



## Form ADV Part 2A Disclosure Brochure

This Disclosure Brochure provides information about the qualifications and business practices of Strategic Blueprint, LLC (“Strategic Blueprint”). If you have any questions about the contents of this Brochure, please contact us at 678.954.4130. 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.

Strategic Blueprint is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about Strategic Blueprint (CRD #284840) is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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September 14, 2020

## ITEM 2 – MATERIAL CHANGES

The Strategic Blueprint, LLC (“Strategic Blueprint”) published the annual update of the Brochures on **March 28, 2020**. The Brochures have been updated on September 14, 2020.

Material revisions since the last annual update on March 28, 2020 include:

1. Strategic Blueprint has added Schwab Advisor Services division of Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC as a qualified custodian we may recommend. See Section 12 of the *Disclosure Brochure* and Section 4 of *The Advisor Directed Program Brochure*.
2. Strategic Blueprint has added Fidelity Brokerage Services, LLC as a qualified custodian we may recommend. See Section 12 of the *Disclosure Brochure* and Section 4 of *The Advisor Directed Program Brochure*.
3. SMARtX Advisory Solutions, LLC and Symmetry Partners, LLC are available as sub-advisers.
4. In May 2020, SFA Holdings, Inc. (SFAH), owner of a group of financial services companies and parent company of Strategic Blueprint, received a Payroll Protection Plan (PPP) loan as afforded through the CARES Act during the COVID-19 Pandemic. Please see Item 18 for more information.

### **Annual Update**

We will provide you a Summary of Material Changes to this and subsequent Brochures within 120 days of the close of our business fiscal year (December 31). We will provide other ongoing disclosure information about material changes as necessary.

### **Brochure Availability**

We will provide our most current Brochure upon request at any time, without charge. Our Brochure may be requested by contacting our Chief Compliance Officer at 678.954.4130.

Additional information about Strategic Blueprint (CRD #126514) and its Advisory Representatives is available on the SEC’s web site at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

(Material Changes Rev. 09142020)

## ITEM 3 – TABLE OF CONTENTS

ITEM 1 – COVER PAGE .....	i
ITEM 2 – MATERIAL CHANGES .....	ii
ITEM 3 – TABLE OF CONTENTS .....	iii
ITEM 4 – ADVISORY BUSINESS.....	2
DESCRIPTION OF BUSINESS, PRINCIPALS, AND TYPES OF SERVICES .....	2
PORTFOLIO MANAGEMENT PROGRAMS .....	2
THIRD-PARTY ASSET MANAGERS – SOLICITOR ARRANGEMENTS .....	3
FINANCIAL PLANNING SERVICES/FINANCIAL CONSULTING .....	4
LECTURES AND SEMINARS .....	5
CLIENT TAILORED SERVICES AND CLIENT IMPOSED RESTRICTIONS .....	6
ITEM 5 – FEES AND COMPENSATION.....	6
PORTFOLIO MANAGEMENT FEES AND COMPENSATION .....	6
THIRD-PARTY ASSET MANAGER FEES AND COMPENSATION.....	8
FINANCIAL PLANNING AND CONSULTATION FEES AND COMPENSATION .....	8
LECTURE AND SEMINAR FEES AND COMPENSATION .....	9
ADDITIONAL FEES, COMPENSATION AND EXPENSES.....	10
NEGOTIATION OF FEES AND COMPENSATION .....	11
POTENTIAL CONFLICTS OF INTEREST .....	11
ITEM 6 – PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT .....	13
ITEM 7 – TYPES OF CLIENTS.....	13
ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS.....	13
ITEM 9 – DISCIPLINARY INFORMATION.....	17
ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS.....	17
ITEM 11 – CODE OF ETHICS .....	18
ITEM 12 – BROKERAGE PRACTICES .....	19
ITEM 13 – REVIEW OF ACCOUNTS .....	21
ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION .....	22
ITEM 15 – CUSTODY .....	25
ITEM 16 – INVESTMENT DISCRETION .....	25
ITEM 17 – VOTING CLIENT SECURITIES.....	25
ITEM 18 – FINANCIAL INFORMATION.....	26

## ITEM 4 – ADVISORY BUSINESS

### **DESCRIPTION OF BUSINESS, PRINCIPALS, AND TYPES OF SERVICES**

Strategic Blueprint, LLC (“Strategic Blueprint”) is an Investment Adviser registered with the Securities and Exchange Commission (“SEC”). Strategic Blueprint is an Atlanta-based, Georgia corporation, formed in July 2016, and a wholly owned subsidiary of SFA Holdings, Inc. (“SFAH”). Clive Slovin is the President and CEO of SFAH.

Julie Sullivan, President, and LaRee Holloway, Controller and Vice President, are the Managers of Strategic Blueprint. David Pittman is the Executive Vice President.

Strategic Blueprint is under common control with The Strategic Financial Alliance, Inc., MerCap Securities LLC, MerCap Advisors, Inc., SFA Insurance Services, Inc., Green Creek Resources, Inc., and Timbrel Capital LLC. Please refer to Item 10 of this Brochure for additional information about our affiliated companies.

Through its network of independent Advisory Representatives, Strategic Blueprint offers a range of advisory and wealth management services as described below, including:

- Portfolio Management Programs
- Selection of and Referral to Third-Party Asset Managers
- Financial Planning
- Retirement Planning
- College Education Planning
- Family Wealth Planning
- Financial Consulting
- Education Events

Advisory Representatives will market their services under doing-business-as names (“DBAs”), as disclosed in their respective ADV Part 2B Supplements. They will use these DBAs and their respective logos in their marketing, reporting and communications.

As of August 31, 2020, Strategic Blueprint managed assets valued at approximately \$600 million, with \$587 million on a discretionary basis and \$13 million on a non-discretionary basis.

### **PORTFOLIO MANAGEMENT PROGRAMS**

Strategic Blueprint offers a customized approach to implementing individualized investment strategies designed with the goal of meeting your investment objectives through asset allocation, portfolio design, portfolio monitoring, and consolidated reporting.

In order to participate in the portfolio management programs, Advisory Representatives must be properly registered, and have at least five years of experience in the financial services industry (or equivalent experience as determined by Strategic Blueprint).

Through its *Strategic Blueprint Advisor Directed Program*, you may select an all-inclusive program (“wrap fee program”) in which the asset-based fee includes our advisory fee as well as transaction costs. Alternatively, you may choose a program in which you pay transaction fees in addition to our asset-based advisory fee. The amount of your advisory fee is negotiated with your Advisory Representative, based on the program’s published fee schedule. This program is described in the *Strategic Blueprint Advisor Directed Program Brochure*.

### **SUB-ADVISER MANAGER SELECTION PROGRAMS**

Strategic Blueprint evaluates asset managers for selection to participate as portfolio managers in the programs (“Managers”). Strategic Blueprint, through your Advisory Representative, will assist you in reviewing the participating portfolio managers. Your Advisory Representative may recommend managers, strategists or model portfolios to manage all or a portion of your portfolio in a manner consistent with your stated financial objectives, risk tolerance and investment horizon. The selected portfolio manager or managers will, typically, exercise discretionary authority in the account relative to the assets allocated to that strategy. Your Advisory Representative will monitor your account and its performance, meet with you periodically and may recommend changing managers based on your needs and objectives. You may grant discretionary authority to your Advisory Representative to reallocate among and/or replace Managers, consistent with your stated objectives, risk tolerance, and time horizon. This service is offered as part of the *Strategic Blueprint Advisor Directed Program*.

The individual manager programs, including managers, fees and expenses, are more fully described in the respective ADV Part 2A and Appendix 1 Disclosure Brochures, which will be provided to you prior to entering into an advisory agreement. These Brochures are also available upon request.

### **THIRD-PARTY ASSET MANAGERS – SOLICITOR ARRANGEMENTS**

Strategic Blueprint and certain of its Advisory Representatives will act as solicitors for third-party asset managers (“TPAMs”). Your Advisory Representative will recommend a TPAM whose management style and strategies are consistent with your objectives and financial profile. You will enter into an advisory agreement with the TPAM. Neither Strategic Blueprint nor your Advisory Representative will exercise discretion or make investment choices or recommendations in the account. These programs will include asset allocation models, model portfolios, market timing strategies or other strategies for mutual funds and variable annuity sub-accounts.

In a solicitor’s arrangement, Strategic Blueprint through your Advisory Representative typically gathers information about your financial situation, investment objectives, and reasonable restrictions you wish imposed upon the management of your account; periodically reviews

reports provided to you; contacts you at least annually to update your financial information and review the account, its performance and the services of the TPAM; and, communicates changes in your information to the TPAM as warranted. It is important to notify your Advisory Representative of any changes in your financial situation, investment objectives, or account restrictions.

You will receive the TPAM's Disclosure Brochure and a Solicitor's Disclosure Statement, which will describe the relationship between TPAM and Strategic Blueprint, and the solicitor's fee paid to Strategic Blueprint.

## **FINANCIAL PLANNING SERVICES/FINANCIAL CONSULTING**

### ***Financial Planning***

Your Advisory Representative will work with you to prepare (1) a comprehensive, written financial plan designed to help you achieve your financial goals and investment objectives or (2) a plan limited in scope to a particular area. Preparation of a plan requires that you provide your Advisory Representative with personal data such as family records, employment records, budgeting, assets, liabilities, estate information, and tax information. Financial planning is a process that will address any or all of the following topics as you may request:

- asset protection
- tax planning
- business succession
- cash flow
- education planning
- estate planning
- multi-generational planning
- insurance planning
- asset allocation
- risk management
- retirement planning
- wealth transfer
- charitable gifting
- long-term care and disability planning

Should you choose to implement the recommendations in your financial plan, we encourage you to work closely with your attorney, accountant, insurance agent, and other professional advisors.

Certain Advisory Representatives are also registered representatives of The Strategic Financial Alliance, Inc. ("SFA"), an affiliated broker/dealer, and/or licensed as insurance agents. Although you may choose to implement the recommendations made in your financial plan through SFA or your Advisory Representative in his or her capacity as a registered representative or as an insurance agent, you are free to employ the services of any advisor, registered representative or insurance agent of your choice, regardless of whether or not that person is associated with SFA.

### ***Financial Consulting***

We offer investment consulting services that are limited to the specific areas you identify. These services are not considered financial planning services because we will not perform a comprehensive analysis of your financial position and will not prepare a written report documenting our review.

The consulting services our Advisory Representatives provide may include (but are not limited to):

- Assisting you in the preparation of an investment policy statement;
- Reviewing and recommending changes to an existing investment policy statement (or similar guidelines, policies, and/or investment allocation that you are employing);
- Reviewing existing contracts you have with service providers such as managers and consultants, and making recommendations for changes;
- Assisting you in renegotiating the fees you pay to service providers and/or assisting you in conducting a search for new service providers;
- Analyzing the performance of your current investment manager;
- Advising you regarding the manner in which your investment account is being managed and, at your request, assisting you in searching for a new investment manager;
- Advising you on the purchase and sale of particular individual investments;
- Monitoring your transaction costs; and
- Monitoring compliance by your investment managers with your investment policy statement.

### ***Review and Monitoring of Complex Investments***

Your Advisory Representative may recommend complex or alternative investments that are not suitable for managed accounts because of their limited liquidity and/or such products are not maintained in a custodial account. These investments are generally available only to accredited investors.

Your Advisory Representative may review an investment and recommend it to you based on your financial profile as a component of your investment portfolio. Such recommended investments must have undergone a thorough due diligence review by Strategic Blueprint and be approved for recommending to investors. Advisory Representatives who recommend such investments must complete training related to the product as determined by Strategic Blueprint.

Your Advisory Representative will provide on-going monitoring of the investment program, as agreed.

Strategic Blueprint does not offer legal or tax advice. An Advisory Representative will present the tax aspects of certain investments or strategies in general terms but does not provide specific tax advice. We recommend that all tax questions or strategies should be discussed with your tax professional.

### ***LECTURES AND SEMINARS***

Strategic Blueprint sponsors lectures, seminars, or speeches of an educational and generic nature. A broad range of topics may be included in each seminar including, but not limited to, asset allocation, retirement planning, risk, tax planning, long-term care and estate planning.

### ***SUBSCRIPTION ADVISORY SERVICES***

The Subscription Advisory Services Program (Subscription Program) offers an array of financial planning and wealth management services selected by you for an annual flat fee, provided on an on-going basis to help you adhere to your plan and achieve stated goals and objectives. The Subscription Program services may include any of the services outlined above. These services may include retirement, education, estate and legacy planning; wealth management, portfolio management, advice related to accounts held away from the Firm, tax strategies, and asset allocation. Your Advisory Representative will collaborate with your other advisors, including tax and legal advisors, with your authorization. The nature and frequency of reporting, meetings, written plans and other specific services are described and agreed upon in the Subscription Program Agreement.

### ***FAMILY OFFICES SERVICES***

Please refer to the *HFO Family Offices Services Brochure* for more information. These services are offered through Strategic Blueprint on a limited basis by only certain Advisory Representatives, as described in the respective brochure.

### **CLIENT TAILORED SERVICES AND CLIENT IMPOSED RESTRICTIONS**

Your Advisory Representative develops and recommends a strategy based on the information you provide about your financial profile using his or her knowledge and experience. It is very important that you communicate changes in your information so your Advisory Representative can make recommendations and manage your account in a manner that is consistent with your objectives, risk tolerance, and time horizon. You may impose reasonable restrictions on the manner in which your account is managed, such as limiting investments in certain types of securities or asset classes, in accordance with your values or beliefs.

Regardless of the services you choose, we strongly encourage you to notify your Advisory Representative promptly if there are any changes in your personal circumstances, financial situation, investment objectives, or risk tolerances.

## **ITEM 5 – FEES AND COMPENSATION**

### **PORTFOLIO MANAGEMENT FEES AND COMPENSATION**

The *Strategic Blueprint Advisor Directed Account Program* offers two fee structures:

- All-Inclusive (“wrap”) account in which the fee includes our advisory fee and transactions fees; or
- Non-Inclusive account in which the transaction fees are assessed separately from the advisory fee.

Fees are negotiated based on the amount of your managed assets and are assessed monthly or quarterly in arrears based on the average daily balance of your managed account(s). We do not manage wrap accounts in a manner that differs from non-wrap accounts.

Account Value	All-Inclusive (Wrap) Maximum Annual Asset- Based Advisory Fee	Non-Inclusive Maximum Annual Asset- Based Advisory Fee
First \$250,000	2.25%	2.15%
Next \$250,000 to \$500,000	2.15%	2.05%
Next \$500,000 to \$1,000,000	2.00%	1.90%
Next \$1,000,000 to \$2,000,000	1.75%	1.65%
Next \$2,000,000 to \$5,000,000	1.50%	1.40%
Above \$5,000,000	1.25%	1.15%
All fees are negotiable. Minimum Annual Fee is \$75.00.		

These fees do not include the internal fees and expenses associated with the underlying securities in your portfolio; sub-adviser fees, margin interest, maintenance and termination fees (if applicable) or other fees and taxes on brokerage accounts and securities transactions.

The transaction charges assessed by the custodian of your account in the non-inclusive program are described in your account opening, and in your Investment Management Agreement.

You may also select an advisory fee negotiated as a flat fee, based on the amount of assets, the complexity and range of services provided.

For complete fee details, please refer to the respective program brochures, the *Appendix 1 Strategic Blueprint Advisor Directed Program*.

#### **SUB-ADVISER MANAGER SELECTION PROGRAMS**

Sub-Adviser	Strategic Blueprint Platform Fee	Sub-Adviser Fee	Total Sub-Adviser Fee
Loring Ward	0.05%	0.15%	0.20%
Frontier	0.05%	0.35%	0.40%
SMArtX	0.05%	0.12%	0.17%
SMArtX Platform only	0.05%	0.07%	0.12%
Symmetry Precision Core Models	0.05%	0.15%	0.20%
Symmetry Panoramic Models	0.05%	0.05%	0.10

While fees assessed by the Sub-Adviser will appear separately on your account statement, the total of the Strategic Blueprint Advisory Fee and the Sub-Adviser Fee will not exceed the Maximum Annual Advisory Fee shown in the All-Inclusive and Non-Inclusive tables above.

These fees do not include the fees and expenses associated with the underlying investments or strategists and funds available through Sub-Advisers.

Sub-Adviser Fees will appear on your quarterly statement as a separate Advisory Fee from the fee charged by Strategic Blueprint. If all or a portion of your portfolio is sub-advised by SMArtX, then the total SMArtX fee plus the strategists' fees will be combined and appear on your statement as a single charge.

Please refer to the *Strategic Blueprint Advisor Directed Brochure* for more complete information about fees assessed for Sub-Advisers.

### **THIRD-PARTY ASSET MANAGER – SOLICITOR FEES AND COMPENSATION**

Fees will be negotiated within limits set by the third-party asset manager. Fees generally range from 10 basis points to 250 basis points annually, depending upon the program selected, the size of the account, and the services covered. Under some programs, an inclusive fee covers account management, brokerage, clearance, custody, and administrative services. In other programs, the account may be charged separately for such services.

The amount of the fees, services provided, payment structure, termination provisions, and other aspects of each program are detailed and disclosed in the third-party asset manager's Form ADV Part 2 and Appendix 1 wrap fee program disclosure brochures. Strategic Blueprint and your Advisory Representative will share in a portion of the fee assessed by the third-party manager. The amount of this portion varies program by program and is disclosed in the Solicitor's Disclosure Statement provided to you.

If mutual funds or variable annuities are used in these programs, the fees mentioned above are in addition to the internal management fees and expenses paid by the mutual funds or variable annuity companies to their separate investment advisors. In addition, variable annuity companies generally impose mortality charges on such accounts. Fees are payable in advance or in arrears as described in the third-party money manager's Form ADV and wrap fee program brochures.

### **FINANCIAL PLANNING AND CONSULTATION FEES AND COMPENSATION**

Advisory Representatives may charge a fixed or hourly fee for financial planning and consultations. Fees are negotiated with each client depending on the complexity of the situation, the services provided and experience of the representative. The fee charged generally does not exceed a flat fee of \$10,000, an hourly rate of \$500 per hour or an annual management fee of 1.5% of asset value. Due to the complexity of some financial plans and consulting arrangements, a higher fee may be negotiated.

The agreed upon fee may be billed in advance, during or throughout the engagement as agreed upon with your Advisory Representative. However, \$1,200 or more of the fee cannot be billed more than six months in advance of delivery of services related to the plan or consultation, in accordance with your Financial Planning or Consulting Agreement.

Financial Planning services may be included in portfolio management services as described in your Investment Management Agreement, and as negotiated with your Advisory Representative.

You may terminate the planning/consulting agreement without penalty within five business days after signing the agreement. Thereafter, you may terminate the planning or consulting agreement upon written notice. If you terminate the agreement, Strategic Blueprint will refund unearned fees based upon the time and effort expended by Strategic Blueprint prior to the termination, as determined by the Advisory Representative. Strategic Blueprint reserves the right, at its sole discretion, to refund all of the fee paid based on individual circumstances. Strategic Blueprint will bill you for any unpaid fees for services provided prior to termination.

If you choose to implement your financial plan or any recommendations through your Advisory Representative in his or her capacity as a registered representative of The Strategic Financial Alliance, Inc. or a licensed insurance agent, he or she will receive additional compensation in the form of sales commissions and, in some cases as described in the product offering materials, trail commissions such as 12b-1 fees.

Advisory Representatives may assess a fee based on an hourly rate as agreed, to review a private placement or other specialized program to help you evaluate the suitability of the investment for your financial profile and investment objectives. If you purchase the investment outside a managed account, and if agreed upon, the Advisory Representative may assess an annual fee up to 25 basis points (0.0025) for on-going monitoring of the investment program. The 25 basis points is based on the value provided by the custodian or, if not available through the custodian, by the issuer. Generally, an account custodian will assess an additional fee for a transaction and an additional fee for holding a private placement in a brokerage or managed account.

### **LECTURE AND SEMINAR FEES AND COMPENSATION**

Strategic Blueprint may charge attendees a fee for attending such lectures and seminars. Fees for seminars are paid to Strategic Blueprint or to a billing agent designated on the application form. Fees are negotiable at the sole discretion of Strategic Blueprint. Fees are due at or prior to attendance unless otherwise specified and are not refundable.

### **SUBSCRIPTION ADVISORY SERVICES FEES AND COMPENSATION**

The Annual Flat Fee is negotiable, and based on the complexity and scope of your financial situation, including but not limited to your net worth, income, total investable assets, tax situation, number of accounts and account types, employment (i.e. self-employed or W2 employee), number of family members, trusts, current transitions, and any additional factors we determine that may add to the complexity of your financial life.

The annual flat fee is billed quarterly (or monthly, as agreed) in arrears and assessed pro rata depending on when services commence.

An initial negotiated fee of up to \$2,000 (separate from and in addition to the flat fee) may be assessed for the establishment of the services, including account opening and an initial plan. This initial fee may be waived at the discretion of your Advisory Representative on behalf of the Firm.

If investment management is included as part of the Subscription Services, then a portion of the fee will be allocated to the investment performance calculation so that your performance is reported net of fees. The initial fee and monthly (or quarterly) fee are payable through an authorized deduction from your account, or payable by credit card through Advice Pay. If paying through Advice Pay, Firm does not have the ability to change the amount payable, or to cause any charges in addition to those established by you.

We will review fees annually and may increase fees based on certain factors such as the complexity of your financial situation, and/or the addition of investable assets and accounts under our management. No fee increase will be effective until you sign a new or amended advisory agreement fee schedule.

### **ADDITIONAL FEES, COMPENSATION AND EXPENSES**

Strategic Blueprint's fees for non-inclusive accounts are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred. Whether you are in a wrap account or a non-inclusive account, you may incur certain charges imposed by custodians, brokers, third-party asset managers and other third-parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, termination fees for qualified plans and other fees and taxes on brokerage accounts and securities transactions. Mutual funds, variable annuities and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to Strategic Blueprint's advisory fee. Fees assessed by the custodian are disclosed in its account documentation.

If you purchase alternative investments in your managed accounts, additional custodial fees will be charged by your account custodian.

If you purchase alternative investments through SFA as the executing broker/dealer, SFA will generally receive compensation from the issuer (or managing broker-dealer) for commissions, marketing and/or due diligence. SFA is affiliated with Strategic Blueprint. This compensation is not shared with your Advisory Representative. If your Advisory Representative, in his or her role as a Registered Representative, earns a commission on your purchase of an alternative product through SFA, no advisory fee will be assessed on that asset when it is held in your managed account.

Some alternative investments and other products (such as variable annuities) offered through SFA as a broker-dealer are also available with no sales commission (often referred to as Advisor Class shares). These products are made available for managed accounts and an advisory fee would be assessed on the value of that investment as part of your managed

portfolio. It is important to discuss the costs and fees associated with these investments with your Financial Advisor to determine the most appropriate and beneficial way to purchase these investments.

The advisory fees paid for Financial Planning and Consulting services do not include the costs associated with implementing any recommendations.

### **NEGOTIATION OF FEES AND COMPENSATION**

Fees are negotiated on a case-by-case basis, depending on a variety of factors, including the nature and complexity of the particular service, your relationship with Strategic Blueprint and your Advisory Representative, the size of the Account, the potential for other business or clients, the amount of work anticipated and the attention needed to manage your Account. Please note that the same or similar services to those described above may be available elsewhere to you at a lower cost. Your Advisory Representative may negotiate a fee that is more or less than fees negotiated by other Strategic Blueprint Advisory Representatives for similar services.

### **POTENTIAL CONFLICTS OF INTEREST**

In addition to providing advisory services, Advisory Representatives can offer securities products and other investment and insurance products in their capacities as registered representatives of the Strategic Financial Alliance, Inc. (SFA) and as licensed insurance agents. SFA, and its registered representatives, will receive compensation in connection with this activity and the amount of compensation will depend on the type of product purchased. This compensation is disclosed in the product prospectus or offering documents. Advisory Representatives who are also registered representatives may have a greater financial incentive to recommend certain products as opposed to others. Your Advisory Representative will make recommendations based on your stated investment objectives, risk tolerance, and time horizon. Security transactions executed through SFA are reviewed for suitability by a designated supervisor.

No commissions or 12b-1 fees are paid to Strategic Blueprint or your Advisory Representative on those securities recommended and purchased in your Strategic Blueprint accounts.

Certain third-party asset managers with which Strategic Blueprint has entered into sub-advisory, co-advisory and/or solicitor's agreements provide marketing support to Strategic Blueprint and its Advisory Representatives for meetings and other functions. They may also provide software and other tools to assist our Advisory Representatives in providing services to you.

Sponsors and issuers of illiquid investments sponsor training and due diligence programs for Advisory Representatives. They may also provide marketing support to Strategic Blueprint, its affiliated companies, and Advisory Representatives for conferences, education, training and client appreciation events. You may obtain a list of those companies that provide marketing support by contacting the Chief Compliance Officer at 678.954.4130, or by emailing [info@strategicblueprint.net](mailto:info@strategicblueprint.net).

Your Advisory Representative can participate in conferences sponsored by SFAH affiliated companies. These conferences generally receive the financial support of product sponsors and vendors. When attending such conferences, your Advisory Representative will receive non-cash compensation in the form of travel expenses, meals, and other services based on the amount of commissions and compensation earned through the SFAH affiliated companies.

Frontier Asset Management and Loring Ward, two sub-advisors recommended by Strategic Blueprint, provide financial support in the form of cash, provision of speakers, and meals, to affiliated SFAH companies to support these conferences and educational programs. Their participation in this support gives them an advantage over other asset managers in that representatives of these two asset managers have more opportunity to discuss their products and services with those advisory representatives who participate in the conferences.

If your Advisory Representative recommends certain alternative products, the product sponsor will pay for reasonable costs related to due diligence conducted by the Advisory Representative, including travel to visit the sponsor and/or the investment site.

Certain Advisory Representatives and members of Strategic Blueprint management and home office employees are shareholders of SFA Holdings, Inc. ("SFAH"), parent company of Strategic Blueprint, SFA and other entities. Shareholders will benefit from the profits accrued to SFAH in the form of dividends, as well as the potentially enhanced value of the stock. All advisory representatives of Strategic Blueprint and registered representatives of SFA are awarded stock options based on the revenues they generate. As profits accrue from the sale of securities products and investment advisory services of the respective registered entities, the value of SFAH stock can be enhanced. SFAH stock ownership creates a conflict of interest for representatives.

Please be aware that you are under no obligation to purchase products or services recommended by us or your Advisory Representative. Your Advisory Representative will answer any questions you have about fees and expenses of the products recommended. Additionally, Strategic Blueprint has adopted a *Code of Ethics*, as described in Item 11 on Page 12 of this Brochure, which describes the standard of conduct required of our Advisory Representatives.

If your Advisory Representative is also registered with SFA or is a licensed insurance agent, you are under no obligation to purchase securities and/or insurance products and services through him or her in that capacity. Neither are you obligated to purchase any products or services through SFAH affiliated companies.

If a conflict of interest exists between an Advisory Representative, employee, or related entity and any client or client's holdings, Advisory Representatives are responsible to disclose such conflicts to the Strategic Blueprint Compliance Department. The Compliance Department will determine the materiality of such conflicts. Material conflicts will be disclosed to you. You will be offered an opportunity to waive such conflicts, to work with another Advisory Representative, or to move your assets to another investment advisory firm.

Strategic Blueprint monitors for potential conflicts of interest through reviews of client accounts; reviews of Advisory Representatives' personal securities accounts, their correspondence, email and other communications; and, their outside business activities. Any Advisory Representative knowingly placing personal interest above that of a client will be subject to disciplinary action, up to and including termination.

You will receive an ADV Part 2B Supplement with information about your Advisory Representative, including credentials, education and conflicts of interest.

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

Strategic Blueprint does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Certain third-party asset managers may assess a performance-based fee, which will be described in the respective manager's disclosure brochure. In some cases, a portion of the performance fee may be shared with Strategic Blueprint and Advisory Representative(s) as a solicitor's fee. Any such arrangement will be described to you in a written Solicitor's Disclosure Statement.

## **ITEM 7 – TYPES OF CLIENTS**

Strategic Blueprint provides investment advisory services to individuals, high net worth individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations, and other business entities.

Strategic Blueprint requires a minimum account size of \$25,000 for managed accounts. This minimum account size serves as a guideline, only. Strategic Blueprint, at its sole discretion, may waive this minimum account requirement.

The minimum account sizes required for participation in the programs sponsored by third-party asset managers are described in the manager's respective disclosure brochures.

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

Strategic Blueprint's Representatives will rely on various types of tools and methods to assist in recommending or selecting investment strategies to you, including asset allocation and various

types of software. Strategic Blueprint's methods of analysis include charting analysis, fundamental analysis, technical analysis, and cyclical analysis. The main sources of information used to formulate investment advice and/or manage assets includes financial newspapers and magazines, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the SEC, and company press releases. The investment strategies used to implement any investment advice given to clients includes long-term purchases (securities held at least a year), short-term purchases (securities purchased and sold within a year), margin transactions, and option writing. Investment returns are highly dependent on the value of underlying securities which are impacted by trends in the various investment markets.

We generally recommend stocks, bonds, ETFs, and mutual funds. We may also recommend certain alternative or illiquid investments. Investing involves the assumption of risks, which may include the following:

Investing in **stocks** involves the assumption of risk, including:

- Financial Risk: the risk that the companies we recommend to you may perform poorly, which will affect the price of your investment.
- Market Risk: the risk that the Stock Market will decline, decreasing the value of the securities we recommend to you.
- Inflation Risk: the risk that the rate of price increases in the economy deteriorates the returns associated with the stock.
- Political and Governmental Risk: the risk that the value of your investment may change with the introduction of new laws or regulations.

Investing in **bonds** involves the assumption of risk, including:

- Interest Rate Risk: the risk that the value of the bond investments we recommend to you will fall if interest rates rise.
- Call Risk: the risk that your bond investment will be called or purchased back from you when conditions are favorable to the bond issuer and unfavorable to you.
- Default Risk: the risk that the bond issuer may be unable to pay you the contractual interest or principal on the bond in a timely manner or at all.
- Inflation Risk: the risk that the rate of price increases in the economy deteriorates the returns associated with the bond.

Investing in **mutual funds** involves the assumption of risk, including:

- Manager Risk: the risk that an actively managed mutual fund's investment adviser will fail to execute the fund's stated investment strategy.
- Market Risk: the risk that the Stock Market will decline, decreasing the value of the securities contained within the mutual funds we recommend to you.
- Industry Risk: the risk that a group of stocks in a single industry will decline in price due to adverse developments in that industry, decreasing the value of mutual funds that are significantly invested in that industry.

- Inflation Risk: the risk that the rate of price increases in the economy deteriorates the returns associated with the mutual fund.

Investing in **interval funds** involves the assumption of risk, including:

- Liquidity Risk: Interval funds are not traded on a secondary market; shares may be redeemed at intervals, generally quarterly; and, the Fund may limit the periodic redemptions to 5% or less of outstanding shares.

Investing in **Exchange Traded Funds (“ETFs”)** involves the assumption of risk, including:

- The public trading price of a redeemable lot of the ETFs may be different from its net asset value. Declining stock prices can cause losses to your investment.
- Some **leveraged and inverse ETFs and ETNs** "reset" daily, meaning that they are designed to achieve their stated objectives on a daily basis. If held for a period longer than one day, their performance over the longer periods of time can differ significantly from the stated multiple of the performance (or the inverse of the performance) of their underlying index or benchmark during the same period of time. This effect can be magnified in volatile markets.
- ETFs and ETNs linked to commodity futures do not offer direct exposure to the commodity's spot price and may perform differently than the spot price for the commodity itself.
- You should not assume that an ETF or ETN that is linked to commodity futures will provide an effective hedge because of a negative correlation with equities or other asset classes.

Investing in **Alternative Investments (“Alternatives”)** involves the assumption of risk, including:

- There may be no public market so these investments may not be sold quickly or rebalanced.
- Because there is no public market, the shares are not valued daily. An appraised value may be available only on a periodic basis and may not reflect the value you would obtain if a market did exist. The appraised value may be more or less than the amount you invested.
- Alternatives are long term investments. The holding period will vary by product before a liquidation event is executed.
- Many Alternatives are not registered with the SEC so do not afford the benefits of public disclosure and reporting.
- Many Alternatives are speculative. The risks associated with an investment are described in the offering documents. Read the offering documents carefully before investing.
- Investments classified as Alternatives (except interval funds and public, non-traded preferred stock of traded REITs as described on Page 10) may not be purchased on a discretionary basis in your account.

- The percentage of Alternatives held in a managed account will be limited based on your liquidity needs, net worth, investment objectives, risk tolerance, custodial limitations and any state or regulatory limitations.
- Generally, additional fees will be assessed by account custodians related to holding certain alternative investments in managed accounts.

The use of **margin, options and short sales** are higher risk strategies:

- Option transactions are limited to writing covered calls, writing cash secured puts, and purchasing option. It is possible to lose all of the principal you invest.
- In a cash account, your risk is limited to the amount of money that you have invested. In a margin account, your risk includes the amount of money invested plus the amount that has been loaned to you.
- When you sell short, your losses can be infinite.

When funds in your managed account are allocated to **cash**, the funds will earn interest in a cash account or money market fund through the account custodian:

- Cash accounts are generally intended as a place to hold cash pending investment or for immediate cash needs, not solely for the purpose of receiving interest.
- The interest rates will generally be less than the investment management fee when the cash allocation is included in your billable assets.
- The custodian can earn income from holding client cash.
- The custodian can earn fees from money markets for marketing, distribution and other services (see the money market prospectus).
- As a result, the custodian and adviser will likely earn more on your cash assets than you do.

When your custodian offers an **FDIC-insured cash account**, coverage will be defined by the FDIC limits of coverage:

- Limits are up to \$250,000 per account owner, per legal capacity per bank. This means that all accounts held by you in the same legal name at the same bank will be aggregated to determine the coverage limits.
- When your FDIC insured accounts are maintained through multiple banks, the limit across banks per account owner per legal capacity is \$500,000.
- Additional information about FDIC insurance is available at [www.fdic.gov](http://www.fdic.gov).

You should also be aware that transactions in the account (including account reallocations and rebalancing) may trigger a taxable event for you, unless your account is a qualified retirement account.

When using third party investment managers, each manager will have its own methods of analysis, investment strategies and unique investment risks that should also be reviewed and considered. In instances where we recommend that a third-party manage your assets, please refer to the third party's ADV Part 2A and Appendix 1 disclosure brochures for details on their investment strategies, methods of analysis and associated risks.

***Investing in securities involves risk of loss that you should be prepared to bear.***

## **ITEM 9 – DISCIPLINARY INFORMATION**

Strategic Blueprint has no reportable disciplinary information.

On October 29, 2015, the Strategic Financial Alliance, Inc. (SFA), an affiliated company, entered into an Acceptance, Waiver and Consent with the Financial Industry Regulatory Authority (“FINRA”) concerning its supervision of and procedures related to consolidated reports. Without admitting or denying the allegations, SFA consented to a censure and a \$30,000 fine. SFA was also required to submit an attestation that it had implemented procedures which more fully addressed the supervision of consolidated reports.

Information about your Advisory Representative is available in his or her Supplement to this brochure, and at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

Strategic Blueprint’s sole business purpose is as a registered investment adviser.

Strategic Blueprint is wholly owned by SFA Holdings, Inc. (SFAH). SFAH also owns the Strategic Financial Alliance, Inc. (SFA), a registered broker-dealer, member of FINRA and SIPC, and an SEC-registered investment adviser. Strategic Blueprint shares office space, technology, including servers and email archiving, and employees with SFAH and SFA. Ms. Holloway is the Controller, Vice President and FINOP of SFA. Ms. Sullivan is the Senior Vice President of SFA. Compliance and supervisory personnel provide similar functions for both companies.

SFA Partners is wholly owned by SFA Holdings, Inc. It provides services shared by SFA, Strategic Blueprint, and SFA Insurance Services, including human resources, marketing, recruiting, advisor relations, accounting and due diligence.

Individuals affiliated with Strategic Blueprint may also be registered representatives of SFA. They may also associate as advisory representatives of SFA. SFA and its registered representatives offer securities and financial products in addition to rendering investment advice.

Representatives associated with Strategic Blueprint may also be licensed to sell insurance products with the states in which they do business, and are appointed by various insurance companies, including through Strategic Blueprint’s affiliated insurance agency, SFA Insurance Services, Inc.

SFAH owns 50% of Green Creek Resources, LLC, a manager and sponsor of pooled investment programs. Green Creek Resources and Strategic Blueprint share office space. Ms. Holloway is also Secretary of Green Creek Resources.

Timbrel Capital LLC (Timbrel), member FINRA and SIPC, is a registered broker-dealer formed in 2019 and is wholly owned by SFAH. It provides wholesaling and consulting services to sponsors of alternative investments, including Reg D private offerings and unregistered public programs. Timbrel does not conduct business directly with retail investors. If your Advisory Representative recommends a program that is sponsored by a client of Timbrel, disclosure will be made to you. Ms. Holloway serves as FINOP, and Ms. Sullivan is the Chief Compliance Officer.

Clive Slovin, President of SFAH and SFA, and certain Advisory Representatives are shareholders of SFAH, parent company of Strategic Blueprint. Shareholders will benefit from the profits accrued to SFAH from any of its subsidiaries in the form of dividends and enhanced stock value. SFAH offers stock options to employees, and to persons registered with SFA and/or Strategic Blueprint based on the revenues they produce.

Clients are under no obligation to purchase insurance products, securities products, or other products or services through SFA and its associated persons. While Strategic Blueprint and its Advisory Representatives endeavor at all times to put the interests of clients first, should be aware that the receipt of additional compensation itself creates a conflict of interest and may potentially affect the judgment of these individuals when making recommendations.

MerCap Advisors, Inc. is wholly owned by SFAH, parent company of Strategic Blueprint. MerCap Advisors, Inc. ("MCA") is a state-registered investment adviser with its home office in Paoli, Pennsylvania. LaRee Holloway is an officer and Director of MCA, and Julie Sullivan, is a Director.

In 2015, SFAH acquired MerCap Securities, LLC, a registered broker-dealer with its main office in Paoli, Pennsylvania. LaRee Holloway is an officer and Director, and Julie Sullivan is a Director.

## **ITEM 11 – CODE OF ETHICS**

We have adopted a *Code of Ethics* ("Code") to address the standard of business conduct required of our Advisory Representatives and employees. The Code includes our policies and procedures developed to protect your interests in relation to the following:

- Duty at all times to place your interests ahead of ours;
- All personal securities transactions of our Advisory Representatives and employees must be conducted in a manner consistent with the Code and avoid any actual or

potential conflict of interest, or any abuse of an Advisory Representative's or employee's position of trust and responsibility;

- Advisory Representatives may not take inappropriate advantage of their positions; and
- Information concerning the identity of your security holdings and financial circumstances is confidential and must be safeguarded.

We will provide a copy of the Code to you or any prospective client upon request.

We do not buy or sell securities for our own account that we also recommend to you. Our Advisory Representatives and employees are permitted to buy or sell the same securities for their personal and family accounts that are bought or sold for your account.

The personal securities transactions by our Advisory Representatives and employees may raise potential conflicts of interest when they trade in a security that is owned by you or is being considered for purchase or sale for your account.

We have adopted policies and procedures that are intended to address these conflicts of interest. These policies and procedures:

- Require our Advisory Representatives and employees to act in your best interest,
- Prohibit favoring one client over another, and
- Provide for the review of transactions to monitor that an Advisory Representative or employee does not place a trade in a personal or beneficial account in front of a client's transaction in the same security.

Our Advisory Representatives and employees must follow our procedures when purchasing or selling the same securities purchased or sold for your account.

## **ITEM 12 – BROKERAGE PRACTICES**

Strategic Blueprint does not maintain custody of client assets. All managed accounts will be custodied by a qualified custodian, including TD Ameritrade Institutional, a division of TD Ameritrade, Inc. ("TD Ameritrade"), member FINRA/SIPC, Fidelity Brokerage Services, LLC ("Fidelity"), member FINRA/SIPC; or, Schwab Advisor Services division of Charles Schwab & Co., Inc. (Schwab), member FINRA/SIPC.

Strategic Blueprint participates in the TD Ameritrade Institutional program. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer. TD Ameritrade offers to independent investment advisers services which include custody of securities, trade execution, clearance and settlement of transactions. Strategic Blueprint receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under Item 14 below.)

In addition to brokerage and custody services, TD Ameritrade provides access to research, software, and educational opportunities. TD Ameritrade may also make available or arrange for these types of services to be provided to us by independent third parties. It may discount or waive the fees it would otherwise charge for some of the services it makes available to us. It may also pay all or a part of the fees of a third party providing these services to us.

In addition to brokerage and custody services, Fidelity provides access to research, software, and education opportunities.

Schwab Advisor Services (formerly called Schwab Institutional) is Schwab's business serving independent investment advisory firms like ours. Schwab provides us and our clients with access to its institutional brokerage – trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis and at no charge to us as long as we maintain a total of at least \$10 million of our clients' assets in accounts at Schwab. (Please see the disclosure under Item 14 below.)

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit clients or their account(s).

Commissions and other fees for transactions executed through our account custodian (i.e., TD Ameritrade, Fidelity, or Schwab) may be higher than commissions and other fees available if you use another custodian firm to execute transactions and maintain custody of your account. Fees assessed by the custodian of your account will be disclosed to you in the respective custodian's account opening documents.

Strategic Blueprint does not have soft dollar arrangements wherein commissions are used to pay for research.

### **Bunched Trading**

We may engage in "bunched trading," which is the purchase or sale of a security for the accounts of multiple clients in a single transaction. If a bunched trade is executed, each participating client receives a price that represents the average of the prices at which all of the transactions in a given bunch were executed. If the order is not completely filled, the securities purchased or sold are distributed among participating clients on a pro rata basis or in some other equitable manner.

Transactions for the accounts of our Advisory Representatives and employees may be included in bunched trades. They will receive the same average price as clients.

Transactions for the accounts of our Advisory Representatives or employees will not be favored over transactions for client accounts.

We are not obligated to include any client transaction in a bunched trade. Bunched trades will not be effected for any client's account if doing so is prohibited or otherwise inconsistent with that client's investment advisory agreement. No client will be favored over any other client.

## **ITEM 13 – REVIEW OF ACCOUNTS**

Security purchases and sales effected in your account are monitored for suitability by a designated supervisor. Advisory Representatives review advisory accounts with you at least annually. Transactions in the accounts are reviewed on an ongoing basis. Interim reviews may be triggered by changes in political, economic or market conditions or if there are changes in your stated financial profile.

Reviews for financial plans occur upon the engagement as part of the financial planning process. The extent of reviews depends on the arrangement with you. Thereafter, reviews are conducted according to the financial planning agreement. Financial planning clients receive a financial plan in the agreed upon form upon completion of the plan. Updates to the financial plan and subsequent reviews are conducted as determined by advisor and client as outlined in the Financial Planning Agreement.

Strategic Blueprint's Advisory Representatives render investment advisory services to clients using different methods. Advisory Representatives may offer any or all of the advisory services described in this Brochure. Strategic Blueprint instructs each Advisory Representative that manages accounts to review accounts with their clients, at least annually, as to suitability of the portfolio relative to stated financial needs and objectives, and to determine what action, if any, is indicated. Broader reviews are performed periodically by the Advisory Representative's designated supervising principal and/or the Strategic Blueprint Compliance Department, or their qualified designees.

The custodian of your managed account(s) provides quarterly brokerage account statements. You will also receive monthly statements for those months in which there is activity in your account. Please review your statements carefully to make sure that your account is being managed according to your stated objectives. Your statement will also show the amount of any advisory fee deducted from your account.

Performance reports for your managed account(s) will generally be made available no less than quarterly, as agreed upon between you and your Advisory Representative.

Third-party asset managers to which Strategic Blueprint has referred clients, provide statements and performance reports to clients, monthly or quarterly, based on the TPAM's disclosure brochure and their agreement with the client.

## **ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION**

### **OTHER COMPENSATION**

In certain instances, product sponsors, investment companies, and third-party asset managers (“product sponsors”) will participate in activities that are designed to help facilitate the distribution of their products, such as marketing activities and educational programs, and by offsetting expenses that result from the cost of conducting initial and on-going due diligence on their products. In return for assistance in facilitating the activities described above, Strategic Blueprint generally receives additional compensation from product sponsors in the form of marketing allowances and due diligence fees. SFA, an affiliated company, may also receive marketing support and other financial benefits from product sponsors and third-party managers. Advisory Representatives will indirectly share in non-cash benefits when that additional compensation is used by Strategic Blueprint and/or SFA for conferences, meetings or other educational opportunities.

However, Strategic Blueprint does not recommend these products over others. These companies will have greater access to our representatives to provide training, education presentations and product information. And this additional exposure and compensation may give rise to a financial incentive for Strategic Blueprint to recommend these products over other products where such financial incentives are not present.

While Strategic Blueprint and its Advisory Representatives endeavor at all times to put the interests of our clients first, you should be aware that the receipt of additional compensation itself creates a conflict of interest and may potentially affect the judgment of these individuals when making recommendations. Additionally, because of the revenue sharing arrangements referenced above, though they do not impact advisor compensation, Advisory Representatives may prefer recommending products offered by a sponsor who is participating in the revenue sharing program over other products and money managers available through Strategic Blueprint. Please contact Strategic Blueprint at 678.954.4130 for additional information about revenue sharing arrangements.

Strategic Blueprint will receive certain economic benefits as a result of our participation in the institutional brokerage program of TD Ameritrade. These benefits include products and services that assist us in managing and administering client accounts, including access to investments generally available to institutional investors, software, technology, and research. The availability of the custodians' products and services is based solely on our participation in their programs, and not on the provision of any particular investment advice.

As disclosed under Item 12 above, Strategic Blueprint participates in TD Ameritrade's institutional customer program. Strategic Blueprint recommends TD Ameritrade to its clients for custody and brokerage services. There is no direct link between Strategic Blueprint's participation in the program and the investment advice it gives to its clients, although Strategic Blueprint receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Strategic Blueprint participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Strategic Blueprint by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by Strategic Blueprint's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Strategic Blueprint but may not benefit its Client accounts. These products or services may assist Strategic Blueprint in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Strategic Blueprint manage and further develop its business enterprise. The benefits received by Strategic Blueprint or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Strategic Blueprint endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Strategic Blueprint or its related persons in and of itself creates a potential conflict of interest and may indirectly influence Strategic Blueprint's choice of TD Ameritrade for custody and brokerage services.

As disclosed in Item 12 above, Schwab also makes available to us other products and services that benefit us but may not directly benefit the client or their account(s). These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- provides access to client account data (such as duplicate trade confirmations and account statements);
- facilitates trade execution and allocate aggregated trade orders for multiple client accounts;
- provides pricing and other market data;
- facilitates payment of our fees from our clients' accounts; and
- assists with back-office functions, recordkeeping and client reporting.

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- educational conferences and events
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants and insurance providers.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees.

Irrespective of direct or indirect benefits to our client through Schwab, we strive to enhance the client's experience, help reach their goals and put their interests before that of our firm or its associated persons.

### **CLIENT REFERRALS**

Strategic Blueprint will enter into written agreements with certain unaffiliated investment advisers and other professionals (such as CPAs, attorneys, etc.) to compensate them for referring clients to us. We will pay these individuals (referred to as "solicitors") a percentage of the advisory fee that you pay us if it is determined that you have become a client of ours as a result of their direct or indirect efforts.

The payments we make to a solicitor will not result in an increase in the amount of the advisory fee that you pay.

Additionally, we also enter into written agreements through which Strategic Blueprint serves as a solicitor to other investment advisers. Strategic Blueprint (and, in turn, your Advisory Representative) will receive a portion of the advisory fee as a solicitor's or referral fee when you enter into an advisory agreement with a third-party asset manager as a result of your Advisory Representative's recommendation.

Our solicitation or referral arrangements will comply with applicable laws that govern:

- the nature of the services provided;
- the fees to be paid;
- disclosure of solicitor arrangements to clients; and
- client consents, as required.

Any solicitor's fee will be fully described in a written Solicitor's Disclosure Statement which you will receive and acknowledge when you enter into an advisory agreement.

## **ITEM 15 – CUSTODY**

Strategic Blueprint does not maintain physical custody of client assets. We will be deemed to have custody when you authorize us to deduct advisory fees directly from your account. Strategic Blueprint may only deduct fees with your written authorization, and the amount of any advisory fee deducted is shown on your account statement. You will receive at least quarterly statements from the account custodian. Strategic Blueprint urges you to carefully review such statements and compare this official custodial record to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. Where there are differences, you should rely on the values disclosed in the custodial account statements.

Strategic Blueprint is also deemed to have custody when you execute a Standing Letter of Authorization (SLOA) which allows your Financial Advisor to request disbursements to be sent from your account to payees as specified by you in the SLOA at designated addresses or to designated account numbers. You will receive notifications from the account custodian when such a disbursement is made. Annually, the custodian will send a notification to you to confirm the SLOAs which you have authorized. By limiting the manner in which we are deemed to have custody, Strategic Blueprint is not subject to a surprise audit requirement.

## **ITEM 16 – INVESTMENT DISCRETION**

We may manage your accounts on a discretionary or non-discretionary basis. We will only manage your account on a discretionary basis upon obtaining your written consent. Your consent is typically granted and evidenced in the executed Investment Management Agreement. We define discretion as the authority to trade your account, without obtaining your prior consent, to select the securities and amount of securities to be bought or sold, and the timing of the purchase or sale. It does not extend to the withdrawal or transfer of your account funds or securities.

We may give advice and act in the performance of our duties to you, which differs from advice given, or the timing and nature of action taken, with respect to other clients' accounts.

## **ITEM 17 – VOTING CLIENT SECURITIES**

As a matter of firm policy and practice, Strategic Blueprint does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Strategic Blueprint

may provide advice to clients regarding the clients' voting of proxies. You will receive information about proxies directly from your account custodian.

## **ITEM 18 – FINANCIAL INFORMATION**

In May 2020, SFA Holdings, Inc. (SFAH), parent company of Strategic Blueprint, and owner of a group of financial services companies, applied for and received a Paycheck Protection Program (PPP). The COVID-19 Pandemic presents many risks, including unprecedented market volatility, and the uncertainties surrounding duration of the pandemic and its level of impact on the various affiliated companies. The loan proceeds will be used to support SFAH's payroll expenses and other expense items allowed under the program. If used in conformity with the program requirements, the loan will be forgiven without repayment. If the proceeds are used in a manner not allowed under the program, then the loan will convert to a standard loan and SFAH will be required to repay the proceeds to the lending institution.

Strategic Blueprint has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.