Item 1 Cover Page

Schultz Financial Group Incorporated

SEC File Number: 801 – 18297

ADV Part 2A, Brochure
Dated: November 4, 2026

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This Brochure provides information about the qualifications and business practices of Schultz Financial Group Incorporated ("SFG"). If you have any questions about the contents of this Brochure, please contact us at (775) 850-5620 or jspecter@sfginc.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Schultz Financial Group Incorporated is also available on the SEC's website at www.adviserinfo.sec.gov.

References to Schultz Financial Group Incorporated as a "registered investment adviser" or to being "registered" do not imply a certain level of skill or training.

Item 2 Material Changes

There have been no material changes to this Form ADV Part 2A Brochure since the March 26, 2025 annual updating amendment filing.

SFG's Chief Compliance Officer, Jennifer Specter, is available to address any questions about this Brochure including any conflicts of interest presented, and SFG's practices in general.

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Item 4 Advisory Business

A. SFG is a California corporation formed on November 12, 1982, which became registered as an investment adviser in January 1983. SFG's principal owners are the Schultz Family 2005 Trust, for which Russell Schultz and Vicki Schultz are the Trustees; and Alyssa Dalbey. Mr. Schultz is SFG's President, Ms. Schultz is SFG's Executive Vice President, and Ms. Dalbey is SFG's Vice President.

B. SFG offers to provide wealth management and non-discretionary investment management services to its clients (typically: individuals, high net worth individuals, trusts, estates, small businesses, pension and profit sharing plans, and charitable organizations) as described below. SFG customizes its services for clients based on its "Four Capitals" which include: Financial Matters, Physical Well-Being, Intellectual Engagement, and Psychological Space.

FINANCIAL ADVISORY SERVICES

Combined Wealth and Non-Discretionary Investment Management. SFG's primary service offering employs its "Four Capitals" approach to provide wealth management and non-discretionary investment management services tailored to each client's unique situation. SFG charges a fixed annual retainer for these services, subject to a minimum annual fee for new clients. While the specific scope of services will depend on the client's situation and requests, SFG designs and executes its wealth management services with a focus on risk management, cash flow management, tax planning, trust and estate planning, charitable giving strategies, and business consulting services. For families who have a combined net worth exceeding $20 million, SFG may also provide real estate advisory, philanthropic planning, multi-advisor coordination, and legacy planning and wealth transfer services.

Before SFG provides combined wealth and non-discretionary investment management services, clients are required to enter into a Financial Advisory Agreement with SFG setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the fee that is due from the client. An adviser will then coordinate with each client to establish the client's wealth management and investment objectives. Based on that, SFG will prepare a written financial plan and recommend that the client allocate investment assets consistent with the designated financial plan and investment objectives. SFG will then implement or assist the client in implementing the financial plan objectives. Once the plan is agreed upon and implemented, SFG provides ongoing monitoring and review of account performance and asset allocation as compared to client investment objectives and may recommend rebalancing and/or account transactions as a result of those reviews or other triggering events.

Non-Discretionary Investment Management (Stand-Alone). SFG also offers to provide non-discretionary investment management services for a stand-alone fee. SFG's annual fee is fixed and based upon a percentage of the market value of the assets placed under SFG's management. Before SFG provides stand-alone non-discretionary investment management services on a fee-only basis, clients are required to enter into a Financial Advisory Agreement with SFG setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the fee that is due from the client. An investment adviser representative will then coordinate with the client to develop their investment objectives and recommend that the client allocate investment assets consistent with the designated investment objectives. Once allocated, SFG provides ongoing monitoring and review of account performance and asset allocation as compared to client investment objectives and may recommend rebalancing and/or account transactions as a result of those reviews or other triggering events.

Wealth Management Services (Stand-Alone). Finally, SFG offers to provide wealth management services addressing investment and non-investment related matters, such as estate planning, insurance planning, tax planning, business consulting services, etc. for a stand-alone separate fee. SFG's stand-alone wealth management fees depend upon the level and scope of the services required and the professionals rendering the services. Before engaging SFG to provide planning or consulting services, clients are generally required to enter into a Financial Advisory Agreement with SFG setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the portion of the fee that is due from the client before SFG will begin to provide those services.

MISCELLANEOUS

Limitations of Non-Discretionary Investment Management. SFG manages investments on a non-discretionary basis, which means that the client must approve each trade for their portfolio before it is executed. SFG does this so clients can better understand the composition of their investment portfolio and can inform SFG of any changes in their situation that might warrant making other changes to their investment portfolio. Because SFG cannot execute any account transactions without obtaining the client's prior consent, if SFG would like to execute a transaction for a client's account (including during times of market volatility), and the client is unavailable to provide consent, SFG will be unable to execute that account transaction. Affected clients could suffer investment losses or miss potential investment gains if they are not available to provide consent to proposed transactions.

Limitations of Wealth Management and Non-Investment Consulting/Implementation Services. SFG does not serve as a law firm, accounting firm, or insurance agency, and no portion of SFG's services should be construed as legal, accounting, or insurance implementation services. Accordingly, SFG does not prepare estate planning documents, tax returns, or sell insurance products. Unless specifically agreed in writing, neither SFG nor its representatives are responsible to implement any wealth management / financial plans or financial planning advice; provide ongoing wealth management / financial planning services; or provide ongoing monitoring of wealth management / financial plans or financial planning advice. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from SFG and its representatives. To the extent requested by a client, SFG may recommend the services of other professionals for certain non-investment implementation purposes (i.e., attorneys, accountants, insurance agents, etc.). Clients are under no obligation to engage the services of any recommended professional, who are each responsible for the quality and competency of the services they provide.

Retirement Plan Rollovers – No Obligation / Conflict of Interest. A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If SFG recommends that a client roll over their retirement plan assets into an account to be managed by SFG, such a recommendation creates a conflict of interest if SFG will earn a new (or increase its current) advisory fee as a result of the rollover.

ERISA / IRC Fiduciary Acknowledgment. When SFG provides investment advice to a client about the client's retirement plan account or individual retirement account, it does so as a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act ("ERISA") and/or the Internal Revenue Code ("IRC"), as applicable, which are laws governing retirement accounts. Because the way SFG makes money creates certain conflicts with client interests, SFG operates under a special rule that

requires it to act in the client's best interest and not put its interests ahead of the client's. Under this special rule's provisions, SFG must: meet a professional standard of care when making investment recommendations (give prudent advice); never put its financial interests ahead of the client's when making recommendations (give loyal advice); avoid misleading statements about conflicts of interest, fees, and investments; follow policies and procedures designed to ensure that SFG gives advice that is in the client's best interest; charge no more than is reasonable for SFG's services; and give the client basic information about conflicts of interest.

Asset Aggregation / Reporting Services. SFG may provide access to reporting services through one or more third-party aggregation / reporting platforms that can reflect all of the client's investment assets, including those investment assets that the client has not engaged SFG to manage (the "Excluded Assets"). SFG's service for the Excluded Assets is strictly limited to reporting and specifically excludes investment management or implementation. Because SFG does not have trading authority for the Excluded Assets, the client (or a designated investment professional), and not SFG, will be exclusively responsible for implementing any recommendations for the Excluded Assets and the resulting performance or related activity (such as timing and trade errors) pertaining to the Excluded Assets. The third-party aggregation / reporting platforms may also provide access to financial planning information and applications, which should not be construed as services, advice, or recommendations provided by SFG. Accordingly, SFG will not agree to be responsible for any adverse results a client may experience if the client engages in financial planning or other functions available on the third party reporting platforms without SFG's participation or oversight.

Portfolio Trading Activity / Inactivity. As part of its investment advisory services, SFG will review client portfolios on an ongoing basis to determine if any trades are necessary based upon various factors, including but not limited to investment performance, market conditions, fund manager tenure, style drift, account additions/withdrawals, the client's financial circumstances, and changes in the client's investment objectives. Based upon these and other factors, there may be extended periods when SFG determines that upon review, trades within a client's portfolio are not prudent. Clients nonetheless remain subject to the fees described in Item 5 during periods of portfolio trading inactivity.

Client Obligations. When performing its services, SFG is not required to verify any information received from the client or from the client's designated professionals and is expressly authorized to rely on that information. Clients are responsible to promptly notify SFG if there is ever any change in their financial situation or investment objectives for the purpose of reviewing or amending SFG's services or previous recommendations.

C. SFG provides investment advisory services specifically tailored to the needs of each client. Before providing investment advisory services, an investment adviser representative will coordinate with each client to develop investment objectives. SFG allocates each client's investment assets consistent with their designated investment objectives. Clients may, at any time, impose restrictions, in writing, on SFG's services.

D. SFG does not participate in a wrap fee program.

E. As of December 31, 2025, SFG had $214,840,003 in assets under management on a non-discretionary basis.

Item 5 Fees and Compensation

A. SFG's fees for its financial advisory services are as set forth below.

FINANCIAL ADVISORY SERVICES

Combined Wealth and Non-Discretionary Investment Management. SFG's primary service offering employs its "Four Capitals" approach to provide wealth management and non-discretionary investment management services tailored to each client's unique situation. SFG charges a fixed annual retainer that generally ranges between $20,000 and $150,000, payable quarterly or monthly in advance depending on the terms of the applicable Financial Advisory Agreement. The negotiable fee is based on objective and subjective factors including but not necessarily limited to the client's net worth, legacy relationships, managed account composition, future earning capacity, negotiations with the client, the complexity of client assets and liabilities, related accounts, the current and anticipated amount of assets to be managed, the level and scope of the services required, and which professionals will provide the services.

Non-Discretionary Investment Management (Stand-Alone). SFG may agree to provide non-discretionary investment management services for a stand-alone fee. SFG's annual advisory fee is fixed and based upon a percentage (%) of the market value of the assets placed under SFG's management (generally 1% of the first million, .75% of the next million, and .5% on assets over $2 million).

Wealth Management Services (Stand-Alone). SFG may agree to provide financial planning and/or consulting services (including investment and non-investment related matters, including estate planning, insurance planning, etc.) for a stand-alone fee. SFG's planning and consulting fees generally range between $150 and $500 per hour, depending upon the level and scope of the services required and the professionals providing the services.

SFG's Fees in General. Account assets consisting of cash and cash equivalent positions are included in the value of an account's assets for purposes of calculating the investment advisory fees or the fixed annual fee, as applicable. Similar services provided by SFG may be available from other advisers under different fee structures. SFG may agree in limited circumstances to reduce the annual investment advisory fee based upon criteria such as: legacy relationship, type of assets to be managed, related accounts, anticipated future additional assets and earning capacity, account composition, and negotiations with the client. Certain clients have accepted different service offerings and may therefore receive services under different arrangements than as described above. As a result of these factors, similarly situated clients could pay different fees that correspondingly impact net account performance.

B. Clients may elect to have SFG's advisory fees deducted from their custodial account. Both SFG's Financial Advisory Agreement and the custodial/clearing agreement may authorize the custodian to debit the account for the amount of SFG's financial advisory fee and to directly remit that management fee to SFG in compliance with regulatory procedures. In the limited event that SFG bills the client directly, payment is due upon receipt of SFG's invoice. SFG deducts fees or bills clients either monthly or quarterly in advance, based upon the annual fixed fee.

C. SFG generally recommends that Charles Schwab & Co., Inc., an SEC-registered and FINRA member broker-dealer/custodian ("Schwab") and its affiliates serve as the broker-dealer/custodian for client investment management assets. Broker-dealers charge transaction fees for executing certain securities transactions according to their fee schedule, and they or their affiliated custodians also impose charges for custodial services / fees associated with maintaining the client's account. Without limiting the foregoing, clients may also be required to pay certain charges and administrative fees related to their

investment advisory accounts including, but not limited to, transaction charges (including mark-ups and mark-downs), charges resulting from trades executed through or with a broker-dealer other than the designated broker-dealer/custodian, transfer taxes, transfer or wiring fees, odd lot differentials, exchange fees, interest charges, American Depository Receipt agency processing fees, and any charges, taxes or other fees mandated by any federal, state or other applicable law or otherwise agreed to with regard to client accounts. For mutual fund and ETF purchases, clients will incur charges imposed by the respective fund which represent the client's pro rata share of the fund's management fee and other fund expenses. These fees and expenses are described in each fund's prospectus or other offering documents. SFG does not share in the fees or expenses charged by the broker-dealers/custodians and fund sponsors described in this Item.

D. SFG's annual advisory fees are prorated and paid monthly or quarterly, in advance. The applicable form of agreement between SFG and the client will continue in effect until terminated by either party by written notice in accordance with the terms of the agreement, or upon satisfaction of the terms of the agreement. Upon termination, SFG will refund the pro-rated portion of any unearned, advanced advisory fee paid based upon the number of days remaining in the billing period or the amount of services provided to date.

E. Neither SFG nor its representatives accept compensation from the sale of securities or other investment products.

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

Neither SFG nor any supervised person of SFG accepts performance-based fees.

Item 7 Types of Clients

SFG's clients currently include individuals, high net worth individuals, trusts, estates, small businesses, pension and profit sharing plans, and charitable organizations. For new clients, SFG generally requires a minimum $20,000 annual fee for its Combined Wealth and Non-Discretionary Investment Management Services. However, SFG may reduce or waive that minimum fee in its sole discretion based upon certain criteria (i.e., net worth, legacy relationships, managed account composition, future earning capacity, negotiations with the client, the complexity of client assets and liabilities, related accounts, the current and anticipated amount of assets to be managed, the level and scope of the services required, and which professionals will provide the services).

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

SFG's investment process is to analyze different scenarios to see how various economic indicators and variables can affect the macroeconomic environment. Then we look at how these scenarios affect different investment strategies. Based on the client's financial planning goals and objectives, we develop a diversified investment portfolio. Each client's portfolio could vary depending on their investment parameters and may or may not include certain investment strategies. These investments can be executed either through mutual funds or private investment funds. We do not select individual equities or bonds on a regular basis but may do so on occasion based on client objectives. Our philosophy is to invest in people who can execute a specific investment strategy.

We look for investment managers / funds who have the ability to execute a strategy that is in line with the client's objectives. This could be in equities, fixed income, hedged strategies, energy, real estate, commodities, or private equity. We perform due diligence on these managers / funds and analyze their investment strategy. These managers / funds could use fundamental, technical, and/or cyclical analysis.

They may invest, indirectly or directly, in a wide range of U.S. and non-U.S. equity and debt securities, commodities and other financial and investment vehicles, including, without limitation, U.S. and non-U.S. government and U.S. federal agency or instrumentality issued or guaranteed securities, floating rate instruments, equity interests (including common and preferred stock, warrants, options, convertible stock and restricted securities), other asset-backed securities collateralized by high yield bank loans, corporate debt instruments (including convertible debt instruments), as well as repurchase and reverse repurchase agreements, securities lending agreements, futures contracts, spot and forward contracts, options, swaps, and hybrid, synthetic and derivative instruments.

When selecting strategies, SFG focuses on numerous factors, including, without limitation, recent performance, anticipated market conditions, diversification of strategies, and the economic coherence of the various strategies under consideration. Certain investments like energy, real estate, private equity, and private debt are illiquid and require long term commitments.

When allocating assets, SFG first determines which general investment strategy types it believes should be included in the client's portfolio based on their investment profile. Strategy types may from time to time be excluded from the portfolio and new ones added based on our recommendations to the client. This is done on a non-discretionary basis. This means the client needs to approve any investment in their portfolio before the investment is made. SFG does this so the client can better understand the composition of their investment portfolio and can inform us of any changes in their situation which might warrant other changes for their investment portfolio. Because SFG manages client assets strictly on a non-discretionary basis, clients must accept that SFG cannot execute any account transactions without obtaining the client's prior consent to the transactions. Therefore, if SFG would like to make a transaction for a client's account (including selling a security that SFG no longer believes is appropriate or buying a security that SFG believes is appropriate), and the client is unavailable to provide consent, SFG will be unable to execute the account transactions. Affected clients could suffer investment losses or miss potential investment gains as a result if they are not available to provide consent to the proposed transaction.

Investment Risk in General. Investing in securities involves risk of loss that clients should be prepared to bear, including the loss of principal investment. Past performance does not guarantee future results. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and investment strategies recommended or undertaken by SFG) will be profitable or equal to any specific performance levels. Investment strategies such as asset allocation, diversification, or rebalancing do not assure or guarantee better performance and cannot eliminate the risk of investment losses. There is no guarantee that a portfolio employing these or any other strategy will outperform a portfolio that does not engage in such strategies. While asset values may increase and client account values could benefit as a result, it is also possible that asset values may decrease, and client account values could suffer a loss.

Unaffiliated Private Investment Funds. SFG may recommend that its clients consider the purchase of unaffiliated private investment funds. SFG's role in this capacity is limited to its initial and ongoing due diligence and investment monitoring services. The terms and conditions for participation in the unaffiliated private investment funds, including management and incentive fees, conflicts of interest, and risk factors, are set forth in each fund's offering documents. If a client determines to become a private fund investor, the amount of assets invested in the funds are included for purposes of SFG calculating its fixed annual retainer fee, which would be based on the most recent valuation provided by the fund sponsor. SFG's clients are under absolutely no obligation to consider or make an investment in private investment funds.

Independent Managers. SFG may recommend that the client allocate a portion of their assets among certain independent alternative/hedge fund/fixed income investment managers (the "Independent Managers"), consistent with the stated investment objectives of the client according to the terms and conditions of a separate agreement executed between the client and the Independent Managers and/or platform sponsor. In certain circumstances, the terms and conditions of an applicable agreement impose a flat quarterly fee for transaction and custody charges. SFG continues to provide advisory services to the client in this capacity through the ongoing monitoring and reviewing of account performance, as part of SFG's fixed annual retainer fee. Factors that SFG considers when recommending Independent Managers include the client's stated investment objectives, management style, performance, reputation, financial strength, reporting, pricing, and research. The investment management fees charged by the designated Independent Managers, together with the fees charged by the corresponding designated broker-dealer/custodian of the client's assets, are exclusive of, and in addition to, SFG's fixed annual retainer fee.

Margin Loans. SFG does not recommend the use of margin for investment purposes. However, if a client determines to take a margin loan that collateralizes a portion of the assets that SFG is managing, SFG's investment advisory fee will be computed based upon the full value of the assets, without deducting the amount of the margin loan. The terms and conditions of each margin loan are contained in a separate agreement between the client and the margin lender selected by the client, which terms and conditions may vary from client to client. Borrowing funds on margin is not suitable for all clients and is subject to certain risks, including but not limited to: increased market risk, increased risk of loss, especially in the event of a significant downturn; liquidity risk; the potential obligation to post collateral or repay the margin loan if the margin lender determines that the value of collateralized securities is no longer sufficient to support the value of the margin loan; the risk that the margin lender may liquidate the client's securities to satisfy its demand for additional collateral or repayment / the risk that the margin lender may terminate the margin loan at any time. Before agreeing to participate in a margin loan program, clients should carefully review the applicable margin agreement and all risk disclosures provided by the margin lender including the initial margin and maintenance requirements for the specific program in which the client enrolls, and the procedures for issuing "margin calls" and liquidating securities and other assets in the client's accounts. If SFG were to recommend that a client continue the use of margin instead of selling securities that SFG manages for a fee to meet liquidity needs, the recommendation presents an ongoing conflict of interest because selling those securities (instead of leveraging those securities to access a margin loan) would reduce the amount of assets to which SFG's investment advisory fee percentage is applied, and thereby reduce the amount of investment advisory fees collected by SFG. This conflict is generally mitigated for clients who agree to a fixed annual retainer fee with SFG. This conflict of interest would persist as long as SFG has a disincentive to recommend that the client terminate the use of margin. If the client were to invest any portion of the margin proceeds in an account that SFG manages, SFG will receive an advisory fee on the invested amount, which could compound this conflict of interest. Clients are not under any obligation to employ the use of margin, and are solely responsible for determining when to use, reduce, and terminate the use of margin. Although SFG seeks to disclose all conflicts of interest related to its recommended use of margin and related business practices, there may be other conflicts of interest that are not identified above. Clients should carefully review the applicable margin agreement and all risk disclosures provided by the margin lender as applicable and contact SFG's Chief Compliance Officer with any questions regarding the use of margin.

Cybersecurity Risk. The information technology systems and networks that SFG and its third-party service providers use to provide services to SFG's clients employ various controls, which are designed to prevent cybersecurity incidents stemming from intentional or unintentional actions that could cause significant interruptions in SFG's operations and result in the unauthorized acquisition or use of clients' confidential or non-public personal information. Clients and SFG are nonetheless subject to the risk of

cybersecurity incidents that could ultimately cause them to incur losses, including for example: financial losses, costs, and reputational damage to respond to regulatory obligations, other costs associated with corrective measures, and loss from damage or interruption to systems. Although SFG has established its systems to reduce the risk of cybersecurity incidents from coming to fruition, there is no guarantee that these efforts will always be successful, especially considering that SFG does not directly control the cybersecurity measures and policies employed by third-party service providers. Clients could incur similar adverse consequences resulting from cybersecurity incidents that more directly affect issuers of securities in which those clients invest, broker-dealers, qualified custodians, governmental and other regulatory authorities, exchange and other financial market operators, or other financial institutions.

Our investment approach constantly keeps the risk of loss in mind. Without limiting the above or the potential scope of overall investment risk, investors following our investment strategies generally face the following investment risks:

- Market Risk: The price of a security may drop in reaction to tangible and intangible events and conditions. This type of risk may be caused by external factors (such as economic or political factors) but may also be incurred because of a security's specific underlying investments. Additionally, each security's price can fluctuate based on market movement, which may or may not be due to the security's operations or changes in its true value. For example, political, economic and social conditions may trigger market events which are temporarily negative, or temporarily positive.
- Geopolitical Risk. Increased interconnectivity between global economies and financial markets increases the likelihood that events or conditions in one region or financial market may adversely impact issuers in a different country, region, or financial market. Certain securities may underperform due to inflation (or expectations for inflation), interest rates, global demand for particular products or resources, climate change or climate-related events, natural disasters, pandemics, epidemics, terrorism, international conflicts, regulatory events, and governmental or quasi-governmental actions. The occurrence of global events similar to those in recent years may result in market volatility and may have long term effects on both the U.S. and global financial markets.
- Fixed Income Risk: Investments in fixed income instruments involve several risks that can affect their value. The prices of these investments can change from day to day. Common risks include changes in interest rates, the financial condition of the issuer, and how quickly principal is repaid. When interest rates rise, the value of existing fixed income investments typically falls. If an issuer's financial condition worsens or its credit rating is downgraded, the value of its fixed income securities may also decline. Some fixed income investments may also be affected by early repayments, which can limit returns when interest rates are low.
- Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- Currency Risk: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- Concentration Risk: Maintaining concentrated positions in the same companies, industries, or issuers invested in the same industries increases the risk of loss relative to the market as a whole.

- Reinvestment Risk: This is a risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate). This primarily relates to fixed income securities.
- Business Risk: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit.
- Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- Financial Risk: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad times. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- Unaffiliated Private Fund Risk: Private investment funds generally involve various risk factors, including, but not limited to, potential for complete loss of principal, liquidity constraints and lack of transparency, a complete discussion of which is set forth in each fund's offering documents, which will be provided to each client for review and consideration. Unlike liquid investments that a client may maintain, private investment funds do not provide daily liquidity or pricing. Each prospective client investor will be required to complete a Subscription Agreement, pursuant to which the client will establish that they are qualified for investment in the fund and acknowledge and accept the various risk factors that are associated with such an investment.
- Mutual Fund Risk. Mutual funds are operated by investment companies that raise money from shareholders and invest it in stocks, bonds, and/or other types of securities. Each fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. Mutual funds charge a separate management fee for their services, so the returns on mutual funds are reduced by the costs to manage the funds. While mutual funds generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market. Mutual funds come in many varieties. Some invest aggressively for capital appreciation, while others are conservative and are designed to generate income for shareholders. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).
- Cash Positions Risk: Maintaining cash or cash equivalent positions can help reduce portfolio volatility and drawdowns during adverse market conditions and can provide flexibility to meet withdrawals or deploy capital opportunistically. At the same time, holding cash or cash equivalents may cause a client to miss market upswings, and SFG's investment advisory fee could exceed the return earned on cash and cash equivalent positions. Clients may instruct SFG not to maintain (or to limit) cash or cash-equivalent positions in their account.
- Independent Manager Risk: While SFG may conduct due diligence about Independent Managers and their respective investment style and process, SFG will not have the opportunity to evaluate each specific investment that the Independent Managers will execute on the client's behalf. SFG depends on Independent Managers to develop the appropriate systems and procedures to control operational risks. As a result, the rates of return to clients will primarily depend upon the choice of investments and other investment and management decisions of Independent Managers and returns

could be adversely affected by unfavorable performance of such Independent Managers. Some of the strategies that Independent Managers employ may also present additional risk.

Item 9 Disciplinary Information

SFG has not been the subject of legal or disciplinary events that are material to a client or prospective client's evaluation of SFG's advisory business or the integrity of its management.

Item 10 Other Financial Industry Activities and Affiliations

A. Neither SFG nor its representatives are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

B. Neither SFG nor its representatives are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.

C. SFG does not have any relationship or arrangement that is material to its advisory business or to its clients with any related person required to be disclosed in this Item.

D. SFG does not receive, directly or indirectly, compensation from investment advisers that it recommends or selects for its clients.

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

A. SFG maintains an investment policy related to personal securities transactions. This investment policy is part of SFG's overall Code of Ethics, which serves to establish a standard of business conduct for all of SFG's Representatives that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request. In accordance with Section 204A of the Investment Advisers Act of 1940, SFG also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by SFG or any person associated with SFG.

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

C. SFG and its representatives may buy or sell securities that are also recommended to clients. This practice may create a situation where SFG and its representatives could be in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation presents a conflict of interest. Practices such as "scalping" (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if SFG did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, "front-running" (i.e., personal trades executed before those of SFG's clients) and other potentially abusive practices. However, the types of securities and the size of the transactions that SFG and its representatives would typically execute for themselves at or around the same time as those securities are recommended to clients have not been and are not expected to be the types of transactions that could materially affect the market in general or the execution price that clients ultimately realize.

SFG has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of SFG's "Access Persons." SFG's securities transaction policy requires that an Access Person of SFG must provide the Chief Compliance Officer or their designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or their designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date SFG selects. The policy also requires similar quarterly reporting of applicable securities transactions. However, if at any time SFG has only one Access Person, they will not be required to submit any securities report described above.

D. SFG and its representatives may buy or sell securities, at or around the same time as those securities are recommended to, purchased, or sold for clients. This practice creates a situation where SFG and its representatives could be in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation presents a conflict of interest. However, the types of securities and the size of the transactions that SFG and its representatives would typically execute for themselves at or around the same time as those securities are recommended to, purchased, or sold for clients have not been and are not expected to be the types of transactions that could materially affect the market in general or the execution price that clients ultimately realize. Further, as indicated above in Item 11.C., SFG has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of SFG's Access Persons.

Item 12 Brokerage Practices

A. If a client requests that SFG recommend a broker-dealer/custodian for execution or custodial services, SFG generally recommends that investment management accounts be maintained at Schwab. Before engaging SFG to provide investment management services, the client enters into an agreement with SFG setting forth the terms and conditions for the management of the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian. Depending on which broker-dealer/custodian the client selects to maintain their account, they may experience differences in customer service, transaction timing, the availability and investment return of sweep account vehicles and money market funds, and other aspects of investing that could cause differences in account performance.

When seeking "best execution," from a broker-dealer, the determinative factor is not always the lowest possible cost, but whether the transaction represents the best qualitative execution when considering the full range of a broker-dealer's services including the value of research provided, execution capability, commission rates, and responsiveness. Although SFG cannot guarantee that clients will always experience the best possible execution available, SFG seeks to recommend a broker-dealer/custodian that will hold client assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. SFG considers a wide range of factors when recommending a broker-dealer/custodian, including:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody);
- Capability to execute, clear and settle trades (buy and sell securities for client accounts);
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.);
- Breadth of available investment products (stocks, bonds, mutual funds, exchange traded funds, etc.);
- Quality of services (including research);

- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices;
- Reputation, financial strength, and stability; and
- Prior service to SFG and its other clients.

Schwab is compensated for its services according to its fee schedule, generally by charging clients commissions or other fees on trades that it executes or that settle into their Schwab account. Although SFG will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for all client account transactions. The fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, SFG's investment advisory fees. These fees are in addition to the commissions or other compensation clients pay the executing broker-dealer. SFG directs Schwab to execute most if not all trades for client accounts in an attempt to minimize client trading costs. When doing so, SFG has determined that having Schwab execute most trades is consistent with the duty to seek "best execution" of client trades.

1. Research and Other Benefits

   "Schwab Advisor Services™" (formerly called Schwab Institutional®) is Schwab's business serving independent investment advisory firms like SFG. Schwab provides SFG and its clients with access to its institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to Schwab retail customers. Schwab also makes various support services available to SFG. Some of those services help SFG manage or administer its clients' accounts; while others help it manage and grow its business. Schwab's support services are generally available on an unsolicited basis (SFG does not have to request them) and at no charge to SFG.

   Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which SFG might not otherwise have access or that would require a significantly higher minimum initial investment by its clients. These services benefit SFG's clients and their accounts.

   Schwab also makes other products and services available to SFG that benefit SFG but may only indirectly benefit its clients or their accounts, such as investment research developed by Schwab or third parties that SFG may use to service clients' accounts. In addition to investment research, Schwab also makes available software and other technology that:

   - Provide access to client account data (such as duplicate trade confirmations and account statements);
   - Facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
   - Provide pricing and other market data;
   - Facilitate payment of SFG's fees from clients' accounts; and
   - Assist with back-office functions, recordkeeping, and client reporting.

   Schwab also offers other services intended to help SFG manage and further develop its business. These services include:

   - Educational conferences and events;
   - Consulting on technology, compliance, legal and business needs;
   - Publications and conferences on practice management and business succession; and
   - Access to employee benefits providers, human capital consultants, and insurance providers.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to SFG. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide SFG with other benefits, such as providing continuing education courses for SFG's personnel.

SFG's Interest in Schwab's Services and Benefits and Related Conflict of Interest.
The availability of the services and products described above that SFG receives from Schwab (the "Services and Products") provides SFG with an advantage, because SFG does not have to produce or purchase them. However, SFG does not have to pay Schwab or any other entity for Services and Products that Schwab provides. SFG's clients do not pay more for investment transactions executed or assets maintained at Schwab as a result of this arrangement. The receipt of Services and Products is not contingent upon SFG committing any specific amount of business to Schwab in trading commissions or assets in custody. There is no corresponding commitment made by SFG to Schwab or any other entity to invest any specific amount or percentage of client assets in any specific securities or investment products as a result of the above. However, this arrangement nonetheless incentivizes SFG to recommend that clients maintain their account with Schwab, based on its interest in receiving Schwab's services that benefit its business rather than based on clients' interest in receiving the best value in custody services and the most favorable execution of their transactions. This presents a conflict of interest. When making such a recommendation, however, SFG does so when it reasonably believes that recommending Schwab to serve as broker-dealer/custodian is in the best interests of its clients. It is primarily supported by the scope, quality, and price of Schwab's services and not Schwab's services that benefit only SFG.

2. SFG does not receive referrals from broker-dealers.

3. Directed Brokerage.
SFG does not generally accept directed brokerage arrangements (when a client requires that account transactions be executed through a specific broker-dealer). In those client-directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and SFG will not seek better execution services or prices from other broker-dealers. As a result, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. If the client directs SFG to execute securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to execute account transactions through alternative clearing arrangements that may be available through SFG. Higher transaction costs adversely impact account performance. Transactions for directed accounts will generally be executed following the execution of portfolio transactions for non-directed accounts.

B. Because SFG manages accounts on a non-discretionary basis, it executes transactions for client accounts independently and does not aggregate client trades.

Item 13 Review of Accounts

A. For those clients to whom SFG provides investment supervisory services, account reviews are conducted on an ongoing basis by SFG's Principals and representatives. All investment supervisory clients are advised that it remains their responsibility to advise SFG of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with SFG on an annual basis.

B. SFG may conduct account reviews on a non-periodic basis upon a triggering event, such as a change in client investment objectives and/or financial situation, market events, or specific client request.

C. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. SFG may also provide a written periodic report summarizing account activity and performance. SFG's reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 14 Client Referrals and Other Compensation

A. As referenced in Item 12.A. above, SFG receives economic benefits from Schwab including support services and products without cost (or at a discount). SFG's clients do not pay more for investment transactions executed and/or assets maintained at Schwab as a result of this arrangement. There is no corresponding commitment made by SFG to Schwab or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities, or other investment products as a result of the above or similar types of arrangements.

B. SFG does not directly or indirectly compensate any person, other than its supervised persons / employees, for client referrals.

Item 15 Custody

SFG has the ability to have its advisory fee for each client debited by the custodian on a monthly or quarterly basis based upon the annual fixed fee. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. SFG may also provide a written periodic report summarizing account activity and performance. To the extent that SFG provides clients with periodic account statements or reports, SFG urges clients to carefully review those reports and compare them to custodial account statements. The account custodian does not verify the accuracy of SFG's advisory fee calculations. The values used to calculate investment advisory fees based on the market value of client assets may differ from the values shown on the applicable client's custodial statement due to valuation methodologies of certain securities, or other account activities such as unsettled trades, accrued interest, and accrued dividends, which may not be reflected on that client's custodial statement as of the valuation date.

SFG provides other services on behalf of its clients that require disclosure at ADV Part 1, Item 9. In particular, certain clients have signed asset transfer authorizations that permit the qualified custodian to rely upon instructions from SFG to transfer client funds to "third parties." In accordance with the guidance provided in the SEC Staff's February 21, 2017, Investment Adviser Association No-Action Letter, the affected accounts are not subjected to an annual surprise CPA examination.

Item 16 Investment Discretion

SFG does not manage client assets on a discretionary basis.

Item 17 Voting Client Securities

A. SFG does not vote client proxies. Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client are voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings, litigation or other types of events pertaining to the client's investment assets.

B. Clients will receive their proxies or other solicitations directly from their custodian. Clients may contact SFG to discuss any questions they may have with a particular solicitation.

Item 18 Financial Information

A. SFG does not solicit fees of more than $1,200 per client, six months or more in advance.

B. SFG provides only non-discretionary (and not discretionary) investment advisory services.

C. SFG has not been the subject of a bankruptcy petition.

SFG's Chief Compliance Officer, Jennifer Specter, is available to address any questions about this Brochure including any conflicts of interest presented, and SFG's practices in general.