory Fee you will pay is the negotiated rate described in your Investment Management Agreement (IMA).
- The fee cannot be deducted from your participant account but must be deducted from a separate non-qualified account specified by you in the Participant Directed Account Addendum to the IMA.
- These accounts may be terminated with written notice at least 30 days in advance.

#### **Transaction Charges in the All-Inclusive Program**

No transaction or custody charges are assessed for transactions in these accounts.

Transaction costs are paid by your Advisory Representative out of the Advisory Fee. Certain nominal fees and charges beyond Strategic Blueprint's control, such as reorganization charges, termination fees, wires, and postage, are assessed against the account by the custodian. Fees associated with Sub-Advisers are not included in the All-Inclusive Program fee unless negotiated with your Advisory Representative and detailed in your Agreement Fee Schedule. If you purchase alternative investments, the custodian will charge an annual fee per position to hold the investment in your account. These fees are disclosed in Appendix B to the Advisory Agreement. Please also refer to "FEES NOT INCLUDED IN THE ADVISORY FEE" below.

The All-Inclusive Program option is not available for those accounts managed all or in part through the Schwab Select or Access solutions on its Managed Account Platform.

#### **Transaction Charges for Non-Inclusive Program**

Schwab does not charge for transactions in individual securities (e.g., stocks, bonds, ETFs).

Transaction fees will be charged by Schwab (1) on a per transaction basis of \$15.00 for each mutual fund transaction and \$0.65 per options contract, or an asset-based pricing of ten basis points (.0010) with a \$15/month minimum charge. There is no transaction or custodial fee for alternative investments purchased through Schwab's OneSource® or Alternative Investment Marketplace™ platforms. There is a custodial fee of \$200 per position, with a maximum per account charge of \$400 for alternatives not purchased through those platforms. If sub-advisers are used, their fees will be charged separately.

Fidelity does not assess transaction fees for householded accounts under \$1M which are enrolled for eDelivery or for all householded accounts in excess of \$1M. For all other accounts, the transaction fee is \$4.95 for individual securities, with an additional \$0.01 per share premium for all orders and allocations to any individual account over 10,000 shares. And, there is a \$0.65 per contract fee for options. There are no transaction fees for Fidelity retail, advisor, or money market funds. Certain funds are designated as NTFs (see below). There is a \$20 transaction fee on other funds. There is an additional \$20 surcharge on transactions for certain "Non-Participating CUSIPs" which are funds in Fidelity's FundsNetwork Program that do not pay a servicing fee to Fidelity. Alternative Investments incur a \$100-\$125 transaction fee, plus \$125 per position annual custody fee, with a maximum account charge of \$500. Alternatives available through the Alternative Investment Network® incur no annual custody fee and certain alternatives on this platform can be purchased with no transaction fee.

Consideration should be given to the size of your account and the number of transactions during a period of time. The method of payment for transactions is specified in the Agreement. Certain nominal fees and charges beyond Strategic Blueprint's control, such as reorganization charges, termination fees, wires, and postage, are also assessed against the account. The Non-Inclusive Program is not available for accounts for which Fidelity is the account custodian.

Commissions and other fees for transactions executed through the custodian(s) we recommend may be higher than commissions and other fees available if you use another custodian firm to execute transactions and maintain custody of your account.

Custodians make certain mutual funds available for no transaction fees. These No Transaction Fee Funds ("NTFs") generally have higher expense ratios and the custodian receives additional compensation from the fund company. When your Advisory Representative recommends or selects funds which are not on the NTF Fund list, in the Non-Inclusive Program you will pay transaction fees, the cost of which may reduce the performance of the portfolio. In considering NTFs over other funds or share classes of the same fund, your Advisory Representative will consider the frequency of expected trading relative to the higher expense ratio, and the potential impact on your portfolio.

The scheduled Advisory Fees for the All-Inclusive Program are higher than the Non-Inclusive Program because transaction charges are paid by your Advisory Representative out of the Management Fee. This may create an incentive for your Advisory Representative to limit the number or type of transactions in your account. Your Advisory Representative will consider these costs when negotiating the Management Fee with you. When deciding whether to select an All-Inclusive or Non-Inclusive account, you should base your decision upon trading activity anticipated and the types of securities utilized in the account.

Please consider that Schwab has eliminated commissions for trades of equities, ETFs, and options (subject to \$0.65 per contract fee). This means that, in most cases, when we buy and sell these types of securities in your account, we will not have to pay any commissions to the custodian. We encourage you to review the custodian's pricing to compare the total costs of entering into a wrap fee arrangement versus a non-wrap fee arrangement. If you choose to enter into a wrap fee arrangement, your total cost to invest could exceed the cost of paying for brokerage and advisory services separately. We remind you that advisory fees are negotiable.

Depending upon the level of the wrap fee charges, the amount of portfolio activity in the account, the value of services provided under the investment program, and other factors, the wrap fee may cost you more than the aggregate cost of services if they were provided separately. Therefore, Advisory Representatives may have a financial incentive to recommend the wrap fee program over other programs or services. Generally, wrap programs are relatively less expensive for actively traded accounts. However, they may result in higher overall costs to you in accounts that experience little trading activity.

Please review the trading activity in your account when you receive statements.

### ***Sub-Adviser Fees/SMA Manager Fees***

<b>Sub-Adviser</b>	<b>Strategic Blueprint Platform Fee</b>	<b>Sub-Adviser Fee</b>	<b>Total Sub-Adviser Fee</b>
Frontier	0.05%	0.35%	0.40%
Loring Ward (BAM)	0.05%	0.15%	0.20%
SMArtX	0.05%	0.12%	0.17%
SMArtX Platform Only	0.05%	0.07%	0.12%
Symmetry Panoramic Models	0.05%	0.05%	0.10%
Symmetry Precision Core Models	0.05%	0.15%	0.20%
55ip – Blackrock Models	0.05%	0.00%	0.05%

<b>Sub-Adviser</b>	<b>Strategic Blueprint Platform Fee</b>	<b>Sub-Adviser Fee</b>	<b>Total Sub-Adviser Fee</b>
55ip – Fidelity Models	0.05%	0.00%	0.05%
55ip – Frontier ETF Models	0.05%	0.25%	0.30%
Zachs – Model Portfolios	0.05%	0.28%	0.33%
Zachs – SMAs	0.05%	0.18%	0.23%
Schwab Personalized Indexing™	0.05%	0.12%	0.17%
SMA Managers	0.05%	See Manager ADV and Fee Disclosure	See Manager ADV and Fee Disclosure

These fees do not include the fees and expenses associated with the underlying investments or strategists and funds available through Sub-Advisers and SMAs.

Sub-Adviser Fees will appear on your quarterly statement as a separate Advisory Fee from the fee charged by Strategic Blueprint. If all or a portion of your portfolio is sub-advised by SMArtX, then the total SMArtX fee plus the strategists' fees will be combined and appear on your statement as a single charge. The strategist fees are not included in the Maximum Annual Asset-Based Advisory Fee.

Certain SMA asset managers may charge their fees in advance, rather than in arrears. This will be described in the respective Form ADV, and on the Fee Schedule.

Your Advisory Representative does not receive any portion of Strategic Blueprint's Platform Fee described above.

Currently, there is no additional Sub-Adviser fee associated with 55ip for BlackRock or Fidelity Models. 55ip bills monthly in arrears but the Strategic Blueprint platform fee and Advisory Fee are billed monthly or quarterly as specified in your Management Agreement.

#### **SCHWAB INSTITUTIONAL INTELLIGENT PORTFOLIOS®**

Schwab offers a platform with advisor-directed model portfolios and automated rebalancing. If your Advisor Representative recommends allocating a portion of your portfolio to this platform, Schwab will require that at least four percent (4%) of the assets in each investment strategy be allocated to cash. This cash is placed in an FDIC-insured deposit account at Schwab Bank, on which Schwab Bank will earn interest.

#### **FEEES NOT INCLUDED IN THE ADVISORY FEE**

In addition to the Advisory Fee, depending on the securities in your portfolio and the type of

account, your investment account may also be charged:

- internal fees and expenses charged by mutual funds, index funds, ETFs and variable annuities (as disclosed in the respective prospectuses);
- custodial fees for alternative investments;
- mark-ups, mark-downs, and spreads paid to market makers;
- fees (such as commission or mark-up) for trades executed away from the custodian of your accounts at another broker-dealer;
- Sub-Adviser and strategist fees;
- interest charges and associated fees, and expenses associated with use of margin;
- maintenance and termination fees for IRAs, certain retirement, and qualified accounts;
- miscellaneous fees such as wire transfer fees; and,
- other fees and taxes on brokerage accounts and securities transactions.

Mutual fund companies, ETFs, and variable annuity issuers charge internal fees and expenses for their products. These fees and expenses are in addition to any advisory fees charged by us. Class B, C, and similar mutual fund shares, and variable products held in accounts may incur sales charges when sold or redeemed. Complete details of these internal fees and expenses are explained in the prospectuses for each investment. We encourage you to read these documents before making or authorizing any investments. Your Advisory Representative will be available to answer any questions you have about fees and expenses. Your Advisory Representative will work to identify share classes designed for managed accounts which will generally have lower expenses.

Advisory fees on Program Accounts with margin are calculated based on the gross market value of all securities within the account. This will result in a higher fee billed to the account than if the margin debt were subtracted from the total market value of the account.

#### STRATEGIC BLUEPRINT AND ADVISORY REPRESENTATIVE COMPENSATION

The Advisory Representative managing your Program account will receive a substantial portion of the advisory fee paid to Strategic Blueprint as a result of his/her services and the client's participation in the Program. In the all-inclusive program, your Advisory Representative will pay the transaction fees resulting from trading in your account. Payment of these transaction fees may incent your Advisory Representative to limit trading activities in your account. In negotiating your advisory fee, you and your Advisory Representative should take these charges and the amount of anticipated trading into consideration. The amount of this compensation may be more or less than the amount the Advisory Representative would receive if you participated in other company programs or paid separately for investment advice, brokerage, and other services.

Strategic Blueprint charges its Advisory Representatives for the services it provides to support their advisory business, including performance reporting software, email and document archiving, and reimbursement for a Client Relationship Management system.

When you purchase mutual fund shares or alternative investments through the custodian, you will pay a transaction fee that would not be charged if the transaction were made directly through the issuer. Also, mutual funds held in accounts at brokerage firms may charge internal fees that are different from mutual funds held at the mutual fund company. Internal fees and expenses of funds are described in their respective prospectuses.

If you purchase investments directly through the issuer, they will not be part of our advisory relationship with you. This means that they will not be included in our investment strategies, investment performance monitoring, or investment reallocations.

Generally, only securities purchased at Net Asset Value ("NAV") or advisor share class securities may be deposited into a managed account.

Other securities may be deposited into a managed account with the following limitations:

- No advisory fees will be assessed on alternative investments on which sales compensation was paid to the Advisory Representative in his/her capacity as a registered representative of SFA; and
- No advisory fees will be assessed on alternative assets (e.g., private funds) which are purchased in your Program account(s) for which fee is paid to Strategic Blueprint for it promoting the asset sponsor by endorsement or testimonial. Any such fee will be disclosed to you in the Disclosure Statement.

Such investments may be held in a managed account, but marked as non-billable, during the designated period.

Exceptions will only be made if there is a strong, documented, and practical reason for doing so. Exceptions must be authorized in writing by the Chief Compliance Officer or the Chief Supervisory Officer and accepted by you.

Certain third-party advisors, mutual fund companies, alternative product sponsors, insurance companies, and other product vendors agree to pay directly or indirectly additional compensation to Strategic Blueprint's affiliate, SFA. This additional compensation may include, but is not limited to, due diligence costs, marketing allowances, cash or non-cash support for conferences, meetings and/or functions. These companies may also provide software, training or other tools and services to facilitate Representatives' business.

Currently, Strategic Blueprint does not receive additional cash or non-cash compensation as described above, except through the custodians' programs described below in Section 9. However, Advisory Representatives will benefit when they are also registered representatives of SFA and when they participate in SFA-sponsored conferences and educational events.

A list of those companies that provide additional compensation and marketing support is available in the *Additional Sources of Financial Benefits to Strategic Blueprint* disclosure at [www.strategicblueprint.net](http://www.strategicblueprint.net), by emailing [info@strategicblueprint.net](mailto:info@strategicblueprint.net), or calling the Chief Compliance Officer at 678-954-4130.

### **NEGOTIATION OF FEES AND COMPENSATION**

Management Fees are negotiated on a case-by-case basis, depending on a variety of factors, including the nature and complexity of the particular service, your relationship with Strategic Blueprint and your Advisory Representative, the size of the Account, the potential for other business or clients, the amount of work anticipated, and the attention needed to manage your Account. Your Advisory Representative may negotiate fees that are higher or lower than those negotiated by other Strategic Blueprint Advisory Representatives for similar services. Please note that the same or similar services to those described above may be available through other providers at a lower cost.

Advisory Fees can be negotiated but not waived for the All-Inclusive program, in which the transactions fees are included in the management fee. Accounts where Advisory Fees are waived will be transferred to the Non-Inclusive program, in which the transaction fees are charged to the account holder separately from the Advisory Fee.

### **OPTIONAL LIMITED TRADING AUTHORIZATION/DISCRETION**

You may choose to grant limited trading authorization in order to facilitate management of portfolios consistent with your stated investment objectives. This limited authority gives investment discretion as to the selection of securities, number of shares to be bought or sold, and the time of execution.

Discretion applies only to the selection and amount of general securities, including stocks, bonds, commercial paper, money market shares, and exchange traded funds; variable insurance sub-accounts; and, open-end and closed-end mutual funds bought and sold in your Account. Discretion may also be authorized for the selection of third-party asset managers (co-advisers or sub-advisers) to manage all or a part of your portfolio. This discretionary authority would permit your Advisory Representative to reallocate among managers.

Variable annuity contracts and alternative investments, including private placements, direct participation programs, and non-traded REITs, may not be purchased on a discretionary basis. Public, non-traded preferred stock of public REITs (if available on the custodian's platform) and interval funds may be purchased on a discretionary basis in your account, unless otherwise restricted by you. These investments may have limited liquidity (for example, tiered redemption fees or quarterly, rather than daily, liquidity). You may restrict these types of investments in your account by indicating your preferences in your *Agreement*.

Discretion does not extend to deposits into or withdrawals from accounts. All Program accounts are held at, and trades executed through, a qualified custodian. Currently, Strategic Blueprint

will recommend TD Ameritrade, Schwab, or Fidelity Brokerage Services, LLC. We are independently owned and operated, and are not affiliated with any of the recommended custodians.

You must authorize discretion in writing, through the *Discretionary Investment Management Agreement*, and you may withdraw the authorization, in writing, at any time. Advisory Representatives must receive the approval of Strategic Blueprint's Chief Supervisory Officer and Executive Vice President (or their designees) prior to offering discretionary portfolio management.

You may choose a *Non-Discretionary Investment Management Agreement*, which requires your Advisory Representative to confer with you before causing a transaction in your Account. When your account is managed on a non-discretionary basis, your Advisory Representative will make recommendations, but you will ultimately make decisions related to purchase and sale of securities in your account.

## **TERMINATION**

You and Strategic Blueprint have the right to terminate the Agreement and advisory relationship at any time with or without cause. Termination is effective within 30 days of receipt of your notice to Strategic Blueprint, unless a later date is requested in your notice and agreed to by Strategic Blueprint. For your convenience, Strategic Blueprint may accept your request for termination by telephone. You may terminate your Agreement without penalty within five business days of executing the Agreement.

If the Agreement is terminated before the end of a billing period (during a quarter), the Advisory Fee will be prorated for the number of days during the billing period in which services were provided.

If you choose to terminate an Account within the first calendar year after the Account is opened, you will be assessed a fee ("Administrative Fee") of \$200 to defray initial account setup and administration costs. Such a fee may be paid in the same manner as the Advisory Fee.

Strategic Blueprint may waive the Administrative Fee in its sole discretion. You will be responsible for any transactions initiated prior to termination. Such redemption or liquidation may affect the asset allocation and/or market value of the Account and may also have tax consequences. In addition, early redemption fees or similar fees for mutual funds and other products may be applicable as described in the product's prospectus or other offering documents. Certain assets that may be transferred or held in the Account may not be accepted by another investment adviser or custodian. Strategic Blueprint will use reasonable efforts to follow your instructions regarding the disposition of Account assets; however, assets that are not accepted by the receiving investment adviser or broker-dealer may require liquidation.

## ITEM 5 – ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS

Strategic Blueprint requires a minimum account size of \$25,000 for managed accounts. . This minimum account size serves as a guideline. Strategic Blueprint, at its sole discretion, may waive this minimum account requirement and the minimum account fee.

Should the value of your managed account fall below the minimum requirement of \$25,000 and remain 20% below the minimum (or below \$20,000) for two consecutive quarters, then the advisory contract can be terminated, and the assets would no longer be managed. It may be recommended that the assets be transferred to a non-managed brokerage account.

Strategic Blueprint provides investment advisory services to individuals, high net-worth individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations, and other business entities.

## ITEM 6 – PORTFOLIO MANAGER SELECTION AND EVALUATION

Your Advisory Representative is the sole portfolio manager available with respect to the Program. Please refer to your Advisory Representative's Supplement to this Brochure for information about his or her education and business experience. Your Advisory Representative must be properly registered, have at least five years' experience in the financial services industry (or equivalent experience as determined by Strategic Blueprint), and be approved by Strategic Blueprint's management as a portfolio manager in the Program.

When your Advisory Representative works with another Advisory Representative in partnership to manage your account, you will receive the Supplement for each Advisory Representative.

Affiliated and unaffiliated service providers may develop asset allocation models. Your Advisory Representative may also develop asset allocation models or use others from outside independent sources. Each representative develops his or her own methods of analysis, sources of information, and investment strategies. As such, recommendations by representatives, individual investment portfolios, and performance will differ.

Your Advisory Representative will manage accounts on an ongoing basis. At least annually (or more frequently, as agreed), your Advisory Representative will review accounts with you to discuss the portfolio and performance, any changes in your financial profile or investment goals, and recommend changes that may be warranted.

The account custodian will provide quarterly brokerage statements, and monthly brokerage statements for months in which there is account activity. Performance reports are made available to you as agreed with your Advisory Representative. You can contact your Advisory

Representative or the Strategic Blueprint home office at 678.954.4130 when you have questions or concerns about your account, financial situation, or investment needs. Please note that your Advisory Representative may not be readily available for unscheduled or unannounced visits or calls.

### **CLIENT TAILORED SERVICES AND CLIENT IMPOSED RESTRICTIONS**

Your Advisory Representative develops and recommends a strategy based on the information you provide about your financial profile using his or her knowledge and experience. It is very important that you communicate changes in your information so your Advisory Representative can make recommendations and manage your account in a manner that is consistent with your objectives, risk tolerance, and time horizon. You may impose reasonable restrictions on the manner in which your account is managed, such as limiting investments to certain types of securities or asset classes, in accordance with your values, beliefs, or preferences.

### **WRAP FEE PROGRAMS**

You may select the All-Inclusive Program ("wrap fee program") in which the asset-based Advisory Fee includes transaction fees assessed by the account custodian. Alternatively, you may select a program in which you pay transaction fees in addition to the Advisory Fee. You and your Advisory Representative, together, agree on the asset-based fee applied to the management of the account ("Advisory Fee"), based on the program's published maximum fee schedule. We do not manage the All-Inclusive program accounts in a manner different from the Non-Inclusive Program accounts, except as mentioned above. The All-Inclusive Program is more suitable when the portfolio strategy includes more active trading and includes mutual funds.

Strategic Blueprint will offer wrap fee and non-wrap fee programs sponsored by third-party asset managers. These programs are fully described, including fees and expenses, in their respective ADV Part 2A and/or Appendix 1 Disclosure Brochures. Disclosure brochures for these programs are available upon request to your Advisory Representative, at no charge.

### **OTHER ADVISORY SERVICES**

In addition to the investment management services through the Advisor Directed Program, Strategic Blueprint offers financial planning and investment consulting, as well as recommendations of and referrals to third-party asset managers. These services are described in Strategic Blueprint's ADV Part 2A Disclosure. The Brochures are available upon request at no charge.

### **PERFORMANCE-BASED FEES AND SIDE-BY-SIDE-MANAGEMENT**

Strategic Blueprint does not charge any performance-based fees (fees based on a share of capital gains or capital appreciation of the assets of a client).

Certain third-party asset managers may assess a performance-based fee, which will be described in the respective manager's disclosure brochure. In some cases, a portion of the

performance fee may be shared with Strategic Blueprint and Advisory Representative(s) as a solicitor's fee. Any such arrangement will be described to you in a written Solicitor's Disclosure Statement.

### **METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS**

Strategic Blueprint's Advisory Representatives may rely on various types of tools and methods to assist in recommending or selecting investment strategies, including asset allocation and various types of software. Strategic Blueprint's methods of analysis include charting analysis, fundamental analysis, technical analysis, and cyclical analysis. The main sources of information used to formulate investment advice and/or manage assets includes financial newspapers and magazines, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the SEC, and company press releases. The investment strategies used to implement any investment advice given to clients include long term purchases (securities held at least a year), short term purchases (securities purchased and sold within a year), margin transactions, and covered option writing. Investment returns are highly dependent on the value of underlying securities which are impacted by trends in the various investment markets.

We generally recommend stocks, bonds, ETFs, mutual funds, and alternative investments.

Investing in **stocks** involves the assumption of risk, including:

- Financial Risk: the risk that the companies we recommend to you may perform poorly, which will affect the price of your investment.
- Market Risk: risk that the Stock Market will decline, decreasing the value of the securities we recommend to you.
- Inflation Risk: the risk that the rate of price increases in the economy deteriorates the returns associated with the stock.
- Political and Governmental Risk: risk that the value of your investment may change with the introduction of new laws or regulations.

Investing in **bonds** involves the assumption of risk, including:

- Interest Rate Risk: the risk that the value of the bond investments we recommend to you will fall if interest rates rise.
- Call Risk: risk that your bond investment will be called or purchased back from you when conditions are favorable to the bond issuer and unfavorable to you.
- Default Risk: the risk that the bond issuer may be unable to pay you the contractual interest or principal on the bond in a timely manner, or at all.
- Inflation Risk: the risk that the rate of price increases in the economy deteriorates the returns associated with the bond.

Investing in **Exchange Traded Funds** ("ETFs") and **Exchange Traded Notes** ("ETNs") involves the assumption of risk, including:

- The public trading price of a redeemable lot of ETFs may be different from its net asset value. Declining stock prices can cause losses to your investment.
- Some **leveraged and inverse ETFs and ETNs** "reset" daily, meaning that they are designed to achieve their stated objectives on a daily basis. If held for a period longer than one day, their performance over the longer periods of time can differ significantly from the stated multiple of the performance (or the inverse of the performance) of their underlying index or benchmark during the same period of time. This effect can be magnified in volatile markets. High portfolio turnover will increase underlying fees and expenses.
- ETFs and ETNs linked to commodity futures do not offer direct exposure to the commodity's spot price and may perform differently than the spot price for the commodity itself.
- You should not assume that an ETF or ETN that is linked to commodity futures will provide an effective hedge because of a negative correlation with equities or other asset classes.

Investing in **mutual funds** involves the assumption of risk, including:

- **Manager Risk:** the risk that an actively managed mutual fund's investment adviser will fail to execute the fund's stated investment strategy.
- **Market Risk:** the risk that the Stock Market will decline, decreasing the value of the securities contained within the mutual funds we recommend to you.
- **Industry Risk:** the risk that a group of stocks in a single industry will decline in price due to adverse developments in that industry, decreasing the value of mutual funds that are significantly invested in that industry.
- **Inflation Risk:** the risk that the rate of price increases in the economy deteriorates the returns associated with the mutual fund.

Investing in **interval funds** involves the assumption of risk, including:

- **Liquidity Risk:** Interval funds, a type of closed-end mutual fund, are not traded on a secondary market; shares may be redeemed at intervals, generally quarterly; and the fund may limit the periodic redemptions to 5% or less of outstanding shares. If liquidation is requested, it could take more than one interval (e.g., quarter) to liquidate all the shares in your account.
- Interval funds generally invest in unlisted, more complex products such as real estate investment trusts and limited partnerships. These underlying non-traded investments are valued by the respective asset manager as of a specific date, so the valuation of an interval fund may vary from the fair market value of the investment that would be obtained if the underlying investments were sold to a third party.

Investing in **Alternative Investments (“Alternatives”)** involves the assumption of risk, including:

- Alternatives are generally more complex products which are not correlated to the general market, and include non-traded REITs, direct participation programs, private placements, private equity, hedge funds, and preferred stock of non-traded REITs.
- There may be no public market, so these Alternatives could not be sold quickly or rebalanced.
- Because there is no public market, the shares are not valued daily. An appraised value may be available only on a periodic basis and may not reflect the value you would obtain if a market did exist. The appraised value may be more or less than the amount you invested.
- Privately offered investments (e.g., Reg D programs) may not be valued until there is a liquidation event, which can be years after the initial investment. These investments are often valued by the issuer at the initial investment amount, which does not reflect the value you would obtain if a market existed. If these investments are included in your managed account, the advisory fee will be assessed on the value provided by the issuer as described in the offering memorandum, which could be the invested amount and not the true value of the asset.
- Alternatives are long-term investments. The holding period will vary by product before a liquidation event is executed.
- Many Alternatives are not registered with the SEC so do not afford the benefits of public disclosure and reporting.
- Many Alternatives are speculative. The risks associated with an investment are described in the offering documents. Read the offering documents carefully before investing.
- Privately offered, non-public investments classified as Alternatives may not be purchased on a discretionary basis in your account.
- The percentage of Alternatives held in a managed account will be limited based on your liquidity needs, net worth, investment objectives, risk tolerance, custodial limitations and any state or regulatory limitations.
- Additional fees may be assessed by account custodians related to holding certain alternative investments in managed accounts. Please refer to your custodian’s fee schedule.

Investing in **Real Estate Investment Trusts (“REITs”)** involves the assumption of risk, including:

- Changes in economic conditions and real estate markets can affect a REIT’s ability to deploy proceeds and can impact the REIT’s performance.
- A perpetual REIT has no specific liquidity event or liquidity date contemplated.

- There is not a public market for non-traded REITs so you will be unable to sell or reallocate your shares quickly. Limited redemption programs are described in the offering documents.

Investing in **Non-Traded Redeemable Preferred Stock** of publicly traded REITs involves the assumption of risk, including:

- There is no public market. After a required holding period (if any), shares may be redeemed.
- Some securities impose a sliding redemption fee, so if your investment is liquidated during the redemption period, you will pay a penalty which will lower the potential return on your investment.
- After the holding period, shares may be redeemed at par. In some cases, shares may be redeemed for shares of the issuer's common stock.
- There is market risk when you sell common shares of thinly traded stock.
- The underlying shares of the Non-Traded Redeemable Preferred are publicly traded, have ready liquidity.

The use of **Barrier and Buffered Notes** involves the assumption of risk, including:

- These Notes provide only limited downside protection against loss and only if the note is held to maturity.
- You can lose up to 100% of your principal invested in a Note if the reference asset(s) declines by more than the stated barrier or buffer level at maturity.
- Gains on the Notes are subject to a cap so you may not benefit from the full upside of the reference asset(s).
- These Notes lack liquidity. They are not listed on any securities exchange, but if a secondary market were to develop, the prices may be less or more than the original investment.
- Buffered Notes do not pay dividends. Payment at maturity of the Note will reflect cumulative performance.
- Some Barrier Notes may not pay dividends, while others may pay periodic dividends contingent on the performance of the reference asset(s).
- An automatic call feature associated with some Barrier Notes can force a potential early exit which would terminate future coupon payments.
- These notes are not obligations of a bank and are not guaranteed by any governmental agency or program of the United States or other jurisdiction.
- All payments on these Notes are subject to the creditworthiness of the issuer.

The use of **margin, options and short sales** are higher risk strategies:

- Option transactions are limited to writing covered calls, writing cash secured puts, purchasing options, and certain spread strategies. It is possible to lose all of the principal you invest.
- Option spreads are strategies that typically involve two or more options on the same underlying asset, but with different expiration dates or strike prices.
- Writing a covered call will limit upside potential of the underlying asset, in exchange for the premium earned. This strategy does not protect against downside risk of owning the asset.
- When writing cash secured puts, losses can be significant when the price of the stock falls and you are obligated to buy the stock at the strike price. This loss is reduced by the premium received for selling the put option.
- In a cash account, your risk is limited to the amount of money that you have invested. In a margin account, your risk includes the amount of money invested plus the amount that has been loaned to you.
- When you sell short, your losses can be infinite.

When funds in your managed account are allocated to **cash**, the funds will earn interest in a cash account or money market fund through the account custodian:

- Cash accounts are generally intended as a place to hold cash pending investment or for immediate cash needs, not solely for the purpose of receiving interest.
- The interest rates will generally be less than the investment management fee when the cash allocation is included in your billable assets.
- The custodian can earn income from holding client cash.
- The custodian can earn fees from money markets for marketing, distribution and other services (see the money market prospectus).
- As a result, the custodian and adviser will likely earn more than you on your cash assets.

When your custodian offers an **FDIC-insured cash account**, coverage will be defined by the FDIC limits of coverage:

- Limits are up to \$250,000 per account owner, per legal capacity per bank. This means that all accounts held by you in the same legal name at the same bank will be aggregated to determine the coverage limits.
- When your FDIC insured accounts are maintained through multiple banks, the limit across banks per account owner per legal capacity is \$500,000.
- Additional information about FDIC insurance is available at [www.fdic.gov](http://www.fdic.gov).

The use of securities associated with **Digital Assets, Virtual Currencies, or Cryptocurrencies** involves the assumption of risk, including:

- Digital Assets are deemed commodities, not securities.
- Digital Assets are speculative investments. They lack intrinsic economic value.

- The market for Digital Assets is decentralized and unregulated.
- Digital Assets are not legal tender.
- These assets have a history of high volatility. The value may change drastically in a short period of time.
- Because these assets are virtual, they are susceptible to fraud, hackers, technical problems, and malicious software.
- The value of a digital asset is directly related to its supply and demand.
- You may obtain exposure to Digital Assets through funds, grantor trusts, and private placements without purchasing the actual asset.

You should also be aware that transactions in the account (including account reallocations and rebalancing) can trigger a taxable event for you unless your account is a qualified retirement account.

When using third-party asset managers, each manager will have its own methods of analysis, investment strategies and unique investment risks that should also be reviewed and considered. In instances where we recommend that a third party manage your assets, please refer to the third party's ADV Part 2A and Appendix 1 Disclosure Brochures for details on their investment strategies, methods of analysis, and associated risks.

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

### **VOTING CLIENT SECURITIES**

As a matter of firm policy and practice, Strategic Blueprint does not have any authority to and does not vote proxies on behalf of advisory clients. You retain the responsibility for receiving and voting proxies for any and all securities maintained in your account(s). Your Advisory Representative may provide advice to you regarding the voting of your proxies. Strategic Blueprint will not take any action with respect to any securities held in any accounts that are named in or subject to class action lawsuits.

You will receive information related to proxies directly from your account custodian. We will forward any information received by us regarding proxies and class action legal matters involving securities held in your accounts.

## **ITEM 7 – CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS**

Strategic Blueprint appreciates the trust you place in us, and we respect your right to privacy. We are committed to safeguarding the personal information you entrust to us. At Strategic Blueprint, we believe that it is important that you understand the uses and safeguarding of your personal information. Strategic Blueprint receives information:

- From paperwork you provide, such as Client Account Forms, questionnaires and product applications;
- From conversations, discussions and interviews; and
- From product or service vendors, as a result of your transactions with or through Strategic Blueprint.

At Strategic Blueprint, we:

- Maintain all client records in a secure environment;
- Protect computer programs through physical and electronic safeguards; and
- Limit access to responsible employees who require access to the information in order to act on your behalf.

Strategic Blueprint may disclose certain types of information to qualified entities that perform administrative services on our behalf, and as required or permitted by law for legal or regulatory purposes. The information that falls within this category is:

- Information provided by you on Client Profiles, account opening documents, custodial account documents and product applications; and
- Information provided by product or service vendors, as a result of your relationship with Strategic Blueprint.

If your Advisory Representative is also a Registered Representative of The Strategic Financial Alliance, Inc. ("SFA"), which is affiliated with Strategic Blueprint through common ownership, then Strategic Blueprint will share account and transaction information with SFA in order to facilitate SFA's supervisory responsibilities for the securities business of its registered representatives.

Strategic Blueprint maintains physical, electronic and procedural safeguards to help ensure that your personal information is safe and accessed only according to these policies, and we will continue to make safeguarding your privacy our highest priority.

Our Privacy Notice is available at account opening and upon request by calling (678) 954-4130.

## **ITEM 8 – CLIENT CONTACT WITH PORTFOLIO MANAGERS**

You are encouraged to contact your Advisory Representative with respect to any changes regarding your investment objectives, risk tolerance, and requested restrictions with respect to management of your Program account. Your Advisory Representative will conduct a review of your account with you no less than annually.

## ITEM 9 – ADDITIONAL INFORMATION

### **DISCIPLINARY ACTION**

Strategic Blueprint has no reportable disciplinary actions.

On October 29, 2015, the Strategic Financial Alliance, Inc., an affiliate of Strategic Blueprint, entered into an Acceptance, Waiver and Consent with the Financial Industry Regulatory Authority (“FINRA”) concerning its supervision of and procedures related to consolidated reports. Without admitting or denying the allegations, SFA consented to a censure and a \$30,000 fine. SFA was also required to submit an attestation that it had implemented procedures which more fully addressed the supervision of consolidated reports.

Information about your Advisory Representative is available in his or her Supplement to this brochure, and at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### **CODE OF ETHICS**

We have adopted a *Code of Ethics* (“Code”) to address the standard of business conduct required of our Advisory Representatives and employees. The *Code* includes our policies and procedures developed to protect your interests in relation to the following:

- Duty at all times to place your interests ahead of ours;
- All personal securities transactions of our Advisory Representatives and employees must be conducted in a manner consistent with the *Code* and avoid any actual or potential conflict of interest, or any abuse of an Advisory Representative’s or employee’s position of trust and responsibility;
- Advisory Representatives may not take inappropriate advantage of their positions; and
- Information concerning the identity of your security holdings and financial circumstances is confidential and must be safeguarded.

We will provide a copy of the *Code* to you or any prospective client upon request.

We do not buy or sell securities for our own account that we also recommend to you. Our Advisory Representatives and employees are permitted to buy or sell the same securities for their personal and family accounts that are bought or sold for your account.

The personal securities transactions by our Advisory Representatives and employees may raise potential conflicts of interest when they trade in a security that is owned by you or is being considered for purchase or sale in your account.

We have adopted policies and procedures that are intended to address these conflicts of interest. These policies and procedures:

- Require our Advisory Representatives and employees to act in your best interest;
- Prohibit favoring one client over another; and
- Provide for the review of transactions to monitor that an Advisory Representative or employee does not place a trade for a personal or beneficial account ahead of a client's transaction in the same security.

Our Advisory Representatives and employees must follow our procedures when purchasing or selling the same securities purchased or sold for your account.

### **REVIEW OF ACCOUNTS**

Your Advisory Representative reviews your account on an on-going basis to monitor that your investments and investment strategies are performing in a manner consistent with your stated objectives. Your Advisory Representative will contact you at least annually (or more often as agreed upon with you) to review your account with you and to update your financial status, goals, objectives, and risk tolerance. These reviews also consider any investment restrictions you have requested and how your investments meet your investment time horizons, liquidity needs, tax due considerations and other circumstances unique to you. Changes in your investments and your investment strategies will be made or recommended by your Advisory Representative as they are deemed appropriate. Interim reviews may be triggered by social, economic and/or political events.

You are encouraged to advise your Advisory Representative of any changes in your personal circumstances, your investment goals or objectives, and your risk tolerance to ensure that your investments and investment strategies are most appropriate for you.

In addition to the reviews conducted by your Advisory Representative, an Advisory Representative's designated supervisor and Strategic Blueprint monitor client accounts on a periodic and on-going basis to help ensure that the investments and transactions in those accounts are consistent with the information you have provided.

### **CLIENT REFERRALS AND OTHER COMPENSATION**

#### **CLIENT REFERRALS THROUGH TESTIMONIALS AND ENDORSEMENTS**

We will compensate certain unaffiliated investment advisers, existing and former clients, and other professionals (such as CPAs, attorneys, etc.), for referring clients to us. We will pay these individuals or entities (referred to as "solicitors") a percentage of the advisory fee that you pay us if it is determined that you have become a client of ours as a result of their direct or indirect efforts.

We will enter into written agreements with these solicitors. The payment of these referral fees will not result in an increase in the amount of the advisory fee that you pay. You will receive a disclosure describing the relationship with the solicitor, the nature of the compensation, and any conflicts of interests created by the arrangement.

Additionally, we will enter into written agreements through which Strategic Blueprint will refer clients to or endorse other investment advisers. Strategic Blueprint (and, in turn, your Advisory Representative) will receive a portion of the advisory fee as a Solicitor's or Referral Fee when you enter into an advisory agreement with a third-party asset manager as a result of your Advisory Representative's recommendation. We currently do not have any such agreements in place.

These referral arrangements will comply with applicable laws that govern:

- the nature of the services provided;
- the fees to be paid;
- disclosure to the referred clients;
- state regulations; and
- client consents, as required.

Any referral fee that exceeds a nominal payment will be fully described in a written Disclosure Statement, which you will receive when you enter into an advisory agreement as a result of your Advisory Representative's recommendation.

## **OTHER COMPENSATION**

In certain instances, product sponsors, investment companies, and third-party asset managers ("product sponsors") participate in activities with Strategic Blueprint and its affiliate, SFA, that are designed to facilitate the distribution of their products, such as marketing activities and educational programs, and by offsetting expenses that result from the cost of conducting due diligence on their products and services. In return for assistance in facilitating the activities described above, SFA receives additional compensation from certain product sponsors. These companies will have greater access to our representatives to provide training, educational presentations, and product information. Our advisors will generally be more familiar with these products. This additional compensation also gives rise to a financial incentive for Strategic Blueprint to recommend these products over other products where such financial incentives and access are not present. Please see the *Additional Sources of Financial Benefits to Strategic Blueprint* located on the Disclosures tab at [www.strategicblueprint.net](http://www.strategicblueprint.net) for additional information.

SFA, an affiliated company, receives marketing support and other financial benefits from product sponsors and third-party managers. Both Frontier Asset Management and Loring Ward provide cash and non-cash compensation to SFA for conferences and education. Advisory Representatives indirectly enjoy non-cash benefits when they attend these conferences or meetings.

If your Advisory Representative recommends certain alternative products, the product sponsor will pay for reasonable costs related to due diligence conducted by the Advisory Representative, including travel to visit the sponsor and/or the investment site.

### ***Alternative and Complex Investments***

Strategic Blueprint makes available a select group of alternative investments for managed portfolios. The products are vetted through a due diligence process and must be approved by Strategic Blueprint. They are then monitored during the life of the investment. These products are generally purchased by subscription or application and will have limited or no liquidity. Because there is no public market for these securities, they are valued only periodically. The value on your statement may not reflect the price you would receive if you were able to liquidate the holding. The value provided to the custodian by the issuer or other third party will be included in the asset value of your account for the purpose of calculating advisory fees. Risks associated with these programs are outlined in the product's prospectus or offering document. Many of the general risks are outlined in Item 8 herein. Advisory Representatives who recommend these products complete product specific training as determined by Strategic Blueprint.

Advisory Representatives will be limited to recommending alternative investments for your managed account(s) that are included on the Strategic Blueprint Alternative Product Platform ("platform"). Each investment sponsor on the platform is charged an annual fee, to help offset the firm's cost in making these investments available, including due diligence, additional workflows, disclosures, and supervision. These sponsors will also contribute financially to the national and educational conferences held by Strategic Blueprint and its affiliates. This additional compensation does create a conflict for the firm.

Your advisory representative can recommend an investment that is not on the platform but is available through SFA. When you purchase a product with a commission through your Advisory Representative in his or her role as a registered representative, an advisory fee will not be charged on those assets even if the assets are held in your advisory account. Please talk with your Advisory Representative about the pricing options, the impact on yield, and other relevant factors related to the purchase of a commission product through SFA.

Strategic Blueprint does not offer legal or tax advice. An Advisory Representative will present the tax aspects of certain investments or strategies in general terms but does not provide specific tax advice. We recommend that all tax questions or strategies be discussed with your tax professional.

While the financial arrangements described above do not impact advisor compensation, they do limit your Advisory Representative to recommending only alternative investment products that are available on the platform or through registered representatives of SFA. The additional compensation paid to Strategic Blueprint to participate on the platform, and the commissions, marketing and due diligence fees that are paid to SFA for commission products, as well as the limitations on available products, create a conflict of interest for the firm and your Advisory Representative. Your Advisory Representative recommends these investment products based on your financial objectives, risk tolerance, and other financial information. Risk and benefits are

more fully disclosed in the product offering documents, and these products cannot be purchased in your account without your consent.

### ***Benefits Provided by Custodians***

Strategic Blueprint may recommend clients establish brokerage accounts with the Schwab Advisor Services division of Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member FINRA/SIPC, to maintain custody of clients' assets and to effect trades for their accounts. The final decision to custody assets with Schwab is at the client's discretion, including those accounts under ERISA or IRA rules and regulations, in which case the client is acting as either the plan sponsor or IRA accountholder. Strategic Blueprint is independently owned and operated and not affiliated with Schwab. Schwab provides us with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's clients' assets are maintained in accounts at Schwab Advisor Services. Schwab's services include brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For Strategic Blueprint client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab also makes available other products and services that benefit Strategic Blueprint but do not directly benefit our clients' accounts. These services can include professional compliance, legal and business consulting; education, publications, conferences and events on such topics as practice management, information technology, business succession, marketing, and regulatory compliance; access to employee benefits and insurance providers, human capital consultants; and recruiting. Schwab may make available, arrange and/or pay vendors for these types of services rendered to Strategic Blueprint by independent third parties. Schwab Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to us. Other potential benefits may include occasional business entertainment of our associated persons and staff by Schwab Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities.

Other products and services offered by Schwab assist Strategic Blueprint in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations

and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of Strategic Blueprint's fees from clients' accounts, and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of our accounts, including accounts not maintained at Schwab Advisor Services.

In addition, Schwab has also agreed to pay for certain products and services for which we would otherwise have to pay once the value of our clients' assets in accounts at Schwab reaches a certain size. In some cases, a recipient of such payments is an affiliate of ours or another party which has some pecuniary, financial or other interest in us (or in which we have such an interest). You do not pay more for assets maintained at Schwab as a result of these arrangements. However, we benefit from the arrangement because the cost of these services would otherwise be borne directly by us. You should consider these conflicts of interest when selecting a custodian. The products and services provided by Schwab, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices).

Fidelity Brokerage Services, LLC (Fidelity), too, provides products and services to help us manage and administer accounts. It provides access to educational events and conferences; and, technology, compliance and business consulting. Fidelity will also provide support for certain transitions costs, such as account termination fees.

While, as a fiduciary, we endeavor to act in our clients' best interests, Strategic Blueprint's recommendation that clients maintain their assets in accounts at a particular custodian may be based in part on the benefit of the availability of some of the foregoing products and services and other arrangements and not solely on the nature, cost or quality of custody and brokerage services provided by the custodian, which may create a potential conflict of interest. Your Advisory Representative will generally recommend one of these custodians exclusively for the custody of client funds and securities and for trade execution.

#### ***Other Direct and Indirect Compensation***

Certain Advisory Representatives are also Registered Representatives of SFA, an affiliate of Strategic Blueprint. In its capacity as a broker-dealer, SFA and its registered representatives earn commissions and/or fees from the sale of investment products such as stocks, bonds, mutual funds, ETFs, direct participation programs, variable annuities, and variable universal life products. Commissions vary depending upon the type of security and service offered. No commissions are paid to SFA related to transactions executed in Strategic Blueprint accounts.

SFA, as a broker/dealer, receives additional compensation for marketing and due diligence from product sponsors related to the sales of those products as outlined above.

Certain Advisory Representatives and members of Strategic Blueprint management and home office employees are shareholders of SFA Holdings, Inc. ("SFAH"), parent company of Strategic Blueprint, SFA and other entities. Shareholders will benefit from the profits accrued to SFAH in the form of dividends, as well as the potentially enhanced value of the stock. Stock options are awarded to employees and to advisory representatives of Strategic Blueprint based on the assets they manage and non-asset-based revenues, and to registered representatives of SFA based on the revenues they generate. As profits accrue from the sale of securities products and investment advisory services of the respective registered entities, the value of SFAH stock can be enhanced. SFAH stock ownership creates a conflict of interest for representatives.

While Strategic Blueprint and its Advisory Representatives endeavor at all times to put the interest of their clients first, you should be aware that the receipt of additional compensation itself creates a conflict of interest and may potentially affect the judgment of these individuals when making recommendations. Additionally, because of the revenue sharing arrangements referenced above, though they do not impact advisor compensation, Advisory Representatives may prefer recommending products and services offered by a sponsor who is participating in the revenue sharing program over other products and services available through Strategic Blueprint. You should feel free to ask your Advisory Representative for clarification about any revenue sharing or marketing support, or you may contact the Chief Compliance officer at 678-954-4130.

You are under no obligation to purchase securities products and services through your Advisory Representative in his/her capacity as a Registered Representative of SFA or as a licensed insurance agent.

### **FINANCIAL INFORMATION**

In May 2020, SFA Holdings, Inc. (SFAH), parent company of Strategic Blueprint, and owner of a group of financial services companies, applied for and received a Paycheck Protection Program (PPP). The COVID-19 Pandemic presented many risks, including unprecedented market volatility, and the uncertainties surrounding duration of the pandemic and its level of impact on the various affiliated companies. The loan proceeds were used in conformity with the program requirements. Accordingly, the loan was forgiven in June 2021.

Strategic Blueprint has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients. It has not been the subject of a bankruptcy proceeding.