

Effective Date: March 23, 2021

ITEM 1: INTRODUCTION – SGL FINANCIAL, LLC (“SGL”) IS AN SEC REGISTERED INVESTMENT ADVISER

Retail investors should be aware that various brokerage and investment advisory services are available from many different firms for various fees. Each investor should make every effort to understand these services, the differences between each service, and the fees charged. Free and simple tools are available

to research firms and financial professionals at www.Investor.gov/CRS, which also provides educational materials about investment advisers, broker-dealers, and investing in general.

ITEM 2: RELATIONSHIPS AND SERVICES

Questions: *Given my financial situation, should I consider an investment advisory service? How will you choose the investments that you recommend to me? What is your relevant experience including your licenses, education and other qualifications? What do these qualifications mean?*

- Personal investment policy
- Regular portfolio monitoring
- Asset allocation
- Sub-Adviser and/or Third-Party Money Management Selection
- Asset selection

A. SGL Offers the Following Types of Investment Advisory Services

SGL is a fee-based investment management firm, offering asset management, financial planning and consulting services. SGL and its advisers are fiduciaries and act in their clients best interest business. SGL's philosophy is to seek to minimize investment risk through careful diversification and selection of appropriate investment vehicles within each asset class. SGL will meet with each client to determine if SGL's services are appropriate and relevant to each client given their current financial situation. Once a client, SGL will periodically review and monitor each client's portfolio and/or financial plan, if applicable, to determine whether risk and return objectives and investment policies need revision as a result of changes in the client's financial circumstances.

Currently SGL provides investment advice and/or management supervisory services to the following types of clients:

- Individuals
- Small Businesses
- High-Net-Worth Individuals
- Pension and Profit Sharing Plans

SGL's Minimum Account Size is \$50,000 which may be waived by SGL for various circumstances.

SGL may manage accounts on both a discretionary and non-discretionary basis. For those clients' accounts where SGL provides ongoing supervision, SGL requests written discretionary authority over the client's accounts with respect to sub-advisers or third-party money management selection; asset allocations within sub-advisers or third-party money manager accounts; securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides SGL discretionary authority via a limited power of attorney in the Investment Advisory Contract and in the contract between the client and the custodian.

More information and specifics on SGL's services can be found on SGL's ADV Part 2A which can be found by searching SGL Financial on the www.Investor.gov/CRS SEC link or alternatively <https://adviserinfo.sec.gov>.

SGL ongoing portfolio management services are based on the individual goals, objectives, time horizon, and risk tolerance of each client. SGL collects risk assessment and investment suitability information and creates an Investment Policy Statement and/or Risk Assessment for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation.

Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy
- Risk tolerance

ITEM 3: FEES, COSTS, CONFLICTS, AND STANDARD OF CONDUCT

Questions: *Help me understand how fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me? What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have? How might your conflicts of interest affect me, and how will you address them?*

A. SGL's Fee Structure

SGL charges fees for investment supervisory and financial planning services. Fees for managing clients' investment portfolios are based on a percentage of the total assets under management or advisement. This fee is payable in advance on a quarterly basis. The fee is assessed based on the value of accounts as of the end of the previous quarter with prorated fees charged on assets received during the current quarter. SGL's investment adviser representatives are allowed to set investment advisory services fees with a maximum fee of 1.50%. So our fee structure is designed so that we make more if you make more. Lower fees for comparable services may be available from other sources.

B. Conflict of Interest Disclosure

Because asset-based fees are based on the valuation of client's accounts, advisers have an incentive to motivate clients' to invest as many assets as possible and to recommend investments that will grow the value of clients' holdings. However, this billing method also aligns the client's and the investment adviser's interests in that growth in account value (which is obviously good for the client) earns the adviser more fees (which is good for the adviser). Overarching this conflict is the fact that SGL and its advisers are also held to a fiduciary duty with all clients—meaning they must put client's interests in front of individual adviser or firm interests.

Financial planning services are based on the size, scope, and complexity of each individual project. Fees will be determined prior to commencement of planning services and may range from \$250 to \$5000. Typically, these fees are paid in arrears at the time of plan delivery, but in rare cases deposits may be required for complex projects or projects that require an extended time to complete.

In addition to the fees listed above, investors may be liable for third party fees such as internal fees charged by mutual funds, custodial fees, and transaction fees. These fees are separate and distinct from SGL fees.

More information and specifics on SGL's fees can be found on SGL's ADV Part 2A which can be found by searching SGL Financial on the above SEC link or alternatively <https://adviserinfo.sec.gov>.

In general, investors should be aware that they will pay fees and costs whether they make or lose money on specific investments and that fees and costs will reduce the amount of money the investor will make on their investments over time. For example, an investment valued at \$10,000 at the end of the quarter would be billed a maximum fee of $\$150 / 4 = \37.50 (1.5%/4) for the following quarter. Depending on investment performance the following quarter the fee billed may be more or less depending on the valuation of the account at the end of the next quarter. These fees lower the overall performance of the investment. Investors should make sure they understand all the fees and costs they are paying.



ITEM 4: DISCIPLINARY HISTORY

Questions: *As a financial professional, do you have any disciplinary history? For what type of conduct?*

Neither SGL or its Investment Adviser Representative have any legal or



ITEM 5: ADDITIONAL INFORMATION

Questions: *Who is my primary contact person? Is he or she a representative of and investment adviser or a broker-dealer firm or both? Who can I talk to if I have concerns about how this person is treating me?*

Investors are always encouraged to contact their individual adviser with any questions or concerns. All SGL advisers are investment adviser representatives and are not broker-dealer representatives. If your adviser is unavailable or you

C. Standard of Conduct – SGL's Legal Obligation as Your Investment Adviser

When we act as your investment adviser, we act as a fiduciary, which means we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here is an example to help you understand what this means.

Because asset based fees are based on the valuation of client's accounts, advisers have an incentive to motivate clients to invest as many assets as possible and to recommend investments that will grow the value of clients' holdings. However, this billing method also aligns the clients' and the investment adviser's interests in that when the accounts grow in value (which is good for the client), the adviser earns more fees (which is good for the adviser). Overarching this conflict is the fact that SGL is also held to a fiduciary duty with all clients—meaning they must put client's interests in front of individual adviser or firm interests.

More information and specifics on SGL's business practices and potential conflicts of interest can be found on SGL's ADV Part 2A which can be found by searching SGL Financial on the above SEC link or alternatively <https://adviserinfo.sec.gov>.

D. How Do SGL's Advisers Make Money?

Clients' investment advisory fees are typically split between SGL, a selected third-party money manager, and the investment adviser representative. SGL provides all client support and back office services, the third-party money manager is responsible for portfolio management, and the investment adviser representative is responsible for client interactions and support. In addition to sharing investment advisory fees, when appropriate, some SGL advisers are insurance agents and separately market and sell various insurance products and services to SGL advisory clients. These insurance products and services will typically pay these agents commissions for the sale of these products. This is a conflict of interest that investors should be aware of and should ask for specifics on these commissions to help determine if these products are in the investor's best interest.

disciplinary history. Additional information about SGL Financial, LLC and/or it's advisers can be found on the above SEC link [Investor.gov/CRS](https://www.investor.gov/CRS) for a free and simple search tool to research SGL or its advisers, alternatively information can be found on <https://adviserinfo.sec.gov>.

would like to discuss any issues you may have with your adviser, you can contact our home office directly. For more information on SGL Financial, LLC or to request copies of SGL's CRS or ADV Part 2A disclosure forms please contact:

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