Certior Financial Group

CLIENT RELATIONSHIP SUMMARY

March 31,2022

Introduction

Certior Financial Group ("our," "firm," "us," "we") is an investment adviser registered with the Securities and Exchange Commission. Brokerage and investment advisory services and fees differ, and we feel that it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers and investing.

What investment services and advice can you provide me?

We offer discretionary and non-discretionary investment management services, as well as financial planning. We offer advisory services to *retail investors* through direct management of an investment portfolio and the selection of professional third-party investment managers. If you open an advisory account with our Firm, we'll meet with you to understand your current financial situation, existing resources, goals, and risk tolerance. Based on what we learn, we'll recommend an asset allocation and portfolio of investments that is monitored on an ongoing basis, and if necessary, rebalanced to meet your changing needs, stated goals and objectives. We'll offer you advice on a regular basis and contact you at least annually to discuss your portfolio. We will determine which service or products are most suitable for you and tailor our advice to your needs consistent with your investment objectives and risk tolerance.

We manage your investments and make day-to-day investment decisions for your portfolio, or you may choose, as may be suggested by us, to contract separately with third-party investment managers who will implement the selection of specific investments consistent with the asset allocation we develop for you under our supervision. We act as your investment adviser pursuant to the terms of our written investment advisory agreement with you that describes our obligations to you and limits our authority. .

When we perform asset management services, we prefer to do so on a discretionary basis. This means that while we will continue an ongoing relationship with each client, being involved in various stages of their lives and decisions to be made, we will not seek specific approval of changes to client accounts. Upon request, we may also provide investment management services on a non-discretionary basis, which means we will manage your account as we do for our discretionary clients, except we will consult with you prior to implementing and investment recommendation. Clients should be aware that some recommendations may be time-sensitive, and, as such, your performance may or may not be affected if we are unable to reach you on a timely basis.

Our financial planning approach is multi-disciplined and hands on, with our team working with clients to implement a plan consisting of diversified and personalized ideas. In the information gathering stage, the client will supply to CFG information including income, investments, savings, insurance, age and many other items thatare helpful to the firm in assessing your financial goals. The information is typically provided during personal interviews and supplemented with written information. Once the information is received, we will discuss your financial needs and goals with you, and compare your current financial situation with the goals you state. Once these are compared, we will create a financial and/or investment plan to help you meet your goals.
We do not impose minimum account balance requirements for opening and maintaining accounts. Certain investment products to which the Firm provides advisory services may impose eligibility standards and account minimums including those accessible through Independent Managers and other Financial Institutions.

Additional information about our advisory services is in the ***Advisory Business*** *and* ***Types of Clients*** *sections of our Firm Brochure, which is available online at https://adviserinfo.sec.gov/firm/summary/285502.*

Questions to ask us:

- Given my financial situation, should I choose an investment advisory service? Why or why not?
- How will you choose investments to recommend to me?
- What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

What fees will I pay?

You will pay an advisory fee based on the total value of your account. Your fee is generally calculated as a percentage of assets in your account and assessed quarterly as set forth on the fee schedule as part of your advisory agreement with us. You will be charged an ongoing monthly fee based on the value of the investments in your account. Our tiered fee schedule ranges from 0.50% to 1.20% depending on the value of the investments in your account. Our fees vary and are negotiable. The amount you pay will depend, for example, on the services you receive and the amount of assets in your account.
Clients who have entered into prior advisory agreements with us may pay fees differently and we may offer other fee arrangements as disclosed in our Firm Brochure. The advisory fee we charge does not cover transaction costs, fees to the broker-dealer or bank that has custody of these assets, or cost of execution. You are required to pay for these fees in addition to your advisory fee. Clients invested in pooled investment vehicles will pay built in fees and expenses applicable to the investment as described in the product's offering materials. Your fee under our advisory agreement will not cover the management fee charged by selected third-party managers. You may be able to obtain these services directly at a higher or lower cost. The more assets you have in your advisory account, the more you will pay us. Since our fees are based on a percentage of assets in your advisory account, we have an incentive to increase the assets in your advisory

account in order to increase our compensation. We may have incentive to invest your assets in higher risk strategies that require higher account minimums because they have potential for higher advisory fees. Our Firm's fees will be automatically deducted from your advisory account, which will reduce the value of your advisory account.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

*Additional information about our advisory services is in the **Fees and Compensation** section of our Firm Brochure, which is available online at https://adviserinfo.sec.gov/firm/summary/285502.*

Questions to ask us:

- Help me understand how these fees and costs might affect my investments. If I give you $10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. For example, we receive more revenues from larger accounts than smaller accounts. Fees for managing discretionary accounts are typically higher than the fees we charge for advising non-discretionary accounts. This may create an incentive for us to recommend the higher fee service to our clients over a lower fee service in order to generate greater compensation.

Certain of the Firm's professionals are (i) licensed to sell insurance, and (ii) registered to offer you brokerage services with Mutual Securities, Inc., an unaffiliated broker-dealer. In both instances, you would pay a commission and your financial advisor could receive a portion of that commission. They have an incentive to recommend securities and insurance products to you to increase their compensation. Brokerage services and advisory services are different, and the fees our firm and the broker-dealer charge for those services are different. Registered representatives ("RRs") earn a commission each time they buy or sell a security in a brokerage account. Some RRs have an incentive to trade as much as possible in a brokerage account to increase their compensation. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Our interests can conflict with your interests. We manage these conflicts through disclosures and employing supervisory procedures to ensure our financial advisors are acting in your best interest.

Additional information about our conflicts is in our Firm Brochure, which is available online at https://adviserinfo.sec.gov/firm/summary/285502.

Questions to ask us:

- How might your conflicts of interest affect me, and how will you address them?

How do your financial professionals make money?

Our financial professionals are compensated based on asset management fee revenues, a portion of the financial planning fees, and/or retainer fees collected from clients, investment or financial recommendations, the amount of client assets serviced. Our financial professionals may also be compensated for insurance or brokerage commissions facilitated through affiliated or non-affiliated entities.

Your financial professional has a financial interest to recommend to you that you invest assets with us or recommend a service that generates higher revenue for us in order to generate higher amounts of compensation. Financial Professionals may also receive non-cash compensation such as reimbursement for education and training.

Do you or your financial professionals have legal or disciplinary history?

No, our firm and financial professionals do not have any legal and disciplinary history to disclose. Please visit Investor.gov/CRS, for a free and simple search tool to research us and our financial professionals.

Questions to ask us:

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

Additional Information

You can find additional information regarding our investment advisory services on the SEC's website at https://adviserinfo.sec.gov/ by searching CRD# 285502. You may also contact our firm at (610) 783 7010 to request up-to-date information and obtain a copy of this Relationship Summary.

Questions to ask us:

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

Certior Financial Group

APPENDIX A

Summary of material changes to Form CRS as of March 31, 2022

This Customer Relationship Summary (Form CRS) was updated on March 31, 2022. The material changes to this Form CRS from its prior version dated February 9, 2021, include updates to the following sections:

What investment services and advice can you provide me?

Added Disclosure:
We offer advisory services to r*etail investors* through direct management of an investment portfolio and the selection of professional third-party investment managers. If you open an advisory account with our Firm, we'll meet with you to understand your current financial situation, existing resources, goals, and risk tolerance. Based on what we learn, we'll recommend an asset allocation and portfolio of investments that is monitored on an ongoing basis, and if necessary, rebalanced to meet your changing needs, stated goals and objectives. We'll offer you advice on a regular basis and contact you at least annually to discuss your portfolio. We will determine which service or products are most suitable for you and tailor our advice to your needs consistent with your investment objectives and risk tolerance.

We manage your investments and make day-to-day investment decisions for your portfolio, or you may choose, as may be suggested by us, to contract separately with third-party investment managers who will implement the selection of specific investments consistent with the asset allocation we develop for you under our supervision. We act as your investment adviser pursuant to the terms of our written investment advisory agreement with you that describes our obligations to you and limits our authority.

We do not impose minimum account balance requirements for opening and maintaining accounts. Certain investment products to which the Firm provides advisory services may impose eligibility standards and account minimums including those accessible through Independent Managers and other Financial Institutions.

Removed Disclosure:
For some smaller clients or clients that may not need all of CFG's comprehensive services, we offer an automated investment program (the "Program") through which clients are invested in a range of investment strategies we have constructed and manage, each consisting of a portfolio of mutual funds, exchange-traded funds ("ETFs") and a cash allocation.

What fees will I pay?

Removed Disclosure:

Specific fee ranges for fixed fees and financial planning fees were removed. A link to Form ADV Part 2A is provided which provides additional disclosure on fees.

Added Disclosure:

You will pay an advisory fee based on the total value of your account. Your fee is generally calculated as a percentage of assets in your account and assessed quarterly as set forth on the fee schedule as part of your advisory agreement with us.

You will be charged an ongoing monthly fee based on the value of the investments in your account. Our tiered fee schedule ranges from 0.50% to 1.20% depending on the value of the investments in your account. Our fees vary and are negotiable. The amount you pay will depend, for example, on the services you receive and the amount of assets in your account.

Clients who have entered into prior advisory agreements with us may pay fees differently and we may offer other fee arrangements as disclosed in our Firm Brochure. The advisory fee we charge does not cover transaction costs, fees to the broker-dealer or bank that has custody of these assets, or cost of execution. You are required to pay for these fees in addition to your advisory fee. Clients invested in pooled investment vehicles will pay built in fees and expenses applicable to the investment as described in the product's offering materials. Your fee under our advisory agreement will not cover the management fee charged by selected third-party managers. You may be able to obtain these services directly at a higher or

lower cost. The more assets you have in your advisory account, the more you will pay us. Since our fees are based on a percentage of assets in your advisory account, we have an incentive to increase the assets in your advisory account in order to increase our compensation. We may have incentive to invest your assets in higher risk strategies that require higher account minimums because they have potential for higher advisory fees. Our Firm's fees will be automatically deducted from your advisory account, which will reduce the value of your advisory account.

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

Added Disclosure:

For example, we receive more revenues from larger accounts than smaller accounts. Fees for managing discretionary accounts are typically higher than the fees we charge for advising non-discretionary accounts. This may create an incentive for us to recommend the higher fee service to our clients over a lower fee service in order to generate greater compensation.

Certain of the Firm's professionals are (i) licensed to sell insurance, and (ii) registered to offer you brokerage services with Mutual Securities, Inc., an unaffiliated broker-dealer. In both instances, you would pay a commission and your financial advisor could receive a portion of that commission. They have an incentive to recommend securities and insurance products to you to increase their compensation. Brokerage services and advisory services are different, and the fees our firm and the broker-dealer charge for those services are different. Registered representatives ("RRs") earn a commission each time they buy or sell a security in a brokerage account. Some RRs have an incentive to trade as much as possible in a brokerage account to increase their compensation. You should understand and ask us about these conflicts because they can affect the investment advice, we provide you. Our interests can conflict with your interests. We manage these conflicts through disclosures and employing supervisory procedures to ensure our financial advisors are acting in your best interest.

How do your financial professionals make money?

Added Disclosure:
Financial professionals are compensated based on asset manage fee revenues, investment or financial recommendations, the amount of client assets serviced. Our financial professionals are compensated for insurance or brokerage commissions

Your financial professional has a financial interest to recommend to you that you invest assets with us or recommend a service that generates higher revenue for us in order to generate higher amounts of compensation. Financial Professionals may also receive non-cash compensation such as reimbursement for education and training.

Removed Disclosure:

Financial professionals are not rewarded sales bonuses.

Form ADV Part 2A
Informational Brochure

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This Brochure provides information about the qualifications and business practices of Certior Financial Group (hereinafter "CFG" or the "Firm"). If you have any questions about the contents of this Brochure, please contact us at (610) 783-7010. The information in this Brochure has not been approved by the Securities and Exchange Commission or by any state securities authority. or verified by the United States.

Additional information about CFG is also available on the SEC's website at www.adviserinfo.sec.gov. References herein to CFG as a "registered investment adviser" or any reference to being "registered" does not imply a certain level of skill or training.

Item 2. Material Changes

This section of the brochure discusses only the material changes that have occurred since CFG's last annual amendment of the brochure, dated March 31, 2021. Since the last annual amendment, the following sections were revised:

Item 4. Advisory Business.

- Updated to reflect the change in the value of assets under management as of December 31, 2021.
- Updated to disclose additional services offered by Access Persons as licensed insurance agents and/or representatives of an unaffiliated broker-dealer

Item 5. Fees

- Updated to provide additional disclosure of other fees assessed from unaffiliated third parties, related parties and registered representatives of an unaffiliated broker-dealer or insurance agent.

Item 8.

- Added additional disclosure of risk related to volatility, portfolio turnover, pandemics, and cybersecurity risks.

Item 10. Other Financial Industry Activities and Affiliations.

- Disclosure of additional fees charged to clients when CFG recommends Dreyfuss Capital Management LLC.

Item 14. Client Referrals and Other Compensation.

- Disclosure of CFG's solicitor arrangement and compensation arrangement with a third party to solicit clients on CFG's behalf.

Item 3. Table of Contents

Item 4. Advisory Business

Certior Financial Group ("CFG") has been a registered investment adviser since October 2016. As of August 2018, Kantor Financial Group, LLC changed their legal name to Certior Financial Group. Avi Kantor is the firm's principal owner. The team has worked together under the name "Kantor Financial Group" as part of their prior firm since 2009.

CFG provides personalized financial planning and asset management services. We value strong relationships built with clients through offering them customized services, and joining in a collaborative process, providing confidence and clarity to help clients effectively navigate the constantly changing financial landscape.

CFG also conducts business using the name Dreyfuss Wealth Management LLC and Drozdow Financial LLC. These entities are single member LLCs owned and operated by CFG supervised persons. CFG has no ownership interest in these entities but supervises the activities of its owners.

Financial Planning

Financial planning is a process by which a client's current circumstances are reviewed, goals are stated, and a plan is made to guide the client to those goals. CFG's financial planning approach is multi- disciplined and hands on, with our team working with clients to implement a plan consisting of diversified and personalized ideas. In the information-gathering stage, the client will supply to CFG information including income, investments, savings, insurance, age and many other items that are helpful to the firm in assessing your financial goals. The information is typically provided during personal interviews and supplemented with written information. Once the information is received, we will discuss your financial needs and goals with you and compare your current financial situationwith the goals you state. Once these are compared, we will create a financial and/or investment plan to help you meet your goals.

The plan is intended to be a roadmap toward your goals. Not every plan will be the same for every client. Each one is specific to the client who requested it. Because the plan is based on information supplied by you, it is very important that you accurately and completely communicate to us the information we need. We determine these objectives by reviewing new client questionnaires and then interviewing the client for additional background and clarity so we can gather a more complete picture of a client's needs. It is very important that you continually update us with any changes so that if the updates require changes to your plan, we can make those changes. Otherwise, your plan may no longer be accurate.

If the Financial Planning Services include estate planning advice, such advice does not include implementation of the estate plan. Implementation involves drafting of legal documents, which requires the services of an attorney, the cost of which is in addition to the cost of CFG's services described below in Item 5. CFG may recommend an attorney, but clients are under no obligation to utilize the services of the recommended, or any attorney.

The Firm may recommend clients engage the Firm for additional related services, its Access Persons in their individual capacities as insurance agents or registered representatives of an unaffiliated broker-dealer and/or other professionals to implement its recommendations. Clients are advised that a conflict of interest exists if clients engage the Firm or its affiliates to provide additional services for compensation.

Clients retain absolute discretion over all decisions regarding implementation and are under no obligation to act upon any of the recommendations made by the Firm under a financial planning or consulting engagement. Clients are advised that it remains their responsibility to promptly notify the Firm of any change in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising the Firm's recommendations and/or services.

Where appropriate, the Firm may also provide advice about any type of legacy position or other investment held in client portfolios. Clients may engage the Firm to manage and/or advise on certain investment products that are not maintained at their primary custodian, such as variable life insurance and annuity contracts and assets held in employer sponsored retirement plans and qualified tuition plans (i.e., 529 plans

or ABLE plans). In these situations, the Firm directs or recommends the allocation of client assets among the various investment options available with the product. These assets are generally maintained at the underwriting insurance company, or the custodian designated by the product's provider.

Asset Management

CFG's asset management services aim to protect clients from downside risk. We strive to accomplish this by utilizing multiple investment styles and products as appropriate for each client. When we perform asset management services, we prefer to do so on a discretionary basis. This means that while we will continue an ongoing relationship with each client, being involved in various stages of their lives and decisions to be made, we will not seek specific approval of changes to client accounts. CFG tailors its advisory services to the individual needs of clients, and clients can always make deposits or withdrawals in their accounts at any time. Clients may place reasonable restrictions such as the types of investments we may use, or on the allocations to each security type. Because we take discretion when managing accounts, clients engaging us will be asked to execute a Limited Power of Attorney (granting us the discretionary authority over the client accounts) as well as an Investment Management Agreement that outlines the responsibilities of both the client and CFG.
Upon request, CFG may also provide investment management services on a non-discretionary basis, which means we will manage the clients' accounts as we do for our discretionary clients, except we will consult with the client prior to implementing any investment recommendation. Clients should be aware that some recommendations may be time-sensitive, and, as such, their performance may or may not be affected if CFG is unable to reach them on a timely basis.

While not a separate service, CFG may select certain Independent Managers to actively manage a portion of its clients' assets. The specific terms and conditions under which a client engages an Independent Manager may be set forth in a separate written agreement with the designated Independent Manager. In addition to this brochure, clients may also receive the written disclosure documents of the respective Independent Managers engaged to manage their assets. CFG evaluates a variety of information about Independent Managers, which may include the Independent Managers' public disclosure documents, materials supplied by the Independent Managers themselves and other third-party analyses it believes are reputable. To the extent possible, CFG seeks to assess the Independent Managers' investment strategies, past performance and risk results in relation to its clients' individual portfolio allocations and risk exposure. CFG also takes into consideration each Independent Manager's management style, returns, reputation, financial strength, reporting, pricing and research capabilities, among other factors. CFG continues to provide services relative to the discretionary selection of the Independent Managers. On an ongoing basis, the Firm monitors the performance of those accounts being managed by Independent Managers. CFG seeks to ensure the Independent Managers' strategies and target allocations remain aligned with its clients' investment objectives and overall best interests.

We charge clients a fee for our services as described below under Item 5 Fees and Compensation. Our fees are not set or supervised by Schwab. Clients do not pay brokerage commissions or any other fees to CS&Co. as part of the Program. Schwab does receive other revenues in connection with the Program as described below under Item 5 Fees and Compensation.

Assets Under Management

As of December 31, 2021, CFG has $232,752,205 assets under management across 994 accounts.
Of that total, $137,881,782 is managed on a discretionary basis and $94,870,423 is managed on a non- discretionary basis.

Item 5. Fees and Compensation

A. Fees Charged

The Firm offers services for a fee based upon assets under management. Additionally, certain of the Firm's

Access Persons, in their individual capacities, may offer securities brokerage services and/or insurance products under a separate commission-based arrangement. The Firm's wealth management fee will vary depending upon the assets under management and services provided.

Financial Planning Fees

Financial planning fees are done on a fixed fee basis. Fixed fee rates vary from $500 to $15,000. The fee range stated is a guide. Fees are negotiable and may be higher or lower than this range, based on the nature of the engagement. Some clients may also engage CFG on a project basis to provide advice on isolated matters, such as an evaluation of a client's employer-sponsored retirement plan.

Asset Management Fees

All investment management clients will be required to execute an Investment Advisory Agreement that will describe the type of management services to be provided and the fees, among other items. Generally, fees vary from 0.50% to 1.20% per annum of the market value of a client's assets managed by CFG. Fees are negotiable and may be higher or lower than this range. Factors affecting fee percentagesinclude asset value, complexity, number of accounts, etc. All clients, but especially those with smaller accounts, should be advised they may receive similar services from other professionals for higher or lower overall costs.

Retainer Option

In some cases, clients may elect to retain CFG by paying a fixed monthly or quarterly fee. Monthly fees range from $100 to $5,000, and quarterly fees range from $300 to $12,500.

Fee Discretion

The Firm may, in its sole discretion, negotiate to charge a lesser fee based upon certain criteria, such as anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, client holdings, pre-existing/legacy client relationship, account retention and pro bono activities.

B. Fee Payment

Financial Planning

Generally, fifty percent (50%) of the anticipated financial planning fee will be payable upon signing the Financial Planning Agreement, with the remainder due upon completion of the financial plan. For fixed fee engagements, the final amount due will be fifty percent (50%) of the fixed fee.

Asset Management

Clients generally provide the Firm and/or certain Independent Managers with the authority to directly debit their accounts for payment of the investment advisory fees, which is done monthly in arrears or in advance as required by the Financial Institution. The Financial Institutions that act as the qualified independent custodian for client accounts, from which the Firm retains the authority to directly deduct fees, have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to the Firm. Alternatively, clients may elect to have the Firm send a separate invoice for direct payment.

The advisory fee is paid quarterly, in advance, and the value used for the fee calculation is the gross value as of the last market day of the previous quarter. Accounts that are managed by a third-party manager, the billable value is inclusive of cash balances. This means that if your annual fee is 1.00%, then each quarter we will multiply the value of your account by 1.00% then divide by 4 to calculate our fee. Once the calculation

is made, we will instruct your account custodian to deduct the fee from your account and remit it to CFG. Clients will provide written authorization to debit advisory fees from their accounts held by a qualified custodian chosen by the client. At least quarterly, clients will receive a statement from their account custodian showing all transactions in their account, including the fee.

If in any given transaction assets in excess of $50,000 are deposited into or withdrawn from an account after the inception of a billing period, the fee payable with respect to such assets is pro-rated and the client will either be refunded or assessed a fee with respect to such assets based upon the number of days remaining in that billing period.

Additionally, for asset management services the Firm provides with respect to certain client holdings (e.g., held-away assets, accommodation accounts, alternative investments, etc.), the Firm may charge no fee or may negotiate a fee rate that differs from the range set forth above.

C. Other Fees

As further discussed in response to Item 12 (below), CFG generally recommends that clients utilize the brokerage, custodial, and clearing services of Schwab Advisor ServicesTM ("*Schwab*") for investment management accounts.

CFG may only implement its investment management recommendations after the client has arranged for and furnished CFG with all information and authorization regarding accounts with appropriate financial institutions.

In addition to the advisory fees paid to the Firm, clients may also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks and other financial institutions (collectively "Financial Institutions"). Financial institutions include, but are not limited to, *Schwab*, any other broker-dealer recommended by CFG, broker-dealer directed by the client, trust companies, banks, etc. (collectively referred to herein as the "*Financial Institutions*").

These additional charges may include securities brokerage commissions, transaction fees, custodial fees, fees charged by the Independent Managers, margin costs, charges imposed directly by a mutual fund or ETF in a client's account, as disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), fees and commission for assets not held with our primary custodian (such as 401(k) or 529 plan assets), fees imposed by variable annuity providers, fees attributable to alternative assets (including transaction fees), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Additionally, forassets outside of any wrap fee programs, clients may incur brokerage commissions and transaction fees. Such charges, fees and commissions are exclusive of and in addition to CFG's fee.

D. Pro-rata Fees

If one becomes a client during a quarter, client will pay a management fee for the number of days left in that quarter. If client terminates the relationship during a quarter, client will be entitled to a refund of any management fees for the remainder of the quarter. Once client's notice of termination is received, CFG will refund the unearned fees to client by check. CFG will cease to perform services, including processing trades and distributions, upon termination. Assets not transferred from terminated accounts within 30 (thirty) days of termination may be "de-linked", meaning they will no longer be visible to CFG and will become a retail account with the custodian.

If an advisory agreement is terminated, the fee for the final billing period is prorated through the effective date of the termination and the outstanding or unearned portion of the fee is charged or refunded to the client, as appropriate.

Account Additions and Withdrawals

Clients may make additions to and withdrawals from their account at any time, subject to the Firm's right to terminate an account. Additions may be in cash or securities provided that the Firm reserves the right to liquidate any transferred securities or declines to accept particular securities into a client's account. Clients may withdraw account assets on notice to the Firm, subject to the usual and customary securities settlement procedures. However, the Firm generally designs its portfolios as long-term investments, and the withdrawal of assets may impair the achievement of a client's investment objectives. The Firm may consult with its clients about the options and implications of transferring securities. Clients are advised that when transferred securities are liquidated, they may be subject to transaction fees, short-term redemption fees, fees assessed at the mutual fund level (e.g., contingent deferred sales charges) and/or tax ramifications.

E. Commission and Sales Charges for Recommendations of Securities

Clients can engage certain persons associated with the Firm (but not the Firm directly) to render securities brokerage services under a separate commission-based arrangement. Clients are under no obligation to engage such persons and may choose brokers or agents not affiliated with the Firm.

Under this arrangement, the Firm's Access Persons, in their individual capacities as registered representative employees of a FINRA member brokerage firm, Mutual Securities, Inc. ("MSI"), may provide securities brokerage services and implement securities transactions under a separate commission-based arrangement. Registered representative status enables these professionals to receive customary commissions for the sales of various securities, including those they recommend to clients.

The relationship with MSI allows these professionals to provide additional products to clients' portfolios that would not otherwise be available. Because MSI supervises the activities of these professionals as registered representatives of MSI, the relationship may be deemed material. However, MSI is not affiliated with CFG or considered a related party. MSI does not make investment decisions for client accounts. As registered representatives of MSI (in addition to the Firm), these individuals may be entitled to a portion of the brokerage commissions paid to MSI, as well as a share of any ongoing distribution or service (trail) fees from the sale of investment.

In addition, when mutual funds are utilized, depending on the share class selected, the registered representativesalso receive additional ongoing 12b-1 fees from the mutual fund company for mutual fund purchases during the period you maintain the mutual fund investment. However, CFG may also recommend no-load or load-waived funds, where no sales charges are assessed. Commissions charged and 12b-1 fees received by registered representatives for these products will not offset management fees owed to CFG. For certain accounts covered by the Employee Retirement Income Security Act of 1974 ("ERISA") and such others that the Firm, in its sole discretion, deems appropriate, the Firm may provide its investment advisory services on a fee-offset basis. In this scenario, the Firm may offset its fees by an amount equal to the aggregate commissions and 12b-1 fees earned by the Firm's Access Persons in their individual capacities as registered representatives of MSI.

A conflict of interest exists to the extent that the Firm recommends the purchase or sale of securities where its Access Persons receive commissions or other additional compensation as a result of the Firm's recommendation. The Firm has procedures in place to ensure that any recommendations made by such Access Persons are in the best interest of clients.

The receipt of commissions and 12b-1 fees for investment products that are recommended to clients gives rise to a conflict of interest for the representative, in that the individual who will receive the commissions is also the individual that is recommending that the client purchase a given product. Thereis an additional conflict of interest when a registered representative is selecting a more expensive 12b-1 fee paying mutual fund share class when a lower-cost share class is available for the same fund. These conflicts are disclosed to clients verbally and in this brochure. Clients are advised that they are not obligated to implement any recommendation provided by the registered representative or may choose to implement any investment recommendation through another broker-dealer that is not affiliated with CFG. CFG attempts to mitigate

this conflict by requiring that all investment recommendations have a sound basis for the recommendation, and by requiring employees to acknowledge their fiduciary responsibility toward each client.

Prior to effecting any transactions, clients are required to enter into a separate account agreement with MSI. For more information regarding MSI, refer to its Form CRS, available at crs_13092.pdf (finra.org).

Item 6. Performance-Based Fees

CFG will not charge performance-based fees.

Item 7. Types of Clients

CFG provides its services to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations and business entities. CFG has fee arrangements that vary based on the type and level of services provided and can be in the form of one or a combination of the following: planning fee, retainer fee, or asset management fee.

The Firm does not impose minimum account balance requirements for opening and maintaining accounts. Certain investment products to which the Firm provides advisory services may impose eligibility standards and account minimums including those accessible through Independent Managers and other Financial Institutions.

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

It is important for clients to know and remember that all investments carry risks. **Investing in securities involves risk of loss that clients should be prepared to bear.**

A. Methods of Analysis and Strategies

Each client's portfolio is created through the evaluation of the client's needs that in most cases takes place during a financial planning process. For those clients who have not engaged CFG to provide financial planning services, portfolio construction originates with an evaluation of each client's investment objectives as well as the client's risk tolerance. Our goal is minimizing downside risk for clients. Both sources are part of developing a portfolio that takes into consideration the client's investment horizons, ability and desire to withstand the volatility that can come with investing, and overall goals for each specific portfolio. Where possible, CFG prefers to include financial planning as part of the asset management process to ensure that all client objectives are being considered. Whether a slow evolution or via a life event, the planning process is designed to thoughtfully incorporate these changes into the investments in the client's portfolio. It is essential to our service that the process to be a fully cooperative one, and therefore clients of all account sizes are advised to keep CFG informed of changes in financial circumstances, as these changes could affect the client's asset allocation and financial plan.

Construction of each strategy begins with a determination of the asset allocation for that strategy. Unlike some managers that have fixed percentages for various strategies, or "models", CFG's strategies have asset allocations that can vary based on our opinions of the markets and economic indicators at the time. Asset allocations are not a binary split between equities and fixed income. Rather, CFG includes a number of different asset classes as sub-sets of equity and fixed income. We also look to diversify by investment style and investment products

Once an overall asset allocation is determined, CFG moves on to determine how best to implement that allocation, beginning with an assessment as to whether a passive or active approach is most likely to achieve the desired results. An active path would include the use of a managed account or mutual fund, where a manager makes active decisions for that account or fund. A passive example would be an exchange traded fund or mutual fund. In some instances, both active and passive routes may be taken in constructing a strategy's holdings. The cost of each specific security, both in terms of price and expenses, is also considered when choosing specific securities.

Part of the security selection process is also the consideration of what assets the client already has in the portfolio. Clients may come to CFG with a variety of investments, with a variety of custodians. Where possible and advisable, CFG will advise the transfer of assets in-kind, meaning the asset will not be sold before the account is moved to the custodian under CFG's advisement. Some securities may be kept in the portfolio because of tax issues or other costs associated with a transition. To the extent these securities are not sold, CFG will attempt to build a portfolio taking these securities into consideration and advise the client if there are additional risks associated with keeping a specific security.

Additionally, part of the CFG process includes, where appropriate, involving multiple generations in order to facilitate family financial planning. This can increase the financial education of the later generations and manage expectations. However, potential for conflicts of interest exist with the exchange of intergenerational information. CFG attempts to minimize these conflicts by treating each household as its own fiduciary relationship. Information can only be shared across generations with each household's consent.

Third Party Managers

We may recommend that certain portions of a client's portfolio be managed by independent third-party managers or recommend direct investment with independent third-party managers, typically when those managers demonstrate knowledge and expertise in a "defensive" tactical investment strategy. We focus on manager's who may have a unique method for mitigating downside risks.

These managers are selected by CFG after a process whereby CFG evaluates each manager's investment performance, operations, and offerings to determine if the manager would be a fit for CFG clients. This process continues on an ongoing basis, throughout the time the client works with the third-party manager. It is important to note that these managers will charge a separate and additional fee, for their services. CFG will consider these fees in its decision to recommend the use of a third-party manager.

B. Material Risks

There are always risks to investing. **Clients should be aware that all investments carry various types of risk including the potential loss of principal that clients should be prepared to bear.** It is impossible to name all possible types of risks. Among the risks are the following:

- **Political Risks.** Most investments have a global component, even domestic stocks. Political events anywhere in the world may have unforeseen consequences to markets around the world.
- **Client Participation.** Because CFG uses each client's financial plan and other information from clients in determining the appropriate asset allocations for each portfolio or account, having up to date and accurate information from the client is imperative. Changes in circumstances that are not reported to CFG in a timely manner can materially and adversely affect CFG's ability to meet the client's needs.
- **General Market Risks.** Markets can, as a whole, go up or down on various news releases or for no understandable reason at all. This sometimes means that the price of specific securities could go up or down without real reason and may take some time to recover any lost value. Adding additional securities does not help to minimize this risk since all securities may be affected by market fluctuations.
- **Currency Risk.** When investing in another country using another currency, the changes in the value of the currency can change the value of your security value in your portfolio.
- **Regulatory Risk.** Changes in laws and regulations from any government can change the value of a given company and its accompanying securities. Certain industries are more susceptible to government regulation. Changes in zoning, tax structure or laws impact the return on these investments.
- **Tax Risks Related to Short Term Trading**: Clients should note that while CFG does not

consider short-term trading a strategy for its clients, trades may be made with frequency if conditions and client goals merit it. These transactions may result in short term gains or losses for federal and state tax purposes, which may be taxed at a higher rate than long term strategies. CFG endeavors to invest client assets in a tax efficient manner, but all clients are advised to consult with their tax professionals regardingthe transactions in client accounts.

- **Purchasing Power Risk.** Purchasing power risk is the risk that your investment's value will decline as the price of goods rises (inflation). The investment's value itself does not decline, but its relative value does, which is the same thing. Inflation can happen for a variety of complex reasons, including a growing economy and a rising money supply.
- **Business Risk.** This can be thought of as certainty or uncertainty of income. Management comes under business risk. Cyclical companies (like automobile companies) have more business risk because of the less steady income stream. On the other hand, fast food chains tend to have steadier income streams and therefore, less business risk.
- **Financial Risk**. The amount of debt or leverage determines the financial risk of a company.
- **Default Risk.** This risk pertains to the ability of a company to service their debt. Ratings provided by several rating services help to identify those companies with more risk. Obligations of the U.S. government are said to be free of default risk.
- **Margin Risk.** 'Margin' is typically used to maximize returns on a given investment by using securities in a client account as collateral for a loan from the custodian to the client. The proceeds of that loan are then used to buy more securities. In a positive result, the additional securities provide additional return on the same initial investment. In a negative result, the additional securities provide additional losses. Margin, therefore, carries a higher degree of risk than investing without margin. Any client account that will use margin will do so in accordance with Regulation T. CFG does not recommend the use of margin as part of its portfolio construction process. However, clients may on occasion wish to utilize margin to facilitate some other need or goal. In these cases, the margin will increase the value of the assets in the account, which means the management fees calculated, which are based on account value, will also increase.
- **Information Risk.** All investment professionals rely on research in order to make conclusions about investment options. This research is always a mix of both internal (proprietary) and external (provided by third parties) data and analyses. Even an adviser who says they rely solely on proprietary research must still collect data from third parties. This data, or outside research is chosen for its perceived reliability, but there is no guarantee that the data or research will be completely accurate. Failure in data accuracy or research will translate to a compromised ability by the adviser to reach satisfactory investment conclusions.
- **Small Companies.** Some investment opportunities in the marketplace involves smaller issuers. These companies may be starting up or are historically small. While these companies sometimes have potential for outsized returns, they also have the potential for losses because the reasons the company is small are also risks to the company's future. For example, a company's management may lack experience, or the company's capital for growth may be restricted. These small companies also tend to trade less frequently than larger companies, which can add to the risks associated with their securities because the ability to sell them at an appropriate price may be limited as compared to the markets as a whole. Not only do these companies have investment risk, if a client is invested in such small companies and requests immediate or short-term liquidity, these securities may require a significant discount to value in order to be sold in a shorter time frame.
- **Concentration Risk**. While CFG selects individual securities, including mutual funds, for client portfolios based on an individualized assessment of each security, this evaluation comes without an overlay of sector specific issue analysis. This means that a client's equity portfolio may be concentrated in a specific sector, geography, or sub-sector (among other types of potential concentrations), so that if an unexpected event occurs that affects that specific sector or geography, for example, the client's equity portfolio may be affected negatively, including significant losses

- **Transition Risk.** As assets are transitioned from a client's prior advisers to CFG, there may be securities and other investments that do not fit within the asset allocation strategy selected for the client. Where possible, CFG will maintain securities that come from the client's existing accounts and will not sell a security merely to push the portfolio into line with other accounts CFG manages. If a client transitions mutual fund shares to CFG that are not the lowest-cost share class, and CFG is not recommending disposing of the security altogether, CFG will attempt to convert such mutual fund share classes into the lowest-cost share classes the client is eligible for, taking into account any adverse tax consequences associated with such conversion. However, in some instances, selling a security is advisable despite costs. CFG's goal is to minimize costs, which means that the overall transition process to CFG may take some time as cost considerations are compared with client needs. Some investments may not be unwound for a lengthy period of time for a variety of reasons that may include unwarranted low share prices, restrictions on trading, contractual restrictions on liquidity, or market-related liquidity concerns. In some cases, there may be securities or investments that are never able to be sold. The inability to transition a client's holdings into recommendations of CFG may adversely affect the client's account values, as CFG's recommendations may not be able to be fully implemented.
- **Restriction Risk**. Clients may at all times place reasonable restrictions on the management of their accounts. However, placing these restrictions may make managing the accounts more difficult, thus lowering the potential for returns. In addition, significant restrictions may lead to CFG needing to increasethe management fee rate.
- **Risks Related to Investment Term & Liquidity**. Securities do not follow a straight line up in value. All securities will have periods of time when the current price of the security is not an accurate measure of its value. If you require us to liquidate your portfolio during one of these periods, you will not realize as much value as you would have had if the investment had the opportunity to regain its value. Further, some investments are made with the intention of the investment appreciating over an extended period of time. Liquidating these investments prior to their intended time horizon may result in losses
- **REITs.** CFG may recommend that significant portions of client portfolios be allocated to real estate investment trusts, otherwise known as 'REITs'. A REIT is an entity, typically a trust or corporation that accepts investments from a number of investors, pools the money, and then uses that money to invest in real estate through either actual property purchases or mortgage loans. While there are some benefits to owning REITs, which include potential tax benefits, income and the relatively low barrier to invest in real estate as compared to directly investing in real estate, REITs also have some increased risks as compared to more traditional investments such as stocks, bonds, and mutual funds. First, real estate investing can be highly volatile. Second, the specific REIT chosen may have a focus such as commercial real estate or real estate in a given location. Such investment focus can be beneficial if the properties are successful but lose significant principal if the properties are not successful. REITs may also employ significant leverage for the purpose of purchasing more investments with fewer investment dollars, which can enhance returns but also enhances the risk of loss. The success of a REIT is highly dependent upon the manager of the REIT.
- **Excess Cash Balance Risk.** Client accounts may have cash balances in excess of $250,000, which is the insurance limit of the Federal Deposit Insurance Corporation. For cash balances in excess ofthat amount, there is an enhanced risk that operation related counterparty risk related to the account custodian could cause losses in the account. We mitigate this risk by carrying cash balances in amounts either subject to protection or as limited as you, the client, directs. You may elect to participate in a 'cash sweep' program through your account custodian which automatically moves excess cash from your investment account into a cash account and then invests that cash into cash-based investments, such as money market funds. We do not receive compensation of any kinds for facilitating your participation insuch cash sweep accounts.
- **Volatility Risks.** (All strategies) The prices and values of investments can be highly volatile,

and are influenced by, among other things, interest rates, general economic conditions, the condition of the financial markets, the financial condition of the issuers of such assets, changing supply and demand relationships, and programs and policies of governments.

- **Portfolio Turnover Risk.** (All strategies) Portfolio turnover refers to the rate at which investments are replaced. The higher the rate, the higher the transactional and brokerage costs associated with the turnover which may reduce the return, unless the securities traded can be bought and sold without corresponding commission costs. Active trading of securities may also increase your realized capital gains or losses, which may affect the taxes you pay.
- **Risk of Infectious Diseases and Pandemics.** Any spread of an infectious illness, public health threat, or similar issue could reduce consumer demand or economic output, result in market closures, travel restrictions or quarantines, social unrest, significant volatility in financial markets, commercial disruption on a global scale and generally have a significant impact on the economies of the affected country and other countries with which it does business, which in turn could cause financial market disruptions and adversely affect clients' investments in that country and other affected countries.
- **Cybersecurity and Disaster Recovery Risk.** With the increased use of technologies such as the Internet and the dependence on computer systems to perform necessary business functions, Certior Financial Group and its service providers may be susceptible to operational, information security and related risks. These systems are subject to a number of different threats or risks that could adversely affect the clients and their accounts, despite the efforts of the Firm and service providers to adopt technologies, processes and practices intended to mitigate these risks and protect the security of their computer systems, software, networks and other technology assets, as well as the confidentiality, integrity and availability of information belonging to the clients and the investors. In general, cyber incidents can result from deliberate attacks or unintentional events. Unintentional events may have similar effects. The risks associated with unintentional acts include power outages and catastrophic events such as fires, tornadoes, floods, hurricanes and earthquakes.

  Cyber-attacks include, but are not limited to, gaining unauthorized access to digital systems (e.g., through "hacking" or malicious software coding) for purposes of misappropriating assets or sensitive information, stealing or corrupting data, or causing operational disruption.

  Cyber-attacks may also be carried out in a manner that does not require gaining unauthorized access, such as causing denial-of-service attacks on websites (i.e., efforts to make network services unavailable to intended users). Third parties may also attempt to fraudulently induce employees, customers, third-party service providers or other users of Certior Financial Group's systems to disclose sensitive information in order to gain access to Certior Financial Group's data or that of the client.

  Cyber incidents affecting Certior Financial Group and their respective service providers have the ability to cause disruptions and impact business operations, potentially resulting in financial losses, impediments to trading, fraudulent trading and transfer activity, cause information and technology systems to become inoperable for extended periods of time or to cease to function properly, the inability to transact business, violations of applicable privacy and other laws, regulatory fines, penalties, financial losses, reputational damage, reimbursement or other compensation costs, or additional compliance costs. There is also a risk that cybersecurity breaches may not be detected. The information and technology systems of Certior Financial Group and its service providers may be vulnerable to damage or interruption from computer viruses, network failures, computer and telecommunication failures, infiltration by unauthorized persons and security breaches (e.g., "hacking" or malicious software coding),

  The failure of these systems and/or of disaster recovery plans for any reason could cause significant interruptions in Certior Financial Group and/or service providers operations, potentially resulting in financial losses, the inability to transact business, or a failure to maintain the security, confidentiality or privacy of sensitive data, including personal information relating to clients, fund investors (and the beneficial owners of investors). Such a failure could harm

to the Firm's reputation, subject any such entity and their respective affiliates to legal claims and otherwise affect their business and financial performance. While the Firm and its service providers have established business, continuity plans in the event of, and risk management systems to prevent or reduce the impact of cyber-attacks, there are inherent limitations in such plans and systems due in part to the ever-changing nature of technology and cyber security attack tactics, including the possibility that certain risks have not been identified and prepared for.

Furthermore, Certior Financial Group cannot control the cyber security and business continuity plans and systems put in place by service providers or any other third parties whose operations may affect our clients or the Funds we manage and could be negatively impacted as a result. Although the Certior Financial Group and all of its service providers have implemented various measures to manage risks relating to these types of events, if these systems are compromised, become inoperable for extended periods of time or cease to function properly, the relevant party may have to make a significant investment to fix or replace them.

- **Use of Independent Managers.** As stated above, the Firm may select certain Independent Managers to manage a portion of its clients' assets. In these situations, the Firm continues to conduct ongoing due diligence of such managers, but such recommendations rely to a great extent on the Independent Managers' ability to successfully implement their investment strategies. In addition, the Firm generally may not have the ability to supervise the Independent Managers on a day-to-day basis.
- **Security Type Risks**. CFG recommends mutual funds, ETFs and in some instances, third party managers. However, CFG may utilize stocks or bonds. Most mutual funds offer different share classes with vary fee structures, including share classes with sales load, sales charges, or 12b-1 fees. 12b-1 fees are deducted from the mutual funds' assets on an ongoing basis and are paid to broker-dealers and registered representatives whose clients own those shares to cover fund distribution and shareholder services. This receipt of fees presents a potential conflict of interest, as CFG has an incentive to recommend more expensive share classes to clients based on the compensation received, rather than based upon the client's needs. However, CFG and its advisory representatives do not retain any 12b-1 fees from any mutual funds held by clients in advisory accounts. Additionally, it is CFG policy that when specific funds offer more than one share class, CFG will select the lowest-cost share class available to the client, absent circumstances that dictate otherwise.

Item 9. Disciplinary Information

CFG is required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of management. CFG does not have any required disclosures to this Item.

Item 10. Other Financial Industry Activities and Affiliations

A. Broker-dealer

Brokerage and Insurance

Certain of the Firm's Access Persons are registered representatives of MSI and may provide clients with securities brokerage services under a separate commission-based arrangement. MSI is a broker-dealer registered with the SEC under the Securities and Exchange Act of 1934, as amended (the "Exchange Act"), and a member of the Financial Industry Regulatory Authority, Inc. ("FINRA"). MSI is also a licensed general insurance broker and agency, a member of FINRA, the MSRB, and SIPC, and registered in various states as required. This arrangement is described at length in Item 5.

A number of the Firm's Access Persons are also broker agents of MSI whereby they maintain certain broker registrations and insurance licensures and may offer certain insurance products on a fully disclosed

commissionable basis.

The relationship with MSI allows these professionals to provide additional products to clients' portfolios that would not otherwise be available. Because MSI supervises the activities of these professionals as registered representatives of MSI, the relationship may be deemed material. However, MSI is not affiliated with CFG or considered a related party. MSI does not make investment decisions for client accounts. Registered representative status enables these professionals to receive customary commissions for the sales of various securities, including those he recommends to clients. Commissions charged for these products will not offset management fees owed to CFG.

A conflict of interest exists to the extent that the Firm representatives recommend the purchase or sale of insurance products where the Firm and its Access Persons may be entitled to brokerage or insurance commissions as well as other additional compensation. The Firm has procedures in place whereby it seeks to ensure that all recommendations are made in its clients' best interest regardless of any such affiliations.

B. Futures Commission Merchant/Commodity Trading Adviser

Neither the principal of CFG, nor any related persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading adviser, or an associated person of the foregoing entities.

C. Relationship with Related Persons

CFG is under common control with another firm that provides administrative services to family trusts: The Certior Group, LLC does not act as Trustee but will provide administrative, tax and coaching services to families. While it is not expected that CFG will provide services for The Certior Group's clients, when appropriate, CFG may recommend that clients engage The Certior Group. Recommending the services of an affiliated entity poses a conflict of interest because CFG professionals may have a financial incentive to recommend affiliated entities versus an unaffiliated third party. CFG will attempt to mitigate this conflict by disclosing the conflict to clients, reminding clients that they are under no obligation to engage any professional recommended by CFG, and noting in its policies and procedures each individual representative's obligation to place client interests ahead of their own.

D. Recommendations of Other Advisers

As discussed in Item 8, CFG may recommend to clients one or more third party managers who charge a separate and additional fee for their services. Typically, both CFG and the managers will each debit their fees separately. Accordingly, while each manager charges their own separate fee, CFG does not receive any compensation, directly or indirectly, from the unrelated third-party investment managers or professionals for the referral of clients.

Noah Dreyfuss of CFG is also an owner in Dreyfuss Capital Management, LLC which provides sub-advisory services to other registered investment advisors. Mr. Dreyfuss will receive compensation for referring advisors, including CFG's clients, to use Dreyfuss Capital Management, LLC.

CFG may select Dreyfuss Capital Management, LLC to actively manage a portion of its clients' assets as a third-party investment advisor. The specific terms and conditions under which a client engages Dreyfuss Capital Management, LLC is set forth in a separate written agreement.

The management fee charged by Dreyfuss Capital Management; LLC is in addition to the advisory fee a client will pay to us. Clients will pay less in fees if they contract directly with Dreyfuss Capital Management LLC for investment advisory services. In addition, certain CFG client accounts are managed directly by Noah Dreyfuss and do not pay a subadvisor fee. These clients will pay less in fees than those that CFG directs to Dreyfuss Capital Management LLC as sub-advisor.

This presents a conflict of interest because the Firm has a financial incentive to recommend Noah Dreyfuss to clients and Mr. Dreyfuss has an incentive to utilize Dreyfuss Capital Management, LLC for the management of client assets. CFG attempts to mitigate this conflict by disclosing it to clients and the public in addition to performing due diligence on Dreyfuss Capital Management, LLC to be used as a third-party manager and disclosed in Item 8. Mr. Dreyfuss are also subject to the firm's Code of Ethics which requires them to put client interests ahead of their own.

Item 11. Code of Ethics

A copy of our Code of Ethics is available upon request. Our Code of Ethics includes discussions of our fiduciary duty to clients, political contributions, gifts, entertainment, and trading guidelines.

CFG does not recommend to clients that they invest in any security in which CFG, or any principalthereof has any financial interest.

On occasion, an employee of CFG may purchase for his or her own account securities which are also recommended for clients. Our Code of Ethics details rules for employees regarding personal trading and avoiding conflicts of interest related to trading in one's own account. To avoid placing a trade before a client (in the case of a purchase) or after a client (in the case of a sale), all employee trades must be reviewed by the Compliance Officer. All employee trades must either take place in the same block as a client trade or sufficiently apart in time from the client trade, so the employee receives no added benefit. Employee statements are reviewed to confirm compliance with the trading procedures.

On occasion, an employee of CFG may purchase for his or her own account securities which are also recommended for clients at the same time the clients purchase the securities. Our Code of Ethics details rules for employees regarding personal trading and avoiding conflicts of interest related to trading in one's own account. To avoid placing a trade before a client (in the case of a purchase) or after a client (in the case of a sale), all employee trades must be reviewed by the Compliance Officer or her designee. All employee trades must either take place in the same block as a client trade or sufficiently apart in time from the clienttrade, so the employee receives no added benefit. Employee statements are reviewed to confirm compliance with the trading procedures.

Item 12. Brokerage Practices

A. Recommendation of Broker-Dealer

CFG does not maintain custody of client assets; though CFG may be deemed to have custody if a client grants CFG authority to debit fees directly from their account (see Item 15 below). Assets will be held with a qualified custodian, which is typically a bank or broker-dealer. CFG recommends that investment accounts be held in custody by Schwab Advisor Services ("Schwab"), which is a qualified custodian.

CFG is independently owned and operated and is not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when CFG instructs them to, which CFG doesin accordance with its agreement with you. While CFG recommends that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. CFG does not open the account for you, although CFG may assist you in doing so. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account as described below (see "Your brokerage and custody costs").

How we select brokers/custodians

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. We consider a wide range of factors, including both quantitative (Ex: costs) and qualitative (execution,

reputation, service) factors. We do not consider whether Schwab or any other broker-dealer/custodian, refers clients to CFG as part of our evaluation of these broker-dealers.

Your brokerage and custody costs

For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. For all accounts, Schwab may charge you a percentageof the dollar amount of assets in the account in lieu of commissions. Schwab's asset-based fees applicable to client accounts were negotiated based on the condition that our clients collectively maintain a total asset level in accounts at Schwab. This commitment benefits you because the overall asset-based fees you pay are lower than they would be otherwise. In addition to commissions, Schwab charges you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the fundsfrom the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We have determined that having Schwab execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see "How we select brokers/custodians").

Products and services available to us from Schwab

Schwab Advisor Services (formerly called Schwab Institutional) is Schwab's business serving independent investment advisory firms like us. They provide us and our clients with access to itsinstitutional brokerage - trading, custody, reporting and related services - many of which are not typicallyavailable 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 described below are generally available on an unsolicited basis (we don't have to request them) and at no charge to. The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients. Here is a more detailed description of Schwab's support services:

Services that Benefit You. 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. 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 some substantial number of our clients' 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 accountstatements).
- provide access to client account 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; and
- assist with back-office functions, recordkeeping and client reporting

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

- Educational conferences and events.
- Technology, compliance, legal and business consulting

- Publications and conferences on practice management and business succession; and
- Access to employee benefits providers, human capital consultants and insurance providers.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to 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.

Our Interest in Schwab's Services.

The availability of the services described above (under the caption "Products and Services Available to Us from Schwab") from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services, and they are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. With respect to the Automated Investment Program, as described above under Item 4 Advisory Business, we do not pay SPTfees for the Platform so long as CFG maintains a certain level of assets in accounts at Schwab, that are *not* enrolled in the Automated Investment Program. In light of our arrangements with Schwab, we may have an incentive to recommend that our clients maintain their accounts with Schwab based on our interest in receiving Schwab's services that benefit our business rather than based on the client's interest in receiving the best value in custody services and the most favorable execution of transactions. This is a conflict of interest. We believe, however, that our selection of Schwab. as custodian and broker is in the best interests of our clients. It is primarily supported by the scope, quality, and price of Schwab's services and not Schwab's services that benefit only us. We have adopted policies and procedures designed to ensure, at account opening and thereafter, that our wrap fee program and our use of Schwab's services is appropriate for each of our clients.

We do not consider whether Schwab or any other broker-dealer/custodian, refers clients to CFG as part of our evaluation of these broker-dealers.

Brokerage for Client Referrals
The Firm does not consider, in selecting or recommending broker/dealers, whether the Firm receives client referrals from the Financial Institutions or other third party.

Directed Brokerage
The client may direct the Firm in writing to use a particular Financial Institution to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that Financial Institution and the Firm will not seek better execution services or prices from other Financial Institutions or be able to "batch" client transactions for execution through other Financial Institutions with orders for other accounts managed by the Firm (as described above). As a result, the client may pay higher commissions or other transaction costs, greater spreads or may receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty of best execution, the Firm may decline a client's request to direct brokerage if, in the Firm's sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

Commissions or Sales Charges for Recommendations of Securities
As discussed above, certain Access Persons in their respective individual capacities are registered representatives of MSI. These Access Persons, in their capacity as associated persons of MSI, are subject to FINRA Rules, including FINRA Rule 3280 ("Private Securities Transactions of an Associated Person") which restricts registered representatives from conducting securities transactions away from their broker-dealer unless MSI provides written consent. Therefore, clients are advised that certain Access Persons may be restricted to conducting securities transactions through MSI if they have not secured written consent from MSI to execute securities transactions though a different broker-dealer. Absent such written consent or separation from MSI for CFG employees deemed Associated Persons under FINRA rules, these individuals (who are Access Persons of the Firm) are prohibited from executing securities transactions through any broker-dealer other than MSI under its internal supervisory policies. The Firm is cognizant of its duty to obtain best execution and has implemented policies and procedures reasonably designed in

such pursuit.

B. Aggregating Trades

Transactions for each client generally will be affected independently, unless the Firm decides to purchase or sell the same securities for several clients at approximately the same time. Commission costs per client may be lower on a particular trade if all clients in whose accounts the trade isto be made are executed at the same time. This is called aggregating trades. Instead of placing a number of trades for the same security for each account, we will, when appropriate, executed one trade for all accounts and then allocate the trades to each account after execution.

The Firm may (but is not obligated to) combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among the Firm's client's differences in prices and commissions or other transaction costs that might not have been obtained had such orders been placed independently.

Under this procedure, transactions will generally be averaged as to price and allocated among the Firm's clients pro rata to the purchase and sale orders placed for each client on any given day. To the extent that the Firm determines to aggregate client orders for the purchase or sale of securities, including securities in which the Firm's Access Persons may invest, the Firm generally does so in accordance with applicable rules promulgated under the Advisers Act and no-action guidance provided by the staff of the SEC. The Firm does not receive any additional compensation or remuneration as a result of the aggregation.

As a standard practice, trades for separately managed accounts ("SMA") clients managed by unaffiliated third parties are submitted as separate trades than those client accounts that are managed internally by the Firm.

If an aggregate trade is not fully executed, the securities will be allocated to client accounts on a *pro rata* basis, except were doing so would create an unintended adverse consequence (For example, if a *pro rata* division would result in a client receiving a fraction of a share, or a position in the account of less than 1%.)

In the event that the Firm determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which may include: (i) when only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates; (ii) allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts; (iii) if an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account's assets after an order is placed); (iv) with respect to sale allocations, allocations may be given to accounts low in cash; (v) in cases when a pro rata allocation of a potential execution would result in a de minimis allocation in one or more accounts, the Firm may exclude the account(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts; or (vi) in cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis.

Item 13. Review of Accounts

Account Reviews

For those clients to whom CFG provides investment management services, CFG monitors those portfolios as part of an ongoing process while regular account reviews are conducted on at least an annual basis. For those clients to whom CFG provides financial planning services, reviews are conducted on an "as needed" basis. Such reviews are conducted by a senior professional. All investment advisory clients are

encouraged to discuss their needs, goals, and objectives with CFG and to keep CFG informed of any changes thereto. CFG contacts ongoing investment advisory clients at least annually to review its previous services and/or recommendations and to discuss the impact resulting from any changes in the client's financial situation and/or investment objectives.

General Reports and Account Statements

Unless otherwise agreed upon, clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer or custodian for the client accounts. Those clients to whom CFG provides investment advisory services will also receive a report from CFG that may include such relevant account and/or market-related information such as an inventory of account holdings and account performance as clients may request from time to time. Clients should compare the account statements they receive from their custodian with those they receive from CFG.

Item 14. Client Referrals and Other Compensation

A. Economic Benefit Provided by Third Parties for Advice Rendered to Client

Please refer to Item 12, where we discuss recommendation of Broker-Dealers.

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us. These products and services, how they benefit us, and the related conflicts of interest are described above under Item 12 Brokerage Practices. The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

B. Compensation to Non-Advisory Personnel for Client Referrals

CFG has an arrangement with Thomas Abraham ("Solicitor") to solicit clients on our behalf. The Solicitor is engaged in the business of providing marketing, referral and consulting services for registered investment advisers, other asset managers and funds sponsored by those persons.

Solicitor is registered as a broker-dealer with the SEC, is a member of FINRA, is registered as an investment adviser with the state of New York, is registered as a broker-dealer and/or investment adviser in other states as it believes reasonably necessary to conduct its business and is registered as a municipal advisor with the SEC and with the Municipal Securities Rulemaking Board (MSRB).

Solicitor will provide CFG with sales services. CFG's compensation to Solicitor for the services include an ongoing account fee based on a percentage of the advisory fee paid to us by Firm Clients.

These fees are detailed on the Firm's Solicitation Brochure provided to clients prior to engagement with the Firm. Clients will not pay additional fees because of this referral arrangement. Referral fees paid to Solicitor are contingent upon the Client entering into an advisory agreement with CFG. Solicitor as a financial incentive to recommend us to Clients for advisory services. This creates a conflict of interest; however, Clients are not obligated to retain CFG for advisory services and advisory fees paid to the CFG by Clients are not increased as a result of any referral. Clients do not pay higher fees as a result of these arrangements; however, comparable services and/or lower fees may be available through other firms.

Item 15. Custody

The Advisory Agreement and/or the separate agreement with any Financial Institution generally authorize the Firm and/or the Independent Managers to debit client accounts for payment of the Firm's fees and to directly remit that those funds to the Firm in accordance with applicable custody rules. The Financial Institutions that act as the qualified custodian for client accounts, from which the Firm retains the authority to directly deduct fees, have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to the Firm.

In addition, as discussed in Item 13, the Firm may also send periodic supplemental reports to clients. Clients should carefully review the statements sent directly by the Financial Institutions and compare them to those received from the Firm.

CFG deducts fees from client accounts but would not have custody of client funds otherwise. Clients will receive statements directly from Schwab, and copies of all trade confirmations directly from Schwab.

Clients whose fees are directly debited will provide written authorization to debit advisory fees from their accounts held by a qualified custodian chosen by the client. The client will also receive a statement from their account custodian showing all transactions in their account, including the fee. This is the case for accounts in the Automated Investment program as well.

We encourage clients to carefully review the statements and confirmations sent to them by their custodian, and to compare the information on your quarterly report prepared by CFG against the information in the statements provided directly from Schwab. Please alert us of any discrepancies.

Item 16. Investment Discretion

When CFG is engaged to provide asset management services on a discretionary basis, we will monitor your accounts to ensure that they are meeting your asset allocation requirements. If any changes are needed to your investments, we will make the changes. These changes may involve selling a security or group of investments and buying others or keeping the proceeds in cash. You may at any time place restrictions on the types of investments we may use on your behalf, or on the allocations to each security type. You may receive at your request written or electronic confirmations from your account custodian after any changes are made to your account. You will also receive monthly statements from your account custodian. Clients engaging us on a discretionary basis will be asked to execute a Limited Power of Attorney (granting us the discretionary authority over the client accounts) as well as an Investment Management Agreement that outlines the responsibilities of both the client and CFG.

When a client engages CFG to provide investment management services on a non-discretionary basis, the accounts are monitored by CFG. The difference is that changes to your account will not be made until CFG has confirmed with you (either verbally or in writing) that the proposed change is acceptable to you.

Item 17. Voting Client Securities

From time to time, shareholders of stocks, mutual funds, exchange traded funds or other securities may be permitted to vote on various types of corporate actions. Examples of these actions include mergers, tender offers, or board elections.

Clients are required to vote proxies related to their investments, or to choose not to vote their proxies. CFG will not accept authority to vote client securities. Clients will receive their proxies directly from the custodian for the client account. CFG will not give clients advice on how to vote proxies. Copies of our Proxy Voting Policies are available upon request.

Item 18. Financial Information

CFG does not require the prepayment of fees more than six (6) months or more in advance and therefore has not provided a balance sheet with this brochure.

There are no material financial circumstances or conditions that would reasonably be expected to impair our ability to meet our contractual obligations to our clients.

Avi Kantor
Born: 1968

Item 2: Educational Background and Business Experience

EDUCATION:

Tulane University, BA in Political Economy - Economics, (1990)

BUSINESS EXPERIENCE:

Certior Financial Group, LLC f/k/a Kantor Financial Group, LLC	Principal	11/2016 - Present
VOYA Financial Advisors, Inc. d/b/a Kantor Financial Group	Investment Adviser Representative & Registered Representative	09/2014 - 10/2016
ING Financial Partners, Inc.	Investment Adviser Representative & Registered Representative	01/2004 - 08/2014
Locust Street Securities, Inc.	Registered Representative	05/2000 - 01/2004
United Securities Alliance, Inc.	Registered Principal	01/1999 - 05/2000

PROFESSIONAL DESIGNATIONS:

RFC® (Registered Financial Consultant)

The Registered Financial Consultant, RFC® is a professional designation awarded by the IARFC to financial advisers who meet high standards of education, experience and integrity.

- Experience. Must have a minimum of four years of experience as a full-time practitioner in the field of financial planning or financial services.
- Education. Applicant must possess a baccalaureate or graduate degree in financial planning services or hold one of the following professional degrees or designation: AAMS, CFA, CFP, ChFC, CLU, CPA, EA, JD. Alternatively, a candidate may complete aCFP-equivalent course at an accredited institution or an IARFC approved curriculum and passed a written examination. Each applicant must have at least four years of professional experience in the field of financial planning or financial services, meet local licensing requirements, and adhere to the RFC Code of Ethics. The RFC designation requires 40 hours of Continuing Education every year, including two hours of business ethics every two years. Examination. The educational curriculum must have included an examination process. If not, an experienced candidate must pass on RFC challenge examination.
- Licensing. Applicant must have met local licensing requirements securities, life and health insurance; or an applicant who is a fee-only planner and is not licensed must submit information on the applicant's RIA or ARIA affiliation or business conduct procedures. Conduct. Applicant must have a sound record of business integrity with no suspension or revocation of any profession licenses. Ethics. Applicant must subscribe and adhere to the RFC Code of Ethics.

- Continuing Education. All members must agree to devote a minimum of 40 hours per year of Professional Continuing Education in the field of personal finance and professional practice management.
- Re-Certification. Annually provide assurance of continued compliance and operation.

Item 3: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for Mr. Kantor.

Item 4: Other Business Activities

Certain professionals of CFG are separately licensed as independent insurance agents. As such, these professionals may conduct insurance product transactions for CFG clients, in their capacity as licensed insurance agents, and will receive customary commissions for thesetransactions in addition to any compensation received in his capacity as employees of CFG. Commissions from the sale of insurance products will not be used to offset or as a credit againstadvisory fees. These professionals therefore have incentive to recommend insurance products based on the compensation to be received, rather than on a client's needs. The receipt of additional fees for insurance commissions is therefore a conflict of interest, and clients should be aware of this conflict when considering whether to engage CFG or utilize these professionalsto implement any insurance recommendations. CFG attempts to mitigate this conflict of interestby disclosing the conflict to clients, and informing the clients that they are always free to purchase insurance products through other agents that are not affiliated with CFG, or todetermine not to purchase the insurance product at all. CFG also attempts to mitigate the conflict of interest by requiring employees to acknowledge in the firm's Code of Ethics, their individual fiduciary duty to the clients of CFG, which requires that employees put the interests ofclients ahead of their own.

Mr. Kantor is also the founder and managing member of The Certior Group, which is an office in Wyoming providing nonfinancial legacy planning consulting services. His firm is compensated through consulting fees as arranged with his clients. Through these recommendations, Mr. Kantor may advise clients to establish an ongoing advisory relationship which may generate additional compensation through Certior Financial Group. Clients should be aware of this conflict when considering whether to engage CFG on an advisory basis, and also that they are free to implement these recommendations through other advisors or not at all.

Item 5: Additional Compensation

Please see response to Item 4, above.

Item 6: Supervision

Avi Kantor is the principal and supervisor of the firm. He has no direct supervisor. However, all employees of CFG are required to follow the supervisory guidelines and procedures manual which are designed to ensure compliance with securitieslaws in the states where CFG is registered. Mr. Kantor may be reached at (610) 783-7010.

Gary P. Gallagher
Born: 1961

Item 2: Educational Background and Business Experience

EDUCATION:

Bloomsburg University, BS in Business Administration - Management, (1983)

BUSINESS EXPERIENCE:

Certior Financial Group, LLC f/k/a Kantor Financial Group, LLC	Financial Adviser	11/2016 - Present
Mutual Securities Inc.	Registered Representative	11/2016 - Present
VOYA Financial Advisors, Inc. d/b/a Kantor Financial Group	Investment Adviser Representative & Registered Representative	09/2014 - 10/2016
ING Financial Partners, Inc.	Registered Representative	07/2010 - 08/2014
Pfizer Inc.	Vice President - Finance	10/2009 - 07/2010
Wyeth Pharmaceuticals	Vice President - Finance	08/1986 - 10/2009

PROFESSIONAL DESIGNATIONS:

Certified Public Accountant (CPA)

In order to become a CPA in the United States, the candidate must sit for and pass the Uniform Certified Public Accountant Examination (Uniform CPA Exam), which is set by the American Institute of Certified Public Accountants and administered by the National Association of State Boards of Accountancy. The CPA was established in law on April 17, 1896.

Eligibility to sit for the Uniform CPA Exam is determined by individual State Boards of Accountancy. Typically the requirement is a U.S. bachelor's degree which includes a minimum number of qualifying credit hours in accounting and business administration with an additional 1 year study. This requirement for 5 years study is known as the "150 hour rule" and has been adopted by the majority of state boards, although there are still some exceptions (e.g. California). This requirement mandating 150 hours of study has been adopted by 45 states.

The primary functions CPA fulfill relate to assurance services, or public accounting. In assurance services, also known as financial audit services, CPAs attest to the reasonableness of disclosures, the freedom from material misstatement, and the adherence to the applicable generally accepted accounting principles (GAAP) in financial statements. CPAs can also be employed by corporations-termed "the private sector"-in finance functions such as Chief Financial Officer (CFO) or finance manager, or as CEOs subject to their full business knowledge and practice. These CPAs do not provide services directly to the public.

CPAs also have a niche within the income tax preparation industry. They may also provide business consultation in the areas of entity set-up, QuickBooks assistance, financial statements, and buying v. leasing of equipment.

Whether providing services directly to the public or employed by corporations or associations, CPAs can operate in virtually any area of finance. While some CPAs are generalists and offer a range of services (especially those in small practices) many CPAs specialize in just one area and do not provide all services.

Individuals who become certified must complete the following ongoing ethics and education requirements in order to maintain the right to continue to use the CPA marks:

- Ethics -- Over 40 of the state boards now require applicants for CPA status to complete a special examination on ethics, which is effectively a Fourth E in terms of requirements to become a CPA. The majority of these will accept the AICPA self-study Professional Ethics for CPAs CPE course or another course in general professional ethics. Many states, however, require that the ethics course include a review of that state's specific rules for professional practice.
- Continuing Professional Education (CPE)--CPAs are required to take continuing education courses in order to renew their license. Requirements vary by state but the vast majority requires 120 hours of CPE every 3 years with a minimum of 20 hours per calendar year. The requirement can be fulfilled through attending live seminars, webcastseminars, or through self-study (textbooks, videos, online courses, all of which require a test to receive credit). As part of the CPE requirement, most states require their CPAs to take an ethics course during every renewal period. Again, ethics requirements vary by state but the courses range from 2-8 hours.

Item 3: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for Mr. Gallagher.

Item 4: Other Business Activities

To permit CFG clients to have access to as many investment solutions as possible, certain professionals of CFG are registered representatives of Mutual Securities, Inc. ('MSI'), a FINRA member broker-dealer. The relationship with MSI allows these professionals to provide additional products to clients' portfolios that would not otherwise be available. Because MSI supervises the activities of these professionals as registered representatives of MSI, the relationship may be deemed material. However, MSI is not affiliated with CFG or considered a related party. MSI does not make investment decisions for client accounts. Registered representative status enables these professionals to receive customary commissions for the sales of various securities, including those he recommends to clients. Commissions charged for these products will not offset management fees owed to CFG.

Receipt of commissions for investment products that are recommended to clients gives rise to a conflict of interest for the representative, in that the individual who will receive the commissions is also the individual that is recommending that the client purchase a given product. This conflict is disclosed to clients verbally and in this brochure. Clients are advised that they may choose to implement any investment recommendation through another broker-dealer that is not

affiliated with CFG. CFG attempts to mitigate this conflict by requiring that all investment recommendations have a sound basis for the recommendation, and by requiring employees to acknowledge their fiduciary responsibility toward each client.

Certain professionals of CFG are separately licensed as independent insurance agents. As such, these professionals may conduct insurance product transactions for CFG clients, in their capacity as licensed insurance agents, and will receive customary commissions for thesetransactions in addition to any compensation received in his capacity as employees of CFG. Commissions from the sale of insurance products will not be used to offset or as a credit againstadvisory fees. These professionals therefore have incentive to recommend insurance products based on the compensation to be received, rather than on a client's needs. The receipt of additional fees for insurance commissions is therefore a conflict of interest, and clients should be aware of this conflict when considering whether to engage CFG or utilize these professionalsto implement any insurance recommendations. CFG attempts to mitigate this conflict of interestby disclosing the conflict to clients, and informing the clients that they are always free to purchase insurance products through other agents that are not affiliated with CFG, or todetermine not to purchase the insurance product at all. CFG also attempts to mitigate the conflict of interest by requiring employees to acknowledge in the firm's Code of Ethics, their individual fiduciary duty to the clients of CFG, which requires that employees put the interests ofclients ahead of their own.

Item 5: Additional Compensation

Please see response to Item 4, above.

Item 6: Supervision

Gary P. Gallagher is supervised by the firm's principal and supervisor, Avi Kantor. Additionally, all employees of CFG are required to follow the supervisory guidelines and procedures manual which are designed to ensure compliance with securities laws in the states where CFG is registered. Mr. Kantor may be reached at (610) 783-7010.

Adam Peltzman
Born: 1978

Item 2: Educational Background and Business Experience

EDUCATION:

University of Delaware, BS in Economics, (2000)

BUSINESS EXPERIENCE:

Certior Financial Group f/k/a Kantor Financial Group, LLC	Financial Adviser	06/2017 - Present
Mutual Securities Inc.	Registered Representative	06/2017 - Present
VOYA Financial Advisors, Inc.	Registered Representative	09/2014 - 06/2017
ING Financial Partners, Inc.	Registered Representative	04/2005 - 08/2014
LINSCO/Private Ledger Corp.	Registered Representative	03/2003 - 07/2010

PROFESSIONAL DESIGNATIONS:

CFP® - CERTIFIED FINANCIAL PLANNER

The CERTIFIED FINANCIAL PLANNER®, CFP® and federally registered CFP (with flame design) marks (collectively, the 'CFP® marks') are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ('CFP Board').

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education - Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, andattain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

- Examination - Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience - Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics - Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education - Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics - Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

REGISTERED HEALTH UNDERWRITER®

The Registered Health Underwriter® (RHU®) designation is administered by The American College. Designees must complete two required and one elective college-level course covering such topics as group benefits, individual health insurance, and managed care. Additional program requirements must be met, including a minimum of three years of business experience,ethics standards and agree to comply with The American College Code of Ethics and Procedures. Continuing Education for this designation requires 30 hours every two years.

Item 3: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for Mr. Peltzman.

Item 4: Other Business Activities

To permit CFG clients to have access to as many investment solutions as possible, certain professionals of CFG are registered representatives of Mutual Securities, Inc. ('MSI'), a FINRA member broker-dealer. The relationship with MSI allows these professionals to provide additional products to clients' portfolios that would not otherwise be available. Because MSI supervises the activities of these professionals as registered representatives of MSI, the relationship may be deemed material. However, MSI is not affiliated with CFG or considered a related party. MSI does not make investment decisions for client accounts. Registered representative status enables these professionals to receive customary commissions for the sales of various securities, including those he recommends to clients. Commissions charged for these products will not offset management fees owed to CFG.

Receipt of commissions for investment products that are recommended to clients gives rise to a conflict of interest for the representative, in that the individual who will receive the commissions is also the individual that is recommending that the client purchase a given product. This conflict is disclosed to clients verbally and in this brochure. Clients are advised that they may choose to implement any investment recommendation through another broker-dealer that is not affiliated with CFG. CFG attempts to mitigate this conflict by requiring that all investment recommendations have a sound basis for the recommendation, and by requiring employees to acknowledge their fiduciary responsibility toward each client.

Certain professionals of CFG are separately licensed as independent insurance agents. As such, these professionals may conduct insurance product transactions for CFG clients, in their capacity as licensed insurance agents, and will receive customary commissions for thesetransactions in addition to any compensation received in his capacity as employees of CFG. Commissions from the sale of insurance products will not be used to offset or as a credit againstadvisory fees. These professionals therefore have incentive to recommend insurance products based on the compensation to be received, rather than on a client's needs. The receipt of additional fees for insurance commissions is therefore a conflict of interest, and clients should be aware of this conflict when considering whether to engage CFG or utilize these professionalsto implement any insurance recommendations. CFG attempts to mitigate this conflict of interestby disclosing the conflict to clients, and informing the clients that they are always free to purchase insurance products through other agents that are not affiliated with CFG, or todetermine not to purchase the insurance product at all. CFG also attempts to mitigate the conflict of interest by requiring employees to acknowledge in the firm's Code of Ethics, their individual fiduciary duty to the clients of CFG, which requires that employees put the interests ofclients ahead of their own.

Item 5: Additional Compensation

Please see response to Item 4, above.

Item 6: Supervision

Adam Peltzman is supervised by the firm's principal and supervisor, Avi Kantor. Additionally, all employees of CFG are required to follow the supervisory guidelines and procedures manual which are designed to ensure compliance with securities laws in the states where CFG is registered. Mr. Kantor may be reached at (610) 783-7010.

Elizabeth Shamir
Born: 1954

Item 2: Educational Background and Business Experience

EDUCATION:

Cornell University, BS in Consumer Economics, (1975)
Columbia University, MBA in Finance, (1977)

BUSINESS EXPERIENCE:

Certior Financial Group f/k/a Kantor Financial Group, LLC	Financial Adviser	06/2017 - Present
Mutual Securities Inc.	Registered Representative	06/2017 - Present
VOYA Financial Advisors, Inc.	Investment Adviser Representative & Registered Representative	09/2014 - 06/2017
ING Financial Partners, Inc.	Investment Adviser Representative & Registered Representative	01/2012 - 08/2014
MML Investor Services, Inc.	Registered Representative	11/2005 - 01/2012
MassMutual Life Insurance Company	Insurance Agent	11/2005 - 01/2012

PROFESSIONAL DESIGNATIONS:

CFP® - CERTIFIED FINANCIAL PLANNER

The CERTIFIED FINANCIAL PLANNER®, CFP® and federally registered CFP (with flame design) marks (collectively, the 'CFP® marks') are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ('CFP Board').

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education - Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, andattain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination - Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience - Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics - Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education - Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics - Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

CHARTERED FINANCIAL ANALYST

The Chartered Financial Analyst (CFA) designation is a globally respected, graduate-level investment credential established in 1962 and awarded by the CFA Institute, the largest global association of investment professionals.

To earn the CFA designation, candidates must (1) pass three sequential, six-hour examinations, (2) have at least four years of qualified professional investment experience, (3) join the 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.

High Ethical Standards - The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, requires CFA charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition - Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study at each level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision-making in today's quickly evolving global financial industry. Asa result, employers and clients are increasingly seeking CFA charterholders, often making the charter a prerequisite for employment.

Additionally, regulatory bodies in 19 countries recognize the CFA charter as a proxy for meeting certain licensing requirements. More than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge - The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test proficiency in a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment management skills to reflect the dynamic and complex nature of the profession.

Item 3: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for Ms. Shamir.

Item 4: Other Business Activities

To permit CFG clients to have access to as many investment solutions as possible, certain professionals of CFG are registered representatives of Mutual Securities, Inc. ('MSI'), a FINRA member broker-dealer. The relationship with MSI allows these professionals to provide additional products to clients' portfolios that would not otherwise be available. Because MSI supervises the activities of these professionals as registered representatives of MSI, the relationship may be deemed material. However, MSI is not affiliated with CFG or considered a related party. MSI does not make investment decisions for client accounts. Registered representative status enables these professionals to receive customary commissions for the sales of various securities, including those he recommends to clients. Commissions charged for these products will not offset management fees owed to CFG.

Receipt of commissions for investment products that are recommended to clients gives rise to a conflict of interest for the representative, in that the individual who will receive the commissions is also the individual that is recommending that the client purchase a given product. This conflict is disclosed to clients verbally and in this brochure. Clients are advised that they may choose to implement any investment recommendation through another broker-dealer that is not affiliated with CFG. CFG attempts to mitigate this conflict by requiring that all investment recommendations have a sound basis for the recommendation, and by requiring employees to acknowledge their fiduciary responsibility toward each client.

Certain professionals of CFG are separately licensed as independent insurance agents. As such, these professionals may conduct insurance product transactions for CFG clients, in their capacity as licensed insurance agents, and will receive customary commissions for thesetransactions in addition to any compensation received in his capacity as employees of CFG. Commissions from the sale of insurance products will not be used to offset or as a credit againstadvisory fees. These professionals therefore have incentive to recommend insurance products based on the compensation to be received, rather than on a client's needs. The receipt of additional fees for insurance commissions is therefore a conflict of interest, and clients should be aware of this conflict when considering whether to engage CFG or utilize these professionalsto implement any insurance recommendations. CFG attempts to mitigate this conflict of interestby disclosing the conflict to clients, and informing the clients that they are always free to purchase insurance products through other agents that are not affiliated with CFG, or todetermine not to purchase the insurance product at all. CFG also attempts to mitigate the conflict of interest by requiring employees to acknowledge in the firm's Code of Ethics, their individual fiduciary duty to the clients of CFG, which requires that employees put the interests ofclients ahead of their own.

Item 5: Additional Compensation

Please see response to Item 4, above.

Item 6: Supervision

Elizabeth Shamir is supervised by the firm's principal and supervisor, Avi Kantor. Additionally, all employees of CFG are required to follow the supervisory guidelines and procedures manual which are designed to ensure compliance with securities laws in the states where CFG is registered. Mr. Kantor may be reached at (610) 783-7010.

Patrick K. Hansen
Born: 1985

Item 2: Educational Background and Business Experience

EDUCATION:

St. Joseph's University, BS in Business Administration - Management, (2008)

BUSINESS EXPERIENCE:

Certior Financial Group, LLC f/k/a Kantor Financial Group, LLC	Financial Adviser	11/2016 - Present
Mutual Securities Inc.	Registered Representative	11/2016 - Present
VOYA Financial Advisors, Inc. d/b/a Kantor Financial Group	Investment Advisor Representative & Registered Representative	09/2014 - 10/2016
The Vanguard Group, Inc.	Client Relationship Associate	08/2010 - 09/2014
Northwestern Mutual	Registered Representative	01/2010 - 06/2010

PROFESSIONAL DESIGNATIONS:

CFP® - CERTIFIED FINANCIAL PLANNER

The CERTIFIED FINANCIAL PLANNER®, CFP® and federally registered CFP (with flame design) marks (collectively, the 'CFP® marks') are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ('CFP Board').

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education - Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, andattain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination - Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and

client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience - Complete at least three years of full-time financial planning-relatedexperience (or the equivalent, measured as 2,000 hours per year); and
- Ethics - Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education - Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics - Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Item 3: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for Mr. Hansen.

Item 4: Other Business Activities

To permit CFG clients to have access to as many investment solutions as possible, certain professionals of CFG are registered representatives of Mutual Securities, Inc. ('MSI'), a FINRA member broker-dealer. The relationship with MSI allows these professionals to provide additional products to clients' portfolios that would not otherwise be available. Because MSI supervises the activities of these professionals as registered representatives of MSI, the relationship may be deemed material. However, MSI is not affiliated with CFG or considered a related party. MSI does not make investment decisions for client accounts. Registered representative status enables these professionals to receive customary commissions for the sales of various securities, including those he recommends to clients. Commissions charged for these products will not offset management fees owed to CFG.

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Item 5: Additional Compensation

Please see response to Item 4, above.

Item 6: Supervision

Patrick K. Hansen is supervised by the firm's principal and supervisor, Avi Kantor. Additionally, all employees of CFG are required to follow the supervisory guidelines and procedures manual which are designed to ensure compliance with securities laws in the states where CFG is registered. Mr. Kantor may be reached at (610) 783-7010.

Gregory Drozdow
Born: 1990

Item 2: Educational Background and Business Experience

EDUCATION:

Brandeis University, BS in Health: Science, Society, Policy, (2012)

BUSINESS EXPERIENCE:

Drozdow Financial / Certior Financial Group f/k/a Kantor Financial Group, LLC	Financial Adviser	01/2021 - Present
Prudential	Financial Adviser	11/2018 - 01/2021
Hornor Townsend & Kent Inc.	Financial Adviser	09/2015 - 11/2018
McAdam LLC	Financial Adviser	10/2014 - 09/2015
VOYA / McAdam Financial Group	Associate	10/2012 - 10/2014
ING Financial Partners, Inc.	Registered Representative	07/2012 - 10/2014
Brandeis University	Student	07/2002 - 07/2012
Openclinica LLC	Client Services Intern	11/2011 - 05/2012
Brandeis University Escort Safety Service	Coordinator	11/2011 - 05/2012

PROFESSIONAL DESIGNATIONS:

Mr. Drozdow does not have any professional designations to disclose.

Item 3: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for Mr. Drozdow.

Item 4: Other Business Activities

Mr. Drozdow is an Account Executive for Snappy Kraken, a business development firm. His role is to assist financial firms with growing their business through the use of the solutions provided by Snappy Kraken. This is a conflict of interest because Mr. Drozdow will financially benefit from the time spent on Snappy Kraken. CFG attempts to mitigate this conflict by disclosing it

to clients and the public and having Mr. Drozdow adhere to CFG's Code of Ethics where a client's best interest is put ahead of his own.

Certain professionals of CFG are separately licensed as independent insurance agents. As such, these professionals may conduct insurance product transactions for CFG clients, in their capacity as licensed insurance agents, and will receive customary commissions for thesetransactions in addition to any compensation received in his capacity as employees of CFG. Commissions from the sale of insurance products will not be used to offset or as a credit againstadvisory fees. These professionals therefore have incentive to recommend insurance products based on the compensation to be received, rather than on a client's needs. The receipt of additional fees for insurance commissions is therefore a conflict of interest, and clients should be aware of this conflict when considering whether to engage CFG or utilize these professionalsto implement any insurance recommendations. CFG attempts to mitigate this conflict of interestby disclosing the conflict to clients, and informing the clients that they are always free to purchase insurance products through other agents that are not affiliated with CFG, or todetermine not to purchase the insurance product at all. CFG also attempts to mitigate the conflict of interest by requiring employees to acknowledge in the firm's Code of Ethics, their individual fiduciary duty to the clients of CFG, which requires that employees put the interests ofclients ahead of their own.

Item 5: Additional Compensation

Please see response to Item 4, above.

Item 6: Supervision

Gregory Drozdow is supervised by the firm's principal and supervisor, Avi Kantor. Additionally, all employees of CFG are required to follow the supervisory guidelines and procedures manual which are designed to ensure compliance with securities laws in the states where CFG is registered. Mr. Kantor may be reached at (610) 783-7010.

Certior Financial Group

Privacy Notice

This notice is being provided to you in accordance with the Securities and Exchange Commission's rule regarding the privacy of consumer financial information ("Regulation S-P"). Please take the time to read and understand the privacy policies and procedures that we have implemented to safeguard your nonpublic personal information.

INFORMATION WE COLLECT

CERTIOR FINANCIAL GROUP, LLC and its affiliate THE CERTIOR GROUP, LLC must collect certain personally identifiable financial information about its clients to ensure that it offers the highest quality financial services and products. The personally identifiable financial information which we gather during the normal course of doing business with you may include:

1. information we receive from you on applications or other forms;

2. information about your transactions with us, our affiliates, or others;

3. information collected through an Internet "cookie" (an information collecting device from a web server); and

4. information we receive from a consumer reporting agency.

INFORMATION WE DISCLOSE

We do not disclose any nonpublic personal information about our clients or former clients to anyone, except as permitted by law. We do not disclose your personal information to any third party for the purpose of allowing that party to market other products to you. In accordance with Section 248.13 of Regulation S-P, we may disclose all of the information we collect, as described above, to certain nonaffiliated third parties such as attorneys, accountants, auditors and persons or entities that are assessing our compliance with industry standards. We enter into contractual agreements with all nonaffiliated third parties that prohibit such third parties from disclosing or using the information other than to carry out the purposes for which we disclose the information.

CONFIDENTIALITY AND SECURITY

We restrict access to nonpublic personal information about you to those employees who need to know that information to provide financial products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.