

Parker Advisory Group, LLC

20 N. Main Street
Suite 202
St. George, UT 84770

Telephone: 435-628-8773

Facsimile : 435-628-8759

Email: chad@parkeradvisor.com

Website: www.parkeradvisor.com

October 4, 2023

FORM ADV PART 2A BROCHURE

This brochure provides information about the qualifications and business practices of Parker Advisory Group, LLC. If you have any questions about the contents of this brochure, contact us at 435-628-8773. 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 Parker Advisory Group, LLC. (CRD # 150946) is available on the SEC's website at www.adviserinfo.sec.gov.

Parker Advisory Group, LLC. is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Item 2 Summary of Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since the filing of our last annual updating amendment, dated March 23, 2022, we have the following material changes to report:

We offer advice on equity securities, corporate debt securities (other than commercial paper), municipal securities, mutual fund shares, United States government securities, money market funds, real estate, real estate investment trusts ("REITs"), exchange traded funds ("ETFs"), pooled investment vehicles, and interests in partnerships investing in real estate. Refer to Item 4- Advisory Business for additional information.

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, refer to the *Brokerage Practices* section of this brochure. Refer to Item 5- Fees and Compensation for additional information.

Chad W. Parker, President, Chief Compliance Officer, and Investment Adviser Representative of Parker Advisory Group, LLC. is responsible for monitoring your accounts. However, the individuals conducting reviews may vary from time to time, as personnel join or leave our firm. Refer to Item 13- Review of Accounts for further Information.

Certain owners and advisors of our firm are owners and Managers of a special purpose vehicle. Refer to Item 10, Item 11, and Item 15 for additional information.

A description of the types of securities/investments we may recommend to you and some of their inherent risks associated with these securities/investments were added to Item 8 - Methods of Analysis, Investment Strategies, and Risk of Loss. Refer to *Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss* for additional information.

Item 3 Table Of Contents

Item 1 Cover Page	Page 1
Item 2 Summary of Material Changes	Page 2
Item 3 Table Of Contents	Page 3
Item 4 Advisory Business	Page 4
Item 5 Fees and Compensation	Page 8
Item 6 Performance-Based Fees and Side-By-Side Management	Page 11
Item 7 Types of Clients	Page 11
Item 8 Methods of Analysis, Investment Strategies and Risk of Loss.	Page 11
Item 9 Disciplinary Information	Page 20
Item 10 Other Financial Industry Activities and Affiliations	Page 20
Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	Page 21
Item 12 Brokerage Practices	Page 22
Item 13 Review of Accounts	Page 23
Item 14 Client Referrals and Other Compensation	Page 23
Item 15 Custody	Page 24
Item 16 Investment Discretion	Page 24
Item 17 Voting Client Securities	Page 25
Item 18 Financial Information	Page 25
Item 19 State Investment Advisers	Page 25
Item 20 Additional Information	Page 25

Item 4 Advisory Business

Description of Firm

Parker Advisory Group, LLC is a registered investment adviser based in St. George, Utah. We are organized as a limited liability company under the laws of the State of Utah. We have been providing investment advisory services since October 01, 2009. We are owned by Chad W. Parker.

The following paragraphs describe our services and fees. Refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs. As used in this brochure, the words "we," "our," and "us" refer to Parker Advisory Group and the words "you," "your," and "client" refer to you as either a client or prospective client of our firm.

FINANCIAL PLANNING AND CONSULTING SERVICES:

We offer financial planning services which typically involves providing a variety of advisory services to clients regarding the management of their financial resources based upon an analysis of their individual needs. These services can range from broad-based financial planning to consultative or single subject planning. If you retain our firm for financial planning services, we will meet with you to gather information about your financial circumstances and objectives. Once we specify those long-term objectives (both financial and non-financial), we will develop shorter-term, targeted objectives. Once we review and analyze the information you provide to our firm, we will deliver a written plan to you, designed to help you achieve your stated financial goals and objectives.

In general, the financial plan may include, but is not limited to the following:

- retirement and financial planning independence
- estate planning
- risk analysis for life, disability, and long term care
- cash flow and debt management
- investment planning

Typically we will present the financial plan to you within 30 days of the contract date, provided that you have promptly provided all information needed to prepare the financial plan. Financial Planning recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. All recommendations are of a generic nature and are not product specific.

Financial plans are based on your financial situation at the time we present the plan to you, and on the financial information you provide to us. You must promptly notify our firm if your financial situation, goals, objectives, or needs change.

You are under no obligation to act on our financial planning recommendations. Should you choose to act on any of our recommendations, you are not obligated to implement the financial plan through any of our other investment advisory services. Moreover, you may act on our recommendations by placing securities transactions with any brokerage firm.

ASSET MANAGEMENT SERVICES

We offer asset management services on a discretionary and/or non-discretionary basis where our investment advice is tailored to meet our clients' individual needs and investment objectives. These services include an initial consultation along with follow up consultations, as may be required, to discuss your unique investment objectives, time horizon, risk tolerance, tax circumstances, and various other financial factors. We will ask that you complete certain investor questionnaires, onboarding forms, and other documents to assist us in gathering information about your financial needs and circumstances.

Based on our evaluation of the foregoing factors, we will use the information we gather to develop a strategy that enables our firm to give you continuous and focused investment advice and/or to make investments on your behalf. Once we construct an investment portfolio for you, we will monitor your portfolio's performance on an ongoing basis, and will rebalance the portfolio as required by changes in market conditions and/or in your financial circumstances.

As part of our asset management services, you may grant our firm discretionary authority to manage your account. Discretionary authorization will allow us to determine the specific securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. Alternatively, you may grant our firm non-discretionary authority over your account, which requires our firm to obtain your prior approval before each transaction executed in your account. Please see Item 16 (Investment Discretionary) of this Disclosure Brochure for more information on management authority.

Our asset management services are provided to you primarily through a "turn key asset management program" (a "TAMP") sponsored by SEI Investments Management Corporation, and its affiliates, SEI Private Trust Company and SEI Global Services, Inc. (collectively, "SEI"). We provide access to asset management services through SEI's Management Programs: the Tax-Controlled Program and the Managed Accounts Program. Our arrangement with SEI further provides us with a variety of account, performance, due diligence, research and risk management tools and administrative services which allow us to more efficiently deliver advisory services to you. We may recommend other TAMPs as may be appropriate for our clients.

At our discretion we may approve the transferring of an existing asset management account(s) (that may not meet our approval requirements) to one of the asset management programs listed below with the understanding that the account will be moved to an approved program within a 6 to 12 month time frame. The asset management programs are listed below with a brief outline of how they are designed:

SEI Investments Management Corporation ("SIMC") provides several programs or portfolios for different client needs. Common to all these platforms or portfolios are the following steps:

1. Determine the investor's risk profile and investment objectives. We assist in determining your investment objectives, investment time horizon, and risk profile by means of an interview process and the completion of a questionnaire.
2. Set a relevant asset allocation policy. You will agree to one or many mutual fund asset allocations or separate account (individual securities) models. You may also purchase the individual mutual funds without choosing one of the asset allocation models. If you choose to do so, automatic rebalancing to model allocation and recommended model allocation changes may be available.
3. Diversify among asset classes and styles. The investment managers of the underlying mutual

- funds are selected by SEI Financial Management Corporation. SEI utilizes independent, institutional investment firms. The managers are monitored by SEI to ensure that their investment styles and performance remain consistent with the objectives of the mutual funds.
4. Rebalance the investor's portfolio. Rebalancing maintains the proper allocation to each asset class in the model. Rebalancing occurs automatically if the underlying mutual funds deviate from the prescribed quarterly allocation by greater than a 2% variance (3% for tax managed accounts). Rebalancing occurs quarterly with no transaction fees.
 5. Report results. SEI Trust Company (a subsidiary of SEI Financial Corporation) acts as a transfer agent and custodian for your account. SEI Trust Company provides reporting services including; consolidated monthly statements, quarterly performance reports, and year-end tax reports.

SEI's Tax-Controlled Program

If suitable for you, we may suggest SEI's Tax-Controlled Program sponsored by SEI Investments Management Corporation ("SIMC"). To participate in this program, a tri-party agreement ("Tax-Controlled Agreement") is signed between SIMC, us and you that provides for the management of specified assets.

Through the Tax-Controlled Agreement, you appoint us as your investment advisor to assist in selecting an asset allocation strategy. The strategy includes allocating set percentages of your assets to designated portfolios of separate securities (each, a "Separate Account Portfolio"). The strategy may include allocating assets to a portfolio of mutual funds sponsored by SIMC or to an affiliate of SIMC. You will appoint SIMC to manage the assets in each Separate Account Portfolio in accordance with a strategy you have selected with our assistance. SIMC may delegate its responsibility for selecting particular securities to one or more portfolio managers. This program seeks to manage taxes within each Separate Account Portfolio through an individually managed U.S. equity and/or laddered municipal bond component(s) within the structure of a globally diversified portfolio in order to meet an investor's long-term goals of managing taxes while controlling risk.

SEI's Managed Accounts Program

We also participate in the Managed Accounts Program sponsored by SIMC. SIMC will have complete investment authority with respect to the Managed Accounts assets in order to carry out the strategy selected. SIMC may adjust the allocation of the account quarterly to ensure that the mix reflects the objectives of the chosen strategy. SIMC or its affiliates administer, distribute and in some cases advise the Managed Accounts and SEI Funds. SIMC's investment authority is effective until changed or revoked in writing.

For those accounts which apply a "manager of managers" structure, SIMC has the ultimate responsibility for the investment performance of the investment vehicles due to its responsibility to oversee the sub-advisors and recommend their hiring, termination and replacement. SIMC has the authority to determine the securities to be bought or sold in the Managed Account.

SELECTION OF OTHER ADVISORS

We may recommend that you use the services of a third party money manager ("TPMM") to manage all, or a portion of, your investment portfolio. Typically, we recommend the advisory services of John Hancock, American Funds, or SEI (as described above in the *Asset Management Services* section above). After gathering information about your financial situation and objectives, we may recommend that you engage a specific TPMM or investment program. Factors that we take into consideration when making our recommendation(s) include, but are not limited to, the following: the TPMM's performance,

methods of analysis, fees, your financial needs, investment goals, risk tolerance, and investment objectives. We will monitor the TPMM(s)' performance to ensure its management and investment style remains aligned with your investment goals and objectives.

In some instances, we will provide access to the John Hancock 401(k) Program, a customized investment management platform, which offers a suite of asset management programs called Lifecycle or Lifestyle Funds, as well as individual mutual funds. This allocation/investment management program utilizes open-end, no-load, and load waived, as well as, loaded mutual funds. With our assistance you will complete a profile questionnaire which assists in determining which of the many possible portfolio models is most appropriate based on your individual objectives, risk tolerance and overall financial goals. They may also choose individual mutual funds if they desire. Based on this information, a comprehensive investment strategy is developed and documented. John Hancock acting as the investment manager for the Program, selects appropriate mutual funds and/or a separate account manager consistent with the particular portfolio chosen. Investment allocation decisions, as well as, specific portfolio mutual fund selections are reviewed on a continual basis.

In limited instances, we have the ability to utilize American Funds for smaller accounts and simple IRAs. We will assist you in completing your profile questionnaire to determine portfolio model is most appropriate based on your individual objectives, risk tolerance and overall financial goals. Based on this information, a comprehensive investment strategy is developed and documented. American Funds will act as the investment manager for accounts held with American Funds and American Funds selects the appropriate mutual funds and/or a separate account manager consistent with the particular portfolio chosen. Investment allocation decisions, as well as, specific portfolio mutual fund selections are reviewed on a continual basis.

Custody of client assets is maintained by John Hancock, American Funds, and/or any other TPMM that we may recommend, with accounts registered in your name. You will receive a customized monthly and/or quarterly reports detailing, among other things, investment performance. We do not have discretion of assets held at John Hancock or American Funds.

Types of Investments

We offer advice on equity securities, corporate debt securities (other than commercial paper), municipal securities, mutual fund shares, United States government securities, money market funds, real estate, real estate investment trusts ("REITs"), exchange traded funds ("ETFs"), pooled investment vehicles, and interests in partnerships investing in real estate.

Additionally, we may advise you on various types of investments based on your stated goals and objectives. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship.

Since our investment strategies and advice are based on each client's specific financial situation, the investment advice we provide to you may be different or conflicting with the advice we give to other clients regarding the same security or investment.

Wrap Fee programs

We do not participate in any wrap fee program.

IRA Rollover Recommendations

Effective December 20, 2021 (or such later date as the US Department of Labor ("DOL") Field Assistance Bulletin 2018-02 ceases to be in effect), for purposes of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02") where applicable, we are providing the

following acknowledgment to you. When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

We benefit financially from the rollover of your assets from a retirement account to an account that we manage or provide investment advice, because the assets increase our assets under management and, in turn, our advisory fees. As a fiduciary, we only recommend a rollover when we believe it is in your best interest.

Assets under Management

As of December 31, 2022 we provide continuous management services for \$187,176,273 in client assets on a discretionary basis, and \$0 on a non-discretionary basis. Additionally, we provide non-continuous management services for \$11,508,495 in client assets as assets under our advisement.

Item 5 Fees and Compensation

FINANCIAL PLANNING AND CONSULTING FEES

Fixed Fee

We charge a "fixed fee" for financial plans, which generally ranges between \$1,500 and \$3,000. Our fee varies and depends on the nature of the agreement, the level of involvement required, and the specific details of each client's circumstances.

Hourly Consultation

If you only require advice on a single aspect of your finances, we offer single subject financial planning/general consulting services on an hourly basis. These consultations fall outside the above mentioned financial planning process. You may not want to invest the time to do a complete financial plan and may only want advice on certain products, services or aspects of your overall financial situation. In general, the consultation may include, but is not limited to the following:

- retirement and financial planning independence
- estate planning
- risk analysis for life, disability, and long term care
- cash flow and debt management
- investment planning

The hourly fee for our single subject financial planning and/or consulting services depends on the investment adviser representative who is assigned to the project. Chad Parker's hourly rate is currently set at \$250 per hour. Kaylan Anderson's hourly rate is currently set at \$175 per hour. Once it is determined who the assigned investment adviser representative will be, we will estimate the total hours required at the start of the advisory relationship and multiply that by the hourly rate to determine the total fee. In limited circumstances, the cost/time could potentially exceed the initial estimate. In such cases, we will notify you and request that you approve the additional fee.

The hourly rate and the time estimated are not negotiable.

Financial planning fees for both a financial plan and the hourly consultation shall be due and payable as follows:

- 50% of the estimated fee will be due upon signing the Financial Planning Services Agreement, with the balance due upon presentation of the plan.
- We accept payments by cash or check.

We will not require prepayment of a fee more than six months in advance and in excess of \$1,200. Should the engagement last longer than six months between acceptance of financial planning agreement and delivery of the financial plan or the agreed upon services, any prepaid unearned fees will be promptly returned to you less a pro rata charge for bona fide financial planning services rendered to date.

You may terminate the financial planning agreement upon written notice. Any unearned fees will be refunded to the client, however any uncollected fees for work already done will be due upon termination of the agreement.

ASSET MANAGEMENT FEES

Advisory fees charged by SEI are separate and apart from our advisory fees. The advisory fee you pay to SEI is established and payable in accordance with the brochure provided by SEI. Assets managed by SEI will be included in calculating our advisory fee, which is based on the fee schedule set forth in the table below. SEI will deduct our fee directly from your account and will remit our advisory fee to us. Our advisory fee will be deducted from your account, only when you have provided your written authorization to do so.

Assets Under Management Management Fee Paid to Parker Advisory Group

<u>Asset Valuation</u>	<u>Annual Fee</u>
First \$1,000,000 (\$1 to \$1,000,000)	1.00%
Next \$2,000,000 (\$1,000,001 to \$3,000,000)	0.90%
Next \$2,000,000 (\$3,000,001 to \$5,000,000)	0.70%
Next \$2,500,000 (\$5,000,001 to \$7,500,000)	0.55%
Next \$2,500,000 (\$7,500,001 to \$10,000,000)	0.40%
Above \$10,000,000	0.25%

At our discretion, we may choose to negotiate the percentages assigned in the aforementioned annual fee schedule with the client. The annual fee schedule above shall be applied to your account on a "blended" basis. For avoidance of doubt, and as an example of how our blended billing procedures function, a hypothetical client account containing a balance of \$3,500,000 would pay 1.00% on the first \$1,000,000 of the client's account balance annually; 0.90% on the the next \$2,000,000 of the client's account balance annually; and 0.70% on the remaining \$500,000 of the client's account balance annually.

The fee charged for SEI programs are typically tiered and are charged quarterly in arrears.

The SEI Management Program may cost more or less than separately purchasing the investment advisory and other services offered under the SEI Management Program if they were available separately. The combination of services available under the Program may not be available separately or may require additional accounts, documentation and fees.

In addition, certain investment managers available to clients in connection with the SEI Management Program may not be available to them outside the Program because of minimum account sizes, fee schedules or other factors.

Either party may cancel the advisory agreement at any time, for any reason, upon receipt of 30 days written notice. Upon termination of any account, we will promptly refund any prepaid, unearned fees and any earned, unpaid fees will be due and payable. You have the right to terminate an agreement without penalty within five business days after entering into the agreement.

SELECTION OF OTHER ADVISORS

Advisory fees charged by TPMMs are separate and apart from our advisory fees. Advisory fees that you pay to the TPMM are established and payable in accordance with the brochure provided by each TPMM to whom you are referred. These fees may or may not be negotiable. Assets managed by TPMMs will be included in calculating our advisory fee, which is typically 1.00% per annum, payable quarterly in arrears. You should review the recommended TPMM's brochure and take into consideration the TPMM's fees along with our fees to determine the total amount of fees associated with this program.

You will be required to sign an agreement directly with the recommended TPMM(s). You may terminate your advisory relationship with the TPMM according to the terms of your agreement with the TPMM. You should review each TPMM's brochure for specific information on how you may terminate your advisory relationship with the TPMM and how you may receive a refund, if applicable. You should contact the TPMM directly for questions regarding your advisory agreement with the TPMM.

Additional Fees and Expenses

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or

custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, refer to the *Brokerage Practices* section of this brochure.

Compensation for the Sale of Investment Products

Persons providing investment advice on behalf of our firm are licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. You are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

Item 6 Performance-Based Fees and Side-By-Side Management

We do not accept performance-based fees or participate in side-by-side management. Performance-based fees are fees that are based on a share of a capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Our fees are calculated as described in the *Fees and Compensation* section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

Item 7 Types of Clients

We offer investment advisory services to individuals, including high net worth individuals, corporations and other business entities.

In general, we require a minimum of \$50,000 to open and maintain an advisory account. At our discretion, we may waive this minimum account size. For example, we may waive the minimum if you appear to have significant potential for increasing your assets under our management.

We may also combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts to meet the stated minimum.

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

Our Methods of Analysis and Investment Strategies

The combination of investments used with respect to any investor will depend upon their investment objectives. Our focus is a disciplined investment process within portfolios designed specifically to help you achieve your life and wealth goals. We develop our approach from disciplined behavioral and analytical research, focusing on the psychology of an individual investor, as well as the trends that impact worldwide financial markets and investment managers. This philosophy is based upon five principles: asset allocation, portfolio structure, tax management, multiple specialist managers, and continuous portfolio management.

Asset Allocation: This is the first most important step. Asset allocation includes determining how much to invest in different asset classes such as cash equivalents, stocks, fixed-income investments and tangible assets such as real estate. Asset allocation also applies to subcategories such as government, municipal and corporate bonds, or in the case of stocks, large company stocks or small company stocks.

Portfolio Structure: This includes making sure you own the right mix of securities. For example, you shouldn't just own "stocks" but also make sure you have the right mix of large and small cap growth, value and even alternative investments. This discipline is exercised across all the asset classes involved.

Tax Management: Tax management should never be ignored. We employ a special focus on tax management to help control tax implications and to help enhance after-tax returns.

Multiple Specialist Managers: To implement our asset management strategies, we evaluate investment talent from a global network of institutional money managers who specialize in specific sectors of the market. We have found that identifying, hiring, and managing specialist money managers helps to deliver more consistent performance.

Continuous Portfolio Management: Through SEI our managers are continually evaluated while searching for new managers continues.

Our own trading strategies include holding for the long term and possible short term investments. All these strategies are intended to enhance the portfolio's value and ability to meet your stated goals.

Long-Term Purchases - securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year

Risk: Using a long-term purchase strategy generally assumes the financial markets will go up in the long-term which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall financial markets advance. Purchasing investments long-term may create an opportunity cost - "locking-up" assets that may be better utilized in the short-term in other investment

Short-Term Purchases - securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations.

Risk: Using a short-term purchase strategy generally assumes that we can predict how financial markets will perform in the short-term which may be very difficult and will incur a disproportionately higher amount of transaction costs compared to long-term trading. There are many factors that can affect financial market performance in the short-term (such as short-term interest rate changes, cyclical earnings announcements, etc.) but may have a smaller impact over longer periods of time

Recommendation of Particular Types of Securities

We offer advice on equity securities, corporate debt securities (other than commercial paper), municipal securities, mutual fund shares, United States government securities, money market funds, real estate, real estate investment trusts ("REITs"), exchange traded funds ("ETFs"), pooled investment vehicles and interests in partnerships investing in real estate. Additionally, we may advise you on various types of investments based on your stated goals and objectives. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship. Since our investment strategies and advice are based on each client's specific financial situation, the investment advice we provide to you may be different or conflicting with the advice we give to other clients regarding the same security or investment.

Third-Party Money Manager Analysis

We may recommend the use of third-party money managers for a portion of client assets if applicable, based on each client's total portfolio size, taxability, diversification requirements, and the availability and cost of various strategies. We examine the experience, expertise, investment philosophies, and past performance of independent third-party money managers in an attempt to determine if that third-party money manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the third-party money manager's underlying holdings, strategies, concentrations and leverage as part of our overall periodic risk assessment. Additionally, as part of our due diligence process, we survey the third-party money manager's compliance and business enterprise risks. These accounts are reviewed as part of the normal course of each client's review.

A risk of investing with a third-party money manager who has been successful in the past is that the manager may not be able to replicate the success in the future. In addition, as we do not control the underlying investments in a third-party money manager's portfolio, there is also a risk the manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputation deficiencies.

Tax Considerations

Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you consult with a tax professional regarding the investing of your assets.

Custodians and broker-dealers must report the cost basis of equities acquired in client accounts. You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes another accounting method is more advantageous, provide written notice to our firm immediately and we will alert your account custodian of your individually selected accounting method. Decisions about cost basis accounting methods will need to be made before trades settle, as the cost basis method cannot be changed after settlement.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear. There is no guarantee that an investment will achieve its goal. We make judgments about the securities markets, and the economy but these judgments may not anticipate actual market movements or the impact of economic conditions on investment performance. In fact, no matter how good of a job we do, you could lose money on your investment. Your investment is not a bank deposit, and its shares are not insured or guaranteed by the FDIC or any other government agency. The value of your investment is based on the market prices of the underlying securities held. These prices change daily due to economic and other events that affect securities markets generally, as well as those that affect particular companies and other issuers. These price movements, sometimes called volatility, may be greater or lesser depending on the types of investments you own and the markets in which those securities trade. The effect on an investment of a change in the value of a single security will depend on how widely the investment portfolio diversifies its holdings. Your investments may not achieve positive returns over short or long term periods.

The following list of risk factors does not purport to be a complete enumeration or explanation of the risks involved with respect to the Firm's investment management activities. Clients should consult with their legal, tax, and other advisors before engaging the Firm to provide investment management services on their behalf. When evaluating risk, financial loss may be viewed differently by each client

and may depend on many different risks, each of which may affect the probability and magnitude of any potential losses. The following risks may not be all-inclusive but should be considered carefully by a prospective client before retaining our services.

Liquidity Risk: The risk of being unable to sell your investment at a fair price at a given time due to high volatility or lack of active liquid markets. You may receive a lower price or it may not be possible to sell the investment at all.

Credit Risk: Credit risk typically applies to debt investments such as corporate, municipal, and sovereign fixed income or bonds. A bond issuing entity can experience a credit event that could impair or erase the value of an issuer's securities held by a client.

Inflation and Interest Rate Risk: Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of a client's future interest payments and principal. Inflation also generally leads to higher interest rates which may cause the value of many types of fixed income investments to decline.

Horizon and Longevity Risk: The risk that your investment horizon is shortened because of an unforeseen event, for example, the loss of your job. This may force you to sell investments that you were expecting to hold for the long term. If you must sell at a time that the markets are down, you may lose money. Longevity Risk is the risk of outliving your savings. This risk is particularly relevant for people who are retired or are nearing retirement.

Volatility Risks - The prices and values of investments can be highly volatile, and are influenced by, among other things, interest rates, general economic conditions, the condition of the financial markets, the financial condition of the issuers of such assets, changing supply and demand relationships, and programs and policies of governments.

Sector risks -Investing in a particular sector is subject to cyclical market conditions and charges.

Foreign investments risk: Non-U.S. investments, currency and commodity investments may contain additional risks associated with government, economic, political or currency volatility.

Emerging markets risk - Emerging markets can experience high volatility and risk in the short term.

Management risk -Investments managed by us vary with the success and failure of our investment strategies, research, analysis and determination of portfolio securities.

Cash Management Risk - We may invest some of a client's assets temporarily in money market funds or other similar types of investments, during which time an advisory account may be prevented from achieving its investment objective.

Market Risk - Investing involves risk, including the potential loss of principal, and all investors should be guided accordingly. The profitability of a significant portion of Parker Advisory Group's recommendations and/or investment decisions may depend to a great extent upon correctly assessing the future course of price movements of stocks, bonds and other asset classes. In addition, investments may be adversely affected by financial markets and economic conditions throughout the world. There can be no assurance that Parker Advisory Group will be able to predict these price movements accurately or capitalize on any such assumptions.

Equity-Related Securities and Instruments - We may take long positions in common stocks of U.S. and non-U.S. issuers traded on national securities exchanges and over-the-counter markets. The value of equity securities varies in response to many factors. These factors include, without limitation, factors specific to an issuer and factors specific to the industry in which the issuer participates. Individual companies may report poor results or be negatively affected by industry and/or economic trends and developments, and the stock prices of such companies may suffer a decline in response. In addition, equity securities are subject to stock risk, which is the risk that stock prices historically rise and fall in periodic cycles. U.S. and non-U.S. stock markets have experienced periods of substantial price volatility in the past and may do so again in the future. In addition, investments in small-capitalization, mid-capitalization and financially distressed companies may be subject to more abrupt or erratic price movements and may lack sufficient market liquidity, and these issuers often face greater business risks.

Mutual Funds and Exchange Traded Funds - Mutual funds and exchange traded funds ("ETFs") are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. ETFs differ from mutual funds since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. The returns on mutual funds and ETFs can be reduced by the costs to manage the funds. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, the fund, other types of mutual funds do charge such fees which can also reduce returns. Mutual funds can also be "closed end" or "open end". So-called "open end" mutual funds continue to allow in new investors indefinitely whereas "closed end" funds have a fixed number of shares to sell which can limit their availability to new investors.

ETFs may have tracking error risks. For example, the ETF investment adviser may not be able to cause the ETF's performance to match that of its Underlying Index or other benchmark, which may negatively affect the ETF's performance. In addition, for leveraged and inverse ETFs that seek to track the performance of their Underlying Indices or benchmarks on a daily basis, mathematical compounding may prevent the ETF from correlating with performance of its benchmark. In addition, an ETF may not have investment exposure to all of the securities included in its Underlying Index, or its weighting of investment exposure to such securities may vary from that of the Underlying Index. Some ETFs may invest in securities or financial instruments that are not included in the Underlying Index, but which are expected to yield similar performance.

Fixed Income Securities - While we emphasizes risk-averse management and capital preservation in its fixed-income bond portfolios, clients who invest in this product can lose money, including losing a portion of their original investment. The prices of the securities in our portfolios fluctuate. We not guarantee any particular level of performance. Below is a representative list of the types of risks clients should consider before investing in this product.

Interest rate risk. Prices of bonds tend to move in the opposite direction to interest rate changes. Typically, a rise in interest rates will negatively affect bond prices. The longer the duration and average maturity of a portfolio, the greater the likely reaction to interest rate moves.

Credit (or default) risk. A bond's price will generally fall if the issuer fails to make a scheduled interest or principal payment, if the credit rating of the security is downgraded, or if the perceived creditworthiness of the issuer deteriorates.

Liquidity risk. Sectors of the bond market can experience a sudden downturn in trading activity. When there is little or no trading activity in a security, it can be difficult to sell the security at or near its perceived value. In such a market, bond prices may fall.

Call risk. Some bonds give the issuer the option to call or redeem the bond before the maturity date. If an issuer calls a bond when interest rates are declining, the proceeds may have to be reinvested at a lower yield. During periods of market illiquidity or rising rates, prices of callable securities may be subject to increased volatility.

Prepayment risk. When interest rates fall, the principal of mortgage-backed securities may be prepaid. These prepayments can reduce the portfolio's yield because proceeds may have to be reinvested at a lower yield.

Extension risk. When interest rates rise or there is a lack of refinancing opportunities, prepayments of mortgage-backed securities or callable bonds may be less than expected. This would lengthen the portfolio's duration and average maturity and increase its sensitivity to rising rates and its potential for price declines.

Municipal Bonds - Municipal securities issuers may face local economic or business conditions (including bankruptcy) and litigation, legislation or other political events that could have a significant effect on the ability of the municipality to make payments on the interest or principal of its municipal bonds. In addition, because municipalities issue municipal securities to finance similar types of projects, such as education, healthcare, transportation, infrastructure and utility projects, conditions in those sectors can affect the overall municipal bond market. Furthermore, changes in the financial condition of one municipality may affect the overall municipal bond market. The municipal obligations in which clients invest will be subject to credit risk, market risk, interest rate risk, credit spread risk, selection risk, call and redemption risk and tax risk, and the occurrence of any one of these risks may materially and adversely affect the value of the Client's assets or profits.

Private Placements - A private placement (nonpublic offering) is an illiquid security sold to qualified investors and are not publicly traded nor registered with the Securities and Exchange Commission. Private placements generally carry a higher degree of risk due to illiquidity. Most securities that are acquired in a private placement will be restricted securities and must be held for an extended amount of time and therefore cannot be sold easily. Investments in hedge funds and other private investment funds may underperform publicly offered and traded securities because such investments:

- typically require investors to lock up their assets for a period and may be unable to meet - redemption requests during adverse economic conditions;
- have limited or no liquidity because of restrictions on the transfer of, and the absence of a market for, interests in these funds;
- are more difficult to monitor and value due to a lack of transparency and publicly available information about these funds;
- may have higher expense ratios and involve more inherent conflicts of interest than publicly traded investments; and

- involve different risks than investing in registered funds and other publicly offered and traded securities. These risks may include those associated with more concentrated, less diversified investment portfolios, investment leverage and investments in less liquid and non-traditional asset classes.

Parker Advisory Group bases its advice to such private investment funds on the investment objectives and restrictions (if any) set forth in the applicable private placement memorandum, organizational documents, investment management agreement, and/or subscription agreements. Please refer to the private placement's offering documents for further information regarding methods of analysis, investment strategies, and risk of loss.

Currency Risk - An advisory account that holds investments denominated in currencies other than the currency in which the advisory account is denominated may be adversely affected by the volatility of currency exchange rates. Interest Rate Risks Interest rates may fluctuate significantly, causing price volatility with respect to securities or instruments held by clients

Use of Structured Products Structured products involve derivatives and a higher degree of risk factors that may not be suitable for all investors. Such risks include risk of adverse or unanticipated market developments, issuer credit quality risk, risk of counterparty or issuer default, risk of lack of uniform standard pricing, risk of adverse events involving any underlying reference obligations, entity or other measure, risk of high volatility, and risk of illiquidity/ little to no secondary market. In certain transactions, investors may lose their entire investment, i.e., incur an unlimited loss.

Money Market Funds: A money market fund is technically a security. The fund managers attempt to keep the share price constant at \$1/share. However, there is no guarantee that the share price will stay at \$1/share. If the share price goes down, you can lose some or all of your principal. The U.S. Securities and Exchange Commission ("SEC") notes that "While investor losses in money market funds have been rare, they are possible." In return for this risk, you should earn a greater return on your cash than you would expect from a Federal Deposit Insurance Corporation ("FDIC") insured savings account (money market funds are not FDIC insured). Next, money market fund rates are variable. In other words, you do not know how much you will earn on your investment next month. The rate could go up or go down. If it goes up, that may result in a positive outcome. However, if it goes down and you earn less than you expected to earn, you may end up needing more cash. A final risk you are taking with money market funds has to do with inflation. Because money market funds are considered to be safer than other investments like stocks, long-term average returns on money market funds tends to be less than long term average returns on riskier investments. Over long periods of time, inflation can eat away at your returns.

Real Estate: Real estate is increasingly being used as part of a long-term core strategy due to increased market efficiency and increasing concerns about the future long-term variability of stock and bond returns. In fact, real estate is known for its ability to serve as a portfolio diversifier and inflation hedge. However, the asset class still bears a considerable amount of market risk. Real estate has shown itself to be very cyclical, somewhat mirroring the ups and downs of the overall economy. In addition to employment and demographic changes, real estate is also influenced by changes in interest rates and the credit markets, which affect the demand and supply of capital and thus real estate values. Along with changes in market fundamentals, investors wishing to add real estate as part of their core investment portfolios need to look for property concentrations by area or by property type. Because property returns are directly affected by local market basics, real estate portfolios that are too heavily concentrated in one area or property type can lose their risk mitigation attributes and bear additional risk by being too influenced by local or sector market changes.

Real Estate Investment Trust: A real estate investment trust ("REIT") is a corporate entity which invests in real estate and/or engages in real estate financing. A REIT reduces or eliminates corporate income taxes. REITs can be publicly or privately held. Public REITs may be listed on public stock exchanges. REITs are required to declare 90% of their taxable income as dividends, but they actually pay dividends out of funds from operations, so cash flow has to be strong or the REIT must either dip into reserves, borrow to pay dividends, or distribute them in stock (which causes dilution). After 2012, the IRS stopped permitting stock dividends. Most REITs must refinance or erase large balloon debts periodically. The credit markets are no longer frozen, but banks are demanding, and getting, harsher terms to re-extend REIT debt. Some REITs may be forced to make secondary stock offerings to repay debt, which will lead to additional dilution of the stockholders. Fluctuations in the real estate market can affect the REIT's value and dividends.

Limited Partnerships: A limited partnership is a financial affiliation that includes at least one general partner and a number of limited partners. The partnership invests in a venture, such as real estate development or oil exploration, for financial gain. The general partner has management authority and unlimited liability. The general partner runs the business and, in the event of bankruptcy, is responsible for all debts not paid or discharged. The limited partners have no management authority and their liability is limited to the amount of their capital commitment. Profits are divided between general and limited partners according to an arrangement formed at the creation of the partnership. The range of risks are dependent on the nature of the partnership and disclosed in the offering documents if privately placed. Publicly traded limited partnership have similar risk attributes to equities. However, like privately placed limited partnerships their tax treatment is under a different tax regime from equities. You should speak to your tax adviser in regard to their tax treatment.

Small-Cap Company Risk - The risk that small capitalization securities may underperform other segments of the equity markets or the equity markets as a whole. Smaller capitalization companies may be more vulnerable to adverse business or economic events than larger, more established companies.

Mortgage-Backed Securities Risk - Mortgage-backed securities are affected by, among other things, interest rate changes and the possibility of prepayment of the underlying mortgage loans. Mortgage-backed securities are also subject to the risk that underlying borrowers will be unable to meet their obligations.

Asset-Backed Securities Risk - Payment of principal and interest on asset-backed securities is dependent largely on the cash flows generated by the assets backing the securities and asset-backed securities may not have the benefit of any security interest in the related assets.

Commodity-linked Securities Risk - Investments in commodity-linked securities may be more volatile and less liquid than direct investments in the underlying commodities themselves. Commodity-related equity returns can also be affected by the issuer's financial structure or the performance of unrelated businesses.

Distressed Securities Risk - Distressed securities frequently do not produce income while they are outstanding and may require the Fund to bear certain extraordinary expenses in order to protect and recover its investment. Distressed securities are at high risk for default.

Derivatives Risk - The risk that changes in the market value of securities held by the account, and of the derivative instruments relating to those securities, may not be proportionate. There may not be a liquid market for the fund or manager to sell a derivative instrument. Derivatives are also subject to the risk that a counterparty may default on its payment obligations to the investor.

Leverage Risk - The use of leverage can amplify the effects of market volatility on the Fund's share price and may also cause the Fund to liquidate portfolio positions when it would not be advantageous to do so in order to satisfy its obligations.

Exchange-Traded Notes (ETNs) - The value of an ETN is subject to the credit risk of the issuer. There may not be an active trading market available for some ETNs. Additionally, trading of ETNs may be halted or delisted by the listing exchange.

Foreign Investment/Emerging Markets Risk - The risk that non-U.S. securities may be subject to additional risks due to, among other things, political, social and economic development abroad, currency movements, and different legal, regulatory and tax environments. These additional risks may be heightened with respect to emerging market countries since political turmoil and rapid changes in economic conditions are more likely to occur in these countries.

Short Sales - Short sales expose an investment to the risk that it will be required to buy the security sold short (also known as "covering" the short position) at a time when the security has appreciated in value thus resulting in a loss to an investor. Reinvesting proceeds received from short selling may create leverage which can amplify the effects of market volatility on the investment's share price.

Directional or Tactical Strategies Risk - Directional or tactical strategies usually use long and short positions which entail prediction on the direction into which the overall market is going to move. Directional or tactical strategies may utilize leverage and hedging. Risk of loss may be significant if the Fund's judgment is incorrect as to the direction, timing or extent of expected market moves.

Event-Driven Strategies Risk - Event-driven strategies involve making evaluations and predictions about both the likelihood that a particular event in the life of a company will occur and the impact such an event will have on the value of the company's securities. The transaction in which such a company is involved may either be unsuccessful, take considerable time or may result in a distribution of cash or a new security, the value of which may be less than the purchase price of the company's security. If an anticipated transaction does not occur, the Fund may be required to sell its securities at a loss.

Arbitrage Strategies Risk - Arbitrage strategies involve engaging in transactions that attempt to exploit price differences of identical, related or similar securities on different markets or in different forms. The Fund may realize losses or reduced rate of return if underlying relationships among securities in which it takes investment positions change in an adverse manner or a transaction is unexpectedly terminated or delayed. Trading to seek short-term capital appreciation can be expected to cause the Fund's portfolio turnover rate to be substantially higher than that of the average equity-oriented investment company.

Non-Diversified Risk - Some fund investments may be non-diversified, which means that it may invest in the securities of relatively few issuers. As a result, some fund investments may be more susceptible to a single adverse economic or political occurrence affecting one or more of these issuers, and may experience increased volatility due to its investments in those securities.

Portfolio Turnover Risk - Due to their investment strategies, an investment and the underlying funds may buy and sell securities frequently. This may result in higher transaction costs and additional capital gains tax liabilities.

Item 9 Disciplinary Information

We are required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of our advisory business or the integrity of our management. We do not have any required disclosures under this item.

Item 10 Other Financial Industry Activities and Affiliations

Neither Parker Advisory Group nor any of our management persons are registered as a broker-dealer or registered representative of a broker-dealer.

Neither Parker Advisory Group nor any of our management persons are registered as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Special Purpose Vehicles

Mr. Chad Parker and Mr. Kaylan Andersen are owners of Parker Advisory Group, LLC.

Mr. Andersen is a part owner of NEBKA Investments, LLC, a special purpose vehicle ("SPV"), that invested in a specific private investment. Parker Advisory Group, LLC does not receive a management fee or other fees for work provided to NEBKA Investments, LLC. Several clients of Parker Advisory Group, LLC are also owners of NEBKA Investments, LLC creating a conflict of interest. Mr. Andersen has access to the aforementioned client's fund and securities in the SPV and therefore, Parker Advisory Group, LLC is deemed to have custody over such funds and securities. Refer to Item 15 - *Custody* for further information.

Flint Creek, LLC (owned by Chad Parker), and Mr. Andersen are part owners of AEP Investments, LLC, a special purpose vehicle ("SPV"), that invested in a specific private investment. Parker Advisory Group, LLC does not receive a management fee or other fees for work provided to AEP Investments, LLC. Several clients of Parker Advisory Group are also owners of AEP Investments, LLC, creating a conflict of interest. Mr. Parker and Mr. Andersen have access to the aforementioned client's fund and securities in the SPV and therefore, Parker Advisory Group, LLC is deemed to have custody over such funds and securities. Refer to Item 15 - *Custody* for further information.

No other clients of Parker Advisory Group, LLC will be solicited to invest in the SPVs. Mr. Parker and Mr. Andersen receive income from these entities based upon their ratable ownership in the underlying investment.

The firm endeavors at all times to put the client's interest first as part of its fiduciary duty. However, clients should be aware that the receipt of additional compensation itself creates a conflict of interest and can influence these individuals when making investment recommendations. In order to properly handle such potential conflicts of interest, the firm has adopted a Code of Ethics. Refer to Item 11 *Code of Ethics, Participation or Interest in Client Transactions and Personal Trading* for further information related to the firm's Code of Ethics.

Insurance Agents

Kaylan Andersen is separately licensed as an independent insurance agent. In this capacity, he can effect transactions in insurance products for his clients and earn commissions for these activities. The fees you pay our firm for advisory services are separate and distinct from the commissions earned by Mr. Andersen for insurance related activities. This presents a conflict of interest because Mr. Andersen may have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

Real Estate Agent

Persons providing investment advice on behalf of our firm are licensed as a real estate agent. These individuals will be able to arrange the purchase and sale of real estate, and in certain circumstances, real estate transactions will be for clients of Parker Advisory Group. In their separate capacities as a real estate agent, they will receive separate yet customary compensation. Parker Advisory Group endeavors to undertake mitigating any conflicts through proper disclosure to clients.

These practices presents a conflict of interest because they have an incentive to recommend real estate and/or insurance products to you for the purpose of generating commissions rather than solely based on your needs.

Affiliated Real Estate Investment Companies

Through common control and ownership, we are affiliated with Candy Apple Red, LLC and Flint Creek, LLC, both are real estate investment companies. There are no referral arrangement between our firm and the affiliated entities. As such, no clients of our firm are invested in or solicited to invest in or with either of our affiliates.

Additionally, employees who partake in other business activities outside of Parker Advisory Group must disclose such activities at least annually. Parker Advisory Group reviews such activities and endeavors to undertake mitigating any conflicts through proper disclosure to clients. As such, Parker Advisory Group will disclose these activities to inform clients and mitigate any conflicts. Refer to ADV Part 2B for further information.

Recommendation of Other Advisers

We may recommend that you use a third party money manager ("TPMM") based on your needs and suitability. We will not receive separate compensation directly or indirectly, from the TPMM for recommending that you use their services. Moreover, we do not have any other business relationships with the recommended TPMM(s). Refer to the *Advisory Business* section above for additional disclosures on this topic.

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

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for persons associated with our firm. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All persons associated with our firm are expected to adhere strictly to these guidelines. Persons associated with our firm are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm.

Clients or prospective clients may obtain a copy of our Code of Ethics by contacting us at the telephone number on the cover page of this brochure.

Participation or Interest in Client Transactions

As described in Item 10 - *Other Financial Industry Activities and Affiliations*, Mr. Chad Parker (Flint Creek, LLC) and Mr. Kaylan Aderson are owners and serve as Managers of special purpose vehicles ("SPV"). Several clients of Parker Advisory Group are part owners of NEBKA Investments, LLC and AEP Investments LLC; however, no other clients will be solicited to invest in the SPVs. Parker Advisory Group does not receive a management fee or other fees for work provided to NEBKA Investments, LLC and AEP Investments LLC. Mr. Parker (Flint Creek, LLC) and Mr. Andersen have direct financial interests in the SPV. Mr. Parker (Flint Creek, LLC) and Mr. Andersen will receive income from the SPVs based upon their ratable ownership in the underlying investment. Conflicts that arise are mitigated through Parker Advisory Group's fiduciary obligation to act in the best interest of its clients, contractual limitations that govern the activities of Mr. Parker (Flint Creek, LLC) and Mr. Andersen as Managers/Owners of the SPVs, as applicable, and the requirement of Mr. Parker and Mr. Andersen to not place their interests before its clients' interests when managing the SPVs. Clients and prospective clients may contact Parker Advisory Group to request a copy of its Code of Ethics by contacting the Firm at the phone number on the cover page of this brochure.

Personal Trading Practices

Our firm or persons associated with our firm may buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To mitigate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities.

Item 12 Brokerage Practices

We do not recommend one or more specific broker-dealer(s). Rather we recommend the investment platforms offered by third party managers. You will be required to use the custodian and/or broker-dealer that is designated by the third party program chosen.

Brokerage Requirements:**SEI Management**

In order to be eligible for the SEI Management Program, you are required to use SEI Financial Services, a FINRA registered broker-dealer for the placement of all trades. SEI Trust Company, a subsidiary of SEI Corporation, acts as the transfer agent and custodian for SEI Management Program accounts. Your account(s) are required to be maintained at SEI Trust Company in order to participate in the SEI Management Programs.

Research and Other Soft Dollar Benefits

We do not have any soft dollar arrangements.

Economic Benefits

As a registered investment adviser, we have access to the institutional platform of your account custodian. As such, we will also have access to research products and services from your account custodian and/or other brokerage firm. These products are in addition to any benefits or research we pay for with soft dollars, and may include financial publications, information about particular companies and industries, research software, and other products or services that provide lawful and appropriate assistance to our firm in the performance of our investment decision-making responsibilities. Such research products and services are provided to all investment advisers that utilize the institutional services platforms of these firms, and are not considered to be paid for with soft dollars. However, you should be aware that the commissions charged by a particular broker for a particular transaction or set of transactions may be greater than the amounts another broker who did not provide research services or products might charge. SEI may co-sponsor and pay up to half the cost of a marketing event. The benefit creates an incentive to use SEI's services and thereby a potential risk for a conflict of interest.

Item 13 Review of Accounts

Advisory Accounts

Chad W. Parker, President, Chief Compliance Officer, and Investment Adviser Representative of Parker Advisory Group, LLC, is responsible for monitoring your accounts. However, the individuals conducting reviews may vary from time to time, as personnel join or leave our firm.

For accounts participating in the SEI programs, your accounts will be monitored on an ongoing basis. For accounts participating in the John Hancock or American Funds programs your accounts will be monitored on a periodic basis. However, all accounts will be reviewed at least annually for suitability purposes and to ensure the advisory services provided to you are consistent with your investment needs and objectives. Additional reviews may be conducted based on various circumstances, including, but not limited to contributions and withdrawals, year-end tax planning, market moving events, security specific events, and/or, changes in your risk/return objectives.

As part of the investment policy that is created for you, we ask that you inform us of any changes in your circumstances that may impact your original investment policy, as an immediate review may be necessary.

We will not provide you with additional or regular written reports. If you participate in the SEI programs, you will receive written quarterly performance reports of activity, income and value from on the program selected. Those participating in either the John Hancock or American Funds programs will receive quarterly performance reports of activity, income and value from John Hancock or American Funds.

Financial Planning Accounts

Financial Planning client accounts will be reviewed as contracted for at the inception of the advisory relationship. Additionally, clients will receive written reports as contracted for at the inception of their advisory relationship.

Item 14 Client Referrals and Other Compensation

As disclosed under the *Fees and Compensation* section in this brochure, persons providing investment advice on behalf of our firm are licensed insurance agents. For information on the conflicts of interest this presents, and how we address these conflicts, refer to the *Fees and Compensation* section.

We do not receive any compensation from any third party in connection with providing investment advice to you nor do we compensate any individual or firm for client referrals.

Refer to the *Brokerage Practices* section above for disclosures on research and other benefits we may receive resulting from our relationship with your account custodian.

Item 15 Custody

As paying agent for our firm, your independent custodian will directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other qualified custodian. You will receive account statements from the qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy.

As disclosed in Item 10, Mr. Chad Parker and Mr. Kaylan Andersen are owners of Parker Advisory Group, LLC. Mr. Andersen is a part owner of NEBKA Investments, LLC, and Flint Creek, LLC (owned by Chad Parker) and Mr. Andersen are part owners of AEP Investments, LLC, special purpose vehicles ("SPVs") that invested in specific private investments. Several clients of Parker Advisory Group are also owners of AEP Investments, LLC, creating a conflict of interest. Mr. Parker and Mr. Andersen have access to the aforementioned client's fund and securities in the SPVs and therefore, Parker Advisory Group, LLC is deemed to have custody over such funds and securities. Parker Advisory Group is required to engage an independent accounting firm registered with the PCAOB to conduct annual financial statement audits. The annual audited financial statements must be distributed to investors for the SPV within 120 days after the SPV's fiscal year end.. Any related opinions issued by an independent accounting firm are filed with the SEC and are publicly available on the SEC's Investment Adviser Public Disclosure website (<http://adviserinfo.sec.gov>).

Item 16 Investment Discretion

For advisory clients that wish to participate in the SEI asset management programs, you must first sign our discretionary management agreement and the appropriate trading authorization forms.

By signing our discretionary management agreement, you will be granting our firm with discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. You may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for your account(s). For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry or security. Discretionary authority will be granted in writing by signing the appropriate agreement and/or trading authorization form. Refer to the *Advisory Business* section in this brochure for more information on our discretionary management services.

If you enter into non-discretionary arrangements with our firm, we will obtain your approval prior to the execution of any transactions for your account(s). You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

Item 17 Voting Client Securities

We will not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of applicable securities, you are responsible for exercising your right to vote as a shareholder.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward any electronic solicitations to vote proxies.

Item 18 Financial Information

Our firm does not have any financial condition or impairment that would prevent us from meeting our contractual commitments to you. We do not take physical custody of client funds or securities, or serve as trustee or signatory for client accounts, and, we do not require the prepayment of more than \$1,200 in fees six or more months in advance. Therefore, we are not required to include a financial statement with this brochure.

We have not filed a bankruptcy petition at any time in the past ten years.

Item 19 State Investment Advisers

We are a federally registered investment adviser; therefore, we are not required to respond to this item.

Item 20 Additional Information

Your Privacy

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any non-public personal information about you to any non-affiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to non-public personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your non-public personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Contact our main office at the telephone number on the cover page of this brochure if you have any questions regarding this policy.

If you decide to close your account(s) we will adhere to our privacy policies, which may be amended from time to time.

If we make any substantive changes in our privacy policy that would further permit or require disclosures of your private information, we will provide written notice to you. Where the change is based on permitted disclosures, you will be given an opportunity to direct us as to whether such disclosure is acceptable. Where the change is based on required disclosures, you will only receive written notice of the change. You may not opt out of the required disclosures.

If you have questions about our privacy policies contact our main office at the telephone number on the cover page of this brochure and ask to speak to the Chief Compliance Officer.

IRA Rollover Considerations

As part of our investment advisory services to you, we may recommend that you withdraw the assets from your employer's retirement plan and roll the assets over to an individual retirement account ("IRA") that we will manage on your behalf. If you elect to roll the assets to an IRA that is subject to our management, we will charge you an asset based fee as set forth in the agreement you executed with our firm. This practice presents a conflict of interest because persons providing investment advice on our behalf have an incentive to recommend a rollover to you for the purpose of generating fee based compensation rather than solely based on your needs. You are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by our firm.

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of:

An employee will typically have four options:

1. Leaving the funds in your employer's (former employer's) plan.
2. Moving the funds to a new employer's retirement plan.
3. Cashing out and taking a taxable distribution from the plan.
4. Rolling the funds into an IRA rollover account.

Each of these options has advantages and disadvantages and before making a change we encourage you to speak with your CPA and/or tax attorney.

If you are considering rolling over your retirement funds to an IRA for us to manage here are a few points to consider before you do so:

1. Determine whether the investment options in your employer's retirement plan address your needs or whether you might want to consider other types of investments.
 1. Employer retirement plans generally have a more limited investment menu than IRAs.
 2. Employer retirement plans may have unique investment options not available to the public such as employer securities, or previously closed funds.
2. Your current plan may have lower fees than our fees.
 1. If you are interested in investing only in mutual funds, you should understand the cost structure of the share classes available in your employer's retirement plan and how the costs of those share classes compare with those available in an IRA.
 2. You should understand the various products and services you might take advantage of at an IRA provider and the potential costs of those products and services.

3. Our strategy may have higher risk than the option(s) provided to you in your plan.
4. Your current plan may also offer financial advice.
5. If you keep your assets titled in a 401k or retirement account, you could potentially delay your required minimum distribution beyond age 70.5.
6. Your 401k may offer more liability protection than a rollover IRA; each state may vary.
 1. Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies. However, there can be some exceptions to the general rules so you should consult with an attorney if you are concerned about protecting your retirement plan assets from creditors.
7. You may be able to take out a loan on your 401k, but not from an IRA.
8. IRA assets can be accessed any time; however, distributions are subject to ordinary income tax and may also be subject to a 10% early distribution penalty unless they qualify for an exception such as disability, higher education expenses or the purchase of a home.
9. If you own company stock in your plan, you may be able to liquidate those shares at a lower capital gains tax rate.
10. Your plan may allow you to hire us as the manager and keep the assets titled in the plan name.

It is important that you understand the differences between these types of accounts and to decide whether a rollover is best for you. Prior to proceeding, if you have questions contact your investment adviser representative, or call our main number as listed on the cover page of this brochure.

Trade Errors

In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account.

Class Action Lawsuits

We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.