

# **Investment Adviser Brochure Part 2A**

## **Schmidt Financial Group, Inc.**

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This brochure provides information about the qualifications and business practices of Schmidt Financial Group, Inc. If you have any questions about the contents of this brochure, please contact us at (425) 893-9195.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or any state securities authority.

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

The use of the term registered investment adviser does not imply a certain level of skill or training.

**March 18, 2020**

## **Item 2 – Material Changes**

Evan Schmidt become the President of Schmidt Financial Group, Inc., in July, 2019.

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## **Item 4 – Advisory Business**

Schmidt Financial Group, Inc. (“SFGI” or “Schmidt Financial”) has been in business since 2002 and NFP Corp. is the principal owner.

### **Investment Management Services**

Schmidt Financial will manage Client’s household assets on a discretionary basis based on information regarding Client’s investment goals and objectives, financial situation and tax status. This information will be provided initially by Client and updated periodically as material changes to Client’s financial situation occur. Client grants SFGI unlimited discretionary trading authority to select third party investment managers and execute securities transactions on behalf of Client without obtaining specific Client consent prior to each investment manager selection and each transaction.

SFGI will implement customized investment allocation utilizing unaffiliated third-party portfolio managers, mutual funds, ETF/ETNs and individual securities among other investments. SFGI conducts a due diligence investigation, selection and monitoring process regarding various investment options utilized.

Household assets are comprised of Client assets held within custodial accounts linked to the Client household as agreed upon by Client and SFGI. Household assets consist of cash, securities and debt instruments initially placed into the custodial accounts by Client plus all investments, reinvestments and proceeds of the sale of those assets, including, without limitation, all dividends, interest, appreciation and other additions, and additional custodial accounts established in the future that are agreed by Client and SFGI to be included in household assets.

The third-party managers that have been retained to support the SFGI will be licensed as investment advisers in the states where they conduct business or with the Securities and Exchange Commission. A copy of the disclosure brochure for each third-party investment manager will be provided prior to or when a client’s assets are allocated to a manager.

### *Sub-Advisory Services*

SFGI has entered into sub-advisory agreements with various independent investment advisers (“Sub-advisers”). Sub-advisers are often chosen because they possess certain expertise in securities or investment strategies that the Adviser does not have. Sub-advisory relationships enable SFGI to offer clients a broader range of services.

Under separate agreement SFGI will have the authority to allocate and reallocate client assets among various investment managers and will allocate assets to the Sub-advisers based on that authority. Sub-advisers are licensed as investment advisers by their resident states and other applicable jurisdictions or with the Securities and Exchange Commission.

SFGI will gather information about a client's financial situation and investment objectives. The Sub-adviser will have the power and authority to supervise and direct all investment decisions for those accounts designated by SFGI on a discretionary basis, including the purchase and sale of securities and any other transactions unless specifically directed otherwise by the Adviser in writing.

The Sub-adviser will have discretionary authority to aggregate (combine) purchases and sales of securities with similar orders of non- SFGI clients and proportionately divide up securities if unable to fill all orders. An account will be deemed to have purchased or sold its proportionate share of the securities at the average price determined for the overall transaction when transactions are aggregated. More information on the Sub-adviser's aggregation policies is shown in the Sub-Adviser's brochure.

### **Assets Under Management**

As of December 31, 2019 Schmidt Financial manages \$414,040,000 in discretionary client assets.

### **Financial Planning & Consulting Services**

Schmidt Financial provides financial planning and consulting services consistent with a client's financial and tax status, in addition to their risk tolerance and investment objectives. Schmidt Financial gathers enough data to perform an analysis of client liabilities, cash flow, net worth and tax assessments. Schmidt Financial also evaluates a client's insurance coverage and needs. Schmidt Financial creates a Financial Roadmap that may incorporate but isn't limited to the following:

#### **Asset Management**

- Detailed Risk Tolerance Assessment
- Asset Allocation Optimization
- Screening and Selection of Funds/Managers
- Investment Oversight
- Personalized, Regularly Updated Financial Plan
- Real Estate Transaction Analysis
- Strategic Portfolio Distribution

#### **Liability Management**

- Tax Planning / Minimization
- Estate Planning
- Education Funding Strategies
- Insurance Planning
- Trust & LLC Personal Liability Strategies

#### **Relationship Management**

- CPA

- Asset Manager
- Attorney
- Private Banking
- Trust Company
- Philanthropy

### **Financial Planning Conflicts of Interest**

A conflict of interest is created whenever SFGI or an associated person recommends products or services to a client for which SFGI or an associated person receives compensation.

However, financial planning clients are under no obligation to act upon any recommendations of Schmidt Financial or to execute any transactions through Schmidt Financial or an associated person if they decide to follow the recommendations.

## **Item 5 – Fees and Compensation**

### **Investment Management Fees**

Clients prior to 01.01.2017 (under certain circumstances referrals may be included) will pay a Program Fee and a SFGI advisory Fee ("Fee Schedule") as reflected herein. The Program Fee includes Equity Fee and Fixed Income Fee as applicable per the following schedule. The advisory Fee is subject to a minimum annual charge of \$5,000.

#### **Program Fee**

<b>Household Asset Valuation</b>	<b>Equity</b>	<b>Fixed Income</b>	<b>Advisory Fee</b>
\$ 667,000 - \$ 999,999	N/A	N/A	0.75%
\$ 1,000,000 - \$ 1,999,999	0.750%	0.260%	0.50%
\$ 2,000,000 - \$ 4,999,999	0.715%	0.255%	0.50%
\$ 5,000,000 - \$ 7,999,999	0.700%	0.250%	0.49%
\$ 8,000,000 - \$13,999,999	0.660%	0.240%	0.49%
\$14,000,000 - \$19,999,999	0.610%	0.240%	0.48%
\$20,000,000 - \$24,999,999	0.590%	0.235%	0.48%
\$25,000,000+	0.585%	0.230%	0.48%

The Program Fee and Advisory Fee are calculated by applying the annual Fee Schedule to the value of Client's household assets, determined quarterly and calculated based on the current market value as of the last day of the prior quarter. The Program Fee and Advisory Fee will be debited from Client custodial accounts on a quarterly basis in advance.

The initial Program Fee for the first calendar quarter (or part thereof) of this Agreement will be calculated on a prorated basis for the number of days remaining in the quarter and deducted from Client accounts following the end of the first quarter. If this Agreement is terminated, any Program Fees and Advisory Fees paid in advance will be refunded on a pro-rated basis.

For aggregated accounts ("Aggregation"), Client will pay an annual aggregation fee of 0.25% with a minimum annual charge of \$250. The Aggregation Fee is calculated by applying the annual Fee Schedule to the value of Client's Aggregation assets, determined quarterly and calculated based on the current market value as of the last day of the prior quarter. The Aggregation Fee will be debited from Client accounts on a quarterly basis in advance. Client shall provide necessary authorization to Advisor to access certain account information on Aggregation accounts that Client wishes to have included in certain reports prepared by Advisor for Client.

Fees are subject to change upon the Adviser giving the Client thirty days written notice in the manner prescribed in the Agreement. Client has the option of accepting the new fee schedule or terminating the Agreement pursuant to the termination provisions of the Agreement.

Clients after 01.01.2017 will pay a blended SFGI Advisory Fee as reflected below:

Assets Under Management	Annual Rate (%)
(\$ ) Up to \$1,000,000	0.90%*
\$1,000,001 to \$2,000,000	0.80%
\$2,000,001 to \$4,000,000	0.70%
\$4,000,001 to \$8,000,000	0.60%
\$8,000,001 to \$15,000,000	0.50%
\$15,000,001 to \$25,000,000	0.40%
Over \$25,000,000	0.30%

\*Subject to a minimum quarterly fee of \$2,000.

### **Financial Planning & Consulting Fees**

Schmidt Financial offers financial planning and consulting services on a fixed or hourly basis. Fixed fees range from a minimum of \$250 to \$20,000. The hourly fee is \$250 to \$500 per hour.

Fees are based on time, complexity, and the range of services provided. They are negotiable and will be agreed upon in advance. Hourly and in some cases fixed fees are payable upon completion and presentation of the plan or completion of the services. Under certain circumstances fixed fees are payable quarterly in advance.

If clients elect to implement recommendations their accounts may incur transaction costs, retirement plan administration fees, and other mutual fund annual expenses that are charged by broker-dealers, plan administrators or mutual fund companies that sell securities or provide additional services to Adviser clients. These fees are in addition to and separate from planning and consulting fees.

Clients will have a period of five (5) business days from the date of signing an agreement to unconditionally rescind the agreement and receive a full refund of all fees. Thereafter, either party may terminate the agreement with 30 days written notice.

Schmidt Financial will prorate fees to the date of termination. When fees are payable after services are provided, there are no unearned fees and the client will not have a refund due upon early termination of the advisory agreement. When fees are payable in advance, the unearned portion will be refunded upon early termination of the advisory agreement.

### **Receipt of Additional Compensation**

Neither the Adviser nor any supervised person is associated with any broker dealer or accepts 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**

Schmidt Financial does not charge or receive, directly or indirectly, any performance-based fees.

## **Item 7 – Types of Clients**

Schmidt Financial provides advisory services to:

- Individual – Trusts, estates, 401(k) plans and IRAs of a household count as one individual.
- High net worth individual – An individual who is a “qualified client” under rule 205-3 of the Advisers Act of 1940 or is a “qualified purchaser”.
- Business entities including sole proprietorships
- Pension and profit-sharing plans (other than plan participants)

### **Account Minimums**

Schmidt Financial requires a minimum of \$667,000 to establish and maintain an investment management relationship. However, the minimum may be waived at the sole discretion of the Adviser. In addition, the Adviser may continue to service existing accounts that have values that are below the minimum.

## **Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss**

### **Method of Analysis**

Schmidt Financial’s main sources of financial information are prospectuses, research materials prepared by others, corporate rating services, annual reports and company press releases.

Schmidt Financial may utilize official statements, continuing disclosures and other information available through the MSRB's Electronic Municipal Market Access system (EMMA) when analyzing municipal securities.

### *Fundamental Analysis*

Schmidt Financial uses fundamental analysis. Fundamental analysis involves predicting the price movement of an asset based on measures that are related to the underlying business. This method is used to judge the performance of management. (Although it is important to note that things outside of management's control can impact performance.) Comparing the margins of the company and its relative performance to that of two or three of its peers will give an idea of whether the performance is potentially outside of management's control.

### *Technical Analysis*

Schmidt Financial uses technical analysis. Technical analysis involves predicting the price movement of an asset based on factors unrelated to the underlying business (price, volume, and open interest, among other factors, to detect and interpret patterns to predict the movement of individual securities, an industry or the broad market).

Charting is a subsector of technical analysis and also focuses on predicting price movements of assets based on patterns that are formed by the price movements. Schmidt Financial may recommend one or a combination of assets and investment strategies as follows:

## **Mutual and Exchange Traded Funds**

Schmidt Financial recommends index and actively managed, mutual and exchange traded funds when designing client portfolios. Schmidt Financial considers index funds based on how closely the funds' characteristics mirror the indices they track.

SFGI analyzes actively managed funds by comparing funds that target the same market sector and have the same investment style using prospectuses and other sources of information. SFGI reviews the following prior to recommending funds to clients:

- Rank in Category over various periods
- Return Rating
- Risk Rating
- YTD Return (Outsize swings in comparisons to peers can be a sign of risky practices such as placing large bets on certain sectors of the market.)
- 1 Yr Return
- 3 Yr Return
- 5 Yr Return (Typically over a five-year period, the economy experiences a complete cycle. However, the way in which a manager operates in various economic environments reflects the manager's ability to make adjustments or stay the course.)
- Loads

- Total Expense Ratios
- Turnover
- Median Market Capitalization
- Morningstar Ratings

SFGI also takes the manager or management team tenure under consideration to determine who was responsible for generating the performance numbers.

### **Variable Annuities**

A variable annuity ("VA") is an insurance contract with an investment component. Investments are typically managed through pooled investment vehicles called subaccounts. Schmidt Financial analyzes VA contracts based on the contract and subaccount features. The criterion used to analyze subaccounts is similar to the processes used for mutual and exchange traded funds.

Variable annuities typically offer:

- Regular stream of income or a lump sum payout at a future time
- Tax-deferred treatment of earnings
- Death benefits

### **Variable Life Insurance**

Variable life insurance is an insurance policy that builds cash value by giving the owner the ability to invest the premiums. The owner also has flexibility in making premium payments due to changes in the cash value. The criterion used to analyze subaccounts is similar to the processes used for mutual and exchange traded funds.

### **Public Equity**

A corporation may issue stock to the general public after registration. Stock represents an ownership interest in a company. Schmidt Financial uses valuation measures and financial information, evaluates the regulatory environment, analyzes products or services that are available or under development and the factors that can impact them to predict the price movement of a company's stock. Schmidt Financial also makes comparisons to the company's peers and to the broader market.

### **Corporate Debt & Municipal Securities**

SFGI generally analyzes the current yield, yield to maturity, yield to call, call and default risks, and interest coverage. Debt is issued by federal, state and foreign governments and corporations to finance their operations. Debt represents their promise to repay the borrowed amount with interest according to the terms and conditions of the debt instrument. Debt obligations offer limited participation in the upside of a business. In exchange holders receive interest and a position that is generally senior to equity in a bankruptcy.

## **Private Securities**

Some securities are acquired in unregistered, private sales from the issuer or from an affiliate of the issuer typically through, Regulation D or other private placement offerings or employee stock benefit plans, as compensation for professional services, or in exchange for providing start-up capital. SFGI reviews the applicable offering documents. SFGI may analyze:

- Management structure
- Backgrounds of management personnel
- Management and director compensation
- Financial statements
- Regulatory environment
- Competitors
- Products and services differentiators
- Threats to a company's ability to execute its business plan

In the case of pooled investments Schmidt Financial may also analyze:

- Allocation of profits, losses and taxes
- Custody of securities and cash
- Lock-up period or any limitations towards the redemption of interest
- Exemptions from registration and types of investors
- Investment strategy, objective and the use of leverage
- Conflicts and potential conflicts of interest
- Performance information Gross or Net and how calculated
- Valuation particularly of illiquid securities and hard assets

## **Investment Strategies**

Schmidt Financial tailors its portfolio design and distribution strategies for each client based on their unique goals, risk tolerance and personal circumstances. Schmidt Financial does not use rigid model portfolios. SFGI meets with clients on a regular basis to ensure their plan continues to fit their evolving circumstances and risk parameters.

Schmidt Financial incorporates analysis and decision-making along a number of intertwined aspects of a client's financial life. Schmidt Financial broadens its focus beyond investment management to incorporate the distinct aspects of a client's financial plan into a coherent roadmap for reaching their personal and financial goals.

## **Risk of Loss**

Clients are advised that investing in securities involves the risk of loss of the entire principal amount invested including any gains. Clients should not invest unless they are able to bear this risk. Any of the above investment strategies may lead to a loss on investments.

Even hedging strategies may fail if markets move against the hedged investments. In addition, investing carries with it, opportunity risk. It is impossible to accurately predict the sectors of the market or asset classes that will have more favorable returns for a given period.

### **Item 8.A – Frequent Trading of Securities**

Schmidt Financial is not involved in the frequent trading of securities.

### **Item 8.B – Material Risks of Particular Securities**

Schmidt Financial doesn't recommend any type of security that involves significant or unusual risks except for the following which may present material risks to investors:

**Municipal securities** – Municipal securities are backed by either the full faith and credit of the issuer or by revenue generated by a specific project (like a toll road or parking garage) for which the securities were issued. The latter type of securities could quickly lose value or even become virtually worthless if the expected project revenue does not meet expectations.

**Variable annuities** – VAs may be subject to:

- Taxes and federal penalties for early withdrawal
- Surrender charges for early withdrawal can last for several years
- Earnings taxed at ordinary income tax rates
- Mortality expense to compensate the insurance company for insurance risks
- Fees and expenses imposed for the subaccounts
- Other features with additional fees and charges
- Investment losses

**Variable Life Insurance** – If the performances of the underlying investments are below expectations the death benefit and cash value may decrease. Maintaining the death benefit increases the cost of the policy.

**Partnership interests** (real estate, oil and gas interests) – Investment partnerships are typically composed of a limited number of partners and at least one general partner. The liability of the limited partners is restricted to the amount of each partner's investment. The liability of the general partner is theoretically unlimited and extends beyond the amount invested to personal or corporate assets. Because of this increased exposure, the general partner manages the partnership, makes the investment decisions and receives management fees and a higher portion of the return on partnership investments.

Because of the nature of the limited partnership structure partnership investments should be considered long term and illiquid. There are typically no secondary markets in which these types of investments trade. Therefore, if the value of the underlying assets should decline, the value of partnership shares would also decline and unlike other types of securities, an investor may find it hard to quickly sell shares in an illiquid market.

Clients should consult SFGI if they have questions concerning the basic characteristics of these or other investment products or about the risks and potential rewards of investing.

## **Item 9 – Disciplinary Information**

Schmidt Financial does not have any disciplinary information to disclose.

### **Item 9.A – Criminal or Civil Actions**

Neither Schmidt Financial nor any management person has been found guilty of or has any criminal or civil actions pending in a domestic, foreign or military court.

### **Item 9.B – Administrative Proceedings**

Neither Schmidt Financial nor any management person has any administrative proceedings pending before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.

### **Item 9.C – Self-Regulatory Organization (“SRO”) Proceedings**

Neither SFGI nor any management person have been found by any SRO to have caused an investment-related business to lose its authorization to do business, or to have been involved in violating the SRO’s rules, or were barred or suspended from membership or from associating with other members, or were expelled from membership, otherwise significantly limited from investment-related activities, or fined.

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

### **Item 10.A – Broker-Dealer Registration**

Neither the Adviser nor its management persons is or owns a securities broker-dealer or has an application for registration pending. No associated person of the Adviser is a registered representative of a broker-dealer.

### **Item 10.B – Futures Commission Merchant/Commodities**

Neither SFGI nor any management person is a commodity broker/futures commission merchant, a commodity pool operator or commodity trader, for the foregoing entities; nor do they have any registration applications pending.

### **Item 10.C – Relationships with Related Persons**

Related persons are insurance agents appointed with various insurance companies.

In such capacities, related persons may recommend insurance products and receive normal commissions and/or other compensation if products are purchased through any firms with which any related person is appointed.

NFP Corp. is the principal owner of Schmidt Financial. NFP Corp. is a provider of benefits, insurance, consulting and wealth management services ("NFP Affiliates"). Schmidt Financial does not conduct business with any NFP Affiliates. **Note:** A full list of NFP Affiliates is available upon request.

### **Conflicts of Interest**

A conflict of interest is created whenever associated persons of SFGI recommend products or services to a client for which the associated person receives compensation. However, clients are under no obligation to act upon any of their recommendations or acquire any insurance products through them if they decide to follow their recommendations.

### **Item 10.D – Relationships with Other Advisers**

Neither SFGI nor any of its management persons have any other material relationships or conflicts of interest with any related financial industry participants other than those discussed above.

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

### **Item 11.A – Code of Ethics**

Schmidt Financial has adopted a Code of Ethics that sets forth standards of conduct expected of advisory personnel and to address conflicts that arise from personal trading by advisory personnel. Advisory personnel are obligated to adhere to the Code of Ethics, and applicable securities and other laws.

The Code covers a range of topics that may include: general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code, review and enforcement processes, amendments to Form ADV and supervisory procedures. Schmidt Financial will provide a copy of the Code to any client or prospective client upon request.

### **Item 11.B – Participation or Interest in Client Transactions**

#### **Principal Trading**

Neither Schmidt Financial nor any affiliated broker-dealer affects securities transactions as principal with Schmidt Financial's clients.

## **Agency-Cross Action Transactions**

Neither Schmidt Financial nor any associated person recommends to clients, or buys or sells for client accounts securities in which Schmidt Financial or an associated person has a material financial interest.

Neither Schmidt Financial nor any associated person acting as a principal, buys securities from (or sells securities to) clients, acts as general partner in a partnership in which Adviser solicits client investments, or acts as an investment adviser to an investment company that Schmidt Financial recommends to clients.

## **Item 11.C – Personal Trading by Associated Persons**

Schmidt Financial recommends that clients invest in various types of assets. Schmidt Financial and its associated persons may invest in the same types of assets. Permitted investments for associated persons are all asset classes.

See Item 11.D for information concerning conflicts of interest.

## **Item 11.D – Conflicts of Interest with Personal Trading by Associated Persons**

Associated persons may own an interest in or buy or sell for their own accounts the same securities, which may be recommended to advisory clients. Associated persons seek to ensure that they do not personally benefit from the short-term market effects of their recommendations to clients and their personal transactions are regularly monitored.

Associated persons are aware of the rules regarding material non-public information and insider trading. Associated persons may also buy or sell a specific security for their own account based on personal investment considerations, which Schmidt Financial does not deem appropriate to buy or sell for clients.

## **Item 12 – Brokerage Practices**

### **Item 12.A – Factors in Selecting or Recommending Broker-Dealers**

SFGI designates a broker-dealer (“Broker”) to provide trade execution and custodial services. A Broker will also be appointed to serve as custodian of Program Assets. Services provided by a Broker in this capacity are provided pursuant to a separate agreement between a client and the Broker.

In selecting the Broker, SFGI may consider not only available prices and commission rates (including the fact that certain transactions effected through Broker are included in the Program Fee), but also other relevant factors such as execution capabilities, research and other services provided by the broker-dealer.

SFGI will have the authority to affect transactions for the Accounts with or through another broker-dealer or bank if SFGI believes that "best execution" of transactions may be obtained through such other broker-dealer or bank. Client agrees to furnish any such broker-dealer or bank such authorizations as any of them or SFGI may request to implement the agreed upon services.

The residual trail commissions that were generated by associated persons when they were registered representative of a broker dealer will be retained by the broker-dealer. The broker-dealer that retains the trail commissions will provide Schmidt Financial with a technology budget.

This arrangement doesn't impact any future transactions nor is it contingent on any trading activity. However, there is an incentive for SFGI to maintain a relationship with the broker-dealer for the duration of the arrangement. The technology budget is a benefit to SFGI. The Adviser's goal is to apply this benefit as an offset to the impact of clients being charged any trailing commissions by reducing or waiving mutual fund platform, custodial and investor portal fees. If the benefit was not provided, SFGI or clients would pay directly for the various services that are covered by the technology budget. All SFGI clients benefit from the services provided.

Schmidt Financial does not refer clients to particular broker-dealers in exchange for client referrals from those broker-dealers. Schmidt Financial does not recommend that clients direct their brokerage business to any particular broker-dealer.

### **Item 12.B – Trade Aggregation**

SFGI's investment strategies do not present an opportunity to aggregate trades.

### **Item 13 – Review of Accounts**

All accounts are subject to a regular and ongoing review in an active management style to assure conformity with client objectives and guidelines. Accounts are reviewed in light of emerging trends and developments as well as market volatility. In addition, a change in the client's investment objective or financial situation may trigger a review.

Clients receive reports showing holdings and performance, which are delivered to clients quarterly. Detailed reports, which may include realized gains/losses, interest and dividends earned are reported to clients no less than annually.

Clients receive confirmations of transactions and statements of positions from the account custodian, either via mail or secure online view, no less than quarterly. Client account status from custodian, including balances, holdings and transactions are available for online client view via secure connection.

Financial Planning client accounts are reviewed annually. Financial Planning clients receive a printed Financial Plan, representing Schmidt Financial's investment recommendations.

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

On occasion, SFGI may refer clients to other professionals for services that Schmidt Financial is unable to perform. In turn, SFGI may receive referrals from these firms.

Although there is no direct monetary benefit derived from these arrangements, they are mutually beneficial and provide an indirect benefit. Schmidt Financial will never base its referrals solely on any formal or informal arrangement.

## **Item 15 – Custody**

Schmidt Financial doesn't accept custody of client funds or securities. Client assets are held by qualified custodians.

## **Item 16 – Investment Discretion**

Schmidt Financial will have unlimited discretionary trading authority to select third party investment managers and execute securities transactions on behalf of Client without obtaining specific Client consent prior to each investment manager selection or each transaction.

SFGI will have discretion over the selection of the broker to be used but not the commission rates to be paid (refer to 12.A for additional information).

## **Item 17 – Voting Client Securities**

Schmidt Financial does not accept authority to vote proxies on behalf of clients as a matter of policy. Clients will receive their proxy information directly from their custodian or a transfer agent or from Schmidt Financial. Clients may contact Schmidt Financial with questions about a particular solicitation by telephone at (425) 893-9195.

## **Item 18 – Financial Information**

SFGI doesn't accept \$1,200 six months in advance of providing services or have custody so no audited balance sheet is being provided. There is no financial condition that is reasonably likely to impair the SFGI's ability to meet its contractual commitments to its clients.

## **PRIVACY PROMISE**

Your relationship with Schmidt Financial Group, Inc. is based on trust and confidence. To fulfill its responsibilities to you, Schmidt Financial Group, Inc. requires that you provide current and accurate financial and personal information. You deserve to expect Schmidt Financial Group, Inc. will protect the information you have provided in a manner that is safe, secure and professional. Schmidt Financial Group, Inc. and its employees are committed to protecting your privacy and to safeguarding that information.

### **Safeguarding Customer Documents**

During regular business hours access to customer records is monitored so that only those with approval may access the files. During hours in which the company is not in operation, the customer records will be locked.

No individual who is not so authorized shall obtain or seek to obtain personal and financial customer information. No individual with authorization to access personal and financial customer information shall share that information in any manner without the specific consent of a firm principal.

Failure to observe Schmidt Financial Group, Inc., procedures regarding customer and consumer privacy will result in discipline and may lead to termination.

### **Sharing Nonpublic Personal and Financial Information**

Schmidt Financial Group, Inc. is committed to the protection and privacy of its customers' and consumers' personal and financial information. Schmidt Financial Group, Inc. will not share such information with any nonaffiliated third party except:

- When necessary to complete a transaction in the account, such as with clearing firms, account custodians or portfolio managers
- When required to maintain or service the account
- To resolve customer disputes
- When requested by a fiduciary or beneficiary on the account
- To the client's attorneys or accountants,
- When required by a regulatory agency, or for other reasons required or permitted by law
- In connection with a reorganization of Schmidt Financial Group, Inc.'s business.
- In any circumstance that has the customer's instruction or consent.

### **Opt-Out Provisions**

It is not a policy of Schmidt Financial Group, Inc. to share nonpublic personal and financial information with unaffiliated third parties except under the circumstances noted above. Since sharing under the circumstances noted is necessary to service the client account or mandated by competent authority, there are no allowances made for clients to opt-out.