



S. Harris Financial Group

BROCHURE SUPPLEMENT

Stephanie Allison Harris, CFP®

Gary Scott Harris, CIMA®

Mitchell Allen Byrum, CFP®

Cole Aaron McCool, CFP®

Daniel P King

Samuel Haager

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San Antonio, TX 78249
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March 27, 2024

This brochure supplement provides information about the officers and employees of S. Harris Financial Group, LLC that supplements the firm's brochure. All of our officers and employees work from our primary address listed above. If you have any questions about the contents of the brochure or this supplement, please contact us at 210-547-3450 and/or Stephanie@SHarrisFinancial.com or Scott@SHarrisFinancial.com.

Additional information about any of our officers or employees is available on the SEC’s website at www.adviserinfo.sec.gov.

STEPHANIE ALLISON HARRIS, CFP® (DOB 1974)

INVESTMENT ADVISER REPRESENTATIVE / FINANCIAL PLANNER

ITEM 2 – EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

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

Professional Designation:

Certified Financial Planner™(CFP®), 1999

Certified Financial Planner Board of Standards, Washington, DC

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services,

and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Certified Divorce Financial Analyst® (CDFA™), 2014

Institute for Divorce Financial Analysts (IDFA), Durham, NC

The CDFA™ designation is available to individuals who have a minimum of three years' experience as a financial professional, accountant, or matrimonial lawyer.

To earn the designation, the participant must complete a series of self-study course modules and pass an exam for each module. Modules One, Two and Three each conclude with a two-hour 100 question multiple choice examination. Module Four concludes with a comprehensive case-study exam consisting of 50 multiple-choice questions. The Module topics are: Financial and Legal Issues of Divorce; Advanced Financial Issues of Divorce; Tax Issues of Divorce; and Working as a CDFA: Case Studies.

To acquire the designation, a candidate must successfully pass all exams (modules) with a minimum score of 70% for each one and be in good standing with their Broker Dealer (if applicable) and the FINRA/SEC or other licensing or regulatory agency. To retain the CDFA

designation and to remain in good standing with the IDFA, the designation holder must also obtain 15 divorce-related hours of continuing education every two years.

ITEM 3 – DISCIPLINARY INFORMATION

Stephanie Allison Harris has no legal or disciplinary events to report.

ITEM 4 – OTHER BUSINESS ACTIVITIES

Securities Brokerage

Mrs. Harris, in her individual capacity as “Registered Representative” of Raymond James Financial Services, Inc. (RJFS) member FINRA/SIPEC, may be paid fees and/or commissions on securities transactions.

Fee and/or 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. This conflict of interest is mitigated by our fiduciary obligation to seek best execution and by our code of ethics.

Insurance Broker/Agent

Mrs. Harris may have insurance company affiliations from which she receives commissions. Clients are under no obligation to execute recommendations relating to insurance and/or annuity products through SHFG.

S. Harris Ventures, LLC

Mrs. Harris is an owner of S. Harris Ventures, LLC, an asset holding company.

ITEM 5 – ADDITIONAL COMPENSATION

Mrs. Harris does not receive any economic benefit from a non-advisory client for the provision of advisory services.

ITEM 6 – SUPERVISION

SHFG maintains a culture of compliance which applies to all officers and employees of the firm. In general, we function as a team such that information and/or advice provided to clients is reviewed

and discussed as a team prior to presentation to the client and its subsequent implementation. We are set up such that at least two members of the firm are required to implement a strategy for a client.

Mrs. Harris is the chief compliance officer and may be contacted via the phone number on the cover page of this brochure supplement.

ITEM 7 – REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Mrs. Harris has not been found liable in an arbitration proceeding, civil, self-regulatory organization, or administrative proceeding. Mrs. Harris has not been the subject of a bankruptcy petition.

GARY SCOTT HARRIS, CIMA® (DOB 1973)

INVESTMENT ADVISER REPRESENTATIVE / OPERATIONS OFFICER

ITEM 2 – EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**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

Professional Designation:**Certified Investment Management Analyst®(CIMA®), 2023****Investments & Wealth Institute®, Greenwood Village, CO**

The CERTIFIED INVESTMENT MANAGEMENT ANALYST®, CIMA® is a professional certification marks granted in the United States by Investments & Wealth Institute®. (“Institute”).

The Certification Commission is an autonomous volunteer committee authorized by the Institute’s Board of Directors and charged with the development and maintenance of the Institute's certification programs. The Commission is responsible for setting the initial and ongoing requirements that candidates and certificants must meet in order to earn and maintain the rights to use the CIMA® designation.

The CIMA® certification is a voluntary certification; no federal or state law or regulation requires Investment Advisors to hold CIMA® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients.

To attain the right to use the CIMA® marks, an individual must satisfactorily fulfill the following requirements:

- Submit a certification program application, with fee, and pass a comprehensive background check performed by Institute staff. The application is valid for two years from the date it is accepted by the Institute. The application is reviewed to verify that the applicant meets the program requirements. Applicants will either be accepted into, or denied from, the program.
- Enroll with a Registered Education Provider and successfully complete their executive education program. Fees are set by and payable to the education providers. Education providers notify the Institute of candidates who have successfully completed their education program. The Institute will provide each Registered Education and Review Provider a list of candidates accepted into the program, except for those candidates who have elected to opt out of their information being shared.
- Pass the Certification Examination after successful completion of the executive education component. A candidate may sit for this examination as often as necessary, but retesting fees apply, and there is a 30 day wait period between exam attempts.
- Demonstrate a minimum of three (3) full years of verified professional experience in financial services or related industry, pass a second background check, complete a license agreement and agree to adhere to the Institute's Code of Professional Responsibility and Rules and Guidelines for the Use of the Marks.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CIMA® marks:

- Continuing Education – Complete 40 hours of continuing education hours every two years, including two hours on *Ethics*; and
- Complete compliance requirements and demonstrate compliance with the Investment & Wealth Institute's Code of Professional Responsibility.

CIMA® professionals who fail to comply with the above standards and requirements may be subject to Institute's Professional Review and Disciplinary process, which could result in suspension or permanent revocation of their CIMA® certification.

ITEM 3 – DISCIPLINARY INFORMATION

Mr. Harris has no legal or disciplinary events to report.

ITEM 4 – OTHER BUSINESS ACTIVITIES

Securities Brokerage

Mr. Harris, in his individual capacity as “Registered Representative” of Raymond James Financial Services, Inc. (RJFS) member FINRA/SIPEC, may be paid fees and/or commissions on securities transactions.

Fee and/or 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. This conflict of interest is mitigated by our fiduciary obligation to seek best execution and by our code of ethics.

S. Harris Ventures, LLC

Mr. Harris is an owner of S. Harris Ventures, LLC, an asset holding company.

Harris Ventures and Advisory

Mr. Harris owns Harris Ventures and Advisory, a business advisory firm. Harris Ventures and Advisory is a start-up and small businesses advisory that consults on business development, efficiencies and business structure. This business is not affiliated with S. Harris Financial Group, LLC.

ITEM 5 – ADDITIONAL COMPENSATION

Mr. Harris does not receive any economic benefit from a non-advisory client for the provision of advisory services.

ITEM 6 – SUPERVISION

SHFG maintains a culture of compliance which applies to all officers and employees of the firm. In general, we function as a team such that information and/or advice provided to clients is reviewed and discussed as a team prior to presentation to the client and its subsequent implementation. We are set up such that at least two members of the firm are required to implement a strategy for a client.

Stephanie Allison Harris is the chief compliance officer and may be contacted via the phone number on the cover page of this brochure supplement.

ITEM 7 – REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Mr. Harris has not been found liable in an arbitration proceeding, civil, self-regulatory organization, or administrative proceeding. Mr. Harris has not been the subject of a bankruptcy petition.

MITCHELL ALLEN BYRUM, CFP® (DOB 1994)

INVESTMENT ADVISER REPRESENTATIVE / FINANCIAL ADVISOR

ITEM 2 – EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**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

Professional Designation:**Certified Financial Planner™(CFP®), 2019****Certified Financial Planner Board of Standards, Washington, DC**

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To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits

planning, investment planning, income tax planning, retirement planning, and estate planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

ITEM 3 – DISCIPLINARY INFORMATION

Mr. Byrum has no legal or disciplinary events to report.

ITEM 4 – OTHER BUSINESS ACTIVITIES

Securities Brokerage

Mr. Byrum, in his individual capacity as “Registered Representative” of Raymond James Financial Services, Inc. (RJFS) member FINRA/SIPEC, may be paid fees and/or commissions on securities transactions.

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the brokerage commissions. This conflict of interest is mitigated by our fiduciary obligation to seek best execution and by our code of ethics.

Mr. Byrum has no other outside business activities.

ITEM 5 – ADDITIONAL COMPENSATION

Mr. Byrum does not receive any economic benefit from a non-advisory client for the provision of advisory services.

ITEM 6 – SUPERVISION

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ITEM 7 – REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Mr. Byrum has not been found liable in an arbitration proceeding, civil, self-regulatory organization, or administrative proceeding. Mr. Byrum has not been the subject of a bankruptcy petition.

COLE AARON MCCOOL, CFP® (DOB 1998)

INVESTMENT ADVISER REPRESENTATIVE / FINANCIAL PLANNING ASSOCIATE

ITEM 2 – EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**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
Student – New Boston Middle/High School	Student	2011-2017

Professional Designation:**Certified Financial Planner™(CFP®), 2023****Certified Financial Planner Board of Standards, Washington, DC**

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and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*.

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- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

ITEM 3 – DISCIPLINARY INFORMATION

Mr. McCool has no legal or disciplinary events to report.

ITEM 4 – OTHER BUSINESS ACTIVITIES

Securities Brokerage

Mr. McCool, in his individual capacity as “Registered Representative” of Raymond James Financial Services, Inc. (RJFS) member FINRA/SIPEC, may be paid fees and/or commissions on securities transactions.

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Mr. McCool has no other outside business activities.

ITEM 5 – ADDITIONAL COMPENSATION

Mr. McCool does not receive any economic benefit from a non-advisory client for the provision of advisory services.

ITEM 6 – SUPERVISION

SHFG maintains a culture of compliance which applies to all officers and employees of the firm. In general, we function as a team such that information and/or advice provided to clients is reviewed and discussed as a team prior to presentation to the client and its subsequent implementation. We are set up such that at least two members of the firm are required to implement a strategy for a client.

Stephanie Allison Harris is the chief compliance officer and may be contacted via the phone number on the cover page of this brochure supplement.

ITEM 7 – REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Mr. McCool has not been found liable in an arbitration proceeding, civil, self-regulatory organization, or administrative proceeding. Mr. McCool has not been the subject of a bankruptcy petition.

DANIEL P. KING (DOB 1995)

INVESTMENT ADVISER REPRESENTATIVE / FINANCIAL PLANNING ASSOCIATE

ITEM 2 – EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**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

ITEM 3 – DISCIPLINARY INFORMATION

Mr. King has no legal or disciplinary events to report.

ITEM 4 – OTHER BUSINESS ACTIVITIES**Securities Brokerage**

Mr. King, in his individual capacity as “Registered Representative” of Raymond James Financial Services, Inc. (RJFS) member FINRA/SIPEC, may be paid fees and/or commissions on securities transactions.

Fee and/or 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. This conflict of interest is mitigated by our fiduciary obligation to seek best execution and by our code of ethics.

Mr. King has no other outside business activities.

ITEM 5 – ADDITIONAL COMPENSATION

Mr. King does not receive any economic benefit from a non-advisory client for the provision of advisory services.

ITEM 6 – SUPERVISION

SHFG maintains a culture of compliance which applies to all officers and employees of the firm. In general, we function as a team such that information and/or advice provided to clients is reviewed and discussed as a team prior to presentation to the client and its subsequent implementation. We are set up such that at least two members of the firm are required to implement a strategy for a client.

Stephanie Allison Harris is the chief compliance officer and may be contacted via the phone number on the cover page of this brochure supplement.

ITEM 7 – REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Mr. King has not been found liable in an arbitration proceeding, civil, self-regulatory organization, or administrative proceeding. Mr. King has not been the subject of a bankruptcy petition.

SAMUEL J HAAGER (DOB 2000)

INVESTMENT ADVISER REPRESENTATIVE / FINANCIAL PLANNING ASSOCIATE

ITEM 2 – EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**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

ITEM 3 – DISCIPLINARY INFORMATION

Mr. Haager has no legal or disciplinary events to report.

ITEM 4 – OTHER BUSINESS ACTIVITIES**Securities Brokerage**

Mr. Haager, in his individual capacity as “Registered Representative” of Raymond James Financial Services, Inc. (RJFS) member FINRA/SIPEC, may be paid fees and/or commissions on securities transactions.

Fee and/or 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. This conflict of interest is mitigated by our fiduciary obligation to seek best execution and by our code of ethics.

Mr. Haager has no other outside business activities.

ITEM 5 – ADDITIONAL COMPENSATION

Mr. Haager does not receive any economic benefit from a non-advisory client for the provision of advisory services.

ITEM 6 – SUPERVISION

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Stephanie Allison Harris is the chief compliance officer and may be contacted via the phone number on the cover page of this brochure supplement.

ITEM 7 – REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Mr. Haager has not been found liable in an arbitration proceeding, civil, self-regulatory organization, or administrative proceeding. Mr. Haager has not been the subject of a bankruptcy petition.