

# PART 2A OF FORM ADV: FIRM *BROCHURE*

ITEM 1 - COVER PAGE



## S. Harris Financial Group

S. Harris Financial Group, LLC  
4456 Lockhill Selma Rd, Ste. 101  
San Antonio, TX 78249

**Phone:** 210-547-3450

**Fax:** 210-547-3451

**Website:** [www.sharrisfinancial.com](http://www.sharrisfinancial.com)

March 27, 2024

This brochure provides information about the qualifications and business practices of S. Harris Financial Group, LLC. If you have any questions about the contents of this brochure, please contact us at 210-547-3450 and/or [Stephanie@SHarrisFinancial.com](mailto:Stephanie@SHarrisFinancial.com) or [Scott@SHarrisFinancial.com](mailto:Scott@SHarrisFinancial.com). 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 S. Harris Financial Group, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## ITEM 2 - MATERIAL CHANGES

This section describes the material changes to S. Harris Financial Group, LLC's Part 2A of Form ADV ("Firm Brochure") since its last update on June 2023.

- **Update - Requirements for State-Registered Advisers (Page 28)**
  - Added Samuel J Haager

**Item 3 - Table of contents****TABLE OF CONTENTS**

<b>Item 1 - Cover Page</b> .....	1
<b>Item 2 - Material Changes</b> .....	2
<b>Item 4 - Advisory Business</b> .....	4
Introduction .....	4
Financial Planning Services And Consulting Services.....	4
Investment Management Services .....	7
<b>PRIVACY POLICY</b> .....	7
<b>Item 5 - Fees and Compensation</b> .....	9
INVESTMENT ADVISORY SERVICES FEES.....	9
Financial Planning and consulting Services.....	9
Investment Management Services .....	10
<b>Item 6 - Performance-Based Fees and Side-By-Side Management</b> .....	13
<b>Item 7 - Types of Clients</b> .....	14
<b>Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss</b> .....	15
Methods of Analysis.....	15
Investment Strategies .....	15
<b>Item 9 - Disciplinary Information</b> .....	16
<b>Item 10 - Other Financial Industry Activities and Affiliations</b> .....	17
Investment management Services.....	17
Securities Brokerage .....	17
Insurance Broker/Agent.....	17
Certified Divorce Financial Analyst (CDFA®) .....	17
<b>Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</b> .....	18
<b>Item 12 - Brokerage Practices</b> .....	19
<b>Item 13 - Review of Accounts</b> .....	20
<b>Item 14 - Client Referrals and Other Compensation</b> .....	21
<b>Item 15 - Custody</b> .....	22
<b>Item 16 - Investment Discretion</b> .....	23
<b>Item 17 - Voting Client Securities</b> .....	24
<b>Item 18 - Financial Information</b> .....	25
<b>Item 19 - Requirements for State-Registered Advisers</b> .....	26

## ITEM 4 - ADVISORY BUSINESS

### INTRODUCTION

S. Harris Financial Group, LLC (“SHFG or Firm”), owned by Stephanie Harris and Gary Scott Harris, is an Independent Registered Investment Advisor specializing in personalized strategies for Clients. SHFG’s areas of expertise include retirement, estate and tax planning, wealth and portfolio management, small business retirement plans, education funding, and charitable giving. The team of SHFG is dedicated to clarifying the investment process, so Clients will comprehend their own wealth management and become a partner in the financial planning experience. Presently, SHFG focuses on providing services mainly to the following types of Clients:

- Individuals and Families
- Pension and profit-sharing plans
- Trusts
- Estates
- Charitable organizations
- Corporations or other business entities not listed in the above

SHFG typically offers investment advice on the following types of investments through S Harris Financial Group (Investment Management/Advisory services are performed through Raymond James Financial Services Advisors, Inc., a SEC-registered investment adviser):

- Equity securities (exchange listed, over-the-counter, and foreign issuers)
- Corporate debt securities (other than commercial paper)
- Certificates of deposits
- Municipal securities
- Investment company securities (variable life insurance, variable annuities, and mutual fund shares)
- U.S. government securities
- Options contracts on securities
- Interests in partnerships investing in real estate and oil and gas

Advice is tailored to individual Client’s needs through interviews with Clients, the collection of important information, and detailed financial planning, as applicable. Clients may be able to impose reasonable restrictions on their accounts. Reasonable restrictions may include the designation of particular securities or types of securities that should not be purchased in their account (i.e. Company XYZ or companies involved in a particular industry, etc.), or should be sold if held in their account(s). However, in some cases, since investment discretion could be delegated to a third-party manager, that manager may determine that the implementation of such a restriction may be impractical. In the event that happens, the Client will be notified promptly.

SHFG offers Financial Planning Services and Investment Advice, as described below. Investment Management Services are provided through Raymond James Financial Services Advisors, Inc.

---

### FINANCIAL PLANNING SERVICES AND CONSULTING SERVICES

SHFG’s approach to personal financial planning is to obtain from the Client significant and material financial and other information including the Client’s attitudes, goals, objectives, time horizon, and risk tolerance and to:

- analyze all the foregoing information in an objective manner,
- develop alternatives for the Client’s consideration,
- educate the Client about the implications of selecting a particular alternative,
- implement the alternative selected by the Client, and
- periodically update the plan adopted.

SHFG's goal is to become the Client's chief financial advisor and to coordinate the efforts of the Client's other advisors in the Client's best interest. SHFG would like to partner with the Client by taking an active role in the management of their financial affairs.

SHFG engages in various forms consultative services for a fee. Financial planning and consulting will typically involve providing a variety of services, principally advisory in nature, to Clients regarding the management of their financial or other resources based upon an analysis of their individual needs. An Investment Adviser Representative ("IAR") of SHFG will first conduct an initial consultation. After the initial consultation, if the Client decides to engage SHFG for financial planning or other services, an IAR will conduct follow-up meetings as necessary, during which important information about the Client's circumstances and objectives is collected. Once such information has been reviewed and analyzed, a plan, financial or other – designed to help the Client achieve their stated goals and objectives – will be produced and presented to the Client.

Financial plan reviews are at the client's option if they elect this engagement. Financial maintenance service may be done on a continuous or periodic basis based upon the client's need and/or updated information provided by the client.

#### **ON-GOING BROAD-BASED FINANCIAL PLANNING SERVICE**

A Broad-Based Financial Plan will be created and customized to address any or all of the following areas:

- cash flow management,
- debt management,
- summary of net worth,
- retirement projections,
- risk tolerance review and asset allocation,
- insurance review,
- tax and estate planning, and
- education planning.
- Certified Divorce Financial Analysis

A summary of the plan will be presented to the client. The plan will be continually updated, modified and maintained. The Advisor will meet with the client in an on-going basis focusing on different aspects of the plan per the action plan created.

#### **ONE-TIME BROAD-BASED FINANCIAL PLANS**

A Broad-Based Financial Plan will be created and customized to address any or all of the following areas:

- cash flow management,
- debt management,
- summary of net worth,
- retirement projections,
- risk tolerance review and asset allocation,
- insurance review,
- tax and estate planning, and
- education planning.
- Certified Divorce Financial Analysis

A summary of findings and recommendations will be created and presented to the Client at the conclusion of the engagement.

### **SPECIFIC FINANCIAL PLANNING**

A Specific Financial Plan will be created and customized regarding specific areas of a financial plan and may address any of the following areas:

- cash flow management,
- debt management,
- summary of net worth,
- retirement projections,
- risk tolerance review and asset allocation,
- insurance review,
- tax and estate planning, and
- education planning.
- Certified Divorce Financial Analysis

A summary of findings and recommendations will be created for the Client.

### **HOURLY FINANCIAL CONSULTING**

Hourly financial consulting covers a broad base of consulting services which may include financial issues involving individual, family or business-related topics. This may or may not include specific recommendations. Specific recommendations will be documented and presented to the client.

### **INDIVIDUAL RETIREMENT PLAN CONSULTING SERVICES**

We offer retirement plan services on a non-discretionary basis with a focus on education and communications to plan participants of plan sponsors and/or plan trustees. Typically, services involve advice and/or recommendations of investments available in the participant's plan, such as fund selection, investment options, and educational seminars.

SHFG offers Consulting and Investment Advice for qualified retirement plans in alignment with Employee Retirement Income Security Act (ERISA) section 3-38.

### **CERTIFIED DIVORCE FINANCIAL ANALYSIS**

SHFG has financial professional(s) who specialize and are skilled at analyzing data and providing expertise on the financial issues of divorce. The firm's role as a CDFA® (Certified Divorce Financial Analyst®) professional is to assist the client and his or her attorney to understand how the decisions he or she makes today will impact the client's financial future. The CDFA® role can take on many roles in the divorce process:

#### **FINANCIAL EXPERTISE AND STRATEGY**

CDFA® professionals provide the client and attorney with data analysis that shows the financial effect of any given settlement. SHFG can become part of the divorce team and provide support on financial issues such as:

- Understanding the short-term and long-term effects of dividing property.
- Analyzing pensions and retirement plans.
- Determining if the client can afford the marital home, and if not, what he or she can afford.
- Recognizing the tax consequences of different settlement proposals.

#### **DATA COLLECTION AND ANALYSIS**

Much of the role is to collect the client's financial data and perform analysis. As a CDFA, the firm can help manage a client's expectations of their financial future by presenting different scenarios and talking through the client's budget and expenses. Our team is trained to:

- Collect financial and expense data.
- Help clients identify their future financial goals.
- Develop a budget.
- Set retirement objectives.
- Determine how much risk they are willing to take with their investments.
- Identify what kind of lifestyle they want.

### **LITIGATION SUPPORT**

In some cases, SHFG professionals will provide mediation and/or litigation support on an hourly basis.

---

### **INVESTMENT MANAGEMENT SERVICES**

IARs of SHFG offers securities through Raymond James Financial Services, Inc. Member [FINRA/SIPC](#). S. Harris Financial Group, LLC is not a registered broker/dealer and is independent of Raymond James Financial Services, Inc. (“RJFS”). Investment advisory services offered through Raymond James Financial Service Advisors, Inc. (RJFSA), a SEC registered investment advisor.

IARs of SHFG, under RJFSA, provides the following investment management solutions program(s):

### **INVESTMENT SOLUTIONS**

S. Harris Financial Group IARs implements our investment process through the use of a variety of tools depending multiple factors to include, but not limited to client objectives, risk tolerance, time horizon, tax situation and investment experience. We believe a fully integrated plan of investments, built on each client’s circumstances, stage in life and goals is the most appropriate way to reach the optimal investment solution.

### **PORTFOLIO CONSTRUCTION PROCESS**

By understanding each client’s goals and tolerance for financial risk, S. Harris Financial Group IARs are able to design an optimal portfolio. It is common to find new clients that are taking on considerably more risk than they are comfortable with; or, not taking enough risk for their long-term goals, because there is no a clear understanding of the need for this risk. SHFG IARs builds a portfolio depending on the client’s situation and needs, to provide diversification and seek to reduce their overall risk to the market. The firm then monitors the accounts to ensure they are providing the expected results, and ensure the projections are adjusted as needed.

### **PROFESSIONAL ASSET MANAGEMENT**

Raymond James enables the advisors at S. Harris Financial Group to provide professional asset management, with one of the widest platforms of mutual funds and money managers in the United States. They employ a rigorous process in the identifying and evaluating of professional money managers. Additionally they provide ongoing monitoring, due diligence and research. An “open architecture” enables us to select funds and managers based on their merits and free of a “push” of proprietary products from Raymond James.

IARs of SHFG perform Investment Management Services as IARs of RJFSA, Inc.

---

### **PRIVACY POLICY**

The Firm views protecting its customers' private information as a top priority and, pursuant to the requirements of the federal Gramm-Leach-Bliley Act, the Firm has created policies and procedures to ensure that customer information is kept private and secure.

SHFG does not disclose any nonpublic personal information about its customers or former customers to any nonaffiliated third parties, except as permitted by law. In the course of servicing a Client's account, SHFG may

share some information with its service providers, such as transfer agents, custodians, broker-dealers, accountants, and lawyers. SHFG restricts internal access to nonpublic personal information about the Client to those associated persons of the Firm who need access to that information in order to provide services to the Client. It has always been and will always be the Firm's policy never to sell information about current or former customers or their accounts to anyone. It is also the Firm's policy not to share information unless required to process a transaction, at the request of a customer or Client, or as required by law.

A copy of the Firm's privacy policy notice is provided to each Client prior to or at the same time the advisory agreement is signed. Thereafter, SHFG delivers a copy of the current privacy policy notice to its Clients annually and is available on the firm's website at [www.SHarrisFinancial.com/more-information/](http://www.SHarrisFinancial.com/more-information/). Questions regarding this policy can be directed to Stephanie A. Harris or Gary Scott Harris at (210) 547-3450.



## ITEM 5 - FEES AND COMPENSATION

As discussed in the Advisory Business section above, S. Harris Financial Group offers 2 Services: Financial Planning Services and Investment Management Services. The following section outlines both of these services.

### INVESTMENT ADVISORY SERVICES FEES

#### FINANCIAL PLANNING AND CONSULTING SERVICES

The following outlines the fees for SHFG's approach to personal financial planning as described above:

##### ON-GOING BROAD-BASED FINANCIAL PLANNING

SHFG charges a monthly fee ranging between \$0 to \$2,500 per month plus an additional one-time setup fee ranging from \$0-\$2,500 for on-going broad-based planning services depending on the scope and complexity of the plan, the Client's situation, the nature of the Client's relationship with SHFG and/or the Client's objectives. SHFG will never require prepayment of a fee more than 6 months in advance and in excess of \$500, as services will be rendered within six months of the date of contract.

##### ONE-TIME BROAD-BASED FINANCIAL PLANNING

SHFG charges a fee ranging between \$8,000 to \$30,000 for broad-based planning services depending on the scope and complexity of the plan, the Client's situation, the nature of the Client's relationship with SHFG and/or the Client's objectives. An estimate of the total time/cost will be determined at the start of the advisory relationship. SHFG requires that 50% of the fee be paid in advance, with the remaining portion due upon completion of the services rendered. SHFG will never require prepayment of a fee more than 6 months in advance and in excess of \$500, as services will be rendered within six months of the date of contract.

##### SPECIFIC FINANCIAL PLANNING

SHFG offers Specific Financial Planning for Clients requiring advice or financial plans on a specific aspect of their financial resources. For these services, SHFG will collect relevant data, conduct personal interviews with the Client, and present selected report(s) to the Client. The fee for each module varies based on complexity and data. An estimate of the total time/cost will be determined at the start of the advisory relationship. The maximum fee for each module of the plan is \$20,000. SHFG typically requires that 50% of the fee be paid in advance, with the remaining portion due upon completion of the services rendered. SHFG will never require prepayment of a fee more than 6 months in advance and in excess of \$500, as services will be rendered within six months of the date of contract.

Financial plan reviews in some cases are at the client's option if they elect this engagement. Financial maintenance service may be done on a continuous or periodic basis based upon the client's need and/or updated information provided by the client. The fee is determined based upon the guideline in alignment with the fees mentioned above and depending on the complexity of the client's situation, and the special needs of the client.

##### INDIVIDUAL RETIREMENT PLAN CONSULTING SERVICES

For our individual retirement plan consulting services, we charge a range from 50 to a maximum of 125 basis points (100 basis points equals 1%) of the participant's retirement plan value payable quarterly in arrears. You may terminate this service by providing written notice to our firm. You will incur a pro rata charge for services rendered prior to the termination of the agreement.

##### CONSULTING SERVICES

Sometimes Clients may only require advice on a single aspect of their financial resources or have other consultative needs. For these Clients, SHFG offers general consulting services that address only those specific areas of interest or concern. The fees for hourly services rendered are billed at a negotiable rate between \$300 and \$750 per hour, (depending on the services needed) and are due upon receipt of a bill. An estimate of the total cost will be determined at the start of the advisory relationship. In limited circumstances, the cost/time

could potentially exceed the initial estimate. If this happens the Firm will notify the Client and may request that the Client approve the additional fee. For Consulting Services, SHFG may require a retainer fee of up to \$2,500. However, SHFG will never require prepayment of a fee in excess of \$500 more than 6 months in advance, as services will be rendered within six months of the date of contract. SHFG may waive the retainer fee requirement in its sole discretion.

Clients may act on the Firm's recommendations by placing securities transactions with any brokerage firm the Client chooses. The Client is under no obligation to act on the Firm's financial planning recommendations. Moreover, if the Client elects to act on any of the recommendations, the Client is under no obligation to implement the financial plan or other recommendations through SHFG.

Rates for litigation support for CDFA and other financial support will be charged hourly (to include preparation and any waiting time). The rate for litigation support is \$400-\$750 per hour.

Financial plans are based on the Client's financial situation at the time the plan is presented and on financial information the Client gives to SHFG. Clients should know that certain assumptions may be made about interest and inflation rates and use of past trends and performance of the market and economy. Past performance does not indicate future performance. SHFG cannot offer any guarantees or promises that the Client's financial goals and objectives will be met. As the Client's financial situation, goals, objectives, or needs change, the Client must notify SHFG promptly.

SHFG or the Client may terminate the financial planning agreement within five (5) days of the date of acceptance without penalty to the Client. After the five-day period either party may terminate the financial planning agreement with written notice to the other party. Unearned portion of pre-paid or retainer fees may be returned to the Client at the sole discretion of SHFG.

---

## INVESTMENT MANAGEMENT SERVICES

### FEES

SHFG may base our fees on a percentage of assets under management, hourly charges, fixed fees (not including subscription fees) or commissions. Clients may negotiate asset-based fee and/or commission rates, and the decision to accept a negotiated fee is at the discretion of SHFG. Factors involved in this negotiation may include the nature and size of the overall relationship with the IAR, the level and type of advisory or other financial services being or expected to be provided, and Raymond James' or its affiliates' policy with respect to discounts. You understand that unless a lower or higher rate has been negotiated, you should expect to be charged fees based upon the applicable standard fee schedule detailed below for each account program. While the asset-based fees are negotiable, the fee schedule's asset-level breakpoints may not be modified in any way.

Unless otherwise indicated, asset-based advisory fees are calculated based on an incremental and "retroactive" pricing schedule. Under a retroactive schedule, as each higher asset breakpoint is reached, the applicable fee is reduced and is assessed retroactively to the first dollar of assets. For example, an account valued at \$2,000,000 would be charged under a standard pricing schedule (the following is solely used as an example):

First \$1,000,000 in assets charged at 2.25%  
Next \$1,000,000 in assets charged at 1.75%  
 Total Charged = \$40,000 annualized fee (2.00% annualized rate)

### AGGREGATION OF RELATED FEE-BASED ACCOUNTS

Client's related fee-based accounts will be combined so that each account will pay a fee that is calculated on the basis of the "Relationship Value" (total aggregate Account Values of all related accounts).

"Related" accounts are accounts of an individual, his or her spouse, and their children under the age of 21, and includes individually owned accounts, individual IRAs, self-directed accounts (i.e., directed by individual

participants) under an employee benefit pension plan (“ERISA plan”), and ERISA plans in which an individual is the sole participant. Furthermore, accounts of the same corporation or business entity are normally deemed as “related.” For example, if ABC Manufacturing has both a profit sharing plan and a pension plan (non-directed), these two accounts will be “related.” However, corporate accounts such as corporate cash would not be related to such retirement plan accounts.

### **GENERAL DISCLOSURES**

Clients should understand that Raymond James Financial stock (RJF) can be purchased on an unsolicited basis and held in accounts. This could create a conflict of interest due to the financial adviser’s personal affiliation with RJF and or their personal holdings of RJF stock and or RJF stock options. In addition, RJF holdings are considered non-billable assets, which could create a potential disincentive for the financial adviser to recommend to a Client that the positions continue to be held.

When making cost comparisons, Clients should be aware that the combination of multiple mutual fund investments, advisory services, custodial and brokerage services available through each program may not be available separately or may require multiple accounts, documentation and fees. If an account is actively traded or the Client otherwise may not qualify for reduced sales charges for fund purchases, the fees may be less expensive than separately paying the sales charges and advisory fees. If an account is not actively traded or the Client otherwise would qualify for reduced sales charges, the fees in these programs may be more expensive than if utilized separately.

The Client’s IAR may have a financial incentive to recommend a fee-based advisory program rather than paying for investment advisory services, brokerage, performance reporting and other services separately. A portion of the annual advisory fee is paid to the Client’s IAR, which may be more than the IAR would receive under an alternative program offering or if the Client paid for these services separately. Therefore, the Client’s IAR may have a financial incentive to recommend a particular account program over another. IARs do not receive a financial incentive to recommend and sell proprietary mutual funds versus non-proprietary funds. However, because compensation structures vary by product type, IARs may receive higher compensation for certain product types. In addition, your IAR may receive incentive compensation for utilizing a particular account program.

SHFG believes the charges and fees offered within each fee-based program are competitive with alternative programs available through other firms and/or investment sources, yet makes no guarantee that the aggregate cost of a particular program is lower than that which may be available elsewhere.

Clients can terminate all SHFG/RJA/RJFSA advisory agreements within the first 5 business days and all fees charged will be refunded.

All above quoted fees may be negotiated within the stated fee schedule; however certain circumstances may dictate an exception from the set range.

### **GENERAL INFORMATION ON ADVISORY SERVICES AND FEES**

SHFG shall never have custody of any Client funds or securities except when the Client has provided written authorization for the Firm to directly debit advisory fees and the services of an independently qualified custodian are used for such services.

The fees charged are calculated as described above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds, or any portion of the funds of an advisory Client.

SHFG does not represent, warrant, or imply that the services or methods of analysis employed by the Firm can or will predict future results, successfully identify market tops or bottoms, or insulate Clients from losses due to market corrections or declines.

Advice offered by SHFG may involve investment in mutual funds. Clients are hereby advised that all fees paid to SHFG for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds (as described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. Further, these transaction charges may be incurred when purchasing or selling securities. SHFG does not share in any portion of the brokerage fees/transaction charges imposed by the custodian holding the Client funds or securities. The Client should review all fees charged by mutual funds, brokers, custodians, SHFG, and others to fully understand the total amount of fees to be paid by the Client.

IARs may receive other forms of compensation as a part of business activities unrelated to the Firm. These activities may create a conflict for the IAR. However, SHFG has policies and procedures in place to recognize and appropriately deal with any conflicts that arise between the IAR's multiple capacities. These activities are discussed in *Item 10 Other Financial Industry Activities and Affiliations*.

Fees for all Financial Planning Services, Consultative Services, CDFA, Litigation Support and Investment Services may vary based many factors to include, but not limited to: Family of Employees or Clients, Special Relationships with Employees, Extent of Relationship with SHFG, Assets Under Management or factors that effect Assets Under Management, Legacy Clients (clients that entered under an previous fee structure), or clients acquired through the purchase of a practice.

#### **TEXAS CLIENT DISCLOSURE STATEMENT:**

Client acknowledges receipt of Part 2 of Form ADV; a disclosure statement containing the equivalent information; or a disclosure statement containing at least the information required by Part 2A Appendix 1 of Form ADV, if the client is entering into a wrap fee program sponsored by the investment adviser. If the appropriate disclosure statement was not delivered to the client at least 48 hours prior to the client entering into any written or oral advisory contract with this investment adviser, then the client has the right to terminate the contract without penalty within five business days after entering into the contract. For the purposes of this provision, a contract is considered entered into when all parties to the contract have signed the contract, or, in the case of an oral contract, otherwise signified their acceptance, any other provisions of this contract notwithstanding.

## ITEM 6 - PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Performance-based fee arrangements involve the payment of fees based on a share of capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees.

SHFG does not have performance-based fees or utilize side-by-side management. The only fees charged to Client are noted in Item 5 Fees and Compensation, as applicable.

## ITEM 7 - TYPES OF CLIENTS

SHFG focuses on providing services mainly to the following types of Clients:

- Individuals and Families
- Business Owners
- Professionals
- Pension and 401(k)/profit sharing plans
- Trusts
- Estates
- Charitable organizations
- Corporations or other business entities not listed in the above

SHFG may require a minimum account balance of \$1,000,000. SHFG may make exceptions to this requirement at its sole discretion.

## ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

### METHODS OF ANALYSIS

SHFG uses the following methods of analysis in its Client accounts:

- Fundamental
- Technical
- Cyclical

Fundamental analysis examines:

- all the material factors of the security,
- the company,
- industry in which the company operates, and
- the economy

Technical/Cyclical analysis examines the supply and demand of the securities as evidenced by market activity.

The potential risks of using Fundamental analysis are that the IAR is using historical information, which may not predict the future outcome of a security. The potential risks of using Technical/Cyclical analysis are the quality of the information being used to support the analysis and no expectation of a change to a cycle.

SHFG receives research from a variety of sources, including Raymond James and Associates (RJA), member New York Stock Exchange/SIPC and sources available for public viewing such as:

- Financial newspapers and magazines
- Research materials prepared by others
- Corporate rating services
- Annual reports, prospectuses, filings with the Securities Exchange Commission, and
- Company press releases

### INVESTMENT STRATEGIES

SHFG typically employs the following types of investment strategies:

- Long term purchases (held for more than a year)
- Short term purchases (held for less than a year)

Clients investing in securities should be aware of the risks involved. Each investment strategy may entail unique risks including the possibility of incurring a loss. In a long term investment strategy, returns may be adversely affected by market downturns or inflation. A short term investment strategy is susceptible to current market volatility.

SHFG typically recommends the following types of securities through RJFSA:

- Equity securities (exchange listed, over-the-counter, and foreign issuers)
- Corporate debt securities (other than commercial paper)
- Certificates of deposits
- Municipal securities
- Investment company securities (variable life insurance, variable annuities, and mutual fund shares)
- U.S. government securities
- Options contracts on securities
- Interests in partnerships investing in real estate and oil and gas

## ITEM 9 - DISCIPLINARY INFORMATION

SHFG does not have any disciplinary history.



## ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

S. Harris Financial Group Investment Advisor Representative (IARs) are registered to provide Investment Advisory Services through S Harris Financial Group and Raymond James Financial Services Advisors, Inc.

### INVESTMENT MANAGEMENT SERVICES

IARs of S Harris Financial Group are registered IARs of Raymond James Financial Service Advisors, Inc. and provide investment management services through RJFSA, Inc.

IARs or related persons, in their individual capacity as Registered Representatives of Raymond James Financial Services, Inc., may be paid fees and/or commissions on securities transactions.

Commission charges may vary depending upon any number of factors, including type of security, purchase or sale, secondary market price, volume of trading, market float, and traded or listed exchange. SHFG believes that commissions charged by RJFS are competitive with other full service broker-dealers and that they are fair and reasonable. Commissions charged by RJFS, while generally competitive, are not necessarily the lowest in the industry. Brokerage transactions are placed only through RJFS. There is an inherent potential conflict of interest in this arrangement in that SHFG through its IARs or related persons who are Registered Representatives of RJFS may share in a percentage of the brokerage commissions

### SECURITIES BROKERAGE

IARs or related persons, in their individual capacity as Registered Representatives of Raymond James Financial Services, Inc., may be paid fees and/or commissions on securities transactions.

Commission charges may vary depending upon any number of factors, including type of security, purchase or sale, secondary market price, volume of trading, market float, and traded or listed exchange. SHFG believes that commissions charged by RJFS are competitive with other full service broker-dealers and that they are fair and reasonable. Commissions charged by RJFS, while generally competitive, are not necessarily the lowest in the industry. Brokerage transactions are placed only through RJFS. There is an inherent potential conflict of interest in this arrangement in that SHFG through its IARs or related persons who are Registered Representatives of RJFS may share in a percentage of the brokerage commissions.

### INSURANCE BROKER/AGENT

SHFG and its IARs or related persons may have insurance company affiliations from which they receive commissions. Clients are under no obligation to execute recommendations relating to insurance and/or annuity products through SHFG.

### CERTIFIED DIVORCE FINANCIAL ANALYST (CDFA®)

SHFG may perform the function of divorce financial analysis, as at least one IAR is a Certified Divorce Financial Analyst®(CDFA®), as a consulting service.

The IARs of SHFG spend approximately 30% of time on these other activities.

## ITEM 11 - CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

SHFG has adopted a Code of Ethics, which is available to Clients and potential Clients upon request. SHFG strives to comply with all applicable laws and regulations governing its practices. Therefore, SHFG has set forth guidelines for professional standards of conduct for its associated persons, the goal of which is to protect Client interests at all times and to demonstrate its commitment to its fiduciary duties of honesty, good faith, and fair dealing with Clients. All associated persons are expected to adhere strictly to these guidelines.

SHFG's Code of Ethics requires that Associated Persons submit personal securities transactions and holdings reports to SHFG which will be reviewed by a qualified representative of SHFG on periodic basis. Associated persons are also required to report any violations of SHFG's Code of Ethics. Additionally, SHFG maintains and enforces written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about Clients or their account holdings by SHFG or any associated person.

From time to time, SHFG or persons associated with SHFG may buy or sell securities that are recommended to its Clients or securities in which its Clients are invested. It is SHFG's policy that associated persons of SHFG shall not have priority over any Client account in the purchase or sale of securities. Under certain circumstances, exceptions to the trading policy may be made.

Associates of SHFG are registered representatives of Raymond James Financial Services, Inc., and as such may receive commissions on securities transactions, and may effect transactions for their own account as recommended to the Client. Related persons will buy or sell for themselves securities that they also recommend to the Client. These investment products will be bought and sold on the same basis as the Client. In all instances, the positions would be so small as to have no impact on the pricing or performance of the security. Clients' accounts are always given priority. SHFG will remain in compliance with the Insider Trading and Securities Fraud Enforcement Act of 1988.

## ITEM 12 - BROKERAGE PRACTICES

S. Harris Financial Group IRIA does not select custodians as part of financial planning/consulting services.

### ITEM 13 - REVIEW OF ACCOUNTS

Reviews of investment accounts will be conducted for each Client account on at least an annual basis. The asset allocation will be considered to see if there is a need to rebalance the account back to the target allocation, and the investments will be reviewed to determine if any changes should be considered. If there is a need to raise funds during the course of the year, the recommendations for liquidation will take into account the need to keep the account balanced with target allocation. Stephanie A. Harris, Mitchell Byrum, Scott Harris or Cole McCool will conduct account reviews.

Reviews of financial plan should be performed every three to five years or more frequently if a Client experiences a significant family event (marriage, divorce, change of employment, birth, death, etc). SHFG will make an effort to contact the Client on the five year anniversary of their financial plan. However, if the Client feels they need to revisit their plan prior to this period, it is their responsibility to contact SHFG.

All investment Clients with assets custodied at Raymond James will receive statements directly from Raymond James Financial Services, Inc. at least quarterly. Clients will be contacted at least once each year to review the reports in a conference call or face-to-face meeting. If Client would like to meet more often, IARs will provide feedback. For Clients with brokerage accounts, a summary of portfolio performance will be provided at least annually as part of their investment review meeting.

## ITEM 14 - CLIENT REFERRALS AND OTHER COMPENSATION

From time to time SHFG and/or Raymond James may receive compensation in the form of sponsorship fees for seminars, meetings or conferences from product sponsors such as limited partnerships, mutual funds, insurance companies and annuity sponsors. Such sponsorship fees generally entitle the sponsor to an allotted presentation to IARs of SHFG.

If Clients act upon IAR advice and chooses to use one of RJFS's affiliates as a money manager, custodian or to purchase insurance, SHFG or its IAR may receive compensation in the form of commissions from the affiliate. If a Client chooses to use an IAR in his individual capacity as an insurance agent, the individual IAR will receive a commission. Additionally, if a Client purchases a mutual fund containing a 12b-1 fee, SHFG and the IAR may receive such fee.

As part of its fiduciary duties to Clients, SHFG endeavors at all times to put the interests of its investment advisory Clients first. Clients should be aware, however, that the receipt of economic benefits by SHFG or its related persons in and of itself creates a potential conflict of interest.

SHFG does not pay for or receive compensation for Client referrals.

**ITEM 15 - CUSTODY**

SHFG does not have custody of Client's assets.

**ITEM 16 - INVESTMENT DISCRETION**

SHFG IRIA does not exercise discretion.

## ITEM 17 - VOTING CLIENT SECURITIES

SHFG does not take any action or render any advice with respect to voting of proxies. Clients should receive their proxy materials from the custodian or transfer agent. However, in the event SHFG receives such material, it will forward all proxy materials to Clients. Furthermore, SHFG will not advise Clients on how to vote their proxies.

From time to time, securities held in the accounts of Clients will be the subject of class action lawsuits. The Firm will not determine if securities held by the Client are subject to a pending or resolved class action lawsuit. It will not evaluate a Client's eligibility or submit a claim to participate in the proceeds of a securities class action settlement or verdict without the knowledge/request of the Client. Furthermore, the Firm will not initiate litigation to recover damages on behalf of Clients who may have been injured as a result of actions, misconduct, or negligence by corporate management of issuers whose securities are held by Clients.



## ITEM 18 - FINANCIAL INFORMATION

SHFG does not have custody of Client's assets. SHFG has not been subject to bankruptcy and knows of no reason that its financial condition would be impaired in meeting its contractual obligations to Clients. SHFG will never require prepayment of a fee more than 6 months in advance and in excess of \$500, as services will be rendered within six months of the date of contract.

**ITEM 19 - REQUIREMENTS FOR STATE-REGISTERED ADVISERS**

SHFG is registered with the state of Texas as a Registered Investment Adviser. SHFG has four IARs. Below is their education and employment background.

**STEPHANIE ALLISON HARRIS, CFP®, CDFA® (DOB 1974)***INVESTMENT ADVISER REPRESENTATIVE / FINANCIAL PLANNER***Education:**

B.S. Applied Mathematics, 1995, Texas A&M University, College Station, Texas  
 CFP Designation, 1999, Certified Financial Planner Board of Standards, Washington, DC  
 Certified Divorce Financial Analyst Designation, 2014, Institute for Divorce Financial Analysts

**Employment:**

Employer	Title	Term
S. Harris Financial Group, LLC (formerly HarrisMartin Financial)	Financial Planner/IAR	2010 – Present
Raymond James Financial Services Advisors, Inc.	Financial Advisor /IAR	2020 - Present
Raymond James Financial Services, Inc.	Financial Advisor	2002-Present
Padgett Financial Services, LLC	Financial Planner /IAR	2002-2010
PricewaterhouseCoopers, L.L.P	Manager	1997-2002
Watson Wyatt Worldwide	Actuarial Consultant	1996-1997

**GARY SCOTT HARRIS, CIMA® (DOB 1973)***INVESTMENT ADVISER REPRESENTATIVE / OPERATIONS OFFICER***Education:**

B.B.A. in Business Analysis with a concentration on Management Information Systems, 1995, Texas A&M University, College Station, TX  
 M.B.A., 2006, University of Texas at San Antonio, San Antonio, TX  
 Business Strategy Certification, 2011, Harvard University, Boston, MA  
 Certified Investment Management Analyst Education, 2022, Chicago Booth School of Business, Chicago, IL  
 CIMA Designation, 2023, Investments & Wealth Institute

**Employment:**

Employer	Title	Term
S. Harris Financial Group, LLC (formerly HarrisMartin Financial)	Operations Officer IAR	2015 – Present 2016 – Present
Raymond James Financial Services Advisors, Inc.	Financial Advisor /IAR	2020-Present
Raymond James Financial Services, Inc.	Operations Officer	2015 – Present
USAA	Executive Director, Treasury Management and Enterprise Strategy	2003 –2015
Self	Business Owner / Consultant	2001-2003
Ernst & Young LLP	Consulting Manager	1997-2001
Coopers & Lybrand LLP	Sr. Consultant	1997 – 1997
SHL Systemhouse	Consultant	1996-1997

**MITCHELL ALLEN BYRUM, CFP® (DOB 1994)****INVESTMENT ADVISER REPRESENTATIVE / FINANCIAL PLANNING ASSOCIATE****Education:**

B.S. in Agricultural Economics, minor in Financial Planning 2017, Texas A&M University, College Station, TX  
 CFP Designation, 2019, Certified Financial Planner Board of Standards, Washington, DC

**Employment:**

Employer	Title	Term
S. Harris Financial Group, LLC	Financial Planning Associate/ CFP® / IAR	2017– Present
Raymond James Financial Services Advisors, Inc.	Financial Advisor / CFP® /IAR	2020-Present
Raymond James Financial Services, Inc.	Financial Planning Associate / CFP®	2017 – Present
Spirit of Texas Bank	Compliance Associate	2013-2017
Texas A&M University	Student	2013-2017
High School - Home Schooled	Student	2009-2013

**COLE AARON MCCOOL, CFP® (DOB 1998)****INVESTMENT ADVISER REPRESENTATIVE / FINANCIAL PLANNING ASSOCIATE****Education:**

B.B.A. in Finance, 2021, Texas A&M University, College Station, TX  
 Certificate in Financial Planning 2022, Texas A&M University, College Station, TX  
 CFP Designation, 2023, Certified Financial Planner Board of Standards, Washington, DC

**Employment:**

Employer	Title	Term
S. Harris Financial Group, LLC	Financial Planning Associate / IAR	2021– Present
Raymond James Financial Services Advisors, Inc.	Financial Advisor /IAR	2021-Present
Raymond James Financial Services, Inc.	Financial Planning Associate	2021 – Present
Texas A&M University	Student	2017-2021
Texas Health Design	Analyst – Intern	2020
Avondale Private Lending	Analyst – Intern	2020
Fish Daddy’s Seafood Grill	Server	2019
Pine Cover Timbers	Counselor	2018
Johnston Ford	Service Technician	2017/2018/2019
New Boston Middle/High School	Student	2011-2017

**DANIEL P KING (DOB 1995)****INVESTMENT ADVISER REPRESENTATIVE / FINANCIAL PLANNING ASSOCIATE****Education:**

B.S. in University Studies – Environment Business 2017, Texas A&M University, College Station, TX  
 Certificate in Financial Planning 2023, Texas A&M University, College Station, TX

**Employment:**

Employer	Title	Term
S. Harris Financial Group, LLC	Financial Planning Associate / IAR	2023– Present
Raymond James Financial Services Advisors, Inc.	Financial Advisor /IAR	2023-Present
Raymond James Financial Services, Inc.	Financial Planning Associate	2023 – Present
Indian Z Stone Ranch	Director of Operations	2022-2023
Rolling Plains Quail Research Fdtn.	Ranch Manager	2018-2022
Lowe’s Home Improvement	Service Manager	2016-2018
Canadian River Cattle Co.	Assistant Ranch Manager	2012-2016
Texas A&M University	Student	2016-2018
University of Texas	Student	2014-2015

**SAMUEL J HAAGER (DOB 2000)****INVESTMENT ADVISER REPRESENTATIVE / FINANCIAL PLANNING ASSOCIATE****Education:**

B.B.A. – Finance and Business Honors, 2023, Texas A&M University, College Station, TX  
 Minor – Financial Planning, 2023, Texas A&M University, College Station, TX

**Employment:**

Employer	Title	Term
S. Harris Financial Group, LLC	Financial Planning Associate / IAR	2023– Present
Raymond James Financial Services Advisors, Inc.	Financial Advisor /IAR	2023-Present
Raymond James Financial Services, Inc.	Financial Planning Associate	2023 – Present
Texas A&M University	Student	2019-2023
Raymond James & Associates, Cantera Capital Partners	Intern	May-Aug 2022
Bar D Ranch	Ranch Hand	May-Aug 2021
Kanakuk Kamps	Student Counselor / Lifeguard	May-July 2020
Kanakuk Kamps	Counselor-in-training	May-July 2019
Student – Hyde Park Middle / High School	Student	2012-2019