

# The Pacific Financial Group Inc. (TPFG)

March 2024

## Form CRS (ADV 3) – Client Relationship Summary

### I. Introduction

TPFG is an investment adviser registered with the Securities and Exchange Commission (“SEC”). As an investment adviser, TPFG does not provide brokerage or commission-based services. It is important for retail investors to understand the differences between advisory and brokerage fees and services. There are free and simple tools available to research firms and financial professionals at [www.investor.gov/CRS](http://www.investor.gov/CRS), which also provides educational materials about investment advisers, broker dealers, and investing.

### II. Relationships and Services

#### WHAT INVESTMENT SERVICE AND ADVICE CAN YOU PROVIDE ME?

TPFG offers six investment advisory Programs to retail investors: 1) Self Directed Brokerage Account ([SDBA](#)) Management; 2) Separately Managed Accounts ([SMA](#)); 3) Enhanced Portfolio Investment Centre and Market Movement Solutions ([EPIC/MMS](#)); 4) the Pacific Premier Partners Program (P4), 5) Core Retirement Optimization ([CRO](#)); and 6) Variable Annuity Optimization ([VAO](#)), each a (“Program”). *See links in parentheses for additional information.*

TPFG primarily works with unaffiliated investment adviser representatives (“IAR”) whose supervising firms have contracted to introduce their Clients to TPFG for asset management. The IAR and TPFG will have their respective obligations to the Client. TPFG provides portfolio management in the Programs it administers while the IAR as the Client’s financial adviser determines the appropriateness of the Program and account allocation selected based on information provided by the Client. Under certain circumstances, IARs registered with TPFG will offer its Programs directly to investors under its Private Client services, in which case, TPFG assumes the responsibilities of the IAR.

Except for P and EPIC/MMS, TPFG constructs model portfolios (each, a “Model”) and continuously monitors each Model to remain consistent with the stated discipline as part of its standard services. For P4, and EPIC/MMS, TPFG offers independent strategists (each a “Strategist”). Accounts may be allocated a single Strategist or a combination of Strategist. TPFG conducts due diligence on Strategists for platform access. TPFG may itself serve as a strategist for EPIC/MMS. TPFG has the discretion to determine the Models/Strategists that will be available within a Program. For all Programs, the IAR determines the initial suitability of each Model/Strategist, based on the IAR’s knowledge of the Client’s investment needs and objectives, and confirms suitability at least annually. All Strategies consist of mutual funds and exchange traded funds. Except as noted below, Clients grant TPFG the discretion to execute transactions without first consulting the Client.

#### ADDITIONAL INFORMATION / PROGRAM LIMITATIONS:

- SDBA Strategies are comprised solely of the Pacific Financial Group family mutual funds (the “Pacific Funds”) which are managed by Pacific Financial Group, LLC, a TPFG affiliate. The Pacific Funds are also known as Single Ticker Models (STM)s because they are mutual fund options comprised of mutual fund models. The underlying models are managed by TPFG’s partner Strategists. Please see the [prospectus](#) for details.
- CRO & VAO are managed within the Client’s retirement plan/annuity and are limited to the investment options provided by the retirement plan or annuity.
- If a retirement plan will not permit TPFG to trade the account, TPFG will enter into a non-discretionary agreement.
- In P4 and EPIC/MMS, the Client’s IAR may build custom portfolios managed by the IAR.
- Depending on the Program, account minimums are between \$25,000 and \$50,000 except CRO and SDBA that have no minimum at TPFG.
- Go to <https://www.tpfg.com/> and click the “Services” tab for additional information about the services offered.

#### Conversation starter to ask your Adviser:

- Given my financial situation, should I choose an investment advisory service?
- Why or why not?
- How will you choose investments to recommend to me?
- What is your relevant experience, including licenses, education and other qualifications? What do these qualifications mean?

### III. Fees, Costs, Conflicts and Standard of Conduct.

#### WHAT FEES WILL I PAY?

You will pay various fees when participating in the Program selected as noted below. Fees are memorialized in the management agreement each client signs prior to investing. **You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make over time. Please make sure you understand what fees and costs you are paying.**

Program	SDBA	SMA	EPIC/MMS	P4	CRO	VAO
TPFG's Max Fee	1.99%	1.0%	1.95%	1.85%	1.0%	1.0%
IAR Max Fee	0.75%	1.0%	1.5%	1.5%	1.0%	1.0%
Frequency -	Monthly in arrears		Quarterly in advance			
	Max fee is annual rate paid:		Max fee is annual rate paid:			
Calculation	% of funds' net asset value		% of account value as of the last trading day of the calendar quarter.			

#### **IMPORTANT NOTES ABOUT FEES:**

- Other than the STMs in SDBA and in P4 all fees are paid directly by you.
- Clients in the SDBA and P4 Programs indirectly pay fees as shareholders of the Pacific Funds. PFG has agreed to cap Pacific Funds expenses, excluding AFPE, not to exceed 1.99%. The IAR fee is paid by TPFPG from its own resources. The Pacific Funds will pay additional fees to include acquired fund fees and distribution charges to custodial and brokerage platforms. Neither TPFPG nor its affiliate receive or share in these additional fees.
- Fees are exclusive of internal fund fees (other than the STM fees described above), custodial fees, and for MMS/EPIC, fees charged by some Strategists.
- Additional information about fees can be found in TPFPG's form [ADV](#) (See Item 5).

**Conversation starter to ask your Adviser:**  
**Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs and how much will be invested for me?**

#### **WHAT ARE YOUR LEGAL OBLIGATIONS TO ME WHEN ACTING AS MY INVESTMENT ADVISER? HOW ELSE DOES YOUR FIRM MAKE MONEY AND WHAT CONFLICTS OF INTEREST DO YOU HAVE?**

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means:

- TPFPG will use its proprietary mutual funds when allocating accounts to the SDBA Program. TPFPG profits through fees paid by the Funds to TPFPG and its affiliate, which fees would not be earned through non-proprietary funds. TPFPG mitigates this conflict by not charging Clients additional SDBA Program fees.
- Some strategists will pay TPFPG or its affiliate for making their services available in a TPFPG Program. TPFPG mitigates these conflicts by reducing its Program fee by the amount received from the strategist.
- TPFPG's fees are "asset based" which means the fee is calculated as a percentage of the value of the account so that Clients will pay more in fees as the account value increases.
- **For additional information about conflicts of interest see TPFPG's form [ADV](#) Items 5 & 10**

#### **HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?**

TPFPG profits from the fees charged to Clients and from its proprietary mutual funds. A portion of these fees are paid to TPFPG's financial professionals as noted in the investment management agreement. See TPFPG's Form [ADV](#) Item 5 & 10 for additional information about conflicts of interest and mitigation.

**Conversation starter to ask your Adviser:**  
**How might your conflicts of interest affect me, and how will you address them?**

## **IV. Disciplinary History**

#### **DO YOU OR YOUR FINANCIAL PROFESSIONAL HAVE LEGAL OR DISCIPLINARY HISTORY?**

No, neither our firm nor its financial professionals have any legal or disciplinary history. There are free and simple tools available to research firms and financial professionals at [www.investor.gov/CRS](http://www.investor.gov/CRS)

**Conversation starter to ask your Adviser:**  
**As a financial professional do you have any disciplinary history? For what type of conduct?**

## **V. Additional Information**

For additional information about our services, visit [www.TPFG.com](http://www.TPFG.com) where you can find our Form [ADV](#) and other information about us to include the [Prospectus](#) for our proprietary funds. You can also call us at 800-735-7199 or email us at [teamCS@tpfg.com](mailto:teamCS@tpfg.com) to request a free copy of our ADV and Form CRS or to speak with a TPFPG Investment Adviser Representative.

**Conversation starter to ask your Adviser:**  
**Who is my primary contact person? Is he/she a representative of an investment adviser or broker dealer? Who can I talk to if I have concerns about how this person is treating me?**