



301 Harbour Town Drive

Madison, WI 53717

FORM ADV Part 2 A

FG Financial, LLC Client Brochure

08/06/2024

Item 1 Cover Page

This brochure provides information about the qualifications and business practices of FG Financial, an investment adviser registered with the State of Wisconsin Department of Financial Institutions, Division of Securities. If clients have any questions about the content of this brochure, please contact us at jonathon@fg-financial.com. The information in this brochure has not been approved or verified by the United States Securities & Exchange or by any state securities authority.

Additional information about FG Financial, LLC is also available on the SEC's website at www.adviserinfo.sec.gov and at fg-financial.com.

Item 2: Material Changes

FG Financial, LLC may at any time update this document and either send a copy of its updated brochure or provide a summary of material changes to its brochure and an offer to send an electronic or hard copy form of the updated brochure. Clients are also able to download this brochure from the SEC's Website: www.adviserinfo.sec.gov or may contact us at jonathon@fg-financial.com to request a copy at any time.

Item 3: Table of Contents

<u>Topic</u>	<u>Page</u>
Item 2: Material Changes	2
Item 4: Advisory Business	5
Information about FG Financial	5
Description of Advisory Services Offered	5
Item 5: Fees and Compensation	7
Method of Compensation and Fee Schedule	7
Client Payment of Fees	9
Item 6: Performance-Based Fees and Side-By-Side Management	9
Item 7: Types of Clients	9
Item 8: Methods of Analysis, Investment Strategies and Risk of Loss	10
Methods of Analysis and Investment Strategies	10
Investment Strategy and Method of Analysis Material Risks	10
Security-Specific Material Risks	12
Item 9: Disciplinary Information	13
Item 10: Other Financial Industry Activities and Affiliations	13
Material Relationships Maintained by this Advisory Business and Conflicts of Interest	13
Recommendation or Selection of Other Investment Advisors and Conflicts of Interest	13
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	13
Code of Ethics Description	14
Investment Recommendations Involving a Material Financial Interest and Conflicts Of Interest	14
Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts Of Interest	15
Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest	15
Item 12: Brokerage Practices	15
Factors Used to Select Broker/Dealers for Client Transactions	15
Directed Brokerage	15
Item 13: Review of Accounts	15
Schedule for Periodic Review and Advisory Persons Involved	15
Review of Client Accounts on Non-Periodic Basis	15
Content of Client Provided Reports and Frequency	16
Item 14: Client Referrals and Other Compensation	16
Economic Benefit from External Sources and Potential Conflicts of Interest	16
Advisory Firm Payments for Client Referrals	16

<u>Topic</u>	<u>Page</u>
Item 15: Custody	17
Item 16: Investment Discretion	17
Item 17: Voting Client Securities	17
Item 18: Financial Information	18
Balance Sheet	18
Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients	18
Bankruptcy Petitions during the Past 10 Years 28 Item 19: Requirements for State-Registered Advisers	18
Item 19: Requirements for State-Registered Advisers	18-20

Item 4: Advisory Business

Information about FG Financial, LLC

FG Financial, LLC is registered as an Investment Adviser with the State of Wisconsin. It was founded as a limited liability company (LLC) on October 9, 2020. Jonathon Ferguson is the principal owner of FG Financial.

FG Financial, LLC provides a broad range of financial education and advising services to clients with varying needs and goals and is especially interested in supporting the following clients in achieving financial prosperity:

- Clients planning for the education of loved ones and/or financing their own education
- First generation investors and clients new to financial planning
- Clients who work in public and social services (healthcare, military, education, etc.)
- Clients pursuing meaningful work that supports their money goals
- Working and middle class individuals, partners, and families

Our primary focus is to provide financial education & advising services, which includes focus in areas such as general investments, saving and investing for education, saving and investing for retirement, etc. We offer these services through one-to-one appointments as well by creating comprehensive financial plans for clients. All sessions take place virtually or in-person at the clients' home or preferred location.

FG Financial, LLC practices under the fiduciary standard. This means clients have FG Financial's undivided loyalty and utmost good faith at all times. We will proactively avoid all conflicts of interest or inform clients of conflicts of interest which can't be removed. As a fiduciary, FG Financial, LLC will always put clients first.

Description of Advisory Services Offered

FG Financial, LLC provides services on a broad range of financial topics for its clients. These topics include: budget planning, career planning, investment planning, retirement planning, insurance planning, real estate planning, credit and debt management, and more.

During or prior to a client's first meeting with FG Financial, they will be provided with a current Form ADV Part 2 advisory brochure that includes a statement with regard to our privacy policy. We will also ensure that we disclose any material conflicts of interest that could be reasonably expected to impair the rendering of unbiased and objective advice.

To engage FG Financial, LLC for its services, clients must first enter into a written agreement (our client services agreement). Thereafter, discussion and analysis will be conducted to determine clients' financial needs, goals, assets, etc. It is important that the information and/or financial statements provided by clients are accurate. FG Financial, LLC may, but is not obligated to, verify the information clients have provided, which will then be used in the financial education and advising process.

Depending on the scope of the service/s, clients may be asked to provide current copies of the following documents early in the process:

- Completed client profile questionnaire or other forms we provide
- Employment benefits documents

- Wills, codicils and trusts
- Divorce decree
- Insurance policies
- Mortgage information
- Financial data that may include tax returns, W-2s or 1099s and/or paystubs
- Information on retirement plans and benefits provided by a client's employer
- Statements reflecting current investments in retirement and non-retirement accounts
- Employment or other business agreements a client may have in place
- Credit card balances and interest rates
- Student loan documents
- Auto, home loans, HELOCs, and other liabilities

FG Financial, LLC services may be as broad-based or narrowly focused as clients' desire. The incorporation of most or all of the listed components allows not only a more thorough analysis but also an in depth view of the clients' plans to assist clients in reaching their goals and objectives.

Budget Planning

A well thought out spending plan is needed for every person planning to achieve financial success. FG Financial will help clients create a budget for whatever needs or wants clients may have. A review of their income and expenses can be conducted to determine their current surplus or deficit along with advice on prioritizing how any surplus should be used, or how to reduce expenses if they exceed their income.

Career Planning

Most people spend more time working than they do on any other activity. In addition to completing work that is meaningful for a client, it is important to consider how their work supports their financial goals. FG Financial is grateful to work with clients to build a plan for them to continue in or find work that is meaningful to them and helps them achieve their financial dreams.

Credit Profile Improvement Planning

What is a FICO score? Why is it so important? What actions can I take to improve or worsen my credit? What score do I need to qualify for a loan? These questions and many more are important for clients to consider. While clients consider their credit, they must also consider how debt fits into their overall financial plan. Depending on a client's beliefs, acquiring debt can be a useful strategy to achieve financial success or debt can be a cause of stress that negatively impacts a client's finances and mental health.

Debt Management Planning

What is unsecured and secured debt? Is it financially wise to leverage debt in financial planning? What is good debt? What is bad debt? Should debt be repaid using a specific strategy? These are important questions to answer. FG Financial works with clients to answer address these topics while also building plans for emergency reserves, opportunity funds, and more.

Education Planning

Participation in higher education and other schooling can be critical to personal development and achieving financial success. However, the costs of education are high and continue to grow every year. Proactive planning to cover these costs can help clients achieve the educational goals they have for themselves and their loved ones.

Estate Planning

It can be extremely challenging to think about the lives of family & friends after our death. However, taking some key steps such as writing a will, selecting beneficiaries for assets, completing an advance healthcare directive, and more can help protect your loved ones in the future. FG Financial is honored to discuss the important topic of legacy & estate planning with clients who are ready to engage in these conversations.

Insurance Planning

Financial planning should include ways to protect the wealth that a client has accumulated. Comprehensive Insurance planning (life, auto, rental, home, etc.) is vital. FG Financial will review the different types of insurance with clients and discuss how to best make decisions about insurance products.

Investment Planning

Our investment education and advising services may involve providing information on the types of investment vehicles available, employee retirement plans and/or stock options, investment analysis and strategies, asset selection and portfolio design, as well as assisting clients with their investment account maintained at broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.

Real Estate Planning

Home ownership is often referred to as the “American dream.” However, a home is usually the largest purchase a client makes in their lifetime and it can be complicated when considering the amount to spend on a home, home loan options, how and if to use the equity in a home, is it better to own or rent, etc. It is beneficial for clients to discuss these issues with a financial educator & advisor to ensure their home purchase, rental plans, etc. supports their life goals.

Retirement Planning

FG Financial’s retirement education & advising services typically include a focus on retirement investment vehicle options (IRA, Roth IRA, 401k, 403b, 457, brokerage, HSA, etc.), retirement goals and required income, withdrawal strategies from retirement funds, and more. Our services will help support clients plan to achieve their retirement dreams and legacy goals.

Vehicle Purchase Planning

After housing, utilities, and food, transportation is often the top expense for many clients on a monthly and annual basis. Due to the size of this expense development of a strategy to purchase a vehicle/s is critical to ensure that transportation costs support, not hinder, a client’s path to financial success. FG Financial will help clients pinpoint the amount of money to dedicate to an automobile purchase and how to fund this expense.

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

Hourly Fees

FG Financial, LLC's fees for financial education and advising services are non-negotiable and offered on an hourly fee basis. To help make financial planning accessible and available to as many people as possible, the hourly rate varies pending the client/clients' gross annual, household income. See table below for hourly rate details. Any time worked above the contracted session time will be billed in 15 minute increments, and a partial increment will be treated as a whole increment.

Hourly Fees

Gross Annual, Household Income	Hourly Rate
\$49,999 and under	\$50
\$50,000 - \$64,999	\$60
\$65,000 - \$79,999	\$75
\$80,000 - \$99,999	\$100
\$100,000 - \$129,999	\$125
\$130,000 - \$174,999	\$150
\$175,000 and above	\$200

Notes: Individual, gross annual income will be used for clients who are claimed as dependents; if evidence of annual, household income is not provided by the client then the hourly rate will default to \$200.

Fixed Fee Services

FG Financial, LLC will create a comprehensive financial plan for clients who would benefit from this service. To help make financial planning accessible and available to as many people as possible, the fixed fees for a comprehensive financial plan range from \$500 to \$2,000 pending the client/clients' gross current annual, household income. See table below. Fees take into consideration factors such as the estimated amount of time dedicated to the engagement as well as the complexity of the project and the client/clients' financial profile. Note that not all billable hours may be specifically tracked for fixed fee engagements.

All financial plan services include a 1 hour initial meeting and a 1 hour presentation meeting to review the financial plan. Both meetings are included in the pricing below.

Fixed Fee Services

Gross Annual, Household Income	Fee for Comprehensive Financial Plan
\$49,999 and under	\$500
\$50,000 - \$64,999	\$600
\$65,000 - \$79,999	\$750
\$80,000 - \$99,999	\$1000
\$100,000 - \$129,999	\$1250
\$130,000 - \$174,999	\$1500
\$175,000 and above	\$2000

Note: The fee for any client/clients with a net worth above \$300,000 will be \$2000; if evidence of annual, household income is not provided by the client then the fee for a comprehensive financial plan will default to \$2000.

Education Workshops

FG Financial, LLC offers virtual and on site financial education workshops to organizations. Fees for this service are \$150 per hour. Please contact FG Financial for availability.

Client Payment of Fees

Hourly and Fixed Fees:

Fees are due as stated in a client's service agreement. Our hourly and fixed fees may be paid by debit card, credit card, ACH transfer, or by check. FG Financial does not accept cash, money orders or similar forms of payment for our services.

Termination of Services

Either party may terminate the service agreement at any time, which will typically be in writing. If a client verbally notifies FG Financial of the termination and, if in two business days following this notification we have not received the client's notice in writing, we will make a written notice of the termination in our records and send the client a termination notice as a substitute.

If our Form ADV Part 2 advisory brochure was not delivered to a client at least 48 hours prior to entering into service agreement with FG Financial, LLC then the client has the right to terminate their engagement without penalty within five business days after entering into the agreement.

Should a client terminate an engagement with FG Financial, LLC after this time period, they may be assessed a fee based upon the uppermost range of our disclosed hourly rate or fixed fee for any time that may have been incurred by FG Financial in the preparation of the client's analysis or plan or negated the opportunity for other clients to use FG Financial's services.

Should an educational workshop be canceled, the hosting organization may be assessed a fee based upon the uppermost range of our disclosed hourly rate for any time that may have been incurred by FG Financial in the preparation of the workshop. In such cases, FG Financial may consider crediting the fee to a future educational session by the hosting organization.

Item 6: Performance-Based Fees

FG Financial, LLC doesn't charge or accept performance-based fees – that is, fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

We provide services to individuals, partners, and families. Our ability to provide such services depends on access to important information about our clients. Accordingly, it is necessary that clients provide a sufficient level of information and supporting documentation for services rendered. These documents include but are not limited to: source of funds, income levels, tax documents, and an account holder or their legal agent's authority to act on behalf of the account, among other information. This information and documentation helps us maximize the services provided to each client.

It is also very important that clients provide updates on any significant changes that may have an impact on their financial situation. Events such as changes in employment or marital status, an unplanned windfall, etc., can have an impact on circumstances and needs. We need to be aware of such events, so that we may make adjustments as necessary in the services we provide clients.

We encourage interested parties of all economic levels to seek our advising services. Therefore, we do not require minimum income, minimum asset levels or other similar preconditions. FG Financial, LLC reserves the right to waive or reduce certain fees based on unique individual circumstances, special

arrangements, or preexisting relationships. We also reserve the right to decline services to any prospective client for any non-discriminatory reason.

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

Methods of Analysis and Investment Strategies

Method of Analysis

When FG Financial, LLC is engaged to provide investment advice, it will first gather and consider several factors, including the clients':

- current financial situation
- current, intermediate, and long-term needs
- investment goals and objectives
- level of investment knowledge
- tolerance or appreciation for risk
- investment limitations

Investment Strategies

FG Financial, LLC recognizes that each client's needs and goals are unique. As a result, investments as well as their vehicles will vary. Generally, our investment advice is based on Modern Portfolio Theory, strategic asset allocation, and the belief that proper diversification and risk management will provide the greatest success for a client. The practice of Modern Portfolio Theory does not employ market timing of investing but rather a long term buy-and-hold strategy with periodic rebalancing of the account to maintain desired risk levels.

For clients who would benefit or prefer individual stock selection, FG Financial, LLC generally recommends using fundamental analysis as the method to evaluate the value of securities. Fundamental analysis is the study of the business prospects of an individual company within the context of its industry and overall economy. While technical analysis is a legitimate approach to investing, FG Financial does not subscribe to this approach and recommends that clients who desire advice on a technical analysis approach use a financial planning service that specializes in this approach.

Investment Vehicles Generally Recommended

We typically recommend portfolios that contain investment vehicles considered diversified, tax-efficient and low-cost whenever practical. It would be common to find a broad range of index funds, no-load and/or no transaction fee mutual funds, and ETFs within recommendations that FG Financial, LLC has made. We may also recommend an investor retain pre-existing holdings when appropriate. FG Financial, LLC makes asset allocation decisions based on these and other factors. We will discuss with clients how, in our best judgment, to meet their objectives while at the same time seeking a prudent level of risk exposure.

Investment Strategy and Method of Analysis Material Risks

FG Financial, LLC believes its strategies and investment recommendations are designed to produce the appropriate potential return for the given level of risk. However, we cannot guarantee that an investment objective or planning goal will be achieved. As an investor clients must be able to bear the

risk of loss that is associated with their account, which may include the loss of some or their entire principal.

Examples of risk include:

Company Risk

When investing in securities, such as stocks, there is always a certain level of company or industry-specific risk that is inherent in each company or issuer. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. This is also referred to as unsystematic risk and can be reduced or mitigated through appropriate diversification.

Financial Risk

Excessive borrowing to finance a business operation increases profitability risk because the company must meet the terms of its obligations in thriving and contracting economic conditions. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Inflation Risk

When any type of inflation is present, a dollar today will not buy as much as a dollar next year because purchasing power is eroding at the rate of inflation.

Management Risk

An investment with a FG Financial varies with the success and failure of its investment strategies, research, analysis and determination of its portfolio. If an investment strategy were not to produce expected returns, the value of the investment would decrease.

Market Risk

When the stock market as a whole or an industry as a whole falls, it can cause the prices of individual stocks to fall indiscriminately. This is also called systemic or systematic risk.

Passive Markets Theory

A portfolio that employs a passive, efficient markets approach (representative of Modern Portfolio Theory) has the potential risk at times to generate lower-than-expected returns for the broader allocation than might be the case for a more narrowly focused asset class, and the return on each type of asset may be a deviation from the average return for the asset class. We believe this variance from the “expected return” is generally low under normal market conditions when a portfolio is made up of diverse, low or non-correlated assets.

Research Data

When research and analyses are based on commercially available software, rating services, general market and financial information, or due diligence reviews, FG Financial, LLC is relying on the accuracy and validity of the information or capabilities provided by selected vendors, rating services, market data, and the issuers themselves. Therefore, while FG Financial makes every effort to determine the accuracy of the information received, we cannot predict the outcome of events or actions taken or not taken, or the validity of all information researched or provided which may or may not affect the advice on or investment management of an account.

Socially Responsible Investing

If a client requires their portfolio to be invested according to socially responsible principles, they should note that returns on investments of this type may be limited and because of this limitation they may not be able to be as well diversified among various asset classes. The number of publicly traded companies that meet socially responsible investment parameters is limited, and due to this limitation, there is a probability of similarity or overlap of holdings, especially among socially responsible mutual funds or ETFs. Therefore, there could be a more pronounced positive or negative impact on a socially responsible portfolio, which could be more volatile than a fully diversified portfolio.

Security-Specific Material Risks

ETF and Mutual Fund Risk

ETFs and mutual funds may carry additional expenses based on their share of operating expenses and certain brokerage fees, which may result in the potential duplication of certain fees. The risk of owning these types of holdings also reflects the risks of their underlying securities.

Fixed Income Risks

Various forms of fixed income instruments, such as bonds, money market funds, bond funds, and certificates of deposit, may be affected by various forms of risk, including:

Credit Risk

The potential risk that an issuer would be unable to pay scheduled interest or repay principal at maturity, sometimes referred to as “default risk.” Credit risk may also occur when an issuer’s ability to make payments of principal and interest when due is interrupted. This may result in a negative impact on all forms of debt instruments, as well as funds or ETF share values that hold these issues. Bondholders are creditors of an issuer and typically have priority to assets before equity holders (i.e., stockholders) when receiving a payout from liquidation or restructuring. When defaults occur due to bankruptcy, the type of bond held will determine seniority of payment.

Duration Risk

Duration is a measure of a bond’s volatility, expressed in years to be repaid by its internal cash flow (interest payments). Bonds with longer durations carry more risk and have higher price volatility than bonds with shorter durations.

Interest Rate Risk

The risk that the value of the fixed income holding will decrease because of an increase in interest rates is termed interest rate risk.

Liquidity Risk

The inability to readily buy or sell an investment for a price close to the true underlying value of the asset due to a lack of buyers or sellers is a form of liquidity risk. While certain types of fixed income are generally liquid (i.e., bonds), there are risks which may occur such as when an issue trading in any given period does not readily support buys and sells at an efficient price. Conversely, when trading volume is high, there is also a risk of not being able to purchase a particular issue at the desired price.

Reinvestment Risk

With declining interest rates, investors may have to reinvest interest income or principal at a lower rate. Clients will need to keep in mind that investment vehicles such as certain ETFs and indexed funds have

the potential to be affected by “tracking error risk” (see earlier paragraph under Core + Satellite Strategy risks).

Item 9: Disciplinary Information

Neither FG Financial, LLC nor its staff has been involved in a material criminal or civil action in a domestic, foreign or military jurisdiction, an administrative enforcement action, or self-regulatory organization proceeding that would reflect poorly upon our offering advisory business or its integrity.

Item 10: Other Financial Industry Activities and Affiliations

FG Financial, LLC policies require associated persons to conduct business activities in a manner that avoids conflicts of interest between the FG Financial, LLC and its clients, or that may be contrary to law. FG Financial, LLC will provide disclosure to each client prior to and throughout the term of an engagement regarding any conflicts of interest which might reasonably compromise its impartiality or independence.

Neither FG Financial, LLC nor its staff are registered or have an application pending to register as a Financial Industry Regulatory Authority (FINRA) or National Futures Association (NFA) introducing broker/dealer, or as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

Relationships Maintained by this Advisory Business and Conflicts of Interest

Neither FG Financial, LLC nor its staff is or has a material relationship with any of the following types of entities:

- municipal securities dealer, or government securities dealer or broker
- banking or thrift institution
- lawyer or law firm
- accountant or accounting firm
- real estate broker or dealer
- insurance company or agency
- pension consultant • issuer of a security
- sponsor or syndicator of limited partnerships
- 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)

Furthermore, FG Financial, LLC does not make recommendations to other financial or ancillary professionals such as accountants, attorneys or insurance representatives. Instead, FG Financial, LLC provides resources for clients to find these professionals and educates clients on the information to consider to make effective decisions on which professional to work with.

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

FG Financial, LLC believes that its business methodologies, ethics rules and adopted policies are appropriate to eliminate or at least minimize potential material conflicts of interest and to appropriately manage any material conflicts of interest that may remain. Clients should be aware that no set of rules can possibly anticipate or relieve all potential material conflicts of interest. FG Financial, LLC will disclose to its advisory clients any material conflict of interest relating to the FG Financial, LLC, its staff, or any of its employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

Code of Ethics Description

FG Financial, LLC holds itself to a fiduciary standard, which means we will act in the utmost good faith, performing in a manner believed to be in the best interest of our clients. FG Financial, LLC accepts the obligation not only to comply with all applicable laws and regulations but also to act in an ethical and professionally responsible manner in all professional services and activities. FG Financial, LLC policies include prohibitions against insider trading, circulation of industry rumors, and certain political contributions, among others.

Statement involving our Privacy Policy

We respect the privacy of all clients and prospective clients (termed “customers” under law), both past and present. It is recognized that clients have entrusted FG Financial, LLC with non-public personal information and it is important that both access persons and customers are aware of FG Financial, LLC’s policy concerning what may be done with that information.

FG Financial, LLC collects personal information about customers from the following sources:

- Information clients provide to complete their financial plan or investment recommendation
- Information clients provide in engagement agreements and other documents completed in connection with an education and advising session
- Information customers provide verbally; and
- Information received from service providers, such as custodians, about client transactions.

FG Financial, LLC does not disclose non-public personal information about our customers to anyone, except in the following circumstances:

- When required to provide services our clients have requested;
- When our customers have specifically authorized us to do so;
- When required during the course of a FG Financial assessment (i.e., independent audit); or
- When permitted or required by law (i.e., periodic regulatory examination).

Within FG Financial, LLC, access to customer information is restricted to staff that need to know that information. All access persons understand that everything handled in FG Financial, LLC’s office is confidential and staff are instructed to not discuss customer information with someone else that may request information about an account unless they are specifically authorized in writing by the customer to do so. This may include, for example, providing information about a spouse’s IRA account or to adult children about parents’ accounts, etc.

To ensure security and confidentiality, FG Financial, LLC maintains physical, electronic, and procedural safeguards to protect the privacy of customer information.

FG Financial, LLC will provide clients with its privacy policy on an annual basis per federal law and at any time, in advance, if FG Financial privacy policies are expected to change.

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither FG Financial, LLC nor its staff is authorized to recommend to a client, or effect a transaction for a client, involving any security in which the FG Financial, LLC or a “related person” (e.g., associate, an immediate family member, etc.) has a material financial interest, such as in the capacity as a board member, underwriter or advisor to an issuer of securities, etc.

FG Financial, LLC and its staff is prohibited from borrowing from or lending to a client unless the client is an approved financial institution.

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

FG Financial, LLC does not trade for its own account (e.g., proprietary trading). FG Financial, LLC’s related persons may buy securities that are the same as, similar to, or different from, those recommended to clients for their accounts. A recommendation made to one client may be different in nature or in timing from a recommendation made to a different client; clients often have different objectives and risk tolerances. At no time, however, will FG Financial, LLC or a related person receive preferential treatment over a client.

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

See responses in the previous section titled Advisory FG Financial Purchase of Same Securities Recommended to Clients and Conflicts of Interest.

Item 12: Brokerage Practices

Factors Used to Select Broker/Dealers for Client Transactions

FG Financial, LLC does not maintain physical custody of client assets. A client’s account must be maintained by a qualified custodian, such as a broker/dealer, bank or trust company. FG Financial, LLC is not a custodian nor is there an affiliate that is a custodian.

Directed Brokerage & Trades

We do not require or engage in directed brokerage involving our client’s accounts. We do not make trades for our clients’ accounts.

Item 13: Review of Accounts

Schedule for Periodic Review and Advisory Persons Involved

Financial Education and Advising Services

Review of Client Accounts on Non-Periodic Basis

Engagement with FG Financial, LLC services on a continuing basis is not possible as FG Financial, LLC works with clients on an hourly fee or fixed fee basis only.

For clients that have worked with FG Financial, LLC in the past, it is their responsibility to initiate a review of their financial plan. Reviews are recommended on at least an annual basis whenever practical.

Reviews will be conducted by FG Financial, LLC and normally involve analysis and possible revision of a client's previous financial plan or investment allocation. A copy of revised plans or asset allocation reports will be provided to the client upon request.

Clients should consider contacting FG Financial, LLC for an additional review when they anticipate or have experienced changes in their financial situation (i.e., employment or marital status, inheritance, the birth of a new child, etc.).

Non-periodic reviews are generally conducted by FG Financial, LLC which may occur under a new or amended agreement unless previously engaged in writing, and will be assessed at our published rate. A copy of revised plans or asset allocation reports will be provided to the client upon request.

Content of Client Provided Reports and Frequency

Whether a client has opened and maintained an investment account on their own or with FG Financial, LLC's assistance, they will receive account statements sent directly from mutual fund companies, transfer agents, custodians or brokerage companies where client investments are held. We urge clients to carefully review these account statements for accuracy and clarity, and to ask questions when something is not clear. FG Financial, LLC does not provide ongoing performance reporting under our investment education and advising services engagements.

Item 14: Client Referrals and Other Compensation

Economic Benefit from External Sources and Potential Conflicts of Interest

We do not receive any economic benefit for client referrals. As part of our fiduciary duty FG Financial, LLC endeavors at all times to put the interests of its clients first.

Advisory Firm Payments for Client Referrals

FG Financial, LLC does not engage in solicitation activities as defined by statute. FG Financial, LLC may hold individual membership or serve on boards or committees of professional industry associations. Generally, participation in any of these entities require membership fees to be paid, adherence to ethical guidelines, as well as in meeting experiential and educational requirements.

A benefit these entities may provide to the investing public is the availability of online search tools that allow interested parties (prospective clients) to search for individual participants within a selected state or region. These passive websites may provide means for interested persons to contact a participant via electronic mail, telephone number, or other contact information, in order to interview the participating member. The public may also choose to telephone association staff to inquire about an individual within their area, and would receive the same or similar information. A portion of these participant's membership fees may be used so that their name will be listed in some or all of these entities' websites (or other listings).

Prospective clients locating FG Financial, LLC via these methods are not actively marketed by the noted associations. Clients who find us in this way do not pay more for their services than clients referred to us in another fashion, such as by another client. We do not pay these entities for prospective client referrals, nor is there a fee-sharing arrangement reflective of a solicitor engagement.

Item 15: Custody

Client assets will be maintained by an unaffiliated, qualified custodian, such as a bank, broker/dealer, mutual fund companies, or transfer agent. Client assets are not held by FG Financial, LLC or its staff. In keeping with this policy involving our client funds or securities, FG Financial, LLC:

- Restricts FG Financial, LLC from serving as trustee or having general power of attorney over a client account;
- Prohibits FG Financial, LLC from having authority to directly withdraw securities or cash assets from a client account.
- Does not accept or forward client securities (i.e., stock certificates) erroneously delivered to FG Financial, LLC;
- Will not collect advance fees of \$500 or more for services that are to be performed six months or more into the future; and
- Will not have knowledge of a client's account access information (i.e., online 401(k), brokerage or bank accounts).

Clients will be provided with transaction confirmations and summary account statements sent directly to them by their custodian of record. Typically statements are provided on at least a quarterly basis or as transactions occur within their account. FG Financial, LLC does not create account statements for a client or serve as a recipient of an account statement.

Item 16: Investment Discretion

Client assets will be managed by the client or by an unaffiliated, qualified custodian, such as a bank, broker/dealer, mutual fund companies, or other person whom the client employs to do so. Client assets will not be managed by FG Financial. As a financial education and advising organization, FG Financial, LLC's goal is to educate and empower clients to manage their assets themselves or to properly select an assets manager who fits their needs.

Should a client ask for assistance in any transaction, FG Financial, LLC is grateful to provide support to assist the client in executing the transaction (ex: rebalancing, bond purchase, etc.).

Item 17: Voting Client Securities

FG Financial, LLC does not vote proxies on a client's behalf nor do we offer guidance on how to vote proxies. Clients will maintain exclusive responsibility for directing the manner in which proxies solicited by issuers of securities that are beneficially owned by the client shall be voted, as well as making all other elections relative to mergers, acquisitions, tender offers or other events pertaining to client

holdings. If a client would like the opinion of FG Financial on a particular proxy vote, the client may make such a request.

FG Financial, LLC will have no power, authority, responsibility, or obligation to take any action with regard to any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise or monitor class action or other litigation involving client assets.

Client may receive proxies or other similar solicitations sent directly from their selected custodian or transfer agent. Should FG Financial receive a duplicate copy, it will generally not be forwarded, nor any other correspondence relating to the voting of their securities, class action litigation, or other corporate actions.

Item 18: Financial Information

Balance Sheet

Our services do not require that we collect advance fees of \$500 or more from clients for our advising services that we will perform six months or more into the future. Due to the nature of FG Financial, LLC services and operational practices, an audited balance sheet is not required nor included in this brochure.

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

FG Financial, LLC and its staff do not have a financial condition likely to impair our ability to meet commitments to our clients.

Bankruptcy Petitions during the Past 10 Years

FG Financial, LLC and its staff have never been the subject of a bankruptcy petition.

Item 19: Requirements for State-Registered Advisers

Jonathon Ferguson, Registered Investment Adviser

Year of Birth: 1981

CRD Number: 7324793, FG Financial, LLC--312218

Educational Background and Business Experience

Regulatory guidance requires the FG Financial, LLC to disclose relevant post-secondary education and professional training for each principal executive and associate of the FG Financial, LLC, as well as their business experience for at least the most recent five years.

Educational Background

- Northern Illinois University: MS. Ed, Adult & Higher Education
- Northern Illinois University: B.A., History
- William Rainey Harper College: A.A.
- Uniform Investment Law Exam – Licenses: Series 63, Series 65 License – FINRA

Financial Industry Regulatory Authority (FINRA) examinations are "criterion based;" candidates who pass the exam are considered to have met the minimum competency level. The completion of a securities industry examination does not constitute or imply a person is "approved" or "endorsed" by a securities

regulatory organization or state securities commissioner.

- Myers-Briggs Type Indicator Certification – The Myers & Briggs Foundation

The MBTI® instrument is a restricted assessment tool and requires specific qualifications in order to administer it to others. A practitioner must be trained in the use and interpretation of the instrument either through previous academic study or by taking courses designed specifically to meet MBTI certification guidelines. In addition to ensuring the ethical and accurate use of the Indicator, such training also provides the practitioner with methods and knowledge for assisting clients in understanding MBTI results and for using that information in various aspects of the clients' lives.

- Florida State University: Certificate in Financial Planning
- CERTIFIED FINANCIAL PLANNER™ professional

I am certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and I may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.CFP.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP

Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.

- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Business Experience

Mr. Ferguson's career has been centered on partnering with clients to achieve their personal, career, and financial goals through his work as a career advisor at multiple higher education institutions since 2005.

- Owner, FG Financial (2020-Present)

Other Business Activities

Jonathon Ferguson works as a full time, financial education specialist at the University of Wisconsin-Madison Division of Extension.

Jonathon Ferguson is not registered, nor has an application pending to register, as a registered representative of a broker/dealer or associated person of a futures commission merchant, commodity pool operator, or commodity-trading advisor. Therefore, he does not receive commissions, bonuses or other compensation based on the sale of securities, including that as a registered representative of a broker/dealer or the distribution or service fees from the sale of mutual funds.

Mr. Ferguson may periodically volunteer to provide financial and/or career coaching, counseling, or education services to those in need. No referrals to FG Financial, LLC are made in the course of these activities, and no financial products or investments are recommended or sold.

