

Item 1 Cover Page

Bolt Financial Group, Inc.

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FORM ADV PART 2A BROCHURE

This brochure provides information about the qualifications and business practices of Bolt Financial Group, Inc. If you have any questions about the contents of this brochure, contact us at (614) 635-0102. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Bolt Financial Group, Inc is available on the SEC's website at www.adviserinfo.sec.gov by searching our CRD number, 291799.

Bolt Financial Group, Inc. is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Item 2 Summary of Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

The last annual filing of the Form ADV Part 2A & 2B for Bolt Financial Group Inc. was filed on March 15, 2023. Since this filing, there have been no reported material changes. In the future, any material changes made during the year will be reported here.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Bolt Financial Group, Inc.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at <http://www.adviserinfo.sec.gov> by searching for our firm name or by our CRD number 291799.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (614) 635- 0102.

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Item 4 Advisory Business

Description of Firm

Bolt Financial Group, Inc is a registered investment adviser primarily based in Worthington, OH. We are organized as a corporation under the laws of the State of Ohio. We have been providing investment advisory services since January 29, 2018. Shaun T. Carney serves as the Principal Owner, President, and Chief Compliance Officer.

The following paragraphs describe our services and fees. Refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs. As used in this brochure, the words "Bolt," "Advisor," "we," "our firm," and "us" refer to Bolt Financial Group, Inc and the words "you," "your," and "client" refer to you as either a client or prospective client of our firm.

Portfolio Management Services

We offer discretionary portfolio management services. Our investment advice is tailored to meet our clients' needs and investment objectives.

If you participate in our discretionary portfolio management services, we require you to grant our firm discretionary authority to manage your account. Discretionary authorization will allow us to determine the specific securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. Discretionary authority is typically granted by the investment advisory agreement you sign with our firm and the appropriate trading authorization forms.

You may limit our discretionary authority (for example, limiting the types of securities that can be purchased or sold for your account) by providing our firm with your restrictions and guidelines in writing.

We also offer non-discretionary portfolio management services. If you enter into non-discretionary arrangements with our firm, we must obtain your approval prior to executing any transactions on behalf of your account. You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

As part of our portfolio management services, in addition to other types of investments (see disclosures below in this section), we may invest your assets according to one or more model portfolios developed by our firm. These models are designed for investors with varying degrees of risk tolerance ranging from a more aggressive investment strategy to a more conservative investment approach. Clients whose assets are invested in model portfolios may not set restrictions on the specific holdings or allocations within the model, nor the types of securities that can be purchased in the model. If a client is not in a model portfolio, then portfolio will be tailored to the client's individual characteristics.

Advising on Held-Away Accounts

In addition to managing investment portfolios directly, we will also provide ongoing advice and supervision on held-away accounts that the client chooses to have us monitor and provide recommendations for but cannot be transferred under our institutional trading platform, such as employee retirement accounts or other held-away investment accounts. This portion of the service will include:

- a) Selection of the appropriate investments based on the options that are available for the clients' held

- away account(s);
- b) Ongoing monitoring and reporting on those accounts every quarter; and
- c) Rebalancing recommendations based on their overall portfolio.

Under these arrangements, we maintain limited powers of attorney. We will have direct access to their held-away accounts and those assets will be counted toward our total assets under management for purposes of calculating the annual advisory fee for assets directly under our firm's management. Fees for advising on the held-away accounts may be paid from the managed account (or other accounts) the client has under our direct management.

Annuity Management Services

We offer fee-only annuities to our clients to help meet their income, preservation and liquidity needs. Fee-only variable annuities are an integral part of our analysis when developing comprehensive financial plans and building long-term investment strategies. Through this service we are able to provide clients access to income streams on a fee only basis without paying commissions. We assist clients in the selection of appropriate annuity carriers, completing the carrier's applications, and requests for medical records and exams.

Financial Planning Services

We provide financial planning services on topics such as retirement planning, risk management, college savings, cash flow, debt management, work benefits, and estate and incapacity planning.

We offer financial planning services which typically involve providing a variety of advisory services to clients regarding the management of their financial resources based upon an analysis of their individual needs. These services can range from broad-based financial planning to consultative or single subject planning. If you retain our firm for financial planning services, we will meet with you to gather information about your financial circumstances and objectives. We may also use financial planning software to determine your current financial position and to define and quantify your long-term goals and objectives. Once we specify those long-term objectives (both financial and non-financial), we will develop shorter-term, targeted objectives. Once we review and analyze the information you provide to our firm and the data derived from our financial planning software, we will deliver a written plan to you, designed to help you achieve your stated financial goals and objectives.

Financial plans are based on your financial situation at the time we present the plan to you, and on the financial information you provide to us. You must promptly notify our firm if your financial situation, goals, objectives, or needs change.

You always have the right to decide whether to act on our financial planning recommendations. Should you choose to act on any of our recommendations, you always have the right to implement the financial plan through the professional of your choosing. Moreover, you may act on our recommendations by placing securities transactions with any brokerage firm.

Personal Tax Return Preparation Assistance

We will utilize the services of a third-party accounting, bookkeeping, and tax preparation firm to facilitate the preparation and filing of your tax return and we will work with you and the third-party in order to gather the necessary information as part of this service.

We offer the use of third-party tax preparation services to our clients to assist with the filing of federal and state tax returns for individuals and businesses. The outside tax preparer may ask for an explanation or clarification of some items, but they will not audit or otherwise verify client data. The client is responsible for the completeness and accuracy of information used to prepare the returns. The tax preparers responsibility is to prepare the returns in accordance with applicable tax laws.

The third-party tax preparation firm may observe opportunities for tax savings that require planning or changes in the way the client handles some transactions. While an engagement for tax return preparation does not include significant tax planning services, we will share any ideas we have with you and discuss terms for any additional work that may be required to implement those ideas.

Educational Seminars and Workshops

Bolt Financial Group, Inc. also provides educational seminars and workshops for clients to learn more about financial planning and investments. If you would like more information about the current seminars being offered, please call us at the number on the front cover of this brochure. No personalized investment advice will be given during one of our seminars.

Client Tailored Services and Client Imposed Restrictions

In conjunction with our financial planning and portfolio management services, we primarily offer advice on Mutual Funds and ETFs. Refer to Item 8 of this Brochure, *Methods of Analysis, Investment Strategies and Risk of Loss*, for additional disclosures on this topic.

Additionally, we may advise you on various types of investments based on your stated goals and objectives. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship.

Clients may impose restrictions on investing in certain securities or types of securities in their account by providing us written notice. In such cases, this may prevent a client from investing in certain models that are managed by our firm.

Wrap Fee Programs

We do not participate in any wrap fee program.

Assets Under Management

As of December 31, 2023, we provide continuous management services for \$77,403,398 in assets under management on a discretionary basis and \$0 in assets under management on a non-discretionary basis.

Item 5 Fees and Compensation

How we are paid depends on the type of advisory services we perform. Below is a brief description of our fees, however, you should review your executed Advisory Agreement for more detailed information regarding the exact fees you will be paying. Please note, lower fees for comparable services may be available from other sources.

Portfolio Management Services, Advising on Held-Away Accounts, and Annuity Planning Services

Our fee for portfolio management services, advising on held-away accounts, and annuity planning services is based on a percentage of the assets in your account and is set forth in the following annual fee schedule:

Account Value	Annual Advisory Fee
\$0 - \$1,000,000	1.00%
\$1,000,001 - \$2,000,000	0.85%
\$2,000,001 and above	0.65%

Our annual fee is billed and payable, quarterly in arrears, based on the last business day of the quarter. The above fee schedule is a straight tier. Our advisory fee is negotiable, at Advisor's sole discretion depending on individual client circumstances. Assets in each of your account(s) are included in the fee assessment unless specifically identified in writing for exclusion.

Our annual fee varies depending upon the market value of your assets under our management, the type and complexity of the portfolio management services provided, as well as the level of administration requested either directly or assumed by the client.

If the advisory agreement is executed at any time other than the first day of a calendar quarter, our fees will apply on a pro-rata basis, which means that the advisory fee is payable in proportion to the number of days in the quarter for which you are a client.

The client's annual fee is based on an aggregate value of all managed accounts within the client's established household, including for assets held away or fee-based variable annuities. For these multiple accounts, we can deduct an aggregated advisory fee from one selected account, if you direct us to do so. Advisory fees are directly debited from client accounts held at an unaffiliated third-party custodian/broker-dealer or the client may choose to pay by check.

If this Brochure were not delivered to the client at least 48 hours prior to the client entering into an advisory agreement, the client has the right to terminate the agreement without penalty or fees within five (5) business days after entering into the agreement. Thereafter, clients may terminate the advisory agreement upon 30 days written notice. You will incur a pro-rata charge for services rendered prior to the termination of the agreement, which means you will incur advisory fees only in proportion to the number of days in the quarter for which you are a client.

Financial Planning Services

We charge either a fixed fee of up to \$1,500 for financial planning services or an hourly fee of \$350. Fees are negotiable depending on the scope and complexity of the plan, your situation, and your financial

objectives. Fees are due upon the delivery of the financial plan to the client.

For hourly engagements, an estimate of the total time/cost will be determined at the start of the advisory relationship. In limited circumstances, the cost/time could potentially exceed the initial estimate. In such cases, we will notify you and request that you approve the additional fee.

We will not require prepayment of a fee more than six months in advance and in excess of \$500.

At our discretion, we may offset our financial planning fees to the extent you implement the financial plan through our Portfolio Management Service.

If this Brochure were not delivered to the client at least 48 hours prior to the client entering into a financial planning agreement, the client has the right to terminate the agreement without penalty or fees within five (5) business days after entering into the agreement. Thereafter, You may terminate the financial planning agreement upon 30 days written notice to our firm. Because financial planning fees are payable in arrears, you will be responsible for a prorated fee based on services performed prior to termination of the financial planning agreement.

Credits for Personal Tax Return Preparation & Estate Planning Services

Tax Preparation Credits

Bolt is not compensated for the preparation of your taxes nor do we prepare taxes for clients. We may recommend third-party tax professionals as part of our portfolio management and/or financial planning services provided to you, should you need such recommendation. Bolt works alongside XY Tax Solutions, LLC ("XYTS") to help facilitate your tax needs. Upon your approval, we will coordinate with XYTS to assist in planning the best tax strategy along with forwarding any information needed to timely process the appropriate tax filings. The fees paid to XYTS will be determined based on the complexity of the return and quality of recordkeeping. Bolt is not affiliated with XYTS and does not share in these fees.

Clients with \$1 million and above in assets under our management will receive up to \$1,000 towards the cost of their Personal Tax Return Preparation by Bolt. Clients with less than \$1 million in assets under our management will not receive a credit towards their Personal Tax Return Preparation. These credits may be negotiable solely at the Advisor's discretion.

Fees paid to XYTS, will be agreed upon at the start of the engagement, and are due at the completion of the engagement. Clients always have the right to utilize any third-party products or services that we may recommend, and they can receive similar services from other professionals of their choosing at a similar or lower cost. Since fees are paid in arrears, no refund will be needed upon termination of the engagement.

Estate Planning Credits

Bolt does not provide legal advice; however we may recommend a third-party law firm for estate planning needs, should you need such recommendation. Bolt is not affiliated with any law firm and does not share in these third-party estate planning fees.

Bolt will contribute \$2,500 towards Estate Planning Services conducted by a third-party for portfolio management clients with assets under our management of \$2 Million or greater. We will not make a contribution towards Estate Planning Services for clients with less than \$2 million in assets under management. These contributions are negotiable solely at the Advisor's discretion.

The fees may be negotiable in certain cases, will be agreed upon at the start of the engagement, and are due at the completion of the engagement. Clients are not required to utilize any third party products or services that we may recommend and they can receive similar services from other professionals at a similar or lower cost.

Educational Seminars and Workshops

Bolt Financial Group, Inc. also provides educational seminars and workshops for clients to learn more about financial planning and investments. We may charge a fee up to \$199 for the tuition of the course per person and up to \$50 for additional workshop supplies. This fee is paid in advance via electronic funds transfer. The fee is fully refundable upon written notice by the Client to cancel their attendance. Fees are negotiable.

Additional Fees and Expenses

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the internal fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, refer to the *Brokerage Practices* section of this brochure. Fees for tax preparation and estate planning services are separate and in addition to Bolt's fees. At Bolt's discretion, Bolt may absorb these fees associated with tax preparation and estate planning services on a case-by-case basis.

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

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

We do not accept performance-based fees or participate in side-by-side management.

Item 7 Types of Clients

We offer investment advisory services to individuals (other than high net worth individuals), high net worth individuals, pension and profit-sharing plans, retirement plans and corporations or other businesses not listed above.

In general, we do not require a minimum dollar amount to open and maintain an advisory account; however, we have the right to terminate your Account if it falls below a minimum size which, in our sole opinion, is too small to manage effectively.

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

Our Methods of Analysis and Investment Strategies

We may use one or more of the following methods of analysis or investment strategies when providing investment advice to you:

Fundamental Analysis - involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company and its industry. The resulting data is used to measure the true value of the company's stock compared to the current market value.

Risk: The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Modern Portfolio Theory - a theory of investment which attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully diversifying the proportions of various assets.

Risk: Market risk is that part of a security's risk that is common to all securities of the same general class (stocks and bonds) and thus cannot be eliminated by diversification.

Long-Term Purchases - securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

Risk: Using a long-term purchase strategy generally assumes the financial markets will go up in the long-term which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall financial markets advance. Purchasing investments long-term may create an opportunity cost - "locking-up" assets that may be better utilized in the short-term in other investments.

Our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial information, liquidity needs and other various suitability factors. Your restrictions and guidelines may affect the composition of your portfolio. **It is important that you notify us immediately with respect to any material changes to your financial circumstances, including for example, a change in your current or expected income level, tax circumstances, or employment status.**

Tax Considerations

Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you consult with a tax professional regarding the investing of your assets.

Custodians and broker-dealers must report the cost basis of equities acquired in client accounts on or after January 1, 2011. Your custodian will default to the First-In First-Out ("FIFO") accounting method for calculating the cost basis of your investments. You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes another accounting method is more advantageous, provide written notice to our firm immediately and we will alert your account custodian of your individually selected accounting method. Decisions about cost basis accounting methods will need to be made before trades settle, as the cost basis method cannot be

changed after settlement.

Risk of Loss

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines.

We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

Other Risk Considerations

When evaluating risk, financial loss may be viewed differently by each client and may depend on many different risks, each of which may affect the probability and magnitude of any potential losses. The following risks may not be all-inclusive, but should be considered carefully by a prospective client before retaining our services.

Credit Risk: Credit risk typically applies to debt investments such as corporate, municipal, and sovereign fixed income or bonds. A bond issuing entity can experience a credit event that could impair or erase the value of an issuer's securities held by a client.

Inflation and Interest Rate Risk: Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of a client's future interest payments and principal. Inflation also generally leads to higher interest rates which may cause the value of many types of fixed income investments to decline.

Horizon and Longevity Risk: The risk that your investment horizon is shortened because of an unforeseen event, for example, the loss of your job. This may force you to sell investments that you were expecting to hold for the long term. If you must sell at a time that the markets are down, you may lose money. Longevity Risk is the risk of outliving your savings. This risk is particularly relevant for people who are retired, or are nearing retirement.

Model Portfolio Risk: If you invest in model portfolio, clients lose the ability to impose restrictions on certain securities within their portfolio. In addition, model portfolios are not tailored to each individual client but instead based on the client's overall objective and risk tolerance.

Recommendation of Particular Types of Securities

We primarily recommend Mutual Funds and ETFs. However, we may advise on other types of investments as appropriate for you since each client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with the investment.

Money Market Funds: A money market fund is technically a security. The fund managers attempt to keep the share price constant at \$1/share. However, there is no guarantee that the share price will stay at \$1/share. If the share price goes down, you can lose some or all of your principal. The U.S. Securities

and Exchange Commission ("SEC") notes that "While investor losses in money market funds have been rare, they are possible." In return for this risk, you should earn a greater return on your cash than you would expect from a Federal Deposit Insurance Corporation ("FDIC") insured savings account (money market funds are not FDIC insured). Next, money market fund rates are variable. In other words, you do not know how much you will earn on your investment next month.

The rate could go up or go down. If it goes up, that may result in a positive outcome. However, if it goes down and you earn less than you expected to earn, you may end up needing more cash. A final risk you are taking with money market funds has to do with inflation. Because money market funds are considered to be safer than other investments like stocks, long-term average returns on money market funds tends to be less than long term average returns on riskier investments. Over long periods of time, inflation can eat away at your returns.

Stocks: There are numerous ways of measuring the risk of equity securities (also known simply as "equities" or "stock"). In very broad terms, the value of a stock depends on the financial health of the company issuing it. However, stock prices can be affected by many other factors including, but not limited to the class of stock (for example, preferred or common); the health of the market sector of the issuing company; and, the overall health of the economy. In general, larger, better established companies ("large cap") tend to be safer than smaller start-up companies ("small cap") are but the mere size of an issuer is not, by itself, an indicator of the safety of the investment. In addition, dividends can fluctuate and stock returns tend to more volatile than other investments such as bonds.

Mutual Funds and Exchange Traded Funds: Mutual funds and exchange traded funds ("ETF") are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. ETFs differ from mutual funds since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. The returns on mutual funds and ETFs can be reduced by the costs to manage the funds. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, the fund, other types of mutual funds do charge such fees which can also reduce returns. Mutual funds can also be "closed end" or "open end". So-called "open end" mutual funds continue to allow in new investors indefinitely whereas "closed end" funds have a fixed number of shares to sell which can limit their availability to new investors.

ETFs may have tracking error risks. For example, the ETF investment adviser may not be able to cause the ETF's performance to match that of the Underlying Index or other benchmark, which may negatively affect the ETF's performance. In addition, for inverse ETFs that seek to track the performance of their Underlying Indices or benchmarks on a daily basis, mathematical compounding may prevent the ETF from correlating with performance of its benchmark. In addition, an ETF may not have investment exposure to all of the securities included in its Underlying Index, or its weighting of investment exposure to such securities may vary from that of the Underlying Index. Some ETFs may invest in securities or financial instruments that are not included in the Underlying Index, but which are expected to yield similar performance.

Item 9 Disciplinary Information

We are required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of our advisory business or the integrity of our management. We do not have any required disclosures under this item.

Item 10 Other Financial Industry Activities and Affiliations

Some investment adviser representatives of Bolt Financial Group, Inc. are also investment adviser representatives of Agdeavor Investments, LLC ("Agdeavor"), an Ohio-registered investment adviser. Agdeavor and Bolt Financial Group, Inc. share the same principal owner, however, both firms are separate entities and do not share in fees or clients. Clients solicited by investment adviser representative, Larry Thompson of Agdeavor will be serviced by Agdeavor. Your advisory agreement will indicate the firm in which we represent. A conflict of interest may arise as advisory fees, custodial fees, and investment strategies may differ between Bolt and Agdeavor. To address this conflict of interest, prospective clients are aware of the two firm's through both firm's Disclosure Brochure. In addition, Bolt will only recommend investment strategies that are most suitable for the client based on the client's objectives. Bolt and Agdeavor is in the process to merge firms at the end of 2022 and the beginning of 2023.

We do not have any relationship or arrangement that is material to our advisory business or to our clients with any of the types of entities listed below.

1. broker-dealer, municipal securities dealer, or government securities dealer or broker.
2. investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund).
3. other investment adviser or financial planner.
4. futures commission merchant, commodity pool operator, or commodity trading advisor.
5. banking or thrift institution.
6. accountant or accounting firm.
7. lawyer or law firm.
8. insurance company or agency.
9. pension consultant.
10. real estate broker or dealer.
11. sponsor or syndicator of limited partnerships.

Bolt does not recommend or select other investment advisers for our clients.

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

Description of Our Code of Ethics

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for persons associated with our firm. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All persons associated with our firm are expected to adhere strictly to these guidelines. Persons associated with our firm are also required to report any violations of our

Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm.

Clients or prospective clients may obtain a copy of our Code of Ethics by contacting us at the telephone number on the cover page of this brochure.

Participation or Interest in Client Transactions

Neither our firm nor any persons associated with our firm has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

Personal Trading Practices

Our firm or persons associated with our firm may buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To mitigate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities. Nor will the trading purchased for accounts of our firm or persons associated with our firm will disadvantage any client of Bolt. All Access Persons of Bolt must submit trading transactions to the CCO of Bolt. The CCO will review all personal securities transactions to ensure compliance with the above policy.

Item 12 Brokerage Practices

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are, overall, the most favorable compared to other available providers and their services. We consider various factors, including:

- Capability to buy and sell securities for your account itself or to facilitate such services.
- The likelihood that your trades will be executed.
- Availability of investment research and tools.
- Overall quality of services.
- Competitiveness of price.
- Reputation, financial strength, and stability.
- Existing relationship with our firm and our other clients.

Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. In recognition of the value of the services the Custodian provides, you may pay higher commissions and/or trading costs than those that may be available elsewhere. With this in consideration, our firm requires the brokerage and custodial services of TD Ameritrade, Inc. and Charles Schwab & Co., Inc. (collectively, our "Custodian(s)").

Research and Other Soft Dollar Benefits

As a registered investment adviser, we have access to the institutional platform of your account custodian. As such, we will also have access to research products and services from your account custodian and/or other brokerage firm, commonly referred to as soft dollar benefits. These products may include financial publications, information about particular companies and industries, research software, and other products

or services that provide lawful and appropriate assistance to our firm in the performance of our investment decision-making responsibilities. Such research products and services are provided to all investment advisers that utilize the institutional services platforms of these firms and are not purchased with soft dollar credits (earned directly in proportion to the amount of commissions paid by a client). However, you should be aware that the commissions charged by a particular broker for a particular transaction or set of transactions may be greater than the amounts another broker who did not provide research services or products might charge. The receipt of soft dollar benefits creates a conflict of interest in that we receive a benefit because we do not have to produce or pay for the research, products or services and we may have an incentive to select or recommend a broker-dealer based on our interest in receiving the research or other products or services, rather than on clients' interest in receiving most favorable execution. However, we believe our requirement that portfolio management clients use TD Ameritrade, Inc. or Schwab as their custodian is in the client's best interest based on the services that our Custodian(s) provides and the fees our Custodian(s) charges.

Brokerage for Client Referrals

We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

Directed Brokerage

Clients are required to utilize the services of TD Ameritrade in order for Bolt to manage their account. Bolt does not recommend, request or require that a client direct Bolt to execute transactions through a specific broker-dealer.

Block Trades

We combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions. Accounts owned by our firm or access persons may participate in block trading with your accounts; however, they will not be given preferential treatment.

Item 13 Review of Accounts

Shaun Carney, President will monitor your accounts on an ongoing basis and will conduct account reviews at least an annual basis, to ensure the advisory services provided to you are consistent with your investment needs and objectives. We also encourage clients to meet with our firm on at least an annual basis. Additional reviews may be conducted based on various circumstances, including, but not limited to:

- contributions and withdrawals,
- year-end tax planning,
- market moving events,
- security specific events, and/or,
- changes in your risk/return objectives.

The individuals conducting reviews may vary from time to time, as personnel join or leave our firm.

Bolt provides written quarterly performance reports to portfolio management clients. In addition, you will receive trade confirmations and monthly or quarterly statements from your account custodian(s). We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you.

Shaun Carney, President will review financial plans as needed. These reviews are provided as part of the portfolio management services. One-time planning clients do not receive ongoing reviews. We do not access additional fees for financial plan reviews. Generally, we will contact you periodically to determine whether any updates may be needed based on changes in your circumstances. Changed circumstances may include, but are not limited to marriage, divorce, birth, death, inheritance, lawsuit, retirement, job loss and/or disability, among others.

We recommend meeting with you at least annually to review and update your plan if needed. Additional reviews will be conducted upon your request. Written updates to the financial plan may be provided in conjunction with the review. Updates to your financial plan may be subject to our then current hourly rate, which you must approve in writing and in advance of the update. If you implement financial planning advice, you will receive trade confirmations and monthly or quarterly statements from relevant custodians.

Item 14 Client Referrals and Other Compensation

Except for the benefits disclosed in Item 12 above, we do not receive any compensation from any third party in connection with providing investment advice to you.

Currently Bolt does not, directly or indirectly, compensate any person who is not advisory personnel for Client referrals. Bolt had previously entered into a Solicitation Agreement with a Solicitor and still compensates those Solicitors for past referred clients.

Item 15 Custody

As paying agent for our firm, your independent custodian will directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer or other qualified custodian. You will receive account statements from the qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy.

If you did not receive a statement from your custodian, contact us immediately at the telephone number on the cover page of this brochure.

In jurisdictions where required, if Bolt deducts its advisory fee from client's account, the following safeguards will be applied:

1. The Client will provide written authorization to Bolt, permitting them to be paid directly for their accounts held by the custodian.
2. Bolt will send a copy of its invoice to the custodian at the same time that it sends the Client a copy specifying and itemizing the fee. Itemization includes the formula used to calculate the fee,

the amount of assets under management or investment advisory services the fee is based on, the amount of time charged and the services provided for hourly billing and the time period covered by the fee.

3. The custodian will send at least quarterly statements to the Client showing all disbursements for the account, including the amount of the advisory fee.

Clients should receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains the Client's investment assets. We urge you to carefully review such statements and compare them to the invoices you receive, and promptly notify us of any concerns.

Item 16 Investment Discretion

Before we can buy or sell securities on your behalf, you must first sign our discretionary management agreement and the appropriate trading authorization forms.

You may grant our firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. You may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for your account(s). For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry or security. Refer to the *Advisory Business* section in this brochure for more information on our discretionary management services.

If you enter into non-discretionary arrangements with our firm, we will obtain your approval prior to the execution of any transactions for your account(s). You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

Item 17 Voting Client Securities

We will not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of applicable securities, you are responsible for exercising your right to vote as a shareholder.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward any electronic solicitations to vote proxies.

Item 18 Financial Information

Our firm does not have any financial condition or impairment that would prevent us from meeting our contractual commitments to you. We do not take physical custody of client funds or securities, or serve as trustee or signatory for client accounts, and, we do not require the prepayment of more than \$500 in fees six or more months in advance. Therefore, we are not required to include a financial statement with this brochure.

We have not filed a bankruptcy petition at any time in the past ten years.

Item 19 Requirements for State-Registered Advisers

Refer to the Part(s) 2B for background information about our principal executive officers, management personnel and those giving advice on behalf of our firm.

Our firm is not actively engaged in any business other than giving investment advice that is not already disclosed above.

Neither our firm, nor any persons associated with our firm are compensated for advisory services with performance-based fees. Refer to the *Performance-Based Fees and Side-By-Side Management* section above for additional information on this topic.

Neither our firm, nor any of our management persons have any reportable arbitration claims, civil, self-regulatory organization proceedings, or administrative proceedings.

Neither our firm, nor any of our management persons have a material relationship or arrangement with any issuer of securities.

All material conflicts of interest under CCR Section 260.238(k) are disclosed regarding Bolt, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

Bolt maintains a written Business Continuity Plan that identifies procedures related to an emergency or significant business disruptions, including the death of the investment adviser or any of its representatives.

Part 2B: Shaun Carney

Shaun Carney

**Bolt Financial Group, Inc
5701 N. High St., Suite 100
Worthington, OH 43085**

**P: (614) 635-0102
F: (888) 488-7863**

www.boltfinancialgroup.com

March 6, 2024

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Shaun Carney that supplements the Bolt Financial Group, Inc. brochure. You should have received a copy of that brochure. Contact us at (614) 635-0102 if you did not receive Bolt Financial Group, Inc's brochure or if you have any questions about the contents of this supplement.

Additional information about Shaun Carney (CRD # 6827381) is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Shaun Carney

Year of Birth: 1985

Formal Education After High School:

- United States Air Force Academy, BS Systems Engineering Management, 5/2008
- Air Force Institute of Technology, MS Cost Analysis, 3/2013

Business Background:

- Agdeavor Investments, Investment Adviser Representative, December 2018 - Present
- Bolt Financial Group, Inc, President, 11/2017 - Present
- United States Air Force Reserves, Pilot / Military Officer, 03/2015 to Present
- Edward Jones, Financial Advisor, 07/2017 to 11/2017
- United States Air Force, Financial Services / Military Officer, 05/2008 to 03/2015

Item 3 Disciplinary Information

Form ADV Part 2B requires disclosure of certain criminal or civil actions, administrative proceedings, and self-regulatory organization proceedings, as well as certain other proceedings related to suspension or revocation of a professional attainment, designation, or license. Mr. Shaun Carney has no required disclosures under this item.

Item 4 Other Business Activities

Shaun Carney is an investment adviser representatives of Agdeavor Investments, LLC ("Agdeavor"), an Ohio-registered investment adviser. He spends 5 hours per week on this activity. Agdeavor and Bolt Financial Group, Inc. share the same principal owner, however, both firms are separate entities and do not share in fees or clients. If the client is referred by a contact of Agdeavor, then the client will be serviced by Agdeavor. Your advisory agreement will indicate the firm in which we represent. Bolt and Agdeavor is in the process to merge firms at the end of 2022 and the beginning of 2023.

Shaun Carney is also a pilot and military officer for the United States Air Force Reserve. He spends approximately 12 hours per month on this activity.

Item 5 Additional Compensation

Except as disclosed in Item 4 above, Shaun Carney does not receive any additional compensation beyond that received as a President of Bolt Financial Group, Inc.

Item 6 Supervision

As the President and Chief Compliance Officer of Bolt Financial Group, Inc., Shaun Carney supervises the advisory activities of our firm. Shaun Carney is bound by the firm's policies and procedures and Code of Ethics. Shaun Carney can be reached at (614) 635-0102.

Item 7 Requirements for State Registered Advisers

Shaun Carney has **NOT** been involved in one of the events listed below:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - (a) an investment or an investment-related business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - (a) an investment or an investment-related business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.

Shaun Carney has **NOT** been the subject of a bankruptcy petition.

Part 2B: David Marlin

David Marlin

**Bolt Financial Group, Inc
5701 N. High St., Suite 100
Worthington, OH 43085**

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www.boltfinancialgroup.com

March 6, 2024

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about David Marlin that supplements the Bolt Financial Group, Inc. brochure. You should have received a copy of that brochure. Contact us at 614-635-0102 if you did not receive Bolt Financial Group, Inc's brochure or if you have any questions about the contents of this supplement.

Additional information about David Marlin (CRD # 6925672) is available on the SEC's website at www.adviserinfo.sec.gov. David Marlin is currently registered as an investment adviser representative in the state of Ohio. He provides investment advice to residents of Ohio only, unless otherwise exempt. David Marlin does not provide investment advice to residents of New York.

Item 2 Educational Background and Business Experience

David Marlin

Year of Birth: 1962

Formal Education After High School:

- Embry-Riddle Aeronautical University, MS Aeronautical Science, 1997
- The University of Akron, BS Civil Engineering, 1985

Business Background:

- Agdeavor Investments, Investment Adviser Representative, December 2018 - Present
- Bolt Financial Group, Inc, Wealth Advisor, 2/2018 - Present
- FlightSafety Services Corp., Pilot Instructor, 11/2018 - Present
- L3 Technologies, Pilot Instructor, 5/2013 - 11/2018
- US Air Force, Officer/Pilot, 4/1986 - 5/2013

Item 3 Disciplinary Information

Form ADV Part 2B requires disclosure of certain criminal or civil actions, administrative proceedings, and self-regulatory organization proceedings, as well as certain other proceedings related to suspension or revocation of a professional attainment, designation, or license. Mr. David Marlin has no required disclosures under this item.

Item 4 Other Business Activities

David Marlin is also an Investment Adviser Representative of Agdeavor Investments, LLC. We are not under common control with Agdeavor Investments, LLC. See Part 2A Item 10, Other Financial Industry Activities and Affiliations for additional information and disclosures. Additionally, David Marlin spends about 75% of his time working at FlightSafety Services Corp.

Item 5 Additional Compensation

Please refer to the *Other Business Activities* section above for disclosures on Mr. Marlin's receipt of additional compensation as a result of his activities as an Investment Adviser Representative of Agdeavor Investments, LLC and FlightSafety Services Corp.

Item 6 Supervision

In the supervision of our associated persons, advice provided is limited based on the restrictions set by Bolt Financial Group, Inc, and by internal decisions as to the types of investments that may be included in client portfolios. We conduct periodic reviews of client holdings and documented suitability information to provide reasonable assurance that the advice provided remains aligned with each client's stated investment objectives and with our internal guidelines.

David Marlin's supervisor is: Shaun Carney, President/Chief Compliance

Officer Supervisor phone number: 614-635-0102

Item 7 Requirements for State Registered Advisers

David Marlin has **NOT** been involved in one of the events listed below:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - (a) an investment or an investment-related business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - (a) an investment or an investment-related business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.

David Marlin has **NOT** been the subject of a bankruptcy petition.

Part 2B: Nora Lamendola

Nora C Lamendola

**Bolt Financial Group, Inc
5701 N. High St., Suite 100
Worthington, OH 43085**

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www.boltfinancialgroup.com

March 6, 2024

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about David Marlin that supplements the Bolt Financial Group, Inc brochure. You should have received a copy of that brochure. Contact us at 614-635-0102 if you did not receive Bolt Financial Group, Inc's brochure or if you have any questions about the contents of this supplement.

Additional information about Nora C Lamendola (CRD # 7257703) is available on the SEC's website at www.adviserinfo.sec.gov. Nora C. Lamendola is currently registered as an investment adviser representative in the state of Ohio. She provides investment advice to residents of Ohio only, unless otherwise exempt. Nora C. Lamendola does not provide investment advice to residents of New York.

Item 2 Educational Background and Business Experience

Nora C Lamendola

Year of Birth: 1988

Formal Education After High School:

- The University of Toledo, Bachelor's in Marketing, Organizational Leadership and Management, 2010f

Business Background:

- Bolt Financial Group, Inc, Wealth Advisor, 01/2018 - Present
- Godshall Professional Recruiting, Recruiter, 05/2017 - 01/2018
- Colorado Springs Orthopedic Group, Marketing Director, 07/2015 - 05/2017
- Claims Management Resources, Project Coordinator, 06/2013 - 07/2015
- Palace Sports and Entertainment, Corporate Partnerships Activation Manager, 06/2012 - 06/2013
- Doner, Project Manager, 05/2010 - 06/2012

Item 3 Disciplinary Information

Form ADV Part 2B requires disclosure of certain criminal or civil actions, administrative proceedings, and self-regulatory organization proceedings, as well as certain other proceedings related to suspension or revocation of a professional attainment, designation, or license. Mrs. Lamendola has no required disclosures under this item.

Item 4 Other Business Activities

Nora Lamendola is currently Owner and President of Retire Educated Seminar Series, LLC. Retire Educated Seminar Series, LLC is an educational platform for Pre-retirees and Retirees held at local College institutions. This activity accounts for approximately 5% of her time.

Item 5 Additional Compensation

Nora Lamendola does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through Bolt Financial Group Inc.

Item 6 Supervision

In the supervision of our associated persons, advice provided is limited based on the restrictions set by Bolt Financial Group, Inc, and by internal decisions as to the types of investments that may be included in client portfolios. We conduct periodic reviews of client holdings and documented suitability information to provide reasonable assurance that the advice provided remains aligned with each client's stated investment objectives and with our internal guidelines.

Nora Lamendola's supervisor is: Shaun Carney, President/Chief Compliance

Officer Supervisor phone number: 614-635-0102

Item 7 Requirements for State Registered Advisers

Nora Lamendola has **NOT** been involved in one of the events listed below:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - (a) an investment or an investment-related business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - (a) an investment or an investment-related business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.

Nora Lamendola has **NOT** been the subject of a bankruptcy petition.