



March 2026

**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](http://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 provide you with a summary of any material changes made to this Brochure and will offer or deliver a complete copy of the Brochure upon request. The material changes listed below reflect updates since the last annual updating amendment of Strategic Financial Services, Inc. on March 31, 2025.

### **Item 4: Advisory Business**

- Updated our regulatory assets under management (AUM) as of the most recent fiscal year-end.
- Renamed the Strategic Gold and Platinum Programs to the Core Client Program.

### **Item 5: Fees and Compensation**

- Added additional details regarding our Employer Retirement Plan Services fee structure.

### **Item 7: Types of Clients**

- Updated Blue Program minimum requirements.

### **Item 12: Brokerage Practices**

- Updated disclosures regarding Schwab custodial arrangements, account-related fees, cash sweep program, and cash management practices. Added disclosure regarding client-directed brokerage.

### **Item 17: Voting Client Securities**

- Updated our proxy voting disclosure to reflect that we do not vote client proxies; clients vote their own proxies, and we may provide limited guidance or an opinion upon request.

## Item 3: Table of Contents

Item 2: Material Changes .....	2
Item 3: Table of Contents .....	3
Item 4: Advisory Business .....	4
Item 5: Fees and Compensation .....	16
Item 6: Performance-Based and Side-By-Side Management .....	20
Item 7: Types of Clients .....	21
Item 8: Methods of Analysis, Investment Strategies, and Risk of Loss .....	22
Item 9: Disciplinary Information .....	26
Item 10: Other Financial Industry Activities and Affiliations .....	27
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....	28
Item 12: Brokerage Practices .....	29
Item 13: Review of Accounts .....	32
Item 14: Client Referrals and Other Compensation .....	35
Item 15: Custody .....	37
Item 16: Investment Discretion .....	39
Item 17: Voting Client Securities .....	40
Item 18: Financial Information .....	40

## 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 have been committed to our independence. Today, Alan Leist III holds a majority ownership stake of approximately 60%, with the remaining shares owned by employees of the firm.

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

#### Core Client Program

In our Core Client Program, we provide holistic 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 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 will be updated 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, so 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.
- **Insurance:** We review your coverage needs and can help identify gaps across life, disability, and other key areas, coordinating with your insurance professional as appropriate.
- **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.
- **Taxes:** We take a tax-aware approach to financial planning and investment strategy, and can coordinate with your tax professional to help identify planning opportunities. We do not prepare returns.
- **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, so your financial plan evolves with you.

For our Core Client Program 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 provides for 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 Core Client Program clients:

- **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 is intended to be 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 Core Client Program primarily offers discretionary management, allowing us to 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 holistic 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, so 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, 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 develop a portfolio consistent with 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 based on 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, so 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 advisory services tailored to meet the unique needs and goals of each institution. Our service model includes:

- **Reviewing Your Mission and Objectives:** We start by understanding your organization's core mission and goals to provide services that 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 provides 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 so 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 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 employee-focused services aim to enhance plan participation, improve financial literacy, and support better retirement outcomes. These services are designed so that employees fully understand their retirement plan options and feel confident making decisions about their financial future. Key components include:

- **Plan Enrollment Meetings:** We assist employees in signing up for their retirement plans, they understand plan benefits, investment options, and how to align plan participation with their financial goals.
- **One-on-One Meetings/Calls:** Participants can schedule personalized sessions to discuss their individual retirement goals, explore plan features, and gain a clear understanding of basic investment principles, asset allocation strategies, and the options available within their employer-sponsored plan.
- **Group Education Meetings:** Strategic facilitates group sessions aimed at providing general education about the retirement plan, explaining foundational investment concepts, and answering common questions about participation and retirement readiness.

Additionally, we offer **participant-level investment advice** to help employees make informed decisions about their retirement accounts. This includes:

- **Personalized, Non-Discretionary Advice:** Upon request, employees receive point-in-time recommendations tailored to their unique financial goals, circumstances, and risk tolerance.
- **Plan-Specific Investment Recommendations:** Strategic provides guidance on asset allocation and investment options available within the retirement plan, recommendations align with the participant's objectives.
- **Participant Retained Authority:** Employees maintain full control over their investment decisions, as Strategic does not exercise discretionary authority over participant accounts.
- **Fiduciary Responsibility:** As a fiduciary under ERISA, Strategic adheres to the highest standards of loyalty, prudence, and care, that all advice serves the best interests of the employee.

Participants may be required to sign a **Participant Advice Disclosure Agreement** prior to engaging in advice services. This agreement clarifies the scope of services, associated fees, and conflicts of interest, promoting transparency and accountability.

Employees are encouraged to proactively update their financial information and reach out when advice is needed, as Strategic does not provide ongoing or unsolicited advice. By combining education with tailored advice, we empower employees to understand their retirement plan benefits and gain financial confidence.

## 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 providers for your plan's needs.
- **General Plan Reviews:** Evaluating your plan's costs, investments, cash flow, and demographics.
- **Plan Operations and Administrative Assistance:** Offering support for the 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 co-fiduciary investment guidance, assisting the plan sponsor/trustee in selecting and monitoring investment options. The final investment decisions remain with 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 serve as ERISA 3(38) investment fiduciary for an existing Pooled Employer Plan (PEP) in partnership with Advisor Trust as the Pooled Plan Provider. This program is closed to new participants. Our ongoing responsibilities include investment policy statement oversight, investment menu construction, a discretionary asset management program for plan participants, and PEP compliance oversight.

## **Workplace Financial Plan**

At our discretion we may offer complimentary, one-time financial planning engagements to employees of select plan sponsor clients as an additional benefit of our retirement plan relationship. This program is not available to all plans and is offered entirely at Strategic's discretion, including whether to offer the program to a particular plan and the number of complimentary engagements available to that plan during a given period.

Strategic establishes a participation limit for each plan based on capacity and operational considerations. Within that limit, the plan sponsor independently determines which employees to invite based on the sponsor's own knowledge of its workforce. Strategic reserves the right to adjust participation limits at any time.

### **Cost of the Program**

These engagements are provided at Strategic's expense. No cost is charged to the plan, the plan sponsor, or the participant, and no plan assets are used in connection with this program.

### **Participant Selection and Communications**

Plan sponsors identify and invite participants. Strategic's role is limited to providing the engagement once a participant is introduced by the sponsor.

### **Scope of the Complimentary Engagement**

Each engagement is a one-time, personalized financial planning session covering topics relevant to the participant's circumstances, which may include:

- budgeting, savings, and cash flow management;
- investment allocation considerations relative to goals and risk tolerance;
- estate planning basics (including beneficiary designations);
- insurance coverage review and gap identification;
- retirement readiness and savings projections;
- education savings strategies; and
- tax-aware planning considerations.

Strategic may provide planning observations and discuss potential action items; however, Strategic does not have discretionary authority to implement any aspect of the participant's financial plan. This is a one-time service with no ongoing monitoring, follow-up, or advisory obligation unless the participant separately engages Strategic for Wealth Management services under a written agreement.

### **Participant Responsibilities**

Participants are responsible for providing complete and accurate financial information. Strategic does not independently verify participant-provided data and relies on the participant for inputs. Participants are encouraged to consult with their own tax, legal, and financial professionals before acting on any information discussed.

### **Conflict of Interest Disclosure**

This program creates a conflict of interest. Strategic has a financial incentive to introduce participants to its Wealth Management services and to convert participants into paying clients. During the complimentary engagement, Strategic may identify the participant as a potential Wealth Management client and may offer ongoing investment management and financial planning services for a separate fee.

Any Wealth Management relationship that results from this engagement is separate from Strategic's role as an investment fiduciary to the retirement plan (including in any 3(21) or 3(38) capacity). Strategic's plan-level fiduciary obligations and recommendations are not affected by, and are managed independently from, any Wealth Management relationship developed with individual participants. The complimentary engagement is provided regardless of whether any ongoing paid relationship results, and participants are under no obligation to engage Strategic for any paid services.

### **Participant Disclosure Acknowledgement**

Prior to the engagement, each participant will receive and sign a disclosure acknowledgement that describes the scope and limits of the engagement, confirms that the engagement is complimentary, and discloses the conflict of interest described above.

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.

For Fiduciary Consulting Services, all recommendations will be submitted to you for your ultimate approval or rejection. For retirement plan Fiduciary Consulting Services, the retirement plan sponsor client or the plan participant who elects to implement any recommendations made by us is solely responsible for such decisions.

Fiduciary Consulting Services are not management services, and Strategic does not serve as administrator or trustee of the plan. Strategic does not act as custodian for any client account or have access to client funds or securities (except for some accounts, having written authorization from the client to deduct our fees).

Strategic acknowledges that in performing the Fiduciary Consulting Services listed above that it is acting as a "fiduciary" as such term is defined under Section 3(21)(A)(ii) of Employee Retirement Income Security Act of 1974 ("ERISA") for purposes of providing non-discretionary investment advice only. Strategic will act in a manner consistent with the requirements of a fiduciary under ERISA if, based upon the facts and circumstances, such services cause Strategic to be a fiduciary as a matter of law.

However, in providing the Fiduciary Consulting Services, Strategic (a) has no responsibility and will not (i) exercise any discretionary authority or discretionary control respecting management of Client's retirement plan, (ii) exercise any authority or control respecting management or disposition of assets of Client's retirement plan, or (iii) have any discretionary authority or discretionary responsibility in the administration of Client's retirement plan or the interpretation of Client's retirement plan documents, (b) is not an "investment manager" as defined in Section 3(38) of ERISA and does not have the power to manage, acquire or dispose of any plan assets, and (c) is not the "Administrator" of Client's retirement plan as defined in ERISA.

### **Total Assets Under Management**

As of December 31, 2025, discretionary assets under management totaled \$2,659,231,336 and non-discretionary assets totaled \$148,347,885.

### **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 the scope of what we provide, we will 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, 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 not being involved to holding a limited power of attorney. This variance affects whether we directly manage the accounts' 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

**Asset Management Services:** Strategic offers asset management services, which involves Strategic providing you with continuous and ongoing supervision over your specified accounts.

You must appoint our firm as your investment adviser of record on specified accounts (collectively, the "Account"). The Account consists only of separate account(s) held by qualified custodian(s) under your name. The qualified custodians maintain physical custody of all funds and securities of the Account, and you retain all rights of

ownership (e.g., right to withdraw securities or cash, exercise or delegate proxy voting and receive transaction confirmations) of the Account.

The Account is managed by us based on your financial situation, investment objectives and risk tolerance. We actively monitor the Account and provide advice regarding buying, selling, reinvesting or holding securities, cash or other investments of the Account.

We will need to obtain certain information from you to determine your financial situation and investment objectives. You will be responsible for notifying us of any updates regarding your financial situation, risk tolerance or investment objectives and whether you wish to impose or modify existing investment restrictions; however, we will contact you at least annually to discuss any changes or updates regarding your financial situation, risk tolerance or investment objectives. We are always reasonably available to consult with you relative to the status of your Account. You have the ability to impose reasonable restrictions on the management of your accounts, including the ability to instruct us not to purchase certain securities.

It is important that you understand that we manage investments for other clients and may give them advice or take actions for them or for our personal accounts that is different from the advice we provide to you, or actions taken for you. We are not obligated to buy, sell or recommend to you any security or other investment that we may buy, sell or recommend for any other clients or for our own accounts.

Conflicts may arise in the allocation of investment opportunities among accounts that we manage. We strive to allocate investment opportunities believed to be appropriate for your account(s) and other accounts advised by our firm among such accounts equitably and consistent with the best interests of all accounts involved. However, there can be no assurance that a particular investment opportunity that comes to our attention will be allocated in any particular manner. If we obtain material, non-public information about a security or its issuer that we may not lawfully use or disclose, we have absolutely no obligation to disclose the information to any client or use it for any client's benefit.

**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 your applicable required beginning date.
  - 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 at 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.

When advising wealth management clients or prospective clients on rollovers, 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.

**Additional Guidance for Participants in Plans We Manage:** If you are a participant in a retirement plan managed by Strategic, you may have the option to:

1. Roll over assets from another IRA or a prior employer's retirement plan into your current retirement plan account, depending on the plan's provisions.
2. Roll over assets from your existing retirement plan account under the plan we manage into an IRA, which could include an IRA managed by our Wealth Management team; or
3. Roll over assets into another IRA, which could also include an IRA managed by our Wealth Management team.

Each of these options creates a conflict of interest because they can generate additional revenue for Strategic and, depending on the circumstances, could result in higher fees for you compared to remaining in your current retirement plan account or IRA. We are committed to providing transparent information to help you evaluate the costs and benefits of these options.

The availability of these choices depends on the specific rules outlined in your plan document. Regardless of the option you choose, assets rolled into an IRA or into your current plan will incur fees as outlined in the applicable agreement.

When we provide investment advice to participants in retirement plans, we manage, we act as fiduciaries under Title I of ERISA and/or the Internal Revenue Code. Under this fiduciary framework and in accordance with the Department of Labor's Prohibited Transaction Exemption (PTE) 2020-02, we follow a special rule designed to ensure that our recommendations serve your best interests. Specifically:

- We act prudently by meeting a professional standard of care when making recommendations.
- We act loyally by putting your financial interests ahead of our own.
- We avoid misleading statements about conflicts of interest, fees, or the investments we recommend.
- We follow policies and procedures designed to ensure our advice is in your best interest.
- We charge no more than reasonable fees for our services.
- We disclose conflicts of interest to ensure transparency.

**Participant Investment Advice Disclosure:** If we provide individualized investment advice to a participant in a plan we manage, we will ask the participant to sign a Participant Investment Advice Disclosure prior to the engagement. This document outlines the scope of the advice, the nature of the advisor-client relationship, any associated fees, and a detailed explanation of potential conflicts of interest. By signing this disclosure, the participant acknowledges their understanding of the engagement and the fiduciary standards under which we operate.

Please refer to Section 14: Client Referrals and Other Compensation for additional disclosure regarding conflicts of interest related to the rollover of retirement assets and participant investment advice.

**Our Commitment to Informed Decision-Making:** We are committed to helping you make informed decisions regarding your retirement plan assets. For participants in the plans we manage, we typically provide general education on available options rather than specific recommendations. However, when individualized advice is provided, the Participant Investment Advice Disclosure ensures clarity and transparency for all parties involved. This approach empowers participants to evaluate their options and make decisions based on their individual financial situation and goals.

**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 offer clients the option to access an online platform designed to facilitate financial planning and aggregate account information. All clients are eligible for access, and participation is voluntary—clients may choose to opt in at their discretion.

This platform enables you to update your financial information and explore various “what-if” scenarios to assess the potential impact of different financial decisions. While this tool can provide valuable insights, the projections and outputs generated by the platform are for informational purposes only and do not constitute personalized advice or recommendations from Strategic.

Additionally, the platform allows you to aggregate external accounts that we do not manage, providing a more comprehensive view of your overall financial situation. However, Strategic does not monitor, manage, or provide investment advice related to these external accounts.

**Important Considerations:** If you choose to use this platform independently, we encourage you to consult with us before making any significant financial decisions. Any actions taken based on platform-generated information, without our direct guidance, may not align with your financial goals or risk tolerance.

**Borrowing Against Assets:** If you need to borrow money, your qualified custodian or broker-dealer may offer the following options:

- **Margin Loans** – Your account custodian or broker-dealer may extend credit to you by lending money against the assets in your investment account. The custodian charges interest on the borrowed funds and uses your securities as collateral.
- **Pledged Asset Loans** – A third-party lender may offer a loan using your investment assets held at your custodian as collateral. The terms, interest rates, and lending conditions are determined by the lender and custodian, not Strategic.

**Important Considerations:** Strategic does not provide, originate, or facilitate loans of any kind. Any margin or pledged asset loans are entirely arranged and administered by your custodian or third-party lender. Before borrowing, we encourage you to carefully review the terms and risks associated with margin lending or asset-backed borrowing, as they may impact your investment strategy and financial situation.

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.

**Pro-Bono Planning Services:** From time to time, we may offer financial planning services on a pro-bono basis to individuals or organizations in need. These engagements are not part of a formal program and are offered at our discretion. Individuals receiving pro-bono services are provided with a copy of our Form ADV and are required to sign a one-time engagement agreement outlining the scope and limitations of the services provided. There is no obligation to engage us for ongoing or paid advisory services, and these engagements are not prioritized differently than paid relationships once accepted.

**Use of Sub-Advisor:** Clients who have large, concentrated stock positions or unique hedging needs can authorize us to engage a specific Sub-Advisor to manage a portion of their account. We do not hire or fire any Sub-Advisor

without the client's prior written consent to engage. Clients may terminate a Sub-Advisor by providing written or verbal notice.

Once a Sub-Advisor is approved, that Sub-Advisor has discretionary authority over the assigned portion of the account—placing trades and making portfolio changes aligned with the client's objectives.

When evaluating and overseeing Sub-Advisors on behalf of our clients, we evaluate alignment with each client's objectives and to support transparency in the ongoing relationship.

- We consider factors such as track record, strategy, cost, and the client's investment goals in evaluating potential Sub-Advisors.
- We continuously monitor the Sub-Advisor's performance and alignment with client objectives.
- If the Sub-Advisor underperforms or becomes unsuitable, we recommend termination or replacement, subject to the client's approval.
- We are available to answer client questions regarding the sub-advised portion of the account, including performance or strategy details.
- Clients should be aware that other Sub-Advisors, not recommended by our firm, exist and may be more or less costly.

A complete description of each Sub-Advisor's services, fees, and practices is provided in the Sub-Advisor's Form ADV Part 2A.

## Item 5: Fees and Compensation

### Wealth Management Services

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

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

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 of all the assets in the account as reported by the firm's portfolio management system, which is reconciled with custodian data. The Advisor will receive no start-up or termination fees. Fee deductions are reflected in 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

At Strategic, we are committed to providing tailored and comprehensive investment solutions through a transparent and structured fee model for our institutional clients. Our fees are designed to align with the complexity and requirements of each client relationship while ensuring fairness and clarity.

Our institutional advisory fees are based on assets under management (AUM) and are calculated using the following tiered structure:

Institutional Price Schedule	Client's Assets Under Management
1.20%	First \$250,000
0.65%	Next \$1,750,000
0.50%	Next \$3,000,000
0.35%	Next \$10,000,000
0.30%	On Assets over \$15,000,000

**Factors Affecting Fees:** While the above fee schedule applies to most institutional clients, final fees may be influenced by factors such as:

- **Asset Size of the Relationship** – Larger relationships may benefit from scaled pricing based on total assets under management.
- **Service Expectations** – Fees may vary based on the breadth and complexity of services required, such as customized reporting, investment advisory, or specialized portfolio management.

Prior to engagement, we provide each institutional client with a detailed fee proposal, ensuring full transparency in pricing. Any fee arrangements will be explicitly outlined in the client agreement.

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 of all the assets in the account as reported by the firm's portfolio management system, which is reconciled with custodian data. The Advisor will receive no start-up or termination fees, nor will it be subject to any penalties. Fee deductions are reflected in 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-Traded 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:** Your custodian and/or broker-dealer may charge fees associated with maintaining and servicing your account and executing transactions. These may include transaction charges and service-related fees (for example, fees for wires, account transfers, account closing, or other administrative services), depending on the custodian's policies and the services used. For additional information regarding Schwab's fees, account-related costs, and cash sweep arrangements, please see Item 12 (Brokerage Practices).

## Sub-Advisor Fees

Clients engaging a Sub-Advisor will incur fees in addition to our advisory fee, and we have outlined below how these fees are structured, assessed, and disclosed.

- **Fee Structure:** Sub-Advisor fees are charged in addition to our advisory fee, unless otherwise noted in the client's household fee arrangement.
- **Range of Fees:** Typical Sub-Advisor fees range from 0.25% to 1.25% (annualized), depending on the strategy. Combined Advisor and Sub-Advisor fees generally do not exceed 2.00% on an annual basis.
- **Deductions:** Sub-Advisor fees are typically deducted directly by the Sub-Advisor from the client's account at Charles Schwab (or other custodian).
- **Transaction Costs:** Because many sub-advisory strategies involve derivatives or more frequent trading, clients will incur additional transaction or brokerage fees beyond our standard management approach.

**Other Products:** Depending on your individual needs, we can 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.

**Class Action Filings:** 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

Our retirement plan advisory fees are customized based on the plan's specific facts and service needs. In determining an appropriate fee, we use a benchmarking approach that considers factors such as plan assets, number of participants, plan complexity, and the scope of services requested (e.g., fiduciary support, participant education, reporting, and administrative involvement).

**Fee Range / Maximum:** Our ERPS advisory fees generally range from 0.20% to 0.75% of plan assets (annualized),

depending on the plan's characteristics and services selected, and will not exceed 1.25% (annualized), unless otherwise agreed in writing.

For startup plans, we typically charge a minimum annual fee of \$2,000 along with an AUM-based fee of 0.75% (75 basis points). All fees are negotiable based on plan needs, complexity, and service expectations.

We periodically assess our fee structure to ensure it remains aligned with industry standards and appropriately reflects the level of service provided. All fees, including those for startup plans, are negotiable based on plan needs, complexity, and service expectations.

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.

Generally, you can terminate the 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**

Performance-based fees are defined as fees based on a share of capital gains or capital appreciation of the assets held in a client's account. Item 6 is not applicable to this Disclosure Brochure because we do not charge or accept performance-based fees.

## 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.

Our Core Client Program is generally designed for clients with at least \$500,000 in investable assets, although we may make exceptions in our discretion.

Our Strategic Blue Program is generally intended for clients with investable assets below \$500,000. The minimum for a Blue Program relationship is generally \$250,000 in investable assets. We may, at our discretion, accept relationships below this minimum based on factors such as the client's savings trajectory, connection to an existing client household or key professional relationship, and overall fit with the program's service model. We generally do not accept relationships where the client has limited assets and no reasonable expectation of additional savings or wallet share, unless the relationship is connected to an existing client or other key relationship described above.

For sub-advisory strategies (e.g., hedging or exchange fund replication for concentrated positions), the Sub-Advisor often imposes additional qualifications or minimums. Refer to the Sub-Advisor's Form ADV for details on account minimums or requirements.

## 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 identify appropriate 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 investment factors that we believe may be associated with certain return and risk characteristics. 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:** Past performance is not indicative of future results. Therefore, you should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds, etc.) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. You should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, our firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated with investing in securities through our investment management program, as described below:

**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 results 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.

**Sub-Advisor Strategies:** We can recommend a Sub-Advisor for clients who maintain significant single-stock holdings or require specialized hedging strategies. These strategies frequently involve derivatives, margin, or other advanced tools that carry increased risks, including:

- **Derivative/Options Risk:** The use of options and other derivatives can introduce volatility and complexity. These instruments may lose value rapidly, become illiquid, or behave unpredictably in certain market conditions, potentially leading to a loss of principal.
- **Concentration Risk:** Maintaining a large position in a single security or sector can significantly increase exposure to company-specific or industry-specific events, which may negatively impact portfolio value.
- **Margin/Leverage Risk:** Borrowing against assets (i.e., using margin) or leveraging positions can amplify gains but also magnify losses. A decline in the value of the account could trigger margin calls, requiring the client to deposit additional funds or liquidate assets at unfavorable prices.
- **Liquidity Risk:** Certain strategies, particularly those involving complex or thinly traded instruments, may result in difficulty entering or exiting positions without materially affecting price, especially during volatile markets.
- **Tax Implications:** Strategies used by the Sub-Advisor may result in short-term gains, wash sale issues, or other complex tax consequences. Clients should consult with a tax professional to understand the implications specific to their situation.

All investments involve the risk of loss, and clients should be prepared to bear such losses. These risks are not exhaustive, and additional disclosures may be provided in the Sub-Advisor's Form ADV.

## Item 9: Disciplinary Information

Strategic Financial Services does not have any reportable disciplinary events.

## **Item 10: Other Financial Industry Activities and Affiliations**

Strategic is not and does not have a related person that is a broker/dealer, municipal securities dealer, government securities dealer or broker, an investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund,” and offshore fund), another investment adviser or financial planner, a futures commission merchant, commodity pool operator, or commodity trading advisor, a banking or thrift institution, an accountant or accounting firm, an insurance company or agency, a pension consultant, a real estate broker or dealer, and a sponsor or syndicator of limited partnerships. However, we do have a related person who is a lawyer and who practices law in a limited capacity, as approved by Strategic, and unrelated to his capacity as a financial advisor.

We are an independent investment registered adviser and only provide investment advisory services. We are not engaged in any other business activities and offer no other services except those described in this Disclosure Brochure.

## 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:** Our Code of Ethics requires employees to report their personal trading activities, ensuring continuous oversight to mitigate potential conflicts of interest. While certain transactions, such as IPOs and other designated restricted securities, require pre-approval from our Chief Compliance Officer (CCO), all other personal trades are subject to post-trade review.

As part of our monitoring process, we review employee trading activity for:

- Trading frequency, including patterns of excessive trading or day trading.
- Short-term buy-sell transactions that may indicate speculative trading behavior.
- Proximity of employee trades to similar client trades, ensuring employees do not improperly benefit from client transactions.

Any transactions found to be in violation of the Code of Ethics may be subject to rectification at the employee's expense.

**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. 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.

We do not receive client referrals from Charles Schwab or any other broker/dealer.

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.

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. This creates a potential conflict of interest in that the execution of model changes is 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. Generally, these changes will all occur on the same day, but we only can 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 standard practice, we will purchase individual bonds for clients. Bonds are purchased for individual accounts on an as-requested basis.

Your assets must be maintained in an account with a "qualified custodian," generally a broker-dealer or bank. We have selected Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer, Member SIPC, as the qualified custodian for client accounts. We are independently owned and operated and not affiliated with Schwab. You 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. Certain assets, such as annuities, 529 plans, or other investment products, may be held at other qualified custodians as appropriate.

As a standard practice, Strategic selects the broker-dealers and custodians used to execute transactions and maintain client assets in order to seek best execution. In rare circumstances, and generally only for larger or more complex client relationships, we may consider accommodating a client request to direct brokerage or use a specific custodian or executing broker. When a client directs brokerage or requests a specific broker or custodian in lieu of our standard approach, we may be unable to aggregate trades with other clients, may be limited in our ability to negotiate execution and service terms, and may not be able to achieve the most favorable overall execution for the account. Client-directed brokerage can also result in higher transaction costs, less favorable pricing, or differences in execution quality compared to accounts that follow our standard brokerage practices.

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.

## **Schwab Support Services Details**

**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.

### **Schwab Fees and Other Account-Related Costs**

For client accounts custodied at Charles Schwab & Co., Inc. ("Schwab"), Schwab generally does not charge a separate custody fee. Instead, Schwab is typically compensated through transaction-related charges and account/service fees (which may include trading-related charges and fees for certain account services). Schwab's fees and pricing are subject to change.

Schwab also offers cash "sweep" / "cash feature" options that move uninvested cash into a designated cash feature intended to earn interest or yield. Rates and yields vary over time and may be lower than or equal to yields available on similar cash-equivalent alternatives outside of Schwab's cash features program. Schwab and/or its affiliated program banks may earn income on uninvested cash balances, including through the spread between what an affiliated bank may earn and the interest rate it pays on swept deposits. Clients may review Schwab's Cash Features Program disclosures for additional detail.

### **Cash Management Practices**

We are aware of the economic incentives associated with Schwab's cash sweep/cash feature options. As part of our portfolio management process, we generally seek to maintain cash balances at levels we believe are reasonably necessary to manage portfolios and meet expected liquidity needs, while avoiding excess uninvested cash when liquidity is not otherwise needed. Cash levels and cash alternatives vary by client circumstances, objectives, portfolio strategy, and custodial account features, and clients may request or require higher cash balances (e.g., recurring distributions or pending withdrawals).

## Item 13: Review of Accounts

### Wealth Management Services

Review practices vary by service offering. Our Core Client Program is designed to be more proactive and planning-driven, while our Strategic Blue Program generally follows a more streamlined review cadence supported by periodic communications and client-initiated requests.

#### Core Client Program

**Annual Review Recommendation:** Each client is assigned an Advisor Team, and 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 directives provided.

**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 so 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:** Each client is assigned an Advisor Team and 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 so their financial plan remains aligned with their current needs and objectives.

#### Institutional Services

**Annual Review Recommendation:** Each client is assigned to an Advisor Team, and 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 provided so the client's portfolio remains aligned with their strategic investment objectives and risk parameters.

## General Information Pertaining to the Core Client Program, Blue, and Institutional Services

**Ongoing Account Supervision:** Strategic continuously monitors the discretionary managed accounts of our clients to ensure alignment with each account's designated investment model and stated objectives. Our Investment and Trading team conducts this monitoring in close partnership with the client's Advisor Team, ensuring that both portfolio strategy and personal financial context are considered in the ongoing management process.

Trading activity and rebalancing are performed based on the requirements of the account's investment strategy and may be adjusted in response to market conditions, model changes, or individual circumstances. While there may be extended periods without trading if no changes are deemed necessary, Strategic remains actively engaged in the supervision of each account, 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 can request more detailed or specific reports based on their unique requirements or interests.

## Employer Retirement Plan Services

Each retirement plan client is assigned to a dedicated advisor team responsible for ongoing relationship management, participant engagement, and coordination of service delivery. In partnership with the advisor team, our Investment Team regularly reviews the plan's investment lineup and Strategic Asset Allocation Models to ensure they remain appropriate and aligned with plan objectives.

We recommend periodic review meetings with plan sponsors—typically on a semi-annual or annual basis—to evaluate whether any changes in plan needs, participant demographics, or investment performance warrant updates. The timing and frequency of these meetings are determined based on the client's preference and the agreed-upon service model.

Additional review sessions are available for plan participants as needed or as specified in the client agreement. Volatile market conditions, lineup changes, updates to Strategic Asset Allocation Models, or changes in plan

objectives may also prompt additional assessments. Clients are always welcome to request more frequent reviews if desired.

Plan sponsors and participants (where applicable) receive monthly or quarterly statements directly from the recordkeeper. In addition, Strategic prepares comprehensive reports, such as plan summaries, cash flow analyses, investment lineup performance, and mutual fund commentary. These reports are available throughout the year, either as part of scheduled meetings or upon request.

For plans and recordkeepers that support participant investment in Strategic's model portfolios, our Investment Team communicates model changes to the recordkeeper and performs periodic reviews to confirm that all updates are accurately implemented and reflected.

## 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 an Independent Promoter (Retirement Plan Clients Only):**

We have entered into an agreement with one independent promoter for referrals related to certain retirement plan advisory relationships. The promoter is generally compensated as a percentage of the ongoing advisory fee, although the compensation arrangement may vary depending on the client's state of residence and applicable requirements. The promoter's compensation is paid by Strategic out of the advisory fee we receive and does not increase the advisory fee rate the client pays under the advisory agreement. Where applicable, clients receive the required promoter disclosures and related documentation, and any compensation arrangement is disclosed to the client prior to or at the time of engagement.

**Referrals from Existing Clients or Professional Partners:** A substantial portion of our new business originates from referrals by current clients or professional partners. We do not compensate clients or professional partners for these referrals, and there is no expectation of reciprocal referrals or services in return. We may provide nominal gifts or occasional business courtesies (e.g., Strategic-branded items) from time to time, not as compensation for referrals but as part of our ongoing relationships.

**Professional Referrals:** When clients have needs outside the scope of our services—such as legal, tax, accounting, or insurance—we may recommend professionals based solely on the client's specific needs and our experience, or that of our clients, in working with these individuals. While we may have a group of professionals with whom we've had positive experiences, we do not have formal referral arrangements in place with these individuals or firms, nor do we receive any compensation for such recommendations. There is no expectation of reciprocal referrals or other benefits. Clients are under no obligation to engage any professional we suggest, and they are encouraged to evaluate and select service providers independently.

**Internal Referral Program**

Our internal referral program includes two components that reward employees for qualified client referrals through monetary incentives:

**1. Direct Referrals by Team Members**

- Employees may refer individuals they know to our Wealth Management (WM), Institutional, or Retirement Plan divisions. A referral bonus is paid once the referred individual/entity participates in an initial introductory meeting with an advisor. Referral bonuses are paid as a flat dollar amount and are earned solely based on the referred individual attending an initial introductory meeting.
- **Referral Compensation:** No additional referral compensation is provided if the prospect later becomes a client.

**2. Referrals of Retirement Plan Participants:** In the course of managing retirement plan accounts, opportunities may arise to refer plan participants to our WM division. During advice engagements with SRP participants, additional planning needs may be identified that fall outside the scope of the plan. In these cases, participants may be offered a meeting with a WM advisor.

As with direct referrals, a bonus is paid once the participant attends an initial meeting.

**Referral Compensation:** No additional referral compensation is provided if the participant later becomes a client.

Referrals from retirement plan participants who choose to become clients may lead to one of the following outcomes:

- **Remain in the Plan as a WM Client:** The participant continues in the retirement plan but engages WM for additional services such as financial planning or investment management.
- **Rollover to an IRA:** If appropriate and in the participant's best interest, assets may be rolled into an IRA managed by WM. This decision is supported by a documented due diligence process evaluating the participant's goals, investment options, fees, and broader financial picture.

**Broader Incentive Alignment:** Beyond the referral program, all employees are eligible for performance-based incentive compensation tied to firm growth. A portion of this compensation is based on net new assets brought into the firm each year. Because our firm's revenue is primarily based on assets under management (AUM), growing AUM—whether through new client relationships or deepening existing ones—directly contributes to the firm's financial success. This structure naturally aligns employee efforts with the firm's broader growth objectives.

### **Conflicts of Interest**

These referral structures and incentive programs may create potential conflicts of interest:

- **Economic Benefit to the Firm:** New client relationships or rollovers increase AUM, which directly impacts firm revenue.
- **Employee Incentives:** Referral bonuses and annual compensation tied to net new assets may influence referral behavior.

We manage these conflicts through consistent due diligence—particularly for rollover recommendations—and by maintaining our fiduciary commitment to act in the best interests of each client.

## Item 15: Custody

### Custody of Client Assets

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented.

Strategic is deemed to have custody of client funds and securities whenever Strategic is given the authority to have fees deducted directly from client accounts or if you give us authorization to transfer funds to a third party on your behalf.

On February 21, 2017, the SEC issued a no-action letter (“Letter”) with respect to Rule 206(4)-2 (“Custody Rule”) under the Investment Advisers Act of 1940 (“Advisers Act”). The letter provided guidance on the Custody Rule as well as clarified that an adviser who has the power to disburse client funds to a third party under a standing letter of instruction (“SLOA”) is deemed to have custody. As such, our firm has adopted the following safeguards in conjunction with our custodian:

- The client provides an instruction to the qualified custodian, in writing, that includes the client’s signature, the third party’s name, and either the third party’s address or the third party’s account number at a custodian to which the transfer should be directed.
- The client authorizes the investment adviser, in writing, either on the qualified custodian’s form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
- The client’s qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client’s authorization, and provides a transfer of funds notice to the client promptly after each transfer.
- The client has the ability to terminate or change the instruction to the client’s qualified custodian.
- The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client’s instruction.
- The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.
- The client’s qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

In a limited number of client relationships, certain personnel within Strategic may be appointed to serve as trustee (or in a similar legal capacity) for the benefit of the client. In these arrangements, the trustee role is assigned to the individual within Strategic, but the firm supervises and oversees the engagement.

When a Strategic employee is serving as trustee, no direct compensation is paid to the individual for acting in that role. Strategic is not separately compensated for trustee services. Rather, we are compensated solely under our standard investment advisory fee arrangement, as outlined in Item 4 of this Brochure.

As trustee, the individual is responsible for administering the trust in accordance with its terms and applicable laws under the trust’s stated domicile. The duties performed include adhering to traditional fiduciary principles such as loyalty, good faith, prudence, and impartiality. The trustee is expected to treat beneficiaries fairly, maintain accurate records, and exercise reasonable discretion regarding the disclosure of trust information to third parties. At all times, the individual will maintain independent, discretionary oversight of the trust estate, consistent with their fiduciary obligations.

**Custodial Arrangements:** Regardless of the custody status, a qualified custodian will always hold the actual custody of client funds and securities in a separate account for each client under that client’s name. This means that all assets are held in a secure, regulated environment by the qualified custodian for your benefit. Clients or an

independent representative of the client will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained.

**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 performance and/or positions reports 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. When clients have questions about their account statements, they should contact Strategic or the qualified custodian preparing the statement.

**Annual Surprise Audits:**

Our annual surprise verification examination is limited to client accounts for which a Strategic employee serves as trustee (or in a similar legal capacity) and does not apply to accounts where Strategic's only custody is the authority to deduct advisory fees or act under a standing letter of authorization ("SLOA").

## 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, and the timing of purchases or sales.

**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.

**Sub-Advisor Engagement:** We do not engage or terminate a Sub-Advisor without the client's **written** sign-off to hire or **written/verbal** notice to terminate. **Once a Sub-Advisor is engaged**, that Sub-Advisor has **discretionary authority** to place trades within its allocated portion of the client's account according to the client's objectives and risk tolerance.

## Item 17: Voting Client Securities

Strategic Financial Services, Inc. does not accept or exercise authority to vote client proxies. Clients receive proxy materials and shareholder communications directly from their custodian and are responsible for voting their own securities. Strategic does not monitor proxy matters on an ongoing basis.

However, if a client requests assistance, we may provide limited guidance, including our general views or opinions regarding a particular proxy matter based on publicly available information. Any such guidance is provided upon request and does not create an obligation for Strategic to monitor proxy issues or provide ongoing proxy voting advice. Strategic retains historical proxy voting records for periods in which it previously exercised proxy voting authority, consistent with applicable recordkeeping requirements.

## Item 18: Financial Information

Strategic does not require or solicit fees of more than \$1,200 per client, six months or more in advance. Therefore, we are not required to include a balance sheet for the most recent fiscal year.

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.

# STRATEGIC

Form ADV Part 2B

**Alan R Leist, III, CFA – Chief Executive Officer**  
114 Business Park Drive | Utica, NY 13502  
315.724.1776

*This brochure supplement provides information about the investment advisor representatives of Strategic Financial Services that supplements the Strategic Financial Services brochure that you should have received. Please contact Strategic if you have not received a copy of Strategic's brochure or if you have any questions about the contents of this supplement. Additional information about Alan R Leist III is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## **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)

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](http://www.cfainstitute.org).

### **Disciplinary Information**

No events have occurred that apply to this item.

### **Other Business Activities**

The supervised person is not actively engaged in any other investment-related business or occupation. Additionally, the supervised person does not participate in any non-investment-related business activity that accounts for 10% or more of their time or compensation. There are no other business activities to disclose.

### **Additional Compensation**

The supervised person receives economic benefits in the form of incentive compensation and referral-based bonuses related to business development activities. Specifically:

- The supervised person may receive a one-time bonus when they refer a prospective client to the firm and that individual participates in an initial prospect meeting, regardless of whether the individual ultimately becomes a client.
- In addition, the supervised person may be eligible for incentive-based compensation tied to the firm's net new assets under management. This compensation is determined based on the supervised person's role and their contribution to the firm's business development efforts, as measured against a target for net new assets brought into the firm.

These compensation structures may create an incentive to refer new clients or bring additional assets to the firm. However, the firm maintains policies and supervisory procedures to ensure that all recommendations and advisory services are made in the client's best interest.

### **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.

# STRATEGIC

Form ADV Part 2B

**Judith V. Sweet, CFA - President**

114 Business Park Drive | Utica, NY 13502  
315.724.1776

*This brochure supplement provides information about the investment advisor representatives of Strategic Financial Services that supplements the Strategic Financial Services brochure that you should have received. Please contact Strategic if you have not received a copy of Strategic's brochure or if you have any questions about the contents of this supplement. Additional information about Judith V. Sweet is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

**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](http://www.cfainstitute.org).

**Disciplinary Information**

No events have occurred that apply to this item.

**Other Business Activities**

The supervised person is not actively engaged in any other investment-related business or occupation. Additionally, the supervised person does not participate in any non-investment-related business activity that accounts for 10% or more of their time or compensation. There are no other business activities to disclose.

**Additional Compensation**

The supervised person receives economic benefits in the form of incentive compensation and referral-based bonuses related to business development activities. Specifically:

- The supervised person may receive a one-time bonus when they refer a prospective client to the firm and that individual participates in an initial prospect meeting, regardless of whether the individual ultimately becomes a client.
- In addition, the supervised person may be eligible for incentive-based compensation tied to the firm's net new assets under management. This compensation is determined based on the supervised person's role and their contribution to the firm's business development efforts, as measured against a target for net new assets brought into the firm.

These compensation structures may create an incentive to refer new clients or bring additional assets to the firm. However, the firm maintains policies and supervisory procedures to ensure that all recommendations and advisory services are made in the client's best interest.

**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.

# STRATEGIC

Form ADV Part 2B

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

*This brochure supplement provides information about the investment advisor representatives of Strategic Financial Services that supplements the Strategic Financial Services brochure that you should have received. Please contact Strategic if you have not received a copy of Strategic's brochure or if you have any questions about the contents of this supplement. Additional information about Aaron Evans is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## **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)

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 charter holders 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](http://www.cfainstitute.org).

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](http://www.cfp.net).

### **Disciplinary Information**

No events have occurred that apply to this item.

### **Other Business Activities**

The supervised person is not actively engaged in any other investment-related business or occupation. Additionally, the supervised person does not participate in any non-investment-related business activity that accounts for 10% or more of their time or compensation. There are no other business activities to disclose.

### **Additional Compensation**

The supervised person receives economic benefits in the form of incentive compensation and referral-based bonuses related to business development activities. Specifically:

- The supervised person may receive a one-time bonus when they refer a prospective client to the firm and that individual participates in an initial prospect meeting, regardless of whether the individual ultimately becomes a client.
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### **Supervision**

# STRATEGIC

## Form ADV Part 2B

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.

# STRATEGIC

Form ADV Part 2B

**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](http://www.cfp.net).

### **Disciplinary Information**

No events have occurred that apply to this item.

### **Other Business Activities**

The supervised person is not actively engaged in any other investment-related business or occupation. Additionally, the supervised person does not participate in any non-investment-related business activity that accounts for 10% or more of their time or compensation. There are no other business activities to disclose.

### **Additional Compensation**

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# STRATEGIC

Form ADV Part 2B

**Melissa Fernalld, CFP® CDFA® - 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), Certified Divorce Financial Analyst (CDFA)

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](http://www.cfp.net).

The Certified Divorce Financial Analyst designation is issued by the Institute for Divorce Financial Analysts (IDFA) to individuals trained to provide financial expertise related to divorce. To obtain the designation, candidates must have a minimum of three years of professional experience in finance or divorce-related fields, complete a four-part course covering financial, tax, legal, and planning issues relevant to divorce, and pass a comprehensive exam for each module. CDFA® professionals must adhere to the IDFA Code of Ethics and complete continuing education requirements to maintain the credential.

### **Disciplinary Information**

No events have occurred that apply to this item.

### **Other Business Activities**

The supervised person is not actively engaged in any other investment-related business or occupation. Additionally, the supervised person does not participate in any non-investment-related business activity that accounts for 10% or more of their time or compensation. There are no other business activities to disclose.

### **Additional Compensation**

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# STRATEGIC

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## ***Supervision***

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# STRATEGIC

Form ADV Part 2B

**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](http://www.theamericancollege.edu/designations-degrees/ChFC).

## **Disciplinary Information**

No events have occurred that apply to this item.

## **Other Business Activities**

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# STRATEGIC

Form ADV Part 2B

**Gregory A. Mattacola, Esq., CFP®. ABFP<sup>SM</sup> – Senior Advisor**  
1320 Floyd Ave | Rome, NY 13440  
315.724.1776

*This brochure supplement provides information about the investment advisor representatives of Strategic Financial Services that supplements the Strategic Financial Services brochure that you should have received. Please contact Strategic if you have not received a copy of Strategic's brochure or if you have any questions about the contents of this supplement. Additional information about Gregory Mattacola is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## **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), Accredited Behavioral Finance Professional (ABFP)

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](http://www.cfp.net).

The Accredited Behavioral Finance Professional designation is offered by the College for Financial Planning. It is designed for financial professionals who want to apply behavioral finance principles to enhance client relationships and financial outcomes. The program focuses on understanding how psychological and emotional factors influence financial decision-making. To earn the designation, candidates must complete a specialized course covering behavioral biases, communication techniques, and client engagement strategies, and pass a final exam. Designees must also adhere to a Code of Ethics and fulfill continuing education requirements to maintain the credential.

### **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**

The supervised person receives economic benefits in the form of incentive compensation and referral-based bonuses related to business development activities. Specifically:

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### **Supervision**

# STRATEGIC

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# STRATEGIC

Form ADV Part 2B

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

*This brochure supplement provides information about the investment advisor representatives of Strategic Financial Services that supplements the Strategic Financial Services brochure that you should have received. Please contact Strategic if you have not received a copy of Strategic's brochure or if you have any questions about the contents of this supplement. Additional information about Francesca Asher is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## **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)

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](http://www.cfp.net).

### **Disciplinary Information**

No events have occurred that apply to this item.

### **Other Business Activities**

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### **Additional Compensation**

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# STRATEGIC

Form ADV Part 2B

**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:**

- Chief Investment Officer; 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)

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 charter holders 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](http://www.cfainstitute.org).

**Disciplinary Information**

No events have occurred that apply to this item.

**Other Business Activities**

The supervised person is not actively engaged in any other investment-related business or occupation. Additionally, the supervised person does not participate in any non-investment-related business activity that accounts for 10% or more of their time or compensation. There are no other business activities to disclose.

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# STRATEGIC

Form ADV Part 2B

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

*This brochure supplement provides information about the investment advisor representatives of Strategic Financial Services that supplements the Strategic Financial Services brochure that you should have received. Please contact Strategic if you have not received a copy of Strategic's brochure or if you have any questions about the contents of this supplement. Additional information about Gregory Tedone is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## **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**

The supervised person is not actively engaged in any other investment-related business or occupation. Additionally, the supervised person does not participate in any non-investment-related business activity that accounts for 10% or more of their time or compensation. There are no other business activities to disclose.

### **Additional Compensation**

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***Supervision***

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# STRATEGIC

Form ADV Part 2B

**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:**

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

**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](http://www.cfp.net).

**Disciplinary Information**

No events have occurred that apply to this item.

**Other Business Activities**

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- The supervised person may receive a one-time bonus when they refer a prospective client to the firm and that individual participates in an initial prospect meeting, regardless of whether the individual ultimately becomes a client.
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These compensation structures may create an incentive to refer new clients or bring additional assets to the firm. However, the firm maintains policies and supervisory procedures to ensure that all recommendations and advisory services are made in the client's best interest.

**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.

# STRATEGIC

Form ADV Part 2B

**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:**

- Lead 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)

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](http://www.cfp.net).

### **Disciplinary Information**

No events have occurred that apply to this item.

### **Other Business Activities**

The supervised person is not actively engaged in any other investment-related business or occupation. Additionally, the supervised person does not participate in any non-investment-related business activity that accounts for 10% or more of their time or compensation. There are no other business activities to disclose.

### **Additional Compensation**

The supervised person receives economic benefits in the form of incentive compensation and referral-based bonuses related to business development activities. Specifically:

- The supervised person may receive a one-time bonus when they refer a prospective client to the firm and that individual participates in an initial prospect meeting, regardless of whether the individual ultimately becomes a client.
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# STRATEGIC

Form ADV Part 2B

**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:**

- Lead 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**

The supervised person is not actively engaged in any other investment-related business or occupation. Additionally, the supervised person does not participate in any non-investment-related business activity that accounts for 10% or more of their time or compensation. There are no other business activities to disclose.

**Additional Compensation**

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# STRATEGIC

Form ADV Part 2B

**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:**

- Lead 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**

The supervised person is not actively engaged in any other investment-related business or occupation. Additionally, the supervised person does not participate in any non-investment-related business activity that accounts for 10% or more of their time or compensation. There are no other business activities to disclose.

### **Additional Compensation**

The supervised person receives economic benefits in the form of incentive compensation and referral-based bonuses related to business development activities. Specifically:

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# STRATEGIC

Form ADV Part 2B

**Jacob Storsberg, CPFA® – 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

**Professional Designation:** Certified Plan Fiduciary Advisor (CPFA®)

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**

The supervised person is not actively engaged in any other investment-related business or occupation. Additionally, the supervised person does not participate in any non-investment-related business activity that accounts for 10% or more of their time or compensation. There are no other business activities to disclose.

### **Additional Compensation**

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### **Supervision**

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# STRATEGIC

Form ADV Part 2B

**Nicholas A. Accordino, 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:** 1988

### **Education:**

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

### **Business Background:**

- 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)

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](http://www.cfp.net).

### **Disciplinary Information**

No events have occurred that apply to this item.

### **Other Business Activities**

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### **Additional Compensation**

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# STRATEGIC

Form ADV Part 2B

**Benjamin Petell, CFP® – Associate Advisor**  
1320 Floyd Ave | Rome, NY 13440  
315.724.1776

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## **Educational Background and Business Experience**

**Year of Birth:** 2000

### **Education:**

- BA Finance, St. John Fisher University

### **Business Background:**

- Associate Advisor, Strategic Financial Services; 2023-Present

**Professional Designations:** Certified Financial Planner (CFP)

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### **Disciplinary Information**

No events have occurred that apply to this item.

### **Other Business Activities**

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### **Additional Compensation**

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### **Supervision**

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# STRATEGIC

Form ADV Part 2B

## **Shannon Cool – 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:** 1997

#### **Education:**

- MS,MHA – Healthcare Administration, Utica University
- BS, Psychology, Utica College

#### **Business Background:**

- Associate Advisor, Strategic Financial Services; 2023-Present
- Assistant Studio Manager/Guest Services Specialist, Chapter Aesthetic Studio; 2022-2023
- Hannaford to Go Supervisor, Hannaford, 2020-2022

#### **Securities License:**

- Series 65

#### **Disciplinary Information**

No events have occurred that apply to this item.

#### **Other Business Activities**

The supervised person is not actively engaged in any other investment-related business or occupation. Additionally, the supervised person does not participate in any non-investment-related business activity that accounts for 10% or more of their time or compensation. There are no other business activities to disclose.

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# STRATEGIC

Form ADV Part 2B

**Alexys Jacobs, 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:** 1998

**Education:**

- MBA, Public Accounting, SUNY Oswego
- BS, Accounting, Le Moyne College

**Business Background:**

- Associate Advisor, Strategic Financial Services; 2025-Present
- Associate Advisor, Rockbridge Investment Management; June 2023-June 2025
- Tax Intern 2019-2021, Tax Associate 2021-2023, Fust Charles LLP

**Professional Designations:** Certified Financial Planner (CFP)

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**Disciplinary Information**

No events have occurred that apply to this item.

**Other Business Activities**

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**Emma Uvanni – 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:**

- AS, General Science, Mohawk Valley Community College
- AS, General Studies & Science, SUNY Empire State University

**Business Background:**

- Associate Advisor, Strategic Financial Services; 2025-Present
- Executive Assistant & Tax Preparer, D.K. Griffith & Co./LifeMark Securities Corp.; 2024-2025
- Accounting and Administration, Utica General Peterbilt; 2019-2024

**Securities License:**

- Series 65

**Disciplinary Information**

No events have occurred that apply to this item.

**Other Business Activities**

The supervised person is not actively engaged in any other investment-related business or occupation. Additionally, the supervised person does not participate in any non-investment-related business activity that accounts for 10% or more of their time or compensation. There are no other business activities to disclose.

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# STRATEGIC

Form ADV Part 2B

**Sarah Owens – Associate Advisor**

114 Business Park Drive | Utica, NY 13502  
315.724.1776

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**Educational Background and Business Experience**

**Year of Birth:**

**Education:**

- AS,

**Business Background:**

- Associate

**Securities License:**

- Series 65

**Disciplinary Information**

No events have occurred that apply to this item.

**Other Business Activities**

The supervised person is not actively engaged in any other investment-related business or occupation. Additionally, the supervised person does not participate in any non-investment-related business activity that accounts for 10% or more of their time or compensation. There are no other business activities to disclose.

**Additional Compensation**

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# STRATEGIC

Form ADV Part 2B

**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

**Professional Designations:** Certified Financial Planner (CFP)

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**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**

The supervised person is not actively engaged in any other investment-related business or occupation. Additionally, the supervised person does not participate in any non-investment-related business activity that accounts for 10% or more of their time or compensation. There are no other business activities to disclose.

**Additional Compensation**

The supervised person receives economic benefits in the form of incentive compensation and referral-based bonuses related to business development activities. Specifically:

- The supervised person may receive a one-time bonus when they refer a prospective client to the firm and that individual participates in an initial prospect meeting, regardless of whether the individual ultimately becomes a client.
- In addition, the supervised person may be eligible for incentive-based compensation tied to the firm's net new assets under management. This compensation is determined based on the supervised person's role and their contribution to the firm's business development efforts, as measured against a target for net new assets brought into the firm.

These compensation structures may create an incentive to refer new clients or bring additional assets to the firm. However, the firm maintains policies and supervisory procedures to ensure that all recommendations and advisory services are made in the client's best interest.

**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.

### Commitment to Your Privacy

At Strategic Financial Services, Inc., maintaining your trust is a core part of our relationship. We are committed to protecting your privacy and the confidentiality of the personal information you share with us during our advisory relationship.

### Information We Collect

In the course of providing financial planning, investment advisory, and related services, we may collect the following types of **non-public personal information (NPI)**:

- Information you provide on applications, forms, or during meetings (e.g., name, address, income, assets, goals)
- Information about your transactions with us or our affiliates (e.g., account balances, investment history, payment history)
- Information we receive from third parties (e.g., custodians, account aggregators, or other financial institutions)

### How We Use and Share Information

We use your information to provide you with tailored financial advice, manage your accounts, and deliver the services you've requested. We **do not sell your personal information** to anyone.

We may share your information:

- With service providers and vendors that help us operate our business (e.g., custodians, technology providers, compliance consultants)
- With other professionals you've authorized us to collaborate with (e.g., accountants, attorneys)
- As required or permitted by law, such as in response to a subpoena or regulatory request

When we do share information, we require that these parties protect the confidentiality of your data and use it only for the services they're providing on our behalf.

### Your Right to Limit Sharing

Federal law gives you the right to limit sharing of your personal information in certain instances. We do not share your personal information with non-affiliated third parties for marketing purposes, so no action is needed to limit this type of sharing.

### How We Protect Your Information

We maintain physical, electronic, and procedural safeguards designed to protect your personal information. Access is limited to employees and service providers who need the information to serve you.

### Former Clients

If you are no longer a client, we will continue to adhere to the privacy policies and practices described in this notice.

### Updates to This Policy

We may revise this policy from time to time. If we make material changes, we will provide an updated policy to you.

### Notice for California Residents

The information we collect as part of providing financial services is subject to federal privacy laws, including the Gramm-Leach-Bliley Act, and is therefore exempt from many provisions of the California Consumer Privacy Act (CCPA). However, we remain committed to protecting all personal information in accordance with applicable laws. If you are a California resident and have questions about your privacy rights or how we handle your information, please refer to our Website Privacy Policy or contact us directly.

### Additional State Privacy Rights

We are committed to respecting and protecting your privacy in accordance with both federal and applicable state laws. While much of the personal information we collect is governed by federal laws such as the Gramm-Leach-Bliley Act and therefore exempt from certain state privacy laws, some states provide residents with additional rights.

If you reside in a state that provides consumer privacy rights—such as the right to access, correct, delete, or limit the use of your personal information—you may contact us to inquire about the rights available to you under your state's laws.

We will evaluate your request and respond in accordance with applicable law. Please note that certain rights may not apply to information collected in connection with providing financial services.

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### Questions?

If you have any questions about our privacy practices, please contact us at:

 (315) 724-1776

 SFSCCompliance@investstrategic.com

 Strategic Financial Services, Inc., 114 Business Park Drive, Utica, NY 13502