

**Item 1 – Cover Page**

**Part 2A of Form ADV**



# Saubel Financial Group

Office Address:

2448 Wildon Dr.

York, PA 17403

Phone: (717) 216-0033

Email: [Adam@SaubelFinancialGroup.com](mailto:Adam@SaubelFinancialGroup.com)

Website: [www.saubelfinancialgroup.com](http://www.saubelfinancialgroup.com)

Mailing Address:

PO Box 60

York, PA 17407

**March 2026**

This Brochure provides information about the qualifications and business practices of Saubel Financial Group, LLC. If you have any questions about the contents of this Brochure, please contact us using the information listed above. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Saubel Financial Group, LLC (CRD# 330604) is a registered investment advisor with the State of PA. Registration of an investment advisor does not imply any certain level of skill or training.

Additional information about Saubel Financial Group, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2: Material Changes

Saubel Financial Group, LLC (hereinafter “SFG” or “the firm”) is required to make clients aware of information that has changed since the last annual update to our Firm Brochure (“Brochure”) that may be important to them. This Brochure updates and replaces the brochure dated January 31<sup>st</sup>, 2025.

The following material changes are reflected in this version:

- *Item 4: Updated to reflect our Assets Under Management (AUM) as of December 31<sup>st</sup>, 2025*

You may request a copy of our current Brochure at any time, without charge, by calling us at (717) 216-0033 or e-mailing us at [Adam@SaubelFinancialGroup.com](mailto:Adam@SaubelFinancialGroup.com).

SFG has made additional non-material updates to other sections in this Brochure, so we encourage each client to review the complete Brochure carefully and to call us with any questions you may have.

SFG will ensure that clients receive a summary of any material changes to this Brochure within 120 days of the close of our fiscal year, along with a copy of this Brochure or an offer to provide the full Brochure. Additionally, as SFG experiences material changes in the future, we will send you a summary of our “Material Changes” under separate cover.

Additional information about Saubel Financial Group, LLC and our investment adviser representatives is available on the SEC’s website at <https://adviserinfo.sec.gov/>.

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## Item 4: Advisory Business

### Description of the Advisory Firm

Saubel Financial Group, LLC is a Limited Liability Company organized in the State of Pennsylvania. The firm was formed in March 2024, and the principal owner is Adam Gregory Saubel.

### Types of Advisory Services

#### *Portfolio Management*

SFG offers portfolio management services to advisory Clients. SFG will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors.

#### Discretionary

SFG offers portfolio management only on a discretionary basis, the Client will sign a limited trading authorization or equivalent allowing SFG to determine the securities to be bought or sold and the amount of the securities to be bought or sold. SFG will have the authority to execute transactions in the account without seeking Client consent on each transaction.

SFG generally limits its investment advice to mutual funds, fixed income securities, insurance products, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, and non-U.S. securities. SFG may use other securities as well to help diversify a portfolio when applicable.

#### *Financial Planning*

Services include an evaluation of a Client's current and future financial state using currently known variables to predict future cash flows, asset values, recommend purchase and sales, and withdrawal plans. SFG will use current net worth, tax liabilities, asset allocation, and future retirement and estate plans in developing financial plans. Topics for planning may include, but are not limited:

- Personal net worth statement: A snapshot of assets and liabilities serves as a benchmark for measuring progress towards financial goals.
- Cash flow analysis: An income and spending plan determines how much can be set aside for debt repayment, savings and investing each month.
- Retirement strategy: A strategy for achieving retirement independent of other financial priorities. Including a strategy for accumulating the required retirement capital and its planned lifetime distribution.
- Long-term investment plan: Build a customized asset allocation strategy based on specific investment objectives and a risk profile. This strategy sets guidelines for selecting, buying and selling investments and establishing benchmarks for performance review.
- Life insurance: Provide advice on life insurance including needs analysis, policy type selection (e.g., term, whole, universal), carrier evaluation, and periodic policy reviews. Where appropriate, we can help implement new coverage or evaluate existing policies for suitability and cost efficiency.
- College planning: Estimate future education costs and develop funding strategies that may include 529 plans, custodial accounts (UGMA/UTMA), and other savings or gifting approaches. Our services include contributions planning, investment selection aligned with

time horizon and risk, coordination with financial aid and tax considerations, and periodic progress reviews.

- Tax reduction strategy: Identify ways to minimize taxes on personal income to the extent permissible by the tax code. The strategy should include identification of tax favored investment vehicles that can reduce taxation of investment income.
- Estate preservation: Help update accounts, review beneficiaries for retirement accounts and life insurance, provide a second look at your current estate planning documents, and prompt you to update your plan when the legal environment changes or you have major life events such as a marriage, death, or births.

If a conflict of interest exists between the interests of SFG and the interests of the Client, the Client is under no obligation to act upon SFG's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to affect the transaction through SFG.

### **Client-Tailored Services and Client-Imposed Restrictions**

The Client's financial needs, investment goals, tolerance for risk, and investment objectives are documented in SFG's Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. These restrictions may, however, prohibit engagement with SFG.

### **Wrap Fee Programs**

SFG does not participate in a Wrap Program.

### **Amounts Under Management**

As of December 31, 2025, SFG provides portfolio management services for:

| Discretionary Amounts: | Non-discretionary Amounts: | Date Calculated:  |
|------------------------|----------------------------|-------------------|
| \$17,633,219           | \$0                        | December 31, 2025 |

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

### **Fee Schedule**

#### ***Portfolio Management Fees***

SFG charges an annual investment advisory fee based on the total assets under management as follows:

| Total Assets Under Management | Annual Fees |
|-------------------------------|-------------|
| \$0 - \$250,000               | 1.50%       |
| \$250,001 - \$750,000         | 1.25%       |
| \$750,001 - \$1,250,000       | 1.00%       |
| \$1,250,001 - 3,000,000       | 0.75%       |
| \$3,000,001 - AND UP          | 0.50%       |

This is a tiered or breakpoint fee schedule, meaning the entire account is charged the same management fee.

Fees are billed quarterly in arrears plus pro-rata flows. Pro-rata flows means that when funds are added or withdrawn during the quarter, the fee is adjusted proportionately based on the number of days the assets were managed. Fees are based on the market value of assets managed as of the close of business on the last business day of the previous billing period.

### ***Financial Planning Fees***

SFG charges an hourly and/or fixed fee for financial planning.

Prior to the planning process, the Client will be provided an estimated plan fee which will be based on the complexity of the engagement. For hourly and fixed fee arrangements, services will be completed and delivered within ninety (90) days contingent upon timely delivery of all required documentation. SFG reserves the right to waive the fee should the Client implement the plan through SFG.

#### **HOURLY FEES**

Financial planning services are offered based on an hourly rate, not to exceed \$450 per hour. Fees for financial plans are billed in arrears upon completion of the plan.

#### **FIXED FEES**

Financial planning services are offered based on a fixed fee, not to exceed \$10,000, depending on the complexity of the engagement. Fees are billed in arrears upon completion of the plan.

### **Payment of Fees**

Asset Management Fees are generally deducted directly from the Client's Account.

Financial Planning Fees are generally invoiced directly to the Client but may also be deducted from another account held with SFG.

Fees are negotiable. SFG, in its sole discretion, may charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.).

For all services, Clients may terminate their engagement with SFG within five (5) business days of signing an Agreement with no obligation and without penalty. After the initial five (5) business days, the Agreement may be terminated by SFG with thirty (30) days written notice to Client and by the Client at any time with written notice to SFG. For accounts opened or closed mid-billing period, fees will be prorated based on the services provided during the given period. In the case of hourly engagements, fees will be prorated based on the work completed at the stated hourly rate. All unpaid earned fees will be due to SFG for work completed. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

### **Additional Fees**

Custodians may charge brokerage commissions, transaction fees, and other related costs on the purchases or sales of mutual funds, equities, bonds, options, margin interest, and exchange-traded funds. Mutual funds, money market funds, and exchange-traded funds may also charge internal management fees, which are disclosed in the fund's prospectus. SFG does not directly receive any compensation from these fees. All of these fees are in addition to the management fee you pay to SFG. For more details on the brokerage practices, see Item 12 of this brochure.

### **Prepayment of Fees**

SFG does not expect Clients to prepay fees.

### **External Compensation for the Sale of Securities**

SFG does not receive any external compensation from the sale of securities.

## **Item 6: Performance-Based Fees and Side-By-Side Management**

Fees are not based on a share of the capital gains or capital appreciation of managed securities. SFG does not use a performance-based fee structure nor “side-by-side” management because of the conflict of interest. Performance based compensation may create an incentive for SFG to recommend an investment that may carry a higher degree of risk to the Client.

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

SFG’s Clients are generally individuals, high net-worth individuals, small businesses, trusts, and estates. Client relationships vary in scope and length of service.

There is no minimum account size and Clients are not required to have a certain amount of investment experience or sophistication.

## **Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss**

### **Methods of Analysis**

SFG’s methods of analysis include Cyclical analysis, Fundamental analysis, Modern portfolio theory and Quantitative analysis.

*Cyclical analysis* involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

*Fundamental analysis* involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

*Modern portfolio theory* is a theory of investment that attempts to maximize portfolio expected returns for a given amount of portfolio risk or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various assets classes.

*Quantitative analysis* deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

### **Investment Strategy**

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time by providing written notice to SFG. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

## **Risks of Investments and Strategies Utilized**

**Investing in securities involves risk of loss that Clients should be prepared to bear. SFG's investment approach constantly keeps the risk of loss in mind. Investors may face the following investment risks:**

**General Investment and Trading Risks.** Clients may invest in securities and other financial instruments using strategies and investment techniques with significant risk characteristics. The investment program utilizes such investment techniques as option transactions, margin transactions, short sales, leverage, and derivatives trading, the use of which can, in certain circumstances, maximize the adverse impact to which a Client may be subject.

**Interest-rate Risk.** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

**Inflation Risk.** When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.

**Reinvestment Risk.** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

**Liquidity Risk.** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

**Management Risk.** The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the Client's portfolio may suffer.

**Exchange-Traded Funds.** ETFs are a type of index fund bought and sold on a securities exchange. The risks of owning an ETF generally reflect the risks of owning the underlying securities they are designed to track, although lack of liquidity in an ETF could result in it being more volatile, and ETFs have management fees that increase their costs. ETFs are also subject to other risks, including: (i) the risk that their prices may not correlate perfectly with changes in the underlying reference units; and (ii) the risk of possible trading halts due to market conditions or other reasons that, in the view of the exchange upon which an ETF trades, would make trading in the ETF inadvisable.

**Mutual Funds.** An investment in mutual funds could lose money over short or even long periods. A mutual fund's share price and total return are expected to fluctuate within a wide range, like the fluctuations of the overall stock market.

**Common Stocks and Equity-Related Securities.** Certain ETFs or mutual funds hold common stock. Prices of common stock react to the economic condition of the company that issued the security, industry and market conditions, and other factors which may fluctuate widely. Investments related to the value of stocks may rise and fall based on an issuer's actual and anticipated earnings, changes in management, the potential for takeovers and acquisitions, and other economic factors. Similarly, the value of other equity-related securities, including preferred stock, warrants, and options may also vary widely.

**Fixed Income.** Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-

known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Non-U.S. Securities.** Certain ETFs and mutual funds hold securities of non-U.S. issuers. Investments in securities of non-U.S. issuers pose a range of potential risks which could include expropriation, confiscatory taxation, imposition of withholding or other taxes on dividends, interest, capital gains or other income, political or social instability, illiquidity, price volatility, and market manipulation. In addition, less information may be available regarding securities of non-U.S. issuers, and non-U.S. issuers may not be subject to accounting, auditing and financial reporting standards, and requirements comparable to or as uniform as those of U.S. issuers.

**Annuities.** Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet income requirements or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities involve investment risks, just as mutual funds do. Annuity guarantees depend entirely upon the insurance company's ability to pay claims, there is risk of insolvency, although rare.

**Fully Paid Securities Lending Program through Altruist Risk:** Clients of SFG have the elective option to participate in a securities lending program through Altruist ("Altruist"), the custodian SFG utilizes to hold Client assets. Altruist offers eligible customers the ability to lend out certain shares of their fully paid and excess margin securities to Altruist, which Altruist may then lend to other Altruist customers or to other market participants who wish to use these shares for short selling or other purposes. If elected, Altruist will be the counterparty borrower to loans a Client makes through the program. Altruist may borrow shares from a Client and then lend those shares to one of its affiliates or other customers. Fully paid securities lending carries the primary risk of counterparty default, where the borrower fails to return loaned securities. The fully paid securities lending program is optional and must be elected by the Client. Clients are encouraged to read the full disclosures about the program, which are available through the Altruist application process.

**Cybersecurity Risk.** SFG and its service providers may be subject to operational and information security risks resulting from cyberattacks. Cyberattacks include, among other behaviors, stealing or corrupting data maintained online or digitally, denial of service attacks on websites, the unauthorized release of confidential information or various other forms of cybersecurity breaches. Cybersecurity attacks affecting SFG and its service providers may adversely impact Clients. For instance, cyberattacks may interfere with the processing of transactions, cause the release of private information about Clients, impede trading, subject SFG to regulatory fines or financial losses, and cause reputational damage. Similar types of cybersecurity risks are also present for issuers of securities in which Clients may invest in, qualified custodians, governmental and other regulatory authorities, exchange and other financial market operators, or other financial institutions. Cybersecurity incidents that could ultimately cause them to incur losses, including for example:

financial losses, cost and reputational damages, and loss from damage or interruption of systems. Although SFG has established its systems to reduce the risk of these incidents from coming to fruition, there is no guarantee that these efforts will always be successful, especially considering that SFG does not directly control the cybersecurity measures and policies employed by third party service providers.

**The foregoing list of risk factors does not purport to be a complete enumeration or explanation of the risks involved in an investment with SFG.**

### **Item 9: Disciplinary Information**

SFG and its management have not been involved in any criminal or civil actions, administrative or self-regulatory enforcement proceedings, nor any legal or disciplinary events that are material to a Client's or prospective Client's evaluation of SFG or the integrity of its management.

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

#### **Registration as a Broker-Dealer or Broker-Dealer Representative**

Neither SFG nor its management persons are registered as a broker-dealer or broker-dealer representative.

#### **Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither SFG nor its management persons are registered as futures commission merchant, commodity pool operator, or a commodity trading advisor.

#### **Relationships Material to this Advisory Business and Possible Conflicts of Interest**

Adam Saubel receives external compensation from sales as an Insurance Agent. This represents a conflict of interest because it gives an incentive to recommend services based on the amount received. This conflict is mitigated by disclosures, procedures and SFG's fiduciary obligation to place the best interest of the Client first. Moreover, Clients are not required to engage Adam for insurance products if they do not wish to. More information on this can be found in the respective Investment Advisor Representative's Form U4 and ADV 2B.

#### **Selection of Other Advisors or Managers**

SFG does not utilize nor select other advisors at this time.

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

#### **Code of Ethics**

The supervised persons (supervised persons include employees and/or independent contractors) of SFG have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of SFG supervised and addresses conflicts that may arise. The Code defines acceptable behavior for supervised persons of SFG. The Code reflects SFG and its supervised persons' responsibility to act in the best interest of their Client.

One area which the Code addresses is when supervised persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any supervised persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

SFG's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other supervised person, officer or director of SFG may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

SFG's Code is based on the guiding principle that the interests of the Client are our top priority. SFG's officers, directors, advisors, and other supervised persons have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either supervised persons or SFG.

Certain parts of this Code apply to "access" persons. "Access" persons are supervised persons who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

SFG will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

#### **Recommendations Involving Material Financial Interests**

Neither SFG nor its related persons recommend to Clients, or buys or sells for Client accounts, securities in which SFG or a related person has a material financial interest.

#### **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

SFG and its supervised persons may invest in the same securities (or related securities, e.g., warrants, options or futures) that SFG or a supervised person recommends to Clients. In order to mitigate conflicts of interest, such as front-running, SFG's Chief Compliance Officer, or their designee, will no less than quarterly, review firm and/or personal holdings of its supervised persons. These reviews ensure that the personal trading of supervised persons does not disadvantage Clients of SFG.

#### **Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

SFG and its supervised persons may recommend securities, or buy or sell securities for Clients accounts, at or about the same time, that they also buy or sell the same securities in their own account(s). In order to mitigate conflicts of interest, such as front-running, SFG's Chief Compliance Officer, or their designee, will no less than quarterly, review firm and/or personal holdings of its supervised persons. These reviews ensure that the personal trading of supervised persons does not disadvantage Clients of SFG.

## Item 12: Brokerage Practices

### **Factors Used to Select or Recommending Broker-Dealers**

SFG requires the use of a specific broker-dealer, Altruist, LLC ("Altruist"). SFG has selected Altruist based on a number of factors including but not limited to their transaction fees, quality of customer service, and reporting ability. SFG relies on the broker-dealer to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by SFG. Please note that not all Investment Advisors require their Clients direct brokerage.

1. **Research and Other Soft Dollar Benefits**

SFG does not receive soft dollar benefits.

2. **Brokerage for Client Referrals**

SFG does not receive Client referrals from any custodian or third party in exchange for using that broker-dealer or third party.

3. **Directed Brokerage**

SFG does not allow Client directed brokerage.

### **Aggregating Trading for Multiple Client Accounts**

If SFG buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, SFG would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy.

## Item 13: Review of Accounts

### **Frequency and Nature of Periodic Review and Who Makes Those Reviews**

All client accounts for SFG's advisory services provided on an ongoing basis are reviewed at least Annually by Adam Saubel, President and Chief Compliance Officer, with regard to clients' respective investment policies and risk tolerance levels. All accounts at SFG are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Adam Saubel, President and Chief Compliance Officer. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

### **Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, SFG's services will generally conclude upon delivery of the financial plan.

### **Content and Frequency of Regular Reports**

Clients receive account statements no less than quarterly for managed accounts. Account statements are issued by the Client's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs. SFG may also send periodic or other event-inspired reports based on market or portfolio activity. Reports will generally be provided in electronic format.

## **Item 14: Client Referrals and Other Compensation**

### **Economic Benefits from Others**

SFG does not receive any economic benefits from external sources.

### **Compensation to Non-Advisory Personnel for Client Referrals**

SFG does not compensate for Client referrals.

## **Item 15: Custody**

All assets are held at a qualified custodian, which means the custodian provides account statements directly to Clients at least quarterly. Clients are urged to compare the account statements received directly from their custodians to any documentation or reports prepared by SFG.

SFG is deemed to have custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of SFG. SFG will obtain written authorization from Client to allow such deductions. In addition, SFG shall:

1. Send the qualified custodian an invoice or statement of the amount of the fee to be deducted from the Client's account; and
2. Send the Client an invoice or statement itemizing the fee. Itemization includes the formula used to calculate the fee, the value of the assets under management on which the fee is based, and the time period covered by the fee.

SFG is not affiliated with the custodian. The custodian does not supervise SFG, its employees, or activities.

## **Item 16: Investment Discretion**

Client will authorize SFG discretionary authority, via the Advisory Agreement, to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. Client will authorize SFG discretionary authority to execute selected investment program transactions as stated within the Portfolio Management Agreement.

SFG allows Clients to place certain restrictions on the securities within their portfolio. These restrictions must be provided to SFG in writing.

The Client approves the custodian to be used, and the commission rates paid to the custodian. SFG does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

## **Item 17: Voting Client Securities (Proxy Voting)**

Clients will receive proxy voting information directly from the issuer and/or custodian of the security. Clients will not receive any such proxy voting material from SFG. When assistance on voting proxies is requested by the Client, SFG will provide recommendations to the Client. However, SFG will not have authority to vote proxies on behalf of the Client. If in the future SFG obtains authority to vote proxies, this Brochure will be appropriately amended. Clients may contact SFG at (717) 216-0033 or [Adam@SaubelFinancialGroup.com](mailto:Adam@SaubelFinancialGroup.com).

## **Item 18: Financial Information**

### **Balance Sheet**

SFG does not require nor solicit prepayment of more than \$500 in fees per Client, six months or more in advance.

### **Financial Condition**

SFG nor its management persons have any financial conditions that are likely to reasonably impair its ability to meet contractual commitments to Clients.

### **Bankruptcy Petitions in Previous Years**

SFG has not been the subject of a bankruptcy petition in the last ten years.

## **Item 19: Requirements For State Registered Advisers**

### **Principal Executive Officers and Management Persons**

The education and business background for all management and supervised persons can be found in Part 2B of this Brochure.

### **Outside Business Activities**

The outside business activities for the Investment Advisor Representative, Adam Saubel, can be found in Part 2B of this Brochure.

### **Performance Based Fee Description**

Neither SFG nor its management receive performance-based fees. Please see Item 6 of ADV 2A for more information.

### **Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons**

1. Neither SFG nor its management have been involved 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;
  - e) Dishonest, unfair or unethical practices.

2. Neither SFG nor its management have been 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;
- e) Dishonest, unfair or unethical practices.

**Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities**

There are no material relationships with issuers of securities to disclose.

**Material Conflicts of Interest Assurance**

All material conflicts of interest regarding SFG, its representatives or any of its employees which could be reasonably expected to impair the rendering of unbiased and objective advice are disclosed.