



October 15, 2024

Client Disclosure Brochure:

- Form ADV Part 2A
- Form ADV Part 2B
- Privacy Notice

This Brochure provides information about the qualifications and business practices of Strategic Financial Services, Inc. This disclosure information should be carefully considered before you become a Client of Strategic Financial Services. If you have any questions about the contents of this brochure, please contact us at the numbers below. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about Strategic Financial Services, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov.

Where a reference is made to being a "registered investment advisor" throughout this document, the term "registered" does not imply a certain level of skill or training. "Registered" means that the company has filed the necessary documentation to maintain registration as an investment advisor with the Securities and Exchange Commission.

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Item 2: Material Changes

At least annually, we will discuss specific material changes made to this Brochure and provide you with a summary of such changes. The material changes in this brochure are from the last annual updating amendment of Strategic Financial Services, Inc. on 3/31/2023 and from an additional amendment on July 1, 2023. The updates are described below:

Item 4: Advisory Business

- Renamed our service offerings under our Wealth Management Services
 - The Strategic Core Program is now referred to our Gold and Platinum Programs
 - The Strategic Sky Program is now referred to our Blue Program.
- The description of program offerings has been updated.

Item 5: Fees and Expenses

- Updated pricing information for our Blue Program.

Item 13: Review of Accounts

- General description updates of our various offerings.

Item 14: Client Referrals and Other Compensation

- Added new language on solicitor arrangements and employee referral program.

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Item 4: Advisory Business

Strategic Financial Services, Inc., which you'll hear us refer to as Strategic (or simply "we," "us," or "our"), is a registered investment advisor with the U.S. Securities and Exchange Commission. Since opening our doors in 1979, we're proud to say we're 100% employee owned.

We offer personalized planning and advisory services for individuals, families, institutions, corporations and employer retirement plans, all tailored to meet your specific needs.

Wealth Management Services

Strategic Gold and Platinum Programs

In our Strategic Gold and Platinum tiers, we provide comprehensive financial planning and investment management services. This program is tailored for clients who have at least \$500,000 in investable assets. However, we're flexible and may make exceptions on a case-by-case basis.

Our financial planning is tailored to match your individual needs and ambitions. From the get-go, we'll have conversations to understand your great life, financial situation, commitments, and how you feel about risk. We'll develop an initial plan that makes sure your financial setup mirrors your values and life aspirations. This includes recommending an investment strategy through our in-house services and potentially advising you to consult with other professionals like attorneys or accountants, who may charge their own fees.

This plan is dynamic, adapting as your life, goals, or circumstances evolve. Whether we discuss changes in person or provide updates in writing, your plan is designed to grow with you.

Here's a closer look at the areas we cover:

- **Finances:** We help with budgeting and saving to build your future, ensuring your finances are streamlined and growth-oriented.
- **Investments:** Focused on managing risk and implementing strategies that match your goals.
- **Estate:** We work to protect your family and assets, ensuring peace of mind for the future.
- **Insurance:** Covering you against life's unexpected turns, providing security when you need it most.
- **Retirement:** Our goal is to guide you towards financial independence through personalized retirement planning, acknowledging the uncertainties of financial markets and life changes.
- **Education:** We support your efforts to fund education by exploring savings and financing strategies, aiming to make educational aspirations more achievable within the context of your financial landscape.
- **Navigating Life Events:** Life events often drive the need for financial planning. Whether it's a marriage, the birth of a child, a career change, or retirement, we're here to help you navigate these important milestones, ensuring your financial plan evolves with you.

For our Gold and Platinum clients, your investment portfolios are not only tailored to your unique financial situation but are also grounded in our model-based strategies. These models are the foundation upon which we build, allowing us to leverage a wide range of investment vehicles tailored to meet your needs. This approach ensures a balance between personalization and the effectiveness of model portfolios, taking into account your risk tolerance, financial goals, and tax considerations.

Here's how we approach investment management for Gold and Platinum tiers:

- **Model-Based Customized Strategies:** While your portfolio benefits from the personalized attention of our investment team, it is primarily based on our model portfolios. This ensures a consistent and strategic approach, aligning with your specific financial objectives. Your investments might mirror those in similar profiles, optimizing for a strategic fit that reflects your unique circumstances.

- **Personal Investment Preferences:** Recognizing you may have specific investment preferences or the desire to retain certain assets, we aim to accommodate these within the context of our model strategies. It's important to communicate any such preferences to us. Although accommodating specific requests might impact the alignment and performance of your portfolio, we're committed to finding solutions that respect your wishes while maintaining strategic integrity.
- **Navigating Brokerage Practices:** For insight into how we address potential conflicts of interest and manage the intricacies of model portfolio management, please see Item 12 - Brokerage Practices.

Our service for Gold and Platinum tiers primarily offers discretionary management, allowing us to dynamically adjust your portfolio in response to market conditions and opportunities. For clients interested in a more hands-on approach, we provide the option for non-discretionary accounts, where you direct trading decisions, tailored to suit your specific requirements. These requests are managed on a case-by-case basis. Considerations include expected trade volume and the size of the relationship.

Strategic Blue Program

The Strategic Blue Program caters to individuals with investable assets under \$500,000, providing a planning and investment management approach that emphasizes planning and guidance at your request, offering tools and advice to empower you in effectively managing your assets.

In the Blue Program, we stand ready to assist you with a broad array of financial planning services. While we actively support these services, the engagement in specific areas is largely initiated by you, the client, based on your evolving needs and our regular communications about various planning topics. These communications are designed to inform and empower you, potentially sparking the desire for deeper exploration of certain services. Here's how we can assist, upon your request:

- **Retirement:** We're here to help guide you in creating a comprehensive plan for a secure retirement, so that you can navigate the roadmap to your future.
- **Education:** We offer strategies and tools for managing current education expenses and loan payments, while supporting your journey towards future educational planning goals.
- **Insurance:** With the goal of ensuring you and your loved ones are protected, we'll help you analyze your current coverage and suggest adjustments as needed.
- **Estate:** We guide you in organizing your estate documents, ensuring your assets and family are safeguarded according to your wishes.
- **Access to Professional Services:** For those moments when you need specialized advice, we connect you with our network of preferred accountants and attorneys.
- **Budgeting and Debt Management:** Upon your request, we provide insights and strategies for managing your finances more effectively.

Additionally, through our Strategic Blue Program, you gain access to self-guided planning tools, a Financial Wellness Program, workflows, and checklists. These resources are designed not just to enhance your financial understanding but to encourage proactive engagement with your financial planning process, at your pace and based on your interests.

For the Blue Program, we tailor your investment strategy to match your unique financial situation, using exchange traded funds (ETFs) and our model-based strategies. This approach is based on our understanding of your risk tolerance, investment timeline, and tax implications to help ensure your portfolio supports your financial goals.

Here's our investment management approach in the Blue Program:

- **Model Strategies:** We manage your assets using model strategies, which means your investments may be similar to those in other accounts. This method helps us efficiently manage portfolios while striving to achieve your individual investment objectives.

- **Investment Restrictions:** If you have preferences, such as holding onto certain investments, please communicate them to us. Although we try to accommodate such requests, they might affect the portfolio's alignment and performance. If you wish to retain specific securities, we might suggest relocating them to an appropriate account to maintain your strategy's effectiveness. It's essential that you share any investment restrictions with us. We will carefully review each request and, if necessary, propose alternatives.
- **Understanding Potential Conflicts:** For details on how we address potential conflicts in our model portfolio management, we encourage you to refer to Item 12 - Brokerage Practices.

Our primary mode of investment management in the Blue Program is discretionary, where we make investment decisions on your behalf. This allows us to manage your portfolio proactively, ensuring that we can adapt to market conditions and seize opportunities for your benefit.

Institutional Services

For our institutional clients, including not-for-profit organizations, businesses, and endowments, we provide specialized advisory services tailored to meet the unique needs and goals of each institution. Our comprehensive service model includes:

- **Reviewing Your Mission and Objectives:** We start by understanding your organization's core mission and goals to ensure our services align with your vision.
- **Setting Investment Policy Statements:** We help you develop clear investment policy statements that guide your investment strategies and objectives.
- **Investment Portfolio Management:** While your portfolio benefits from the personalized attention of our investment team, it is primarily based on our model portfolios. This ensures a consistent and strategic approach, aligning with your specific financial objectives. Your investments might mirror those in similar profiles, optimizing for a strategic fit that reflects your unique circumstances.
- **Fiduciary Oversight and Education:** Providing guidance and education on fiduciary responsibilities to ensure your organization is well-equipped to manage its investments responsibly.

In employing model allocation strategies, we aim for efficiency and strategic coherence across portfolios, recognizing the need for flexibility:

- **Investment Restrictions:** We accommodate institutional requests for specific portfolio restrictions or preferences, understanding these may necessitate deviations from our standard strategies. Should you wish to retain particular securities or impose investment limits, we're prepared to adapt, possibly by segregating these assets to preserve the integrity of your overall investment approach.
- **Communication of Restrictions:** Clear communication of any investment restrictions is imperative. Our team diligently reviews each request, and, in instances where accommodating a specific restriction isn't feasible, we will engage with you to seek out viable alternatives.

For detailed information on how we manage potential conflicts of interest in our model portfolio management, we encourage you to refer to Item 12 - Brokerage Practices.

Employer Retirement Plan Services (ERPS)

We provide comprehensive investment advisory services tailored to employer-sponsored retirement plans, focusing on three key areas: employee services, plan sponsor services, and investment management. Employers have the flexibility to choose the specific services that best meet their needs.

Employee Services

Our offerings aim to enhance plan participation and financial literacy among employees through:

- **Plan Enrollment Meetings:** Helping employees sign up and understand their retirement plan.
- **One-on-One Meetings/Calls:** Personalized sessions to educate participants on plan options and investment basics.
- **Group Education Meetings:** Sessions designed to inform participants about their plan options, investment concepts, and more.

Plan Sponsor Services

We support plan sponsors with services that enhance plan design and operation:

- **Plan Design and Communications:** Assisting in creating a retirement plan that meets the organization's goals.
- **Plan Service Provider Search:** Helping find the best providers for your plan's needs.
- **General Plan Reviews:** Evaluating your plan's costs, investments, cash flow, and demographics to ensure efficiency.
- **Plan Operations and Administrative Assistance:** Offering support for the smooth operation of your retirement plan.

Investment Management Services

Our investment management services are tailored to each plan's needs, including:

- **Acting as a 3(38) Advisor:** We take on fiduciary responsibility for selecting, monitoring, and replacing investment options, focusing solely on those chosen by Strategic.
- **Acting as a 3(21) Advisor:** We provide guidance on investment options without assuming fiduciary responsibility, leaving final investment decisions to the plan sponsor/trustee.

Additionally, we can offer participant-directed accounts access to Asset Allocation Model Portfolios, designed to suit various investment strategies based on time horizon and risk tolerance. These models are available where supported by the plan recordkeeper and are managed and rebalanced according to model goals, not individual participant needs. For details on how we handle potential conflicts in our model portfolio management, please see Item 12 - Brokerage Practices.

We recommend specific plan providers and platforms to employers, though the choice ultimately rests with the plan sponsor. However, our ability to work with certain plans may depend on the chosen platform.

We do offer a Pooled Employer Plan (PEP) program that allows individual qualified retirement plans to pool assets together in the same retirement plan. Advisor Trust acts as the PEP's Pooled Plan Provider (PPP). Strategic acts as ERISA 3(38) investment fiduciary. Strategic, as the PEP's 3(38) investment fiduciary, provides the following services:

- Develop and adopt an Investment Policy Statement appropriate for the PEP.
- Investment menu construction and oversight.
- A discretionary asset management program for plan participants.
- PEP oversight and compliance.

We do not have a stated account or relationship minimum that an ERPS client must satisfy. However, before providing these services Strategic will evaluate each relationship to make sure that it is a good fit for both the client and Strategic.

Total Assets Under Management

As of December 31, 2023, discretionary assets under management totaled \$1,827,831,538 and non-discretionary assets totaled \$136,540,012.

Miscellaneous Additions

Limitation of Financial planning and Non-Investment Counseling: Strategic offers financial planning and counseling on non-investment-related matters, such as estate planning, insurance, and tax planning, only when specifically requested by the client. It's crucial to understand that Strategic does not act as an attorney, insurance agent, or accountant. Accordingly, our services should not be seen as legal, insurance, or accounting advice. We do not prepare estate documents or tax returns.

Here are key points to note:

- **Referrals to Other Professionals:** For services outside our expertise, we may refer clients to other professionals whom we believe to be of high quality and have a good reputation in their field. We may conduct basic research on their professional background and reputation, but we do not conduct a comprehensive investigation of their cybersecurity measures, risk management practices, compliance standards, or professional qualifications. The decision to engage any recommended professional remains entirely with the client, and we encourage clients to independently evaluate any such referrals.
- **Fees for Non-Investment Services:** Engaging services of professionals we recommend may incur fees separate from those charged by Strategic.
- **Liability and Disputes:** In the event of a dispute with a professional recommended by Strategic but not affiliated with us, the client agrees to seek resolution directly from the engaged professional, excluding Strategic from any recourse.

529 College Savings Plan: As part of creating a financial plan, Strategic might suggest setting up a 529 college savings plan for education savings. Here's how we approach this recommendation:

- **Direct or Consumer Plans:** We prefer to recommend "direct or consumer" 529 plans that do not pay advisor commissions, focusing on plans that are most beneficial to the client without additional costs.
- **State Tax Benefits:** If there's a tax advantage for you, we'll suggest opening the plan in your state of legal residence to capitalize on those benefits.
- **Alternative Options:** In cases where your state doesn't offer a tax benefit for a 529 plan, we might recommend the New York State 529 program as an alternative.
- **Authority Level:** Our role in managing the 529 plan can vary. Depending on the specific state-sponsored plan and your preferences, our authority might range from having no involvement to holding a limited power of attorney. This variance affects whether we directly manage the account's allocations or provide you with recommendations for you to implement.
- **Client Agreement:** You'll be asked to sign a form specifying the level of authority you're comfortable granting Strategic in managing the 529 plan account.

Annuities: Strategic offers services and solutions tailored to your annuity accounts. If you bring in existing annuity accounts as you transition your assets to us, we'll collaborate with our partners to assess the best course of action for these accounts. This includes a thorough review of factors such as surrender charges, potential capital gains, ongoing costs, and the current benefits of your annuity.

Depending on the specific details of your situation, our recommendations may include:

- Liquidating the annuity to transfer funds into a brokerage account, aiming to streamline and possibly enhance your investment strategy.
- Moving to a fee-based annuity through one of our partners, which may offer more favorable terms or lower costs.
- Keeping the existing annuity but updating the agent of record to an agent from DPL Financial Partners, ensuring you continue to receive specialized support and advice.

For each of these options, we aim to provide you with a solution that aligns with your financial goals and the particulars of your annuity account

Cash Management Solutions: For cash management solutions, Strategic provides recommendations tailored to your needs, particularly when you hold significant cash amounts that exceed FDIC insurance limits in a single account. We partner with various firms to offer cash management solutions designed for investment advisory clients. It's important to be aware that Strategic may charge a fee on these assets, which will be fully disclosed to you and is determined at our discretion. Additionally, the service provider offering the cash management solution may also have their own fees.

DPL Financial Partners: Strategic is a member of the DPL Financial Partners network, for which we pay a membership fee. Being part of this network gives us access to a variety of commission-free insurance and annuity products. It's important for you to know that when we suggest you buy an insurance or annuity product through DPL or move an existing annuity product to them, Strategic does not receive any compensation from DPL for making these recommendations. However, there are situations where Strategic may apply an Assets Under Management (AUM) fee to an annuity product, specifically when it's considered a fee-based annuity. While DPL does earn compensation based on the sale of products, our relationship with them is focused on providing you with access to commission-free options that best suit your financial needs. We do not exclusively use DPL for insurance and annuity product recommendations.

Retirement Rollovers: As part of our investment advisory services, we offer guidance on withdrawing assets from an employer's retirement plan, including the possibility of rolling these assets into an individual retirement account (IRA) that Strategic manages. Choosing to roll over assets to an IRA managed by us will incur an asset-based fee as detailed in the agreement you sign with our firm. It's important to recognize this creates a conflict of interest, as our advisors have an incentive to recommend rollovers to generate fees, rather than solely basing this advice on your individual needs. However, you are not contractually obligated to proceed with the rollover, nor are you required to have your IRA managed by us.

You generally have four options regarding employer retirement plan assets:

1. Leave the funds in the employer's (or former employer's) plan.
2. Transfer the funds to a new employer's retirement plan.
3. Opt for a taxable distribution by cashing out.
4. Roll the funds into an IRA.

Before making any changes, we recommend consulting with your CPA and/or tax attorney, as each option has its own set of benefits and drawbacks.

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:

- 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.
- Employer retirement plans generally have a more limited investment menu than IRAs.
- Employer retirement plans may have unique investment options not available to the public such as employer securities, or previously closed funds.
 - Your current plan may have lower fees than our fees.
- 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.
- 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.
 - Our strategy may have a higher risk than the option(s) provided to you in your plan.
 - Your current plan may also offer financial advice.

- If you keep your assets titled in a 401k or retirement account, you could potentially delay your required minimum distribution beyond age 72.
- Your 401k may offer more liability protection than a rollover IRA; each state may vary.
- Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been, in most cases, 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.
- You may be able to take out a loan on your 401k, but not from an IRA.
- 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.
- If you own company stock in your plan, you may be able to liquidate those shares at a lower capital gains tax rate.
- Your plan may allow you to hire us as the manager and keep the assets titled in the plan name.

Participants in retirement plans we manage have the option to transfer assets from an existing IRA Rollover or a previous employer's retirement plan into the plan we oversee. Whether you can do this depends on the specific rules outlined in the plan document. If you decide to move assets into a plan we manage, those assets will incur the plan's fees, including any management fee we charge, as detailed in the agreement you have with our firm. This situation could lead to a conflict of interest because our advisors might have a financial incentive to suggest rolling assets into the plan to generate fee-based income, rather than focusing solely on what's best for you. It's important to remember that you're not obligated to proceed with the rollover.

When advising wealth management clients or prospective clients, we employ a software tool to compare the costs, services, and suitability of their current situation against our proposed recommendation. This analysis provides clarity and helps clients make informed decisions. We request clients to review and sign a copy of this analysis. For participants in retirement plans we manage, we typically do not make specific recommendations. Instead, we offer general education on the pros and cons of various options available to them. This approach ensures participants have the knowledge needed to make informed decisions regarding their retirement assets.

Client Obligations: It's important for you to promptly notify us if there are any changes in your financial situation or investment objectives. This allows us to review and potentially revise our previous recommendations and services to better suit your evolving needs and goals.

Acting for Multiple Clients: Each client should be aware that we perform advisory services for various other clients. This relationship, in general, creates a conflict of interest when we render our services to several clients. A conflict could arise when we invest one or more clients in different instruments or classes of securities of the same issuer. For example, some clients may own the common stock of Company XYZ, and different clients may own bonds issued by Company XYZ. In the event of bankruptcy, we would be representing each client's interests, and the client's ability to recoup their investment may vary significantly based on where their investment falls within the issuers' capital structure.

During an issuer bankruptcy, the investors who take the least risk are paid first. For example, secured creditors take less risk because the credit they extend is usually backed by collateral, such as a mortgage or other company assets. They know they will get paid first if the company declares bankruptcy.

Bondholders have a greater potential for recovering their losses than stockholders because bonds represent the company's debt, and the company has agreed to pay bondholders interest and return their principal. Stockholders own the company and take a greater risk. They could make more money if the company does well, but they could lose money if the company does poorly. The owners are last in line to be repaid if the company fails. Bankruptcy laws determine the order of payment.

Digital Planning and Aggregation Platforms: As part of our Wealth Management services, we may provide you with access to an online platform designed to facilitate financial planning and aggregation of accounts. This platform enables you to update your information and explore various "what-if" scenarios to gauge the potential impact on your financial goals. It's important to note that the outputs generated by these platforms should not

be considered as advice or recommendations from us. We cannot be held accountable for any adverse outcomes resulting from your engagement in financial planning activities or utilizing other functions available on the platform without our guidance.

Additionally, the online platform allows you to aggregate accounts that are not under our management, providing you with a comprehensive view of your financial situation. However, Strategic bears no responsibility for overseeing or managing the investment performance of these external accounts.

Borrowing Against Assets: If you have a need to borrow money, Strategic offers two internal options:

- **Margin** – The account custodian or broker-dealer lends money to the client. The custodian charges the client interest for the right to borrow money, and uses the assets in the client's account as collateral.
- **Pledged Asset Loan** – In consideration for a lender to make a loan to the client, the client pledges its investment assets held at the account custodian as collateral.

These kinds of loans can help clients who have a home purchase in progress, allow the repayment of more costly debt, or let them borrow without having to sell their existing account positions and pay capital gain taxes. However, these loans also have significant potential risk for the client's investment assets. The lender can claim the client's investment assets if the loan is not paid back or if the assets drop below a certain level. There is also a conflict of interest when a client uses a Pledged Asset Loan, because by choosing the loan instead of taking out the money from their account, Strategic continues to charge a fee on those assets. For margin accounts, we bill on the net value of the account.

Charles Schwab Institutional Intelligent Portfolios: For a small group of clients, we offer an automated investment program (the "Program") through which clients are invested in a range of investment strategies we have constructed and manage, each consisting of a portfolio of exchange-traded funds ("Funds") and a cash allocation. Clients do not have the ability to place restrictions on the funds and models selected. The client's portfolio is held in a brokerage account opened by the client at Charles Schwab & Co., Inc. ("CS&Co."). We use the Institutional Intelligent Portfolios® platform ("Platform"), offered by Schwab Performance Technologies ("SPT"), a software provider to independent investment advisors and an affiliate of CS&Co., to operate the Program. We are independent of and not owned by, affiliated with, or sponsored or supervised by SPT, CS&Co., or their affiliates (together, "Schwab").

Strategic, and not Schwab, are the client's investment advisor and primary point of contact with respect to the Program. We are solely responsible, and Schwab is not responsible for determining the program's appropriateness, choosing a suitable investment strategy and portfolio for the client's investment needs and goals, and managing that portfolio on an ongoing basis.

We have contracted with SPT to provide us with the Platform, which consists of technology and related trading and account management services for the Program. The Platform enables us to make the Program available to clients online and includes a system that automates certain key parts of our investment process (the "System"). The System includes an online questionnaire that can help us determine the client's investment objectives and risk tolerance and select an appropriate investment strategy and portfolio. Clients should note that the System will automatically recommend a portfolio in response to the client's answers to the online questionnaire. However, Strategic, working with the client, will make the final decision and select a portfolio based on our review of the client's financial situation, investment objectives, and risk tolerance. The System also includes an automated investment engine through which we manage the client's portfolio on an ongoing basis through automatic rebalancing and tax-loss harvesting (if the client is eligible and elects).

Clients do not pay SPT fees in connection with the program. However, Strategic will charge the client a fee for its advisory services, as described in the section titled *Fees and Compensation*. Clients do not pay brokerage commissions or any other fees to Schwab as part of the Program. However, Schwab does receive revenue in connection with the program as described in the Program Disclosure Brochure.

Strategic does not pay SPT fees for the Platform so long as we maintain \$100 million in client assets in accounts at Schwab that are not enrolled in the Program. If we do not meet this condition, then we pay SPT an annual licensing

fee of 0.10% (10 basis points) on the value of our client assets in the Program. This fee arrangement gives us an incentive to recommend or require that our clients with accounts not enrolled in the Program be maintained with CS&Co. This conflict is mitigated by the relatively low level of assets required to be maintained with CS&Co.

While we maintain active accounts on this platform, we are not actively opening new accounts on the platform.

Item 5: Fees and Compensation

Wealth Management Services

Our standard pricing schedule for all Wealth Management Services clients is as follows:

Core Price Schedule	Client's Assets Under Management
1.50%	First \$250,000
0.90%	Next \$1,750,000
0.70%	Next \$3,000,000
0.50%	Next \$10,000,000
0.45%	On Assets over \$15,000,000

Fees will be charged every three months, in advance. Client accounts will be placed in one of three three-month billing cycles at the discretion of Strategic. The fee will be calculated as of the last business day of each three-month cycle and is based on the market value (as determined by the advisor) of all the assets in the account. The Advisor will receive no start-up or termination fees, nor will it be subject to any penalties. Fee deductions are reflected on custodial statements. Clients may request fee statements directly from us. Any such request should be made to the client's advisor. A new client's first bill will be the second-month end from the date the advisory agreement was signed.

We retain the discretion to negotiate alternative pricing schedules on a client-by-client basis. Client facts, circumstances, and needs are considered in determining the pricing schedule. This can include the complexity of the client relationship, assets to be placed under management, anticipated future deposits, related persons, and account composition, among other factors. We may group certain client households to determine the annualized fee.

In certain circumstances, Strategic may offer a specific client account a reduced pricing schedule. This pricing schedule is reserved for specific accounts where there are factors that would limit our management of the account. An account holding a security with no or extremely low-cost basis would be an example of when this pricing schedule may be offered. Additional factors, such as relationship size or complexity, are considered before offering this pricing schedule for a specific account. Clients will sign a price addendum to our advisory agreement to document the reduced price. As part of the agreement and as disclosed here, Strategic may have the authorization to transfer assets from a client account on this reduced pricing schedule to a different client account with a different and potentially higher pricing schedule. This transaction may result in a higher management fee for the client.

Some legacy clients may have grandfathered pricing schedules that are different than the schedules named above and that are not available to new clients.

We deduct our advisory fee(s) directly from client account(s). However, we may, at our discretion, allow a client to be billed directly for their management fees.

Institutional Services

In our commitment to providing tailored and comprehensive investment solutions, we adopt a flexible fee structure for our institutional services. Recognizing that each institutional client has unique needs and objectives, our fee model is designed to reflect the specific requirements and complexities of each relationship.

Our fees are determined based on a range of factors to ensure a customized and equitable pricing model for each relationship. These factors include, but are not limited to:

- **Asset Size of the Relationship:** The scale of assets under management is a key consideration, reflecting the complexity and resources required for effective portfolio management.
- **Service Expectations:** The breadth and depth of services required by the client, including investment management, advisory services, reporting needs, and any specialized support.

Transparency is at the core of our fee structure. We provide a detailed fee proposal to our institutional clients prior to engagement, outlining the determined fee based on the aforementioned factors. This ensures that clients are fully informed and comfortable with the arrangement from the outset.

Fees will be charged every three months, in advance. Client accounts will be placed in one of three three-month billing cycles at the discretion of Strategic. The fee will be calculated as of the last business day of each three-month cycle and is based on the market value (as determined by the advisor) of all the assets in the account. The Advisor will receive no start-up or termination fees, nor will it be subject to any penalties. Fee deductions are reflected on custodial statements. Clients may request fee statements directly from us. Any such request should be made to the client's advisor. A new client's first bill will be the second-month end from the date the advisory agreement was signed.

We retain the discretion to negotiate alternative pricing schedules on a client-by-client basis. Client facts, circumstances, and needs are considered in determining the pricing schedule. This can include the complexity of the client relationship, assets to be placed under management, anticipated future deposits, related persons, and account composition, among other factors. We may group certain client households to determine the annualized fee.

We deduct our advisory fee(s) directly from client account(s). However, we may, at our discretion, allow a client to be billed directly for their management fees.

General Information

Pertaining to Wealth Management and Institutional Services

Termination of Advisory Relationship: The advisory relationship may be terminated at any time by either party, for any reason, with written notice, verbal notice, and/or notification from the custodian. As previously disclosed, certain fees are paid in advance for our services. Any prepaid, unearned fees will be refunded on a pro-rata basis according to the number of days remaining in the billing period. Rebates are calculated based on the date of notification of the relationship terminating.

Billing: Fees will depend on the total value of all managed accounts, on the same fee schedule, within the same household. Accounts within the same household, but with different fee schedules will not be added together for bill calculations. Strategic may choose to combine client accounts from one household with client accounts from other households to add up account values for fee calculations. Again, only accounts on the same fee schedule would be added together for bill calculations. If there are multiple accounts, we may take out combined fees from one account or multiple accounts as allowed by law.

Mutual Fund and Exchange Trade Fund Fees: You will incur fees on the portion of your assets invested in a money market, mutual fund, or exchange-traded fund. These fees are distinct from the fees and expenses charged by Strategic. Money market, mutual fund, and exchange-traded fund companies determine their fees, which are non-negotiable. Upon request, we will provide you with the fee schedules of the money market, mutual fund, and exchange-traded funds. If a fund offers multiple share classes, we will aim to purchase the lowest-cost share class available to you. Additionally, we will review mutual fund share class ownership quarterly and, when possible, execute tax-free exchanges to a lower-cost share class.

Custodial and Brokerage Fees: You will pay a custodial fee to the account custodian. We recommend, but do not require, that you use Charles Schwab & Co., Inc. (Schwab) as your account custodian. Schwab's current fee structure will be presented to you upon establishing an account or in advance if requested. Schwab's fee structure is non-negotiable. If you choose to use another custodian, you will pay fees according to that custodian's fee schedule. You will receive a copy of the custodian's fee schedule before establishing an account. Additionally, you may pay transaction fees to brokers. We select the brokers that execute trades for client accounts, and brokerage fees vary per broker. Please refer to the section on Brokerage Practices for information on how we select brokers. In certain circumstances, you can request which brokers are used to execute trades for your accounts.

Other Fees and Expenses: At our discretion, we may charge an Estate Administration fee. This fee is negotiated with you and agreed upon before estate administration services commence. You will be billed directly, or fees will be deducted from your accounts, depending on the type of accounts and services being offered.

We may recommend the purchase of life, disability, long-term care, and various other forms of insurance. You have complete discretion to implement any aspect of the recommended financial plan. If you implement securities and insurance recommendations from the financial plan, regardless of who the transactions are conducted through, you may pay commissions and fees that are separate and distinct from our fees. You should, and are encouraged to, inquire about the additional transaction fees associated with implementing these recommendations. Please refer to the section on Commissions or Sales Charges for Recommendations of Securities or Investment Products.

We have partnered with Chicago Clearing Corporation to file class action claims on behalf of our clients. Chicago Clearing Corporation will deduct a fee of 20% of your pro-rata share of the settlements' plan of allocation. You are not charged a fee unless you are entitled to proceeds from a filing. Upon request, we will opt you out of this service. We will take no responsibility to file the claims on behalf of a client that chooses to opt-out of this service. We receive no fee for this service. We make a best-effort attempt to provide Chicago Clearing Corporation with the client account history needed to file a claim properly. We cannot guarantee that Chicago Clearing Corporation will automatically file all claims, and we will not manually review every available claim. You may still receive direct mailings regarding class action claim filings, and we encourage you to confirm with us that a claim is being filed on your behalf with Chicago Clearing Corporation. In the case of deceased or terminated clients, we will make a best-effort attempt to process the request based on the last known client address.

Employer Retirement Plan Services

Fees are negotiated with the plan sponsor and are primarily dependent on fee benchmarking data, your servicing needs, and the size of the plan in terms of both assets and participants. We do not have a set advisory fee schedule for the retirement plan services offered

For advisory relationships, clients are generally billed monthly or quarterly from the plan custodian and/or record keeper. The plan sponsor and Strategic, in a written agreement, will authorize the custodian/record keeper to calculate and distribute the management fee to Strategic. The exact fee calculation methodology and frequency of the billing are often dependent on the custodian and/or record keeper's policies and capabilities.

For consulting arrangements with a pre-defined expiration period, we will charge the client an upfront flat fee. This fee is based on the complexity of the services provided. In consulting arrangements, the client has the option of paying an annual retainer fee for predetermined services. The annual retainer fee would be paid annually in advance.

Generally, you can terminate their Agreement with Strategic at any time upon 30-day written notice (or such period as may be mutually agreed upon by the parties) which shall be effective when received by either party. If a client pays a fee in advance and the advisory contract is terminated before the delivery of services, the client can request a rebate of unearned fees. Upon request, Strategic will rebate the management fee from the date it receives its termination notice to the end of the current billing period.

We will recommend plan record keepers, custodians, and third-party administrators. Clients have complete discretion to select these additional service providers. Clients may pay record-keeping, custodial and administrative fees that are transactions separate and distinct from Strategic's management fees. Clients should, and are encouraged to, inquire about the additional fees that are associated with their retirement plan. Each client's retirement planning scenarios are different as are the fees associated with their plan.

Additional Information

You should note that similar investment advisory services may, or may not, be available from other firms for similar or lower fees.

Strategic Financial Services' compensation program is structured so that additional compensation may be received based on the addition of new clients or new assets from existing clients. This creates a conflict due to the incentive.

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

Strategic does not charge a performance-based fee.

Item 7: Types of Clients

Strategic offers comprehensive investment advice tailored to various types of clients, including:

- Individuals
- High-net-worth individuals
- Trusts, Estates, Foundations, and Charitable Organizations
- Corporations
- Non-Profit Institutions
- Pension, Profit Sharing Plans, 401(k) Plans, and other Qualified Retirement Plans
- Other Business Entities

For details regarding the requirements for establishing an account or relationship with us, please refer to the Advisory Business section.

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

Methods of Analysis in Financial Planning

At Strategic, we employ a range of techniques to craft personalized financial plans that align with our clients' objectives and circumstances. Throughout our engagement, we request and gather data from our clients to inform our analysis and decision-making process. Here's an overview of the methods we use:

- **Data Collection:** Throughout the engagement, we gather comprehensive information from our clients, including:
 - Financial documents such as tax returns, estate documents, and asset/liability statements.
 - Details of investment and retirement accounts, insurance policies, and other financial assets.
 - Estimates of living expenses, social security benefits, and business contracts.
 - Client-specific goals, time horizons, and risk tolerance.
- **Forecasting and Budgeting:** We utilize forecasting and budgeting techniques to project future financial scenarios and assess the feasibility of our clients' goals. This involves analyzing historical data and economic trends to estimate future income, expenses, and investment returns.
- **Data Analysis:** We use the information you give us to search for financial planning opportunities. By understanding your financial landscape, we hope to uncover ways to enhance your financial health and help you achieve your goals.
- **Investment Models:** We develop investment models tailored to each client's risk profile and objectives. These models incorporate asset allocation strategies designed to maximize returns while managing risk. We consider factors such as market conditions, economic outlook, and investment preferences in our model construction.
- **Financial Planning Software:** In addition to proprietary methods, we leverage advanced financial planning software, such as Orion Planning, to enhance our analytical capabilities. These tools enable us to perform complex calculations, scenario analysis, and portfolio simulations to better serve our clients.

Risks Associated with Financial Planning Forecasting

Financial planning forecasting involves predicting future financial outcomes based on various assumptions and analyses. However, several risks can impact the accuracy and reliability of these forecasts. Here are some key risks to consider:

Assumption Risks: Forecasts rely on assumptions about future economic conditions, market trends, and individual circumstances, which may not always align with reality.

Market Risks: Volatility in financial markets can lead to unexpected fluctuations in investment returns and asset values, affecting the success of the financial plan.

Regulatory Risks: Changes in tax laws, regulations, or government policies can have significant implications for financial planning forecasts, requiring adjustments to the plan.

Liquidity Risks: Insufficient liquidity or unexpected cash needs can disrupt the execution of the financial plan, particularly during market downturns or emergencies.

Inflation Risks: Failure to account for inflation can result in underestimating future expenses and investment returns, impacting the client's purchasing power over time.

Behavioral Risks: Human behavior, such as emotional reactions, cognitive biases, or unexpected life events, can deviate from the planned savings or spending patterns, affecting the accuracy of forecasts.

Model Risks: Financial planning models may oversimplify complex financial relationships or fail to capture non-linear dynamics, leading to inaccuracies in predictions.

Longevity Risks: Underestimating life expectancy or the risk of outliving retirement savings can leave clients vulnerable to financial insecurity in their later years.

Dependency Risks: Changes in the correlation between asset classes or the stability of income streams can introduce uncertainty into the forecasted outcomes.

External Risks: Unforeseen events beyond the client's control, such as natural disasters, pandemics, or technological disruptions, can disrupt financial planning forecasts.

Methods of Analysis in Investment Management

At Strategic, we employ a meticulous investment process that integrates quantitative screening with fundamental research to construct portfolios biased towards identified advantageous investment factors. Examples of these factors include high quality, good value, high momentum, low size, and minimum volatility.

Fundamental Analysis: Fundamental analysis is conducted in both macro and micro contexts. Macro analysis encompasses major economic activity reports, labor market indicators, interest rates, inflation data, commodity and currency trends, and central bank policies. Micro analysis focuses on industry and individual security conditions, assessing variables such as sales, earnings, business strategies, credit spreads, and debt coverage. Asset prices are scrutinized to determine their absolute and relative worth.

Investment Strategies: Strategies are designed by combining factor exposure, top-down analysis, bottom-up selection, and secular themes. Emphasis is placed on assets and securities that align favorably with these criteria.

Risk Considerations: Clients are advised that all investments carry the risk of loss, and they should be prepared to bear this risk. There is a possibility of material errors in assessing asset attractiveness or investment strategy effectiveness, potentially resulting in losses. Efforts are made to minimize transaction costs by avoiding frequent trading and maintaining reasonable portfolio turnover.

Additional Risks to Consider:

Systematic Risk: Also known as market risk, systematic risk refers to the inherent risk of the overall market affecting all investments to some degree. Factors such as economic downturns, geopolitical events, and changes in interest rates contribute to systematic risk.

Non-Systematic Risk: Non-systematic risk, also known as unsystematic or specific risk, pertains to risks specific to individual investments or asset classes. These risks can arise from company-specific factors such as management changes, product recalls, or industry-specific challenges.

Diversification Risk: While diversification can mitigate risk by spreading investments across different assets, industries, and regions, there's still a risk that a diversified portfolio may not perform as expected due to correlations between asset classes or unforeseen market events.

Timing Risk: Timing risk refers to the risk of making investment decisions at unfavorable times, resulting in suboptimal returns. Factors such as market volatility, investor sentiment, or changes in economic conditions contribute to timing risk.

Credit Risk: Credit risk is the risk of default on debt obligations by borrowers, including governments, corporations, or individuals. This risk affects the value of fixed income investments such as bonds and varies based on the creditworthiness of the issuer.

Leverage Risk: Leverage risk arises from using borrowed funds to invest, amplifying both potential gains and losses. While leverage can magnify returns in favorable market conditions, it also increases the severity of losses in adverse market environments.

Regulatory Risk: Changes in government regulations or tax policies can impact investment returns and the overall investment landscape. Regulatory risk may affect specific industries or sectors more than others, leading to changes in investor behavior and market dynamics.

Environmental and Social Risk: Environmental and social risks include factors such as climate change, natural disasters, social unrest, labor practices, human rights, and community relations. These risks can impact the financial performance of investments and are increasingly considered in investment decisions.

Technological Disruption Risk: Rapid advancements in technology can disrupt established industries and business models, posing risks to traditional investment strategies. Technological disruption risk affects sectors such as retail, transportation, finance, and healthcare.

Legal and Compliance Risk: Legal and compliance risk refers to the risk of legal or regulatory action against an investment firm or its portfolio holdings. Violations of securities laws, breaches of fiduciary duties, or failure to adhere to industry regulations contribute to legal and compliance risk.

Security Specific Risks

ETFs may incur trading costs like brokerage commissions and bid-ask spreads, potentially impacting returns. Some ETFs may have limited availability or low trading volume, making it challenging to buy or sell shares at desired prices, particularly during market volatility. Furthermore, while ETFs aim to replicate the performance of an underlying index or asset class, tracking errors may occur due to factors such as fees, trading costs, and portfolio rebalancing. Certain ETF structures, like leveraged or inverse ETFs, can introduce complexities and risks such as amplified losses and increased volatility.

Investors should be aware that mutual funds may underperform benchmarks or peers due to factors such as high fees, poor investment selection, or ineffective management strategies. Additionally, mutual funds typically charge management fees and other costs, which can erode returns, especially in actively managed funds with higher expense ratios. Furthermore, mutual funds may impose restrictions on frequent trading or short-term redemptions, limiting investors' access to funds. Investors may also face tax liabilities from capital gains distributions and should consider the risk of investment style drift or changes in fund management.

Holding significant cash may expose investors to inflation risk and lower returns compared to other asset classes. Changes in interest rates can impact cash returns, especially in low-yield environments. Additionally, cash equivalents like money market funds may carry credit risk from short-term debt securities. Lastly, while cash is generally liquid, investors may face difficulties accessing funds in certain situations, highlighting the importance of considering liquidity risk.

General Information

The risks outlined above are not exhaustive and client portfolios may be subject to material losses, including a complete loss of principal, which result from factors beyond the scope of this discussion.

Cybersecurity Threat: The computer systems, networks, and devices that Strategic and its service providers use to conduct our business operations have various security measures in place to prevent disruption from computer viruses, system failures, unauthorized access and other security breaches. However, these systems, networks and/or devices can still be compromised. A cybersecurity breach could have negative impacts on Strategic and its clients. For instance, cybersecurity breaches could cause business operation interruptions that could lead to a financial loss for a client; the inability for us and/or other service providers to do business; breaches of applicable privacy laws; the accidental disclosure of confidential information, regulatory fines, penalties and/or reputational harm. Similar negative outcomes could also affect issuers of securities that a client invests in, exchange and other financial market operators, government authorities, banks, or other financial institutions, among others.

Item 9: Disciplinary Information

Strategic Financial Services does not have any reportable disciplinary events.

Item 10: Other Financial Industry Activities and Affiliations

Receipt of Insurance Commission: While several of Strategic's employees are also licensed insurance agents with various insurance companies, none of these individuals are allowed to sell new policies to clients.

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

Strategic is committed to upholding the highest ethical standards in all aspects of our operations, especially regarding the personal securities transactions of our employees. Our Code of Ethics ("The Code") is formulated to ensure our actions consistently reflect our fiduciary duty to our clients, focusing on preventing:

- Conflicts of interest between our personal interests and those of our clients,
- Inappropriate exploitation of our position within Strategic,
- Any actions that could be perceived as, or result in, insider trading, unethical business conduct, or a breach of trust.

The Code's primary objective is to maintain and enhance our firm's integrity and reputation through ethical conduct. To this end, the Code addresses potential conflicts of interest, outlines prohibitions on insider trading, and sets forth comprehensive guidelines for ethical business conduct.

Accessibility of the Code: A copy of our Code of Ethics is available to any client or prospective client upon request.

Restrictions on Transactions: Strategic and its employees are prohibited from recommending, buying, or selling securities in which there is a material financial interest by the firm or its employees. While employees may, under certain conditions, invest in the same securities as our clients, stringent measures are in place to:

- Prioritize clients' interests in all transactions,
- Conduct all personal trading in a manner that avoids actual or potential conflicts of interest, and
- Prevent any abuse of an employee's position of trust.

Monitoring and Compliance: The Code includes mandatory reporting of employees' personal trading activities, allowing for continuous oversight to mitigate potential conflicts of interest. Any transactions found to be in violation of the Code may be subject to rectification at the employee's expense. Specific securities or investment products may be designated as restricted, requiring pre-approval from our Chief Compliance Officer (CCO) for personal investment by employees.

Enforcement and Sanctions: Violations of the Code, particularly concerning personal trading practices, are met with appropriate disciplinary actions, which may range from educational measures to more severe penalties, including termination of employment. Each case is evaluated individually to ensure a fair and effective response.

Item 12: Brokerage Practices

The Brokers and Custodians We Use

In our pursuit to serve our clients' best interests, we strive to secure the most favorable commission rates and/or custodial fees, aligning with the quality of brokerage and research services provided to us. Our selection criteria for brokers and custodians include, but are not limited to:

1. **Order Execution and Quality:** Prioritize the ability to execute orders efficiently, even in volatile markets, ensuring the best possible outcomes for client transactions.
2. **Costs and Cost Transparency:** Look for competitive pricing structures with clear, transparent fee schedules to avoid any hidden costs, ensuring clients receive fair value.
3. **Market Knowledge and Financial Stability:** Select brokers and custodians with a strong understanding of market dynamics and a solid financial foundation, contributing to their reliability and the security of client assets.
4. **Reputation and Stability:** Consider the provider's reputation within the industry, their track record of stability, and their capacity to maintain high service levels over time.
5. **Client Service and Support:** Evaluate the level of client service offered, including responsiveness, the availability of a dedicated support team, and the ability to resolve issues efficiently.
6. **Internal Operation Efficiency:** Ensure the broker's or custodian's systems and processes integrate seamlessly with your firm's operations, enhancing workflow efficiency and compliance management.
7. **Technology and Platform Features:** Assess the technological capabilities, including trading platforms, client portals, and account management tools, for their ability to meet client needs and operational requirements.
8. **Reporting Capabilities:** The ability to generate comprehensive, customizable reports is essential for client communication and portfolio management.
9. **Research Offerings:** Availability of quality proprietary and third-party research can support your investment decision-making process, servicing all client accounts effectively.
10. **Additional Products and Services:** The availability of other beneficial products and services, such as educational resources, compliance support, and marketing tools, can enhance your firm's capabilities and service offerings.

We have a fiduciary obligation to obtain best execution for our client transactions. We may pay a broker-dealer an amount greater than the compensation that could be obtained from another broker or dealer if the research or other services are deemed superior. If a broker is allowed a commission above that which another broker might have charged for executing the same transaction, it is done in recognition that such broker's special services are of significant importance to us and our client(s). Research services furnished by brokers may be used in servicing all our accounts and not just those whose commission dollars contributed to the services. All clients benefit from the research received from the brokers with whom we deal. We do not seek to allocate benefits to client accounts proportionately to the soft dollar credits they generate. Although we seek best execution of transactions, clients should understand that obtaining research and services utilizing soft dollar benefits represents a conflict of interest since it enables us to receive research that we might otherwise have to produce ourselves or purchase with our own money. Research may be proprietary or from a third-party. Proprietary research is provided directly from a broker (for example, research provided by broker analysts and employees about a specific security or industry or region). Third-party research is provided by the payment by a broker, in full or in part, for research services provided by third parties.

We will evaluate the quality and cost of services received from broker-dealers on at least an annual basis. As part of the evaluations, we consider the quality and cost of services available from alternative broker-dealers. A summary of our review is generated on an annual basis. Members of our investment team and our CCO conduct the review.

When selecting, or recommending brokers, we do not consider whether it or an employee of Strategic receives client referrals from the broker.

Generally, our agreement with clients grants us the discretionary authority to enter orders for securities transactions with the brokers, dealers, or issuers as we select. Clients are not permitted to direct brokerage.

We maintain a Trade Allocation Policy for the purchase and sales of securities. The allocation policy states we will aggregate trades when it is consistent with the duties of best execution. Trades will be aggregated when the opportunity is present. Clients that participate in an aggregated trade will participate at the average share price of the transaction. Clients will be presented with a copy of Strategic's Trade Allocation Policy upon request.

As described above in Item 4 – Advisory Business, we manage several model portfolios. These model portfolios are offered to our investment management clients, certain retirement plans and our clients on the Schwab Institutional Intelligence Portfolios Platform. This creates a potential conflict of interest in that the execution of model changes are not executed at the same time and as a result, the execution of trades in one segment may impact the price and availability of the security for the other models. When making model changes, we will generally execute changes and trades for investment management accounts and then update models on the retirement plan recordkeepers platform, and the Schwab Institutional Intelligent Portfolio platform. Generally, these changes will all occur on the same day, but we only have the ability to control the timing of trades for our discretionary managed accounts. All of the other platforms are responsible for executing the changes and have varying time frames for doing so.

While not a standard practice, we will purchase individual bonds for clients. Bonds are purchased for individual accounts on an as-requested basis.

We do not maintain custody of your assets that we manage or advise, although we may be deemed to have custody of your assets if you give us the authority to withdraw assets from your account. (See section on Custody below) Your assets must be maintained in an account with a "qualified custodian," generally a broker-dealer of a bank. We recommend, but do not require, that clients establish their advisory accounts with Charles Schwab & Co., Inc. (Schwab), a FINRA-registered broker-dealer, Member SIPC, as the qualified custodian. We may utilize other qualified custodians to hold your assets, e.g., annuities, 529 plans, etc. We are independently owned and operated and not affiliated with Schwab or any other custodian our clients elect to use. While we recommend that you use Schwab as a custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. Even though your account may be maintained at Schwab or another custodian, we can still use other brokers to execute trades for your account, as described above.

If a client elects to establish an account with a custodian other than Schwab it may affect Strategic's ability to achieve best execution. In addition, it may affect Strategic's ability to aggregate these trades with accounts held at other custodians or Strategic's ability to trade with certain brokers. If a client account is unable to be aggregated with accounts of other custodians, it may cost clients more money because the client may pay more in commissions or receive less favorable net prices on transactions for the account than would otherwise be the case. If there are multiple aggregated orders, the largest orders will be placed and filled before the next largest aggregate order is placed.

Schwab Advisor Services is Schwab's business serving independent investment advisory firms like us. They provide us and our clients with access to its institution brokerage-trading, custody, reporting, and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis and at no charge to us. Following is a more detailed description of Schwab's support services:

Services that Benefit You the Client. 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 we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

Services that May Not Directly Benefit You the Client. Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our client accounts, including accounts not maintained at Schwab. 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 our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

Services that Generally Benefit Only Strategic. Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

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

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We do not have to pay for Schwab's services. These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. This creates an incentive to recommend that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services and not only Schwab's services that benefit only us.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. 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 us with other benefits, such as occasional business entertainment of our personnel.

Item 13: Review of Accounts

Wealth Management Services

Strategic Gold and Platinum Program

Annual Review Recommendation: We recommend an annual review with each client to discuss updates in their financial goals, risk tolerance, and overall financial situation. This is crucial for assessing whether the current investment strategy remains suitable for the client's objectives. In instances where more than a year has passed without a review, despite efforts to arrange one, we will continue to manage the client's account based on their last provided directives.

Online Platform Access: Clients have access to an online platform where they can monitor their investment performance, holdings, planning status, and complete any required actions by either party. This platform is intended to maintain transparency and empower clients with real-time information about their investments.

Customized Review Frequency: The frequency of review sessions is based on client preferences, subject to our ongoing service agreement.

Unscheduled Reviews Triggered by Market Conditions: We may perform unscheduled reviews in response to volatile market conditions or significant changes in securities or sectors to ensure that client accounts are aligned with their financial objectives and risk tolerances. Discretionary accounts receive continuous supervision to guarantee that investment strategies are consistently aligned with the client's goals and risk appetite.

Strategic Blue Program

Periodic Review Guidance: Client portfolios are managed actively according to our understanding of the client's risk and return objectives. Clients have daily access to view their portfolios. In addition, Strategic provides quarterly portfolio updates to the client. Clients are instructed to notify Strategic if their risk and return objectives have changed.

Online Platform Access: Strategic Blue clients also have access to an online platform to track investment performance and holdings, promoting transparency and ongoing engagement with their financial strategies.

Client-Initiated Review Events: We encourage clients to request a review following significant life changes or financial shifts that could influence their financial plan and/or investment strategy. Notable events include, but are not limited to, employment changes, significant financial fluctuations, changes in marital status, or family additions.

Engagement Communication: Periodically all clients will receive an email with instructions on how to access their investment performance data, the importance of reassessing risk tolerance, and a summary of their current investment strategy (e.g., growth investor, moderate investor). The communication will urge clients to review this information, reconsider their risk assessment, and reflect on any life changes that might impact their investment strategy. If necessary, clients are encouraged to schedule a check-in with us to ensure their financial plan remains aligned with their current needs and objectives.

Institutional Services

Annual Review Recommendation: We advocate for a minimum of an annual review meeting with institutional clients to revisit and possibly update the client's investment objectives, needs, risk tolerance, and spending policy, among other factors. This meeting helps to evaluate how the investments are performing relative to the client's expectations and requirements.

Management in Absence of Annual Review: In circumstances where more than one year elapses without a review, despite our reasonable efforts to arrange one, we will continue to manage the client's account based on the most recent instructions provided by the client.

Online Platform Access: Institutional clients also have access to an online platform to track investment performance and holdings, promoting transparency and ongoing engagement with their financial strategies. Prior to gaining access, clients must formally request online portal privileges.

Client-Defined Review Frequency: The scheduling of review meetings can be adjusted according to the preferences of the client, consistent with our ongoing service agreement.

Market-Driven Account Reviews: The occurrence of volatile market conditions or notable changes in the performance of specific securities or sectors may prompt additional reviews of client accounts. These reviews are intended to ensure that the client's portfolio remains in alignment with their strategic investment objectives and risk parameters.

General Information

Pertaining to Strategic Gold, Platinu, Blue and Institutional Services

Ongoing Account Supervision: Strategic continuously monitors the discretionary managed accounts of our clients, ensuring alignment with the designated investment model. Trading activities and general account rebalancing are conducted based on the specific requirements of the account's investment strategy. It is important to note that there may be extended periods without transactions if none are deemed necessary; however, Strategic remains actively engaged in the supervision of these accounts regardless of transaction frequency.

Statement and Report Delivery: Clients are provided with account statements on a monthly or quarterly basis, issued directly by the custodian, broker-dealer, or Mutual Fund Company. Additionally, Strategic prepares and offers a variety of reports tailored to client needs, including portfolio summaries, appraisals, performance evaluations, insurance summaries, and financial plan overviews. These reports are generated on an individual basis, either during regular meetings throughout the year or upon specific request by the client.

Custom Report Requests: Clients have the ability to request more detailed or specific reports based on their unique requirements or interests.

Employer Retirement Plan Services

Our approach to managing retirement plan services includes regular monitoring of plan investment options and Strategic Asset Allocation Models, with additional reviews conducted as needed based on market conditions. We recommend periodic review meetings with plan sponsors, typically on a semi-annual or at least annual basis, to assess any material changes in the client's retirement planning requirements and to review the suitability and performance of plan fund lineups. The timing of these review meetings is flexible, determined by the client's preference.

Additional review sessions are available to plan participants as necessary or as outlined in the client agreement. Volatile market conditions and other relevant factors, such as changes in plan fund lineups or Strategic Asset Allocation Models, may initiate further reviews. Changes in client objectives, financial circumstances, or specific constraints may also trigger additional assessments. Clients are welcome to request more frequent reviews if desired.

Plan sponsors and participants (where applicable) receive monthly or quarterly account statements directly from the recordkeeper. We generate comprehensive reports, such as plan summaries, cash flow analyses, plan fund lineup performance, and mutual fund review commentary, available individually throughout the year or upon client request. For enhanced access and convenience, custodians and plan providers may offer electronic account access to both plan participants and sponsors.

For plans and recordkeepers that permit plan participant investment in our model portfolios, we diligently communicate any model changes to the recordkeeper and thoroughly review the models to ensure all adjustments are accurately reflected and up-to-date.

Charles Schwab Institutional Intelligent Portfolios

We communicate model changes to the platform and review the models to ensure all changes are accurate and up to date.

Item 14: Client Referrals and Other Compensation

Economic Benefits from Schwab: We receive support products and services from Schwab, benefiting us and other independent investment advisors whose clients' accounts are held at Schwab. These benefits, along with the associated conflicts of interest, are detailed in the Brokerage Practices section above.

Referral Fees to Independent Solicitors: In compliance with Rule 206(4)-1 of the Investment Advisers Act of 1940, we compensate independent solicitors for client referrals. Prior to formalizing referral agreements, we conduct due diligence to confirm such arrangements will not impede our fiduciary duty to act in our clients' best interests. Our agreements with solicitors detail the scope of activities and compensation terms. Our client agreements transparently disclose any referral relationships, including the compensation provided to solicitors.

Lead Generation Partnerships: We engage with lead generation services, including SmartAsset, an SEC-registered investment advisor, to connect with potential clients. This program, which we participate in for a flat fee, furnishes us with information on individuals interested in investment advisory services. The fee structure is contingent on various factors, including the potential client's portfolio size, and is payable regardless of whether a lead becomes a client. Every referred prospect is presented with a Disclosure Document elucidating the referral relationship, compensation details, and any pertinent conflicts of interest.

Referrals from Existing Clients or Professional Partners: A substantial portion of our new business originates from referrals by current clients or professional partners, without any compensation promised to the referrer. However, to express our gratitude, we may offer non-monetary gifts of nominal value, not exceeding \$500, such as Strategic-branded materials or other items.

Professional Referrals: We may recommend other professionals for legal, tax, accounting, or insurance services. Clients are not obligated to engage these recommended professionals nor to act on their advice. While recommending these professionals may present a conflict of interest due to potential reciprocal referrals, our primary criterion for such recommendations is the anticipated benefit to the client. We receive no compensation for these referrals.

Internal Referral Program: An internal referral program incentivizes our employees for contributing to client acquisition efforts through monetary rewards for successful client referrals. This program is subject to thorough due diligence to ensure compatibility with our commitment to act in the best interest of our clients.

Item 15: Custody

Custody of Client Assets: In accordance with government regulations, our firm may be considered to have custody of your assets in certain situations. This includes scenarios where you provide us with the authority to instruct your account custodian to deduct our advisory fees directly from your account or if you give us authorization to transfer funds to a third party on your behalf.

Custodial Arrangements: Regardless of the custody status, a qualified custodian will always hold the actual custody of client funds and securities. This means that all assets are held in a secure, regulated environment, under the custodian's name for your benefit.

Client Statements from Custodian: Clients will receive account statements directly from the custodian, either on a monthly or quarterly basis, depending on the custodian's policy or the client's preference. These statements are an important tool for monitoring your account, including the verification of transactions and current holdings.

Comparison of Statements: We also provide the option for clients to receive account statements directly from us. If you choose this service, we strongly encourage you to compare the statements you receive from us with those issued by the qualified custodian. This practice helps ensure accuracy and transparency in the reporting of your account activity and holdings.

Annual Surprise Audits: In instances where our firm is deemed to have custody of client assets, and as required by regulatory standards, we will arrange for an independent public accountant to conduct an annual surprise audit. This audit is a key component of our commitment to upholding the highest standards of trust and integrity in managing custodial responsibilities.

Item 16: Investment Discretion

Discretionary Authority for Account Management: Strategic is granted discretionary authority to manage securities accounts on behalf of our clients. This authority is established when a client signs a Strategic Investment Advisory Agreement, explicitly authorizing Strategic to make investment decisions on their behalf. Under this discretion, Strategic determines the specific securities transactions, including the selection of securities, the quantities to be transacted, the timing of purchases or sales, and the selection of financial institutions through which transactions are executed.

Client-Imposed Limitations: Clients have the option to impose specific limitations on this discretionary authority. Such limitations may pertain to the types of securities eligible for transaction within their accounts. We encourage clients to clearly communicate any desired restrictions to ensure their investment strategy aligns with their individual preferences and goals. We will thoroughly review each limitation to assess the feasibility of implementing it within your portfolio's strategic framework. In instances where a specific restriction cannot be honored, we are committed to working collaboratively with you to explore and suggest viable alternative solutions that respect your objectives while maintaining the integrity of the investment strategy.

Discretion in Retirement Plan Division: Within Strategic's retirement plan division, discretionary authority is not extended to managing individual retirement plan assets or participant accounts directly. However, Strategic retains the discretionary capability to modify investment fund lineups and to rebalance Asset Allocation Models within the plan's framework. This authority is conferred through our Investment Management Agreement with new clients and can be subject to client-imposed limitations, such as restrictions on specific investment options available to plan participants.

Review of Agreements: We strongly encourage all clients to thoroughly review any agreements they enter into with Strategic. Understanding these agreements is crucial for ensuring that the scope of discretionary authority and any potential limitations are clearly defined and aligned with the client's investment objectives.

Item 17: Voting Client Securities

Strategic accepts the responsibility to vote proxies on behalf of our clients, provided this authority is explicitly granted through the custodial account documentation. Acknowledging the significance of proxy voting in promoting shareholder value, we adhere to established Proxy Voting Guidelines. These guidelines aim to support proposals fostering robust corporate governance and aligning management's actions with shareholder interests over the long term.

For the efficient processing of votes and analysis alignment with shareholder interests, we leverage a third-party vendor. While clients may specify how their shares should be voted on particular issues, this option is considered secondary to the established guidelines. Clients desiring to direct votes on specific matters are encouraged to communicate their preferences to their advisor. Although we strive to accommodate such requests, we cannot alter votes already processed.

Any potential conflicts of interest concerning proxy voting are meticulously evaluated by our investment committee, ensuring that conflicted parties do not influence voting decisions. Clients may request copies of our proxy voting records and the Proxy Voting Guidelines.

In instances where Strategic does not possess proxy voting authority, clients will directly receive their proxies or related solicitations from the custodian. Upon request, we provide impartial, unbiased opinions on solicitations, prioritizing the client's best interest, barring any conflicts of interest. Should a conflict arise, we will transparently communicate this to the client and refrain from providing an opinion.

Item 18: Financial Information

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

We are not aware of any financial condition that would impair our ability to fulfill our contractual obligations, including those pertaining to our discretionary management authority over client accounts.

Strategic has not been the subject of a bankruptcy petition.

Alan R Leist, Jr., CFP® – Chairman and Founder
114 Business Park Drive | Utica, NY 13502
315.724.1776

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Educational Background and Business Experience

Year of Birth: 1946

Education:

- MBA Business Administration, Farleigh Dickinson University, NJ
- BA Liberal Arts, Syracuse University, NY

Business Background:

- Strategic Financial Services; 1979 to Present
 - Chief Executive Officer

Security and Insurance Licenses: Series: New York State Life/Accident Health Insurance License

Professional Designations: Certified Financial Planner (CFP)

The CFP is a professional certification mark granted by the Certified Financial Planner Board of Standards, Inc (CFP Board). The CFP is awarded to individuals who meet the CFP Board's education, examination, work experience, and ethics requirements. Eligible candidates must have, at a minimum, a bachelor's degree (or its equivalent) from an accredited college or university to obtain the CFP certification. The candidate must also successfully pass a written examination, have three years of professional experience in the financial planning field, and meet the CFP Board's ethical requirements. To maintain the certification, the CFP Board requires individuals to complete a minimum of 30 hours of continuing education every two years and renew an agreement to abide by the CFP Board's Standards of Professional Conduct. For more information on the CFP certification please visit www.cfp.net.

Disciplinary Information

Mr. Leist has two disclosure events. You can look up more information about us and our investment adviser representatives at <https://www.investor.gov/CRS>.

Other Business Activities

While Mr. Leist is a licensed insurance agent with various insurance companies, he is not allowed to sell new policies to any individuals.

Additional Compensation

Mr. Leist does not receive any additional economic benefit from third parties for providing advisory services.

Supervision

Strategic's Executive Committee and CCO are responsible for supervising and monitoring all client relationship managers and client accounts. Supervision includes account, correspondence, and various other periodic reviews. To reach Strategic's CCO, contact Kasey Williams at 1.800.937.4461.

Judith V. Sweet, CFA - President
114 Business Park Drive | Utica, NY 13502
315.724.1776

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Educational Background and Business Experience

Year of Birth: 1960

Education:

- BA Economics, Bucknell University, PA

Business Background:

- President for Strategic Financial Services; 1989 to Present

Professional Designations: Chartered Financial Analyst (CFA)

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals. There are currently more than 90,000 CFA charterholders working in 135 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct. To learn more about the CFA charter, visit www.cfainstitute.org.

Disciplinary Information

No events have occurred that apply to this item.

Other Business Activities

Strategic is required to disclose any outside business activities or occupations for compensation that could potentially create a conflict of interest with clients. Ms. Sweet is not actively engaged in any such activities.

Additional Compensation

Ms. Sweet does not receive any additional economic benefit from third parties for providing advisory services.

Supervision

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Alan R Leist, III, CFA – Chief Executive Officer

114 Business Park Drive | Utica, NY 13502
315.724.1776

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Educational Background and Business Experience

Year of Birth: 1972

Education:

- MBA, The Johnson School of Management, Cornell University
- BA Economics, Colgate University, NY

Business Background:

- Managing Director, Investment and Management Committees for Strategic Financial Services; 2005-Present
- Institutional Equity Trader for Fulcrum Global Partners; 2005
- Institutional Equity Trader for Merrill Lynch; 1994-2005

Professional Designations: Chartered Financial Analyst (CFA)

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To learn more about the CFA charter, visit www.cfainstitute.org.

Disciplinary Information

No events have occurred that apply to this item.

Other Business Activities

Strategic is required to disclose any outside business activities or occupations for compensation that could potentially create a conflict of interest with clients. Mr. Leist is not actively engaged in any such activities.

Additional Compensation

Mr. Leist does not receive any additional economic benefit from third parties for providing advisory services.

Supervision

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Aaron Evans, CFA, CFP® - Senior Advisor
114 Business Park Drive | Utica, NY 13502
315.724.1776

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Educational Background and Business Experience

Year of Birth: 1981

Education:

- MBA Finance, Simon Graduate School of Business, University of Rochester, Rochester NY
- BS Electrical and Computer Engineering, University of Rochester, Rochester NY
- Graduate Fellow Engineering Leadership, Northeastern University, Boston, MA

Business Background:

- Senior Advisor for Strategic Financial Services; 2016 - Present
- Analyst/Financial Planning Associate for Strategic Financial Services; 2011-2016
- Engineer and Project Management for Lockheed Martin; 2005-2011

Professional Designations: Chartered Financial Analyst (CFA), Certified Financial Planner (CFP)

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Disciplinary Information

No events have occurred that apply to this item.

Other Business Activities

Strategic is required to disclose any outside business activities or occupations for compensation that could potentially create a conflict of interest with clients. Mr. Evans is not actively engaged in any such activities.

Additional Compensation

Mr. Evans does not receive any additional economic benefit from third parties for providing advisory services.

Supervision

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Michael McGraw, CFP® – Senior Advisor
114 Business Park Drive | Utica, NY 13502
315.724.1776

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Educational Background and Business Experience

Year of Birth: 1980

Education:

- BS Business Administration, University at Buffalo, NY
- M.S.Ed. Career and Technical Education, Buffalo State College, NY

Business Background:

- Financial Advisor for Strategic Financial Services; 2015 - Present
- Financial Planning Associate for Strategic Financial Services: 2011-2015
- Business Education Teacher at Whitesboro Central School District: 2010-2011
- Adjunct Professor, Business and Finance Dept. at Hudson Valley Community College: 2009-2010
- Business Education Teacher at Hoosick Falls Central School District: 2008-2010

Professional Designations: Certified Financial Planner (CFP)

The CFP is a professional certification mark granted by the Certified Financial Planner Board of Standards, Inc (CFP Board). The CFP is awarded to individuals who meet the CFP Board's education, examination, work experience, and ethics requirements. Eligible candidates must have, at a minimum, a bachelor's degree (or its equivalent) from an accredited college or university to obtain the CFP certification. The candidate must also successfully pass a written examination, have three years of professional experience in the financial planning field, and meet the CFP Board's ethical requirements. To maintain the certification, the CFP Board requires individuals to complete a minimum of 30 hours of continuing education every two years and renew an agreement to abide by the CFP Board's Standards of Professional Conduct. For more information on the CFP certification please visit www.cfp.net.

Disciplinary Information

No events have occurred that apply to this item.

Other Business Activities

Strategic is required to disclose any outside business activities or occupations for compensation that could potentially create a conflict of interest with clients. Mr. McGraw is not actively engaged in any such activities.

Additional Compensation

Mr. McGraw does not receive any additional economic benefit from third parties for providing advisory services.

Supervision

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Melissa Fernald, CFP® - Senior Advisor
114 Business Park Drive | Utica, NY 13502
315.724.1776

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Educational Background and Business Experience

Year of Birth: 1983

Education:

- BS Management, SUNY Oswego, NY; 2005
- AAS, Accounting, Herkimer County Community College; 2003

Business Background:

- Financial Advisor for Strategic Financial Services; 2016- Present
- Wealth Management Specialist for Strategic Financial Services; 2011-2016
- Operations Specialist for Strategic Financial Services; 2007 to 2011
- Representative in Client Management for BNY Mellon: 2005-2007

Professional Designations: Certified Financial Planner (CFP)

The CFP is a professional certification mark granted by the Certified Financial Planner Board of Standards, Inc (CFP Board). The CFP is awarded to individuals who meet the CFP Board's education, examination, work experience, and ethics requirements. Eligible candidates must have, at a minimum, a bachelor's degree (or its equivalent) from an accredited college or university to obtain the CFP certification. The candidate must also successfully pass a written examination, have three years of professional experience in the financial planning field, and meet the CFP Board's ethical requirements. To maintain the certification, the CFP Board requires individuals to complete a minimum of 30 hours of continuing education every two years and renew an agreement to abide by the CFP Board's Standards of Professional Conduct. For more information on the CFP certification please visit www.cfp.net.

Disciplinary Information

No events have occurred that apply to this item.

Other Business Activities

Strategic is required to disclose any outside business activities or occupations for compensation that could potentially create a conflict of interest with clients. Mrs. Fernald is not actively engaged in any such activities.

Additional Compensation

Mrs. Fernald does not receive any additional economic benefit from third parties for providing advisory services.

Supervision

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Laura E. Powers, ChFC® – Senior Advisor
114 Business Park Drive | Utica, NY 13502
315.724.1776

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Educational Background and Business Experience

Year of Birth: 1980

Education:

- MBA Technology Management, SUNY Institute of Technology, NY
- BA Psychology, SUNY Institute of Technology, NY

Business Background:

- Financial Advisor for Strategic Financial Services; 2015 - Present
- Director of Retirement Plan Services for Strategic Financial Services; 2011-2015
- Retirement Plan Services Associate and Operations Specialist for Strategic Financial Services; 2004-2011

Professional Designations: Chartered Financial Consultant (ChFC)

The ChFC is a designation offered by the American College. To be considered for the program, the applicant must already have a minimum of three years of working full-time in the financial industry. To receive the ChFC you must complete eight required courses and pass a final exam. Participation in the annual Professional Recertification Program is required to maintain the designation. As part of this program, individuals are expected to complete 30 hours of continuing education every two years. For more information about the ChFC please visit: www.theamericancollege.edu/designations-degrees/ChFC.

Disciplinary Information

No events have occurred that apply to this item.

Other Business Activities

Strategic is required to disclose any outside business activities or occupations for compensation that could potentially create a conflict of interest with clients. Mrs. Powers is not actively engaged in any such activities.

Additional Compensation

Mrs. Powers does not receive any additional economic benefit from third parties for providing advisory services.

Supervision

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Gregory A. Mattacola, Esq., CFP® – Senior Advisor
114 Business Park Drive | Utica, NY 13502
315.724.1776

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Educational Background and Business Experience

Year of Birth: 1971

Education:

- BA English/Political Science, St. Bonaventure University
- Juris Doctor, SUNY Buffalo School of Law

Business Background:

- Financial Advisor at Strategic Financial Services; 2018-Present
- Owner of The Mattacola Law Firm; 2003-2016
- Counsel at Hancock Estabrook LLP; 2016-2017
- Vice-President at Rome Memorial Hospital, Inc.; 2011-2016

Professional Designations: Certified Financial Planner (CFP)

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Disciplinary Information

No events have occurred that apply to this item.

Other Business Activities

Strategic is required to disclose any outside business activities or occupations for compensation that could potentially create a conflict of interest with clients. Mr. Mattacola, in certain pre-approved circumstances, will provide legal counsel for compensation. Mr. Mattacola will not provide any legal counsel to clients of Strategic Financial Services.

Additional Compensation

Mr. Mattacola does not receive any additional economic benefit from third parties for providing advisory services.

Supervision

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Francesca Asher, CFP® – Lead Advisor
114 Business Park Drive | Utica, NY 13502
315.724.1776

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Educational Background and Business Experience

Year of Birth: 1990

Education:

- BA Communications Arts and Business Management, SUNY Oneonta

Business Background:

- Financial Advisor, Strategic Financial Services; 2018-Present
- Wealth Management Specialist, Strategic Financial Services, 2017-2018
- Client Service Specialist, Strategic Financial Services; 2016-2017
- Accounting Technician, DFAS, 2015-2016
- Trade Specialist, BNY Mellon; 2013-2015

Professional Designations: Certified Financial Planner (CFP)

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Disciplinary Information

No events have occurred that apply to this item.

Other Business Activities

Strategic is required to disclose any outside business activities or occupations for compensation that could potentially create a conflict of interest with clients. Mrs. Asher is not actively engaged in any such activities.

Additional Compensation

Mrs. Asher does not receive any additional economic benefit from third parties for providing advisory services.

Supervision

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Douglas Walters, CFA – Chief Investment Officer
114 Business Park Drive | Utica, NY 13502
315.724.1776

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Educational Background and Business Experience

Year of Birth: 1972

Education:

- MBA Finance, MIT Sloan School of Management, Cambridge, MA
- MS Mechanical Engineering, Massachusetts Institute of Technology, Cambridge, MA
- BA Mechanical Engineering, Clarkson University, Potsdam, NY

Business Background:

- Portfolio Manager; Strategic Financial Services; 2014 to Present
- Director, Senior Equity Analyst; EVA Dimensions; 2013-2014
- Director, CROCI Investment Strategy and Valuation Group; Deutsche Bank; 2008-2013
- Director, Capital Structure Analysis; Deutsche Bank; 2004-2008
- Vice President, Capital Goods Equity Research; Deutsche Bank; 2001-2004

Professional Designations: Chartered Financial Analyst (CFA)

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To learn more about the CFA charter, visit www.cfainstitute.org.

Disciplinary Information

No events have occurred that apply to this item.

Other Business Activities

Strategic is required to disclose any outside business activities or occupations for compensation that could potentially create a conflict of interest with clients. Mr. Walters is not actively engaged in any such activities.

Additional Compensation

Mr. Walters does not receive any additional economic benefit from third parties for providing advisory services.

Supervision

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Max Berkovich – Portfolio Manager

114 Business Park Drive | Utica, NY 13502
315.724.1776

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Educational Background and Business Experience

Year of Birth: 1982

Education:

- BA Economics and Political Science, Utica College of Syracuse University, NY

Business Background:

- Portfolio Manager and Trader for Strategic Financial Services; 2011-Present
- Portfolio Analyst and Trader for Strategic Financial Services; 2004-2011

Disciplinary Information

No events have occurred that apply to this item.

Other Business Activities

Strategic is required to disclose any outside business activities or occupations for compensation that could potentially create a conflict of interest with clients. Mr. Berkovich is not actively engaged in any such activities.

Additional Compensation

Mr. Berkovich does not receive any additional economic benefit from third parties for providing advisory services.

Supervision

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Gregory Tedone, ARPC, CPFA® - Head of Retirement Plans, Senior Advisor
104 East Ave, Rochester, NY 14604
315.724.1776

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Educational Background and Business Experience

Year of Birth: 1988

Education:

- MBA Finance, Simon Business School, University of Rochester, NY
- BA Political Science, Geneseo College, State University of New York, NY

Business Background:

- Head of Retirement Plans, Senior Advisor; Strategic Financial Services, 2022-Present
- Director of Retirement Plan Consulting; Wealth Enhancement Group, 2021-2022
- Director of Retirement Plan Consulting; QCI Asset Management, 2020-2021
- Retirement Plan Consultant; QCI Asset Management, 2018-2021
- Financial Consultant; TIAA, 2015-2018
- Internal Regional Consultant; Manning & Napier, 2011-2015
- Growth Team Member; Manning & Napier, 2010-2011

Professional Designations: Accredited Retirement Plan Consultant (ARPC) and Certified Plan Fiduciary Advisor (CPFA®)

The ARPC designation is primarily intended for people already working in sales and marketing in the retirement plan field. Except for students, applicants must have a year of full-time experience. Applicants must pass a certification exam that consists of one hundred multiple-choice questions. The exam questions are designed to test the applicant's knowledge of how to determine an organization's retirement plan needs, evaluate the effectiveness of the organization's current retirement plan, formulate a suitable retirement plan solution, present it to the employer and assist in the implementation and follow-up. No coursework is required to sit for the exam.

The Certified Plan Fiduciary Advisor is a professional certification program offered by the National Association of Plan Advisors (NAPA). This program is designed for financial professionals who work with retirement plans, such as 401(k)s, and want to specialize in serving as fiduciary advisors to plan sponsors. To earn the CPFA designation, candidates must pass a comprehensive exam that covers a range of topics related to retirement plans and fiduciary responsibility, including plan design, investment selection, and regulatory compliance. Certificate holders must complete ongoing continuing education requirements to maintain their certification.

Disciplinary Information

No events have occurred that apply to this item.

Other Business Activities

Strategic is required to disclose any outside business activities or occupations for compensation that could potentially create a conflict of interest with clients. Mr. Tedone is not actively engaged in any such activities.

Additional Compensation

Mr. Tedone does not receive any additional economic benefit from third parties for providing advisory services.

Supervision

Strategic's Executive Committee, Investment Committee, and CCO are responsible for supervising and monitoring all client relationship managers and client accounts. Supervision includes account, correspondence, and various other periodic reviews. To reach Strategic's CCO, contact Kasey Williams at 1.800.937.4461.

Cody Carnaya, CFP® – Lead Advisor

114 Business Park Drive | Utica, NY 13502
315.724.1776

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Educational Background and Business Experience

Year of Birth: 1989

Education:

- BS Ecology, SUNY Plattsburgh, Plattsburgh, NY
- AS Natural Science, SUNY Cobleskill, Cobleskill, NY

Business Background:

- Associate Advisor. Strategic Financial Services; 2020-2023
- Registered Representative, Equitable Advisors, LLC; 2020
- Team Leader, Wegmans Food Markets; 2013-2020

Professional Designations: Certified Financial Planner (CFP)

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Disciplinary Information

No events have occurred that apply to this item.

Other Business Activities

Strategic is required to disclose any outside business activities or occupations for compensation that could potentially create a conflict of interest with clients. Mr. Carnaya is not actively engaged in any such activities.

Additional Compensation

Mr. Carnaya does not receive any additional economic benefit from third parties for providing advisory services.

Supervision

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Connor Gaffney, CFP® – Lead Advisor
114 Business Park Drive | Utica, NY 13502
315.724.1776

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Educational Background and Business Experience

Year of Birth: 1989

Education:

- BA Government, Georgetown University

Business Background:

- Associate Advisor, Strategic Financial Services; 2019-Present
- Business Development and Product Line Manager, Fiber Instruments Sales; 2017-2019
- Strategic Account Manager; Fiber Instruments Sales; 2014-2017

Professional Designations: Certified Financial Planner (CFP)

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Disciplinary Information

No events have occurred that apply to this item.

Other Business Activities

Strategic is required to disclose any outside business activities or occupations for compensation that could potentially create a conflict of interest with clients. Mr. Gaffney is not actively engaged in any such activities.

Additional Compensation

Mr. Gaffney does not receive any additional economic benefit from third parties for providing advisory services.

Supervision

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Kyle Dempster, CFP®– Lead Advisor
114 Business Park Drive | Utica, NY 13502
315.724.1776

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Educational Background and Business Experience

Year of Birth: 1990

Education:

- MBA, Utica College
- BS Mathematics, Robert Wesleyan College

Business Background:

- Associate Advisor, Strategic Financial Services; 2020-Present
- Financial Aid Counselor, Utica College; 2014-2020
- Information Specialist, Utica College; 2012-2014

Professional Designations: Certified Financial Planner (CFP)

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Disciplinary Information

No events have occurred that apply to this item.

Other Business Activities

Strategic is required to disclose any outside business activities or occupations for compensation that could potentially create a conflict of interest with clients. Mr. Dempster is not actively engaged in any such activities.

Additional Compensation

Mr. Dempster does not receive any additional economic benefit from third parties for providing advisory services.

Supervision

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Curt Pearsall, CFP®- Lead Advisor
114 Business Park Drive | Utica, NY 13502
315.724.1776

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Educational Background and Business Experience

Year of Birth: 1982

Education:

- BS Finance, Siena College

Business Background:

- Associate Advisor, Strategic Financial Services; 2022-Present
- Business Owner, Collaborative Business Solutions; 2021-2022
- Chief Financial Officer, Upstate Cerebral Palsy Inc.; 2018-2021
- Controller/VP, Upstate Cerebral Palsy Inc.; 2012-2018

Professional Designations: Certified Financial Planner (CFP)

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Disciplinary Information

No events have occurred that apply to this item.

Other Business Activities

Strategic is required to disclose any outside business activities or occupations for compensation that could potentially create a conflict of interest with clients. Mr. Pearsall is not actively engaged in any such activities.

Additional Compensation

Mr. Pearsall does not receive any additional economic benefit from third parties for providing advisory services.

Supervision

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Sophia Tsoupelis – Associate Advisor
114 Business Park Drive | Utica, NY 13502
315.724.1776

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Educational Background and Business Experience

Year of Birth: 1998

Education:

- BS Finance, Providence College

Business Background:

- Associate Advisor, Strategic Financial Services; 2020-Present

Disciplinary Information

No events have occurred that apply to this item.

Other Business Activities

Strategic is required to disclose any outside business activities or occupations for compensation that could potentially create a conflict of interest with clients. Ms. Tsoupelis is not actively engaged in any such activities.

Additional Compensation

Ms. Tsoupelis does not receive any additional economic benefit from third parties for providing advisory services.

Supervision

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Jacob Storsberg – Associate Advisor – Retirement Plans
114 Business Park Drive | Utica, NY 13502
315.724.1776

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Educational Background and Business Experience

Year of Birth: 1998

Education:

- BA Accounting and Finance, St. Johns Fisher University

Business Background:

- Associate Advisor, Strategic Financial Services; 2022-Present
- Insurance Sales Rep, State Farm; 2021-2022
- Client Associate, Bank of America; 2020-2021

Disciplinary Information

No events have occurred that apply to this item.

Other Business Activities

Strategic is required to disclose any outside business activities or occupations for compensation that could potentially create a conflict of interest with clients. Mr. Storsberg is not actively engaged in any such activities.

Additional Compensation

Mr. Storsberg does not receive any additional economic benefit from third parties for providing advisory services.

Supervision

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Mr. Storsberg does not receive any additional economic benefit from third parties for providing advisory services.

Nicholas A. Accordino, CFP®– Associate Advisor
114 Business Park Drive | Utica, NY 13502
315.724.1776

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Educational Background and Business Experience

Year of Birth: 1988

Education:

- MS Sport Administration, Canisius College
- BS Religious Studies, Wells College

Business Background:

- Associate Advisor, Strategic Financial Services; 2023-Present
- Senior Development Officer, Utica University; 2020-2023
- Director of Annual Giving/Leadership Gifts, Utica University; 2015-2020
- Development Officer, Utica University; 2014-2015
- Operations & Marketing Manager, Niagara University; 2012-2014

Professional Designations: Certified Financial Planner (CFP)

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Disciplinary Information

No events have occurred that apply to this item.

Other Business Activities

Strategic is required to disclose any outside business activities or occupations for compensation that could potentially create a conflict of interest with clients. Mr. Accordino is not actively engaged in any such activities.

Additional Compensation

Mr. Accordino does not receive any additional economic benefit from third parties for providing advisory services.

Supervision

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STRATEGIC

Privacy Policy

FACTS

What does Strategic Financial Services do with your personal information?

Why?	<p>The management and employees of Strategic Financial Services respect the privacy of nonpublic personal information that we collect from our clients. We are committed to protecting your privacy and maintaining confidentiality and security of the personal information you provide to us that helps us give you better service and complete your transactions more effectively.</p> <p>Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.</p>
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What?	<p>The types of personal information we collect, and share depends on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> ▪ Social Security Number and Income ▪ Address and Occupation ▪ Assets and Investment Objectives <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p>
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How?	<p>All financial companies need to share customer's personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customer's personal information; the reasons Strategic Financial Services chooses to share; and whether you can limit this sharing.</p>
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Reasons we can share your personal information.	Does Strategic Financial Services share?	Can you limit this sharing?
For our everyday business purposes- such as processing your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	We do not disclose any nonpublic personal information about our customers, former customers, or prospective customers to anyone, except as permitted by law.
For our marketing purposes- to offer our products and services to you	No	N/A
For joint marketing with other financial companies	No	N/A
For our affiliates' everyday business purposes- information about your transactions and experiences	No	N/A
For our affiliates' everyday business purposes- information about your creditworthiness	No	N/A
For non-affiliates to market to you	No	N/A

Questions?	Call (315) 724-1776 or go to www.investstrategic.com
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Who we are	
Who is providing this notice?	Strategic Financial Services
What we do	
How does Strategic Financial Services protect my personal information?	We have always considered the protection of sensitive information to be a sound business practice and a foundation of customer trust. We restrict access to our client's nonpublic personal information to those employees and affiliates who need to know that information to provide you with the services you request. To protect the security and confidentiality of your personal information we maintain physical, electronic, and procedural safeguards that comply with our professional standards.
How does Strategic Financial Services collect my personal information?	<p>Personal information we collect may come from the following sources:</p> <ul style="list-style-type: none"> ▪ Information we receive from you on applications, client profile sheets, and through discussion. ▪ Information about your transaction with us, our affiliates, or others, such as securities transactions, withdrawals, and account transfers. <p>We do not collect consumer report information.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> ▪ sharing for affiliates' everyday business purposes - information about your creditworthiness ▪ affiliates from using the information to market to you ▪ sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies.
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market products or services to you.

Other Important Information

Strategic strives to maintain accurate information about you and your accounts. If you believe that our records contain inaccurate information about you or your accounts, please contact us immediately so that we can update any inaccurate information.

Strategic Financial Services will provide you notice of our privacy policy annually if you maintain an ongoing relationship with us.

Strategic Financial Services also maintains a business continuity plan, including alternate processing facilities, to address disruptions in our normal course of business. These plans are reviewed annually and updated, as necessary. In the event of a significant business interruption, you can contact us by phone at (315) 724-1776 or visit our website at investstrategic.com.