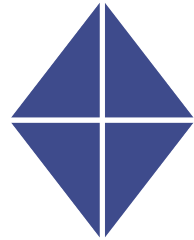


Item 1 Cover Page

**DISCLOSURE BROCHURE**  
FORM ADV PART 2A

**SHARPER IMAGE**  
FINANCIAL SERVICES, LLC



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07/31/2025

This brochure provides information about the qualifications and business practices of Sharper Image Financial Services, LLC. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at (720) 223-0900. 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 SHARPER IMAGE FINANCIAL SERVICES, LLC  
(CRD #330048) IS AVAILABLE ON THE SEC'S WEBSITE AT  
[WWW.ADVISERINFO.SEC.GOV](http://WWW.ADVISERINFO.SEC.GOV)**

## **Item 2: Material Changes**

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### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

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### **Material Changes since the Last Update**

Since the last filing of this brochure on April 22, 2025, the following changes have been made:

- The firm's phone number has been updated.
  - Item 4 has been updated with the firm's most recent assets under management calculation.
- 

### **Full Brochure Available**

This Firm Brochure being delivered is the complete brochure for the Firm.

## Item 3: Table of Contents

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## Item 4: Advisory Business

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### Firm Description

Sharper Image Financial Services, LLC ("SIFS") is a Limited Liability Company organized in the State of Colorado. The firm was formed in January 2024. Jarrett Sharp is 100% owner. SIFS, its representatives or any of its employees will disclose to Clients all material conflicts of interest.

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### Types of Advisory Services

#### ASSET MANAGEMENT

SIFS offers discretionary asset management services to advisory Clients. SIFS 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. The Client will authorize SIFS discretionary authority to execute selected investment program transactions as stated within the Investment Management Agreement.

#### FINANCIAL PLANNING AND CONSULTING

SIFS offers the following financial planning and consulting services as outlined below:

##### *Comprehensive Financial Plan*

Financial planning services include a complete evaluation of an investor's current and future financial state and will be provided by using currently known variables to predict future cash flows, asset values and withdrawal plans. SIFS will use current net worth, tax liabilities, asset allocation, and future retirement and estate plans in developing financial plans.

Typical topics reviewed in a financial plan may include but are not limited to:

- **Financial goals:** Based on an individual's or a family's clearly defined financial goals, including funding a college education for the children, buying a larger home, starting a business, retiring on time or leaving a legacy. Financial goals should be quantified and set to milestones for tracking.
- **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.
- **Comprehensive risk management plan:** Identify all risk exposures and provide the necessary coverage to protect the family and its assets against financial loss. The risk management plan includes a full review of life and disability insurance, personal liability coverage, property and casualty coverage, and catastrophic coverage.
- **Long-term investment plan:** Include a customized asset allocation strategy based on specific investment objectives and a risk profile. This investment plan sets guidelines for selecting, buying and selling investments and establishing benchmarks for performance review.

- **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.

#### *Project-Based Services*

This service is appropriate for clients who need assistance with individual topics. This is not a detailed financial review and will not provide/result in a complete financial plan. Client may select individual topics above, or other topics as may be deemed appropriate. The individual topics that will be included in this service will be outlined and agreed upon on the financial planning and consulting agreement.

#### *Investment Consulting*

This service is appropriate for clients who need assistance with allocating assets that are held at alternative custodians where SIFS does not have access to trade in accounts or bill advisory fees. SIFS will review clients investment options and provide recommendations to the Client, but implementation will be at the sole discretion of the Client.

If a conflict of interest exists between the interests of SIFS and the interests of the Client, the Client is under no obligation to act upon SIFS's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through SIFS. Financial plans will be completed and delivered inside of six (6) months contingent upon timely delivery of all required documentation.

#### *Ongoing Financial Planning Services*

Clients that participate in on-going financial planning services can expect the following:

- An initial financial plan.
- At least two meetings per year to update the plan with new facts and changes.
- Presentation and delivery of any changes and new proposals or recommendations due to changes.
- Communication with tax advisors and attorneys, as applicable for incorporating any tax or estate planning changes.
- Initial recommendations are completed and delivered within six (6) months, contingent upon timely delivery of all required documentation.

If a conflict of interest exists between the interests of SIFSSIFS and the interests of the Client, the Client is under no obligation to act upon SIFS' recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through SIFS. Initial financial plans will be completed and delivered inside of six (6) months contingent upon timely delivery of all required documentation.

## SEMINARS AND WORKSHOPS

SIFS holds seminars and workshops to educate the public on different types of investments and the different services they offer. The seminars are educational in nature and no specific investment or tax advice is given.

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

The goals and objectives for each Client are documented in our 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.

Agreements may not be assigned without written Client consent.

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### **Wrap Fee Programs**

SIFS does not sponsor any wrap fee programs.

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### **Client Assets Under Management**

SIFS has the following Client assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$1,305,105	\$0	July 29, 2025

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

### **Method of Compensation and Fee Schedule**

#### ASSET MANAGEMENT

SIFS offers discretionary direct asset management services to advisory Clients. SIFS charges an annual investment advisory fee based on the total assets under management of 1.5%.

The annual fee is negotiable 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.). Fees are billed quarterly in arrears based on the amount of assets managed as of the close of business on the last business day of the previous quarter. If margin is utilized, the fees will be billed based on the gross asset value of the account.

Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Management Agreement with no obligation and without penalty. After the initial five (5) business days, the agreement may be terminated by SIFS with thirty (30) days written notice to Client and by the Client at any time with written notice to SIFS. If cash and/or securities are deposited into or withdrawn from an existing account mid-billing period a prorated fee will be charged for that portion of the account. For accounts opened or closed mid-billing period, fees will be prorated based on the days services are provided during the given period. All unpaid earned fees will be due to SIFS. Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.



## FINANCIAL PLANNING AND CONSULTING

### *Comprehensive Financial Plan, Project Based Services, and Investment Consulting*

SIFS charges a fixed fee of up to \$25,000 based on complexity and unique Client needs for financial planning. Prior to the planning process the Client will be provided an estimated plan fee.

Fees for financial plans are due in arrears. Client can elect to be billed monthly, quarterly or 100% at delivery. Client will select and agree to billing frequency in the financial planning agreement.

Services are completed and delivered inside of six (6) months contingent upon timely delivery of all required documentation. Client may cancel within five (5) business days of signing Agreement with no obligation and without penalty. If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to SIFS. Refunds will be prorated based on the actual service dates during the billing period. Refunds will be sent via paper check and regular mail to the address we have on file for the client. Actual annual fees are calculated by dividing the annual fee by 12 and multiplying it by the actual number of months service was provided - should the termination date fall in the middle of a month, the prorated month is calculated by dividing the number of days serviced by the total number of days in that month, and is then added to the number of full months. The refund is then calculated by subtracting the amount of service used from the amount paid.

### *Ongoing Financial Planning Services*

SIFS charges a fixed fee of up to \$25,000 based on complexity and unique Client needs for ongoing financial planning services. Prior to the planning process the Client will be provided an estimated plan fee.

Fees for ongoing financial planning services are due in advance. Client can elect to be billed monthly or quarterly. Client will select and agree to billing frequency in the ongoing financial planning agreement.

The initial financial plan is delivered inside of six (6) months contingent upon timely delivery of all required documentation. Client may cancel within five (5) business days of signing Agreement with no obligation and without penalty. If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to SIFS. Refunds will be prorated based on the actual service dates during the billing period. Refunds will be sent via paper check and regular mail to the address we have on file for the client. Actual annual fees are calculated by dividing the annual fee by 12 and multiplying it by the actual number of months service was provided - should the termination date fall in the middle of a month, the prorated month is calculated by dividing the number of days serviced by the total number of days in that month, and is then added to the number of full months. The refund is then calculated by subtracting the amount of service used from the amount paid. Ongoing services will continue from year to year unless cancelled by either party.

## SEMINARS AND WORKSHOPS

SIFS holds seminars and workshops to educate the public on different types of investments and the different services they offer. The seminars are educational in nature and no specific investment or tax advice is given.

SIFS offers these seminars for a fee of up to \$25 per person. Fees will be due within 15 days after completion of the workshop/seminar.

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### **Client Payment of Fees**

Fees for asset management services are:

- Deducted from a designated Client account. The Client must consent in advance to direct debiting of their investment account.
- Check – to be remitted by Client to SIFS
- Deducted from a non-qualified account managed by SIFS
- Electronic Payment via ACH, Debit Card, or Credit Card (fees will be paid via a third-party payment processor in which the client will securely input payment information and pay the advisory fee through a secure portal. SIFS will not have continuous access to the Client's banking information.)

Fees for financial plans will be billed:

- Check – to be remitted by Client to SIFS
  - Deducted from a non-qualified account managed by SIFS
  - Electronic Payment via ACH, Debit Card, or Credit Card (fees will be paid via a third-party payment processor in which the client will securely input payment information and pay the advisory fee through a secure portal. SIFS will not have continuous access to the Client's banking information.)
- 

### **Additional Client Fees Charged**

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

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### **Prepayment of Client Fees**

SIFS does not require any prepayment of fees of more than \$500 per Client and six months or more in advance.

Fees for ongoing financial planning services are billed monthly or quarterly in advance.

If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to SIFS.

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

SIFS does not receive any external compensation for the sale of securities to Clients, nor do any of the investment advisor representatives of SIFS.

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

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### **Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

SIFS does not use a performance-based fee structure because of the conflict of interest. Performance based compensation may create an incentive for SIFS to recommend an investment that may carry a higher degree of risk to the Client.

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

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### **Description**

SIFS generally provides investment advice to individuals. Client relationships vary in scope and length of service.

### **Account Minimums**

SIFS does not require a minimum to open or maintain an account.

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

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### **Methods of Analysis**

Security analysis methods may include Charting analysis, Cyclical analysis, Fundamental analysis, Modern portfolio theory, Quantitative analysis and Technical analysis. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

**Charting analysis** involves the use of patterns in performance charts. SIFS uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security. Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

**Cyclical analysis** involves the analysis of business cycles to find favorable conditions for buying and/or selling a security. Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages. Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**Modern portfolio theory** is a theory of investment that attempts to maximize portfolio expected return 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. Modern portfolio theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

**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. Quantitative analysis Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

**Technical analysis** involves the analysis of past market data; primarily price and volume. Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

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### **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 SIFS. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, and option writing (including covered options).

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### **Security Specific Material Risks**

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with SIFS:

- *Market Risk:* The prices of securities in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.

- *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.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *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.
- *Equity Risk:* Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.
- *Fixed Income Risk:* The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- *Investment Companies Risk:* When a client invests in open end mutual funds or ETFs, the client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value or (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or

the activation of market-wide “circuit breakers” (which are tied to large decreases in stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which client invests.

- *Cash and Cash Equivalents Risk:* Cash and cash equivalents consist of investments like money market funds, certificates of deposit (CDs), Treasury bills, and short-term government bonds. They are generally considered low-risk compared to other asset classes. While they offer safety, liquidity, and stability, they come with certain risks, such as inflation, interest rate fluctuations, and opportunity costs.
- *Derivatives Risk:* Funds in a client’s portfolio may use derivative instruments. The value of these derivative instruments derives from the value of an underlying asset, currency or index. Investments by a fund in such underlying funds may involve the risk that the value of the underlying fund’s derivatives may rise or fall more rapidly than other investments, and the risk that an underlying fund may lose more than the amount that it invested in the derivative instrument in the first place. Derivative instruments also involve the risk that other parties to the derivative contract may fail to meet their obligations, which could cause losses.
- *Foreign Securities Risk:* Funds in which clients invest may invest in foreign securities. Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks may include, among others, currency risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government supervision, less publicly available information, limited trading markets and greater volatility. To the extent that underlying funds invest in issuers located in emerging markets, the risk may be heightened by political changes, changes in taxation, or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.
- *Long-term purchases:* Long-term investments are those vehicles purchased with the intention of being held for more than one year. Typically, the expectation of the investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.
- *Short-term purchases:* Short-term investments are typically held for one year or less. Generally, there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk — the risk that your investment’s return will not keep up with inflation.
- *Trading risk:* Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.
- *Options Trading:* The risks involved with trading options are that they are very time sensitive investments. An options contract is generally a few months. Clients should be aware that the use of options involves additional risks. The risks of covered call writing

include the potential for the market to rise sharply. In such case, the security may be called away and the account will no longer hold the security. When purchasing options there is the risk that the entire premium paid for the option can be lost if the option is not exercised or otherwise sold prior to the option's expiration date.

- *Trading on Margin:* In a cash account, the risk is limited to the amount of money that has been invested. In a margin account, risk includes the amount of money invested plus the amount that has been loaned. As market conditions fluctuate, the value of marginable securities will also fluctuate, causing a change in the overall account balance and debt ratio. As a result, if the value of the securities held in a margin account depreciates, the client will be required to deposit additional cash or make full payment of the margin loan to bring account back up to maintenance levels. Clients who cannot comply with such a margin call may be sold out or bought in by the brokerage firm.
- *Structured Notes Risk:* The risks involved with using structured notes are credit risk of the issuing investment bank, illiquidity, and there is a risk to the pricing accuracy as most structured notes do not trade after issuance.
- *Foreign Investment Risk:* Investments in foreign securities may be riskier than U.S. investments because of factors such as, unstable international, political and economic conditions, currency fluctuations, foreign controls on investment and currency exchange, foreign governmental control of some issuers, potential confiscatory taxation or nationalization of companies by foreign governments, withholding taxes, a lack of adequate company information, less liquid and more volatile exchanges and/or markets, ineffective or detrimental government regulation, varying accounting standards, political or economic factors that may severely limit business activities, and legal systems or market practices that may permit inequitable treatment of minority and/or non-domestic investors. Investments in emerging markets may involve these and other significant risks such as less mature economic structures and less developed and more thinly-traded securities markets.

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## **Item 9: Disciplinary Information**

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### **Criminal or Civil Actions**

SIFS and its management have not been involved in any criminal or civil action.

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### **Administrative Enforcement Proceedings**

SIFS and its management have not been involved in administrative enforcement proceedings.

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### **Self-Regulatory Organization Enforcement Proceedings**

SIFS and its management have not been involved in any self-regulatory organizational enforcement proceedings that are material to a Client's or prospective Client's evaluation of SIFS or the integrity of its management.

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

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

SIFS is not registered as a broker-dealer and no affiliated representatives of SIFS are registered representatives of a broker-dealer.

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**Futures or Commodity Registration**

Neither SIFS nor its affiliated representatives are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

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**Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

Neither SIFS nor any of its management persons have an arrangement with any related persons, such as, broker-dealer, municipal securities dealer, or government securities dealer or broker, 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), other investment adviser or financial planner, futures commission merchant, commodity pool operator, or commodity trading advisor, banking or thrift institution, accountant or accounting firm, lawyer or law firm, insurance company or agency, pension consultant, real estate broker or dealer, and/or sponsor or syndicator of limited partnerships.

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**Recommendations or Selections of Other Investment Advisors and Conflicts of Interest**

SIFS does not select or recommend other investment advisors.

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

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**Code of Ethics Description**

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

One area which the Code addresses is when affiliated 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 affiliated 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.

SIFS's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other affiliated person, officer or director of SIFS 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.

SIFS's Code is based on the guiding principle that the interests of the Client are our top priority. SIFS's officers, directors, advisors, and other affiliated 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 affiliated persons or the company.

The Code applies to "access" persons. "Access" persons are affiliated 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.

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

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**Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

SIFS and its affiliated persons do not recommend to Clients securities in which we have a material financial interest.

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

SIFS and its affiliated persons may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as trading ahead of Client transactions, affiliated persons are required to disclose all reportable securities transactions as well as provide SIFS with copies of their brokerage statements.

The Chief Compliance Officer of SIFS is Jarrett Sharp. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

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

SIFS does not have a material financial interest in any securities being recommended. However, affiliated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest such as front running, affiliated persons are required to disclose all reportable securities transactions as well as provide SIFS with copies of their brokerage statements.

The Chief Compliance Officer of SIFS is Jarrett Sharp. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

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**Item 12: Brokerage Practices**

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**Factors Used to Select Broker-Dealers for Client Transactions**

SIFS will require the use of a particular broker-dealer based on their duty to seek best execution for the client, meaning they have an obligation to obtain the most favorable terms for a client under the circumstances. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is affected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. SIFS will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. SIFS relies on its broker 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 SIFS. SIFS does not receive any portion of the trading fees.

SIFS will require the use of Charles Schwab & Co., Inc.

- *Research and Other Soft Dollar Benefits*

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by SIFS from or through a broker-dealer in exchange for directing Client transactions to the broker-dealer. Although SIFS has no formal soft dollar arrangements, SIFS may receive products, research and/or other services from custodians or broker-dealers connected to client transactions or “soft dollar benefits”. As permitted by Section 28(e) of the Securities Exchange Act of 1934, SIFS receives economic benefits as a result of commissions generated from securities transactions by the custodian or broker-dealer from the accounts of SIFS. SIFS cannot ensure that a particular client will benefit from soft dollars or the client's transactions paid for the soft dollar benefits. SIFS does not seek to proportionately allocate benefits to client accounts to any soft dollar benefits generated by the accounts.

A conflict of interest exists when SIFS receives soft dollars which could result in higher commissions charged to Clients. This conflict is mitigated by the fact that SIFS has a fiduciary responsibility to act in the best interest of its Clients and the services received are beneficial to all Clients.

- *Brokerage for Client Referrals*

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

- *Directed Brokerage*

SIFS does not allow directed brokerage accounts. Not all advisors require their clients to direct brokerage.

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### **Aggregating Securities Transactions for Client Accounts**

SIFS is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of SIFS. All Clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis. If aggregation is not allowed or infeasible and individual transactions occur (e.g., withdrawal or liquidation requests, odd-lot trades, etc.) an account may potentially be assessed higher costs or less favorable prices than those where aggregation has occurred.

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## **Item 13: Review of Accounts**

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### **Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved**

Account reviews are performed quarterly by the Chief Compliance Officer of SIFS, Jarrett Sharp. Account reviews are performed more frequently when market conditions dictate. Reviews of Client accounts include, but are not limited to, a review of Client documented risk tolerance, adherence to account objectives, investment time horizon, and suitability

criteria, reviewing target allocations of each asset class to identify if there is an opportunity for rebalancing, and reviewing accounts for tax loss harvesting opportunities.

Comprehensive Financial Plans, Project Based Services, and Investment Consulting services are updated as requested by the Client and pursuant to a new or amended agreement, SIFS suggests updating at least annually.

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**Review of Client Accounts on Non-Periodic Basis**

Other conditions that may trigger a review of Clients' accounts are changes in the tax laws, new investment information, and changes in a Client's own situation.

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**Content of Client Provided Reports and Frequency**

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by SIFS's custodian. Client receives confirmations of each transaction in account from custodian and an additional statement during any month in which a transaction occurs. SIFS does not provide additional reports to Clients.

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

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**Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest**

SIFS receives additional economic benefits from external sources as described above in Item 12.

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**Advisory Firm Payments for Client Referrals**

SIFS may enter into agreements with individuals and organizations, which may be affiliated or unaffiliated with SIFS, that refer Clients to SIFS in exchange for compensation. All such agreements will be in writing and comply with the requirements of Federal or State regulation. If a Client is introduced to SIFS by a referring party, SIFS may pay that referring party a fee. While the specific terms of each agreement may differ, generally, the compensation will be based upon SIFS's engagement of new Clients and is calculated using a varying percentage of the fees paid to SIFS by such Clients. Any such fee shall be paid solely from SIFS's investment management fee, and shall not result in any additional charge to the Client.

Each prospective Client who is referred to SIFS under such an arrangement will receive a copy of this brochure and a separate written disclosure document disclosing the nature of the relationship between the referring party and SIFS and the amount of compensation that will be paid by SIFS to the referring party. The referring party is required to obtain the Client's signature acknowledging receipt of SIFS's disclosure brochure and the written disclosure statement. In the State of California, any compensated person and/or firm must be properly registered as a Solicitor pursuant to California Code of Regulation, Section 260.236(c)(2) and Section 260.236.1.

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**Item 15: Custody**

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**Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. Clients are urged to carefully compare the account statements received directly from their custodians to any documentation or reports prepared by SIFS.

SIFS is deemed to have limited custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of SIFS.

If SIFS is authorized or permitted to deduct fees directly from the account by the custodian:

- SIFS will provide the Client with an invoice concurrent to instructing the custodian to deduct the fee stating the amount of the fee, the formula used to calculate the fee, the amount of assets under management the fee is based on and the time period covered by the fee;
- SIFS will obtain written authorization signed by the Client allowing the fees to be deducted; and
- The Client will receive quarterly statements directly from the custodian which disclose the fees deducted.

## **Item 16: Investment Discretion**

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### **Discretionary Authority for Trading**

SIFS requires discretionary authority to manage securities accounts on behalf of Clients. SIFS has the authority 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 SIFS discretionary authority as stated within the Investment Management Agreement.

SIFS allows Clients to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. These restrictions must be provided to SIFS in writing.

The Client approves the custodian to be used. SIFS does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

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

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### **Proxy Votes**

SIFS does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, SIFS will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client. If the Client requires assistance or has questions, they can reach out to the investment advisor representatives of the firm at the contact information on the cover page of this document.

## **Item 18: Financial Information**

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### **Balance Sheet**

A balance sheet is not required to be provided to Clients because SIFS does not serve as a custodian for Client funds or securities and SIFS does not require prepayment of fees of more than \$500 per Client and six months or more in advance.

### **Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients**

SIFS has no condition that is reasonably likely to impair our ability to meet contractual

commitments to our Clients.

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**Bankruptcy Petitions during the Past Ten Years**

SIFS has not had any bankruptcy petitions in the last ten years.

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**Item 19: Requirements for State Registered Advisors**

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**Principal Executive Officers and Management Persons**

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

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**Outside Business Activities**

The outside business activities for all executive officers and management persons can be found in the Part 2B of this Brochure.

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**Performance Based Fee Description**

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

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

Neither SIFS, nor its management, have been involved in any of the following:

1. An award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500 involving any of the following:
  - i. An investment or an investment-related business or activity;
  - ii. Fraud, false statement(s) or omissions;
  - iii. Theft, embezzlement or other wrongful taking of property;
  - iv. Bribery, forgery, counterfeiting, or extortion;
  - v. Dishonest, unfair or unethical practices.
2. An award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
  - i. An investment or an investment-related business or activity;
  - ii. Fraud, false statement(s) or omissions;
  - iii. Theft, embezzlement or other wrongful taking of property;
  - iv. Bribery, forgery, counterfeiting, or extortion;
  - v. Dishonest, unfair or unethical practices.

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**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.