

Item 1: Cover Page



Form ADV Part 2A Firm Brochure

February 7, 2023

207 S. McLean Street, Lincoln, Illinois 62656

217-735-1576 (phone), 217-735-5866 (fax)

info@pacesetterfinancial.com

www.pacesetterfinancial.com

This brochure provides information about the qualifications and business practices of Pacesetter Financial Group, LLC. If you have any questions about the contents of this brochure, please contact us at 217-735-1576 or info@pacesetterfinancial.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Pacesetter Financial Group is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Pacesetter Financial Group is 123287.

Pacesetter Financial Group is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Item 2: Material Changes

This is a summary of material changes to Pacesetter Financial Group, LLC's Form ADV Part 2A, Firm Brochure, since our last update, dated December 26, 2019.

As of February 3, 2022, there are the following changes:

We updated our firm our Assets Under Management and Assets Under Advisement.

We no longer use Fidelity for 401(k) plans.

If you would like to receive a complete copy of our updated Brochure, Form ADV Part 2A, and/or a copy of our Brochure Supplement, Form ADV Part 2B, please contact our office at 217-735-1576 or info@pacesetterfinancial.com.

Additional information about Pacesetter Financial Group is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Pacesetter Financial Group is 123287.

Pacesetter Financial Group's website is www.pacesetterfinancial.com.

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Item 4: Advisory Business

Pacesetter Financial Group, LLC is a Registered Investment Advisor. We are a sister company to J.M. Abbott & Associates, Ltd., Certified Public Accountants. We opened our advisory business in 1997 to offer our community an independent approach to long-term investing. Clayton L. George, CPA/PFS, Andrew M. Fitzpatrick, CPA, Kristen R.M. Lanning, CFP®, and Andrew H. Hayes, CPA, are the owners of Pacesetter Financial Group, LLC. Clayton L. George, CPA/PFS, Andrew M. Fitzpatrick, CPA, and Andrew H. Hayes, CPA are also owners of J.M. Abbott & Associates, Ltd.

Pacesetter manages investment portfolios on two separate platforms:

- Individual Client, and
- Company-Sponsored 401(k) Client.

We include the following services in the management of your Individual Client account:

- Meeting with you;
- Providing personalized investment advice and asset allocation recommendations;
- Selecting, purchasing, and selling securities for your account(s);
- Monitoring your portfolio;
- Preparing and mailing quarterly performance reports; and
- Performing limited financial planning services.

We include the following services in providing investment advice for your Company-Sponsored 401(k) plan and its participants:

- Assisting with initial set-up of the plan and rollover of assets from prior plan(s);
- Designing multiple portfolios for participants to choose from, based on various risk-tolerance levels;
- Meeting with and providing limited, personalized investment advice to interested participants;
- Providing advisory-related required disclosures and participant information for participants;
- Reviewing participant accounts; and
- Monitoring pre-designed portfolios, and recommending changes, as needed.

Pacesetter specializes in managing mutual fund portfolios, but we may also make recommendations on other positions that you transfer into accounts held with us.

Clients each have unique financial needs and goals. Therefore, we tailor our advisory services to your needs.

For Individual Clients:

Pacesetter works with you to determine your risk tolerance, time horizon, and financial needs and goals. We use this information to develop a well-diversified portfolio for you. Periodically, depending on your time horizon, we review this information with you to determine if we need to adjust your portfolio.

You may specify your portfolio as discretionary or non-discretionary. You may also impose restrictions or limitations on the management of your portfolio. Regardless of discretion or restrictions, we manage your portfolio with your best interests in mind.

For more information on the differences between discretionary and non-discretionary authority, please see ***Item 16: Investment Discretion***.

We also offer optional 529 College Savings Plan services. College 529 savings plan accounts must be held at the plan provider selected. Therefore, we offer set-up and monitoring services as a supplement to our standard investment advisory services, listed above.

For Company-Sponsored 401(k) Clients:

Pacesetter discusses your risk tolerance, time horizon, and financial needs and goals with you, the participant. We use the information you give us to recommend a pre-designed portfolio for you. Your 401(k) account is client-directed, meaning you select your own investments from the options available in your plan. Upon your request, we can assist you in signing up for your plan and in selecting your portfolio. If you do not select an investment for your account, the default investment will automatically be selected for you, per your plan sponsor's direction.

Assets Under Management

As of December 31, 2022, Pacesetter Financial Group managed a total of \$107,187,398 in client assets. Of that total, we managed \$79,294,018 on a discretionary basis, and \$27,893,380 on a non-discretionary basis. Please bear in mind that all the Company-Sponsored 401(k) plans we manage are participant-directed, and therefore non-discretionary.

Item 5: Fees and Compensation

Pacesetter Financial Group charges advisory fees based on the type of client you are and the type of portfolio in which you are invested. In special circumstances, or if unique services are provided, your fee may be negotiable. You may terminate your contract with us, without penalty, within five (5) business days after entering into the contract, at which time we will provide you with a full refund. We prorate fees for partial years of service, both in the initial year that you become a client, and in the final year, when our services are terminated.

| <u>Individual Client Fee Schedules (annual):</u> | <u>Diversified Portfolio</u> | <u>Fixed Income Portfolio</u> |
|--|------------------------------|-------------------------------|
| On the first \$500,000 | 1.00% | 0.40% |
| On the next \$500,000 | 0.75% | 0.40% |
| On amounts over \$1,000,000 | 0.50% | 0.40% |

Company-Sponsored 401(k) Plan Fee Schedule (annual):

| | |
|-----------------------------|-------|
| On the first \$500,000 | 0.75% |
| On the next \$500,000 | 0.60% |
| On the next \$3,000,000 | 0.45% |
| On the next \$3,500,000 | 0.30% |
| On amounts over \$7,500,000 | 0.20% |

Regardless of the total amount of assets we manage for you, we charge a minimum of \$75 per year, per client, pro-rated for partial years.

Pacesetter charges the above fees quarterly, in advance. For example, we calculate your second quarter (April – June) fee in year 1 by taking the market value of your account on March 31 of year 1, and multiplying it by one-fourth of your annual fee percentage. The calculated fee would be due in April of year 1.

For example, given an Individual Client with a diversified portfolio:

| | |
|--|----------------|
| March 31, Year 1 Account Value = | \$1,050,000.00 |
| We bill the first \$500,000 at $\frac{1}{4}$ of 1.00%, or 0.25% | \$1,250.00 |
| We bill the next \$500,000 at $\frac{1}{4}$ of 0.75%, or 0.1875% | 937.50 |
| We bill the remainder at $\frac{1}{4}$ of 0.50%, or 0.125% | <u>62.50</u> |
| The total fee due for the second quarter of Year 1 = | \$2,250.00 |

Most Individual Clients choose to have their fees deducted directly from their accounts. However, if you prefer, you can pay your bill by check. Please specify your preference at the time you sign your agreement with us. You can change your preference later by contacting us and filling out additional paperwork.

Company-Sponsored 401(k) plan fees are deducted directly from participant accounts.

At the beginning of each quarter, we calculate your fee and send you (Individual Client or Company-Sponsored 401(k) plan administrator) a billing statement. If you pay your bill by check, your bill is immediately due and payable. If your fees are deducted from your Individual Client account or from your Company-Sponsored 401(k) plan participant account, we submit the bill amount to the broker or recordkeeper five days after mailing the billing statement to you.

Fees are prorated for accounts opened during each quarter. We mail your first Individual Client billing statement to you at the beginning of the quarter following when you deposited or transferred assets into an account that we manage for you. That billing statement will include both your initial, pro-rated billing for the prior quarter, based on the assets that were deposited and/or transferred into your account(s), PLUS your current quarter billing. We mail your first Company-Sponsored 401(k) plan billing statement to you after the end of the current quarter. This billing statement is calculated in arrears, pro-rata, based on the value of the plan at the end of the quarter. In this case, your next quarter advance billing statement will be included with your first billing statement, and all subsequent billings will be in advance.

In addition to our advisory fees, Individual Clients may also pay (directly to the service provider):

- brokerage commissions,
- mutual fund fees, and
- custodian and account or special processing fees, if applicable.

Company-Sponsored 401(k) plans also pay (directly to the service provider):

- custodian fees,
- recordkeeping fees,
- mutual fund fees,
- third-party administration fees, and
- account or special processing fees, if applicable.

Our investment advisory contract is open-ended. You, or we, can terminate the contract at any time, upon ten days written notice. If your contract is terminated before the end of a billing period, you will be entitled to a partial refund of fees. We will calculate your refund based on the number of full days in the quarter that you are no longer our client. If your account remains open, we may deposit your refund directly into your account. If your account is closed, we will mail a check directly to you.

Optional Supplemental 529 College Savings Plan Fees (for Individual Clients):

| | |
|--------------------------------|------------------|
| Account set-up fee | \$250 (one-time) |
| Annual review & monitoring fee | \$150 (annually) |

Additional and/or supplemental services may also be available. These services may be charged by the hour or as a fixed fee.

Item 6: Performance-Based Fees and Side-By-Side Management

This item is not applicable—Pacesetter does not charge or accept performance-based fees.

Item 7: Types of Clients

Pacesetter manages investment portfolios for:

- individuals,
- trusts,
- business entities,
- tax-exempt entities, and
- company-sponsored retirement plans.

We do not require a minimum account size for opening or maintaining an investment account. However, we impose a minimum annual investment advisory fee of \$75 per client, per year, pro-rated for partial years.

For additional information on advisory fees, see ***Item 5: Fees and Compensation***.

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

Pacesetter uses Modern Portfolio Theory to develop *well-diversified investment portfolios* for our clients. We select a *combination of asset classes* to maximize the expected return for any given level of market risk. To invest in these asset classes, we select *disciplined mutual funds* that target each of the selected asset classes. Based on your time horizon, your risk tolerance, and your financial needs and goals, we recommend an initial portfolio for you. As markets move, the combination of assets held in your portfolio will shift, so we monitor your portfolio, and sometimes make trades to keep your risk level consistent with your needs—this is called *rebalancing*. Many factors may change your needs and goals over time, so we periodically meet with you to review and, if necessary, revise your portfolio.

We design our investment portfolios to diversify away much of the risk inherent in individual stock and bond investments. However, virtually all investments involve some amount of risk. Stock and bond investments, including the mutual funds we recommend, can be subject to the following risks, among others:

- liquidity risk,
- currency risk,
- market risk,
- credit risk,
- inflation risk,
- political risk,
- industry risk, and
- interest rate risk.

If you invest in these types of assets, there is always the risk that you may lose money.

To develop well-diversified investment portfolios, we review *long-term historical performance* (risk and return) of asset classes. Based on this information, we create *combinations of asset classes* that maximize historical returns for each targeted level of risk. However, past performance is not a guarantee of future results. Market values change frequently and past performance may not be repeated.

We primarily recommend *disciplined, asset-class mutual funds* in the investment portfolios we develop for you. We do so because of the *diversification* we can achieve at lower cost. However, mutual funds have risks of their own. A mutual fund is a pooled investment that invests based on

the fund's offering papers (prospectus). Each mutual fund that we recommend carries the risk of its targeted asset class, in addition to the related risks listed above. As an owner of mutual fund shares, you own a share in the underlying investments of the fund. Since mutual funds have management teams who oversee the fund and its activities, improper management of the fund is another risk to which you are exposed. We do our best to mitigate this risk by screening the funds and fund companies that we recommend to you.

Item 9: Disciplinary Information

This item is not applicable—Pacesetter Financial Group and our employees have not been involved in, or subject to, any reportable charges, actions, findings, convictions, proceedings, penalties, suspensions, revocations, or denials.

Item 10: Other Financial Industry Activities and Affiliations

Pacesetter Financial Group is a sister company to J.M. Abbott & Associates, Ltd. Our two companies have a business relationship that is material to our advisory business. Abbott & Associates is a Certified Public Accounting firm that provides accounting, tax, business consulting, and financial planning services for individuals, businesses, and other various entities.

We share:

- office space,
- computer hardware,
- certain computer software,
- receptionists,
- assistants,
- phone and fax numbers, and
- an e-mail domain.

All employees of Pacesetter are also employees of Abbott & Associates. We run the businesses separately, to the extent possible, and we keep all Pacesetter client files separate from Abbott & Associates' files.

If you engage Abbott & Associates for any services they provide, Abbott & Associates will bill you directly. Abbott & Associates services are not included in the advisory fees you pay to Pacesetter.

We may refer you to Abbott & Associates for tax, accounting, business consultation, or other services they provide. Abbott & Associates may refer their clients to Pacesetter for investment advice, wealth management, or financial planning services that we provide. This creates the potential benefit for clients that multiple financial-related services are provided in one office. However, it can also create a conflict of interest for us, as we have incentive to help each other gain clients and earn additional revenue.

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

Pacesetter Financial Group has established a written Code of Ethics that each employee, officer, and owner must adhere to in all dealings with clients, client assets, and client information.

Our Code of Ethics describes proper behavior and actions regarding:

- Confidentiality;
- Gifts;
- Company opportunities;
- Undue influence;
- Reporting violations of the Code;
- Pre-approval procedures for personal trading;
- Certification of compliance with the Code;
- Compliance review and recordkeeping;
- Exceptions; and
- Sanctions.

The overall tone of our Code of Ethics emphasizes that each employee must adhere to our fiduciary duty to place clients' interests ahead of our own. Upon your request, we will provide you with a copy of our Code of Ethics.

Most of the employees of Pacesetter and Abbott & Associates currently invest in the same mutual funds that we recommend to clients. Concurrent investment in mutual funds does not create a conflict of interest since purchases and sales of mutual fund shares do not affect the market value of those shares.

The employees of Pacesetter and Abbott & Associates also have the ability to purchase or sell individual securities, such as stocks or bonds, in their own accounts. This can create a conflict of interest, since purchases or sales of these types of securities can affect their market value or price.

We have put policies in place to address these potential conflicts of interest:

- Pacesetter employees must obtain approval from the Chief Compliance Officer prior to any purchase or sale of publicly traded securities.
 - If it appears that a requested transaction may adversely impact you, we will contact you to discuss the potential conflict prior to approving the transaction.

- Each Pacesetter employee must provide the Chief Compliance Officer with Annual Personal Securities Holdings reports and Quarterly Personal Securities Transactions reports, including copies of their account statements, if applicable.

Our employees may also be eligible for bonuses beyond their regular bonuses and pay, based at least partially on the amount of assets under management brought in by new clients. These bonuses are up to the full discretion of the owners of Pacesetter Financial Group, and so are unknown ahead of time by employees. However, the possibility of getting a bigger bonus for bringing clients in can create a conflict of interest. We monitor and address this conflict through our commitment to our fiduciary duty to clients, through regular client service, investment management, and through regular monitoring and review procedures.

Item 12: Brokerage Practices

Pacesetter Financial Group recommends a custodian/broker to you when you open an account through us. In recommending a broker for a client, we consider the following factors (if applicable):

- Mutual fund transaction fees;
- Security trade commissions;
- Custodian fees;
- Access to the mutual funds we recommend;
- Trade execution quality, accuracy, and reliability;
- Compatibility between our client management software and the broker's platform; and
- Quality and accessibility of client service.

Research and Other Soft Dollar Benefits

Pacesetter Financial Group does not have any formal soft dollar arrangements. We do not receive research or other products or services from a broker-dealer in connection with client securities transactions.

For Individual Clients:

Your custodian/broker grants us access to its institutional trading and custody services, which are generally unavailable to retail investors. The broker provides these services because we maintain client assets in client accounts with the broker. The custodian/broker's institutional services include:

- Brokerage;
- Custody;
- Access to certain institutional mutual funds and/or mutual funds and ETFs (exchange-traded funds) with no transaction fees;
- Practice management publications;
- Marketing publications;
- Regulatory compliance information, publications, and web-based seminars; and
- Software or technology that:
 - Provides access to client account data;
 - Facilitates trade execution;
 - Provides research, trading, and other market data;
 - Provides a secure electronic communication network for correspondence with the broker-dealer;
 - Facilitates payment of Pacesetter's advisory fees from client accounts;
 - Facilitates client electronic signature of custodian/broker and advisory forms; and
 - Assists with back-office functions, recordkeeping, and client reporting.

Most custodian/brokers and broker-dealers offer these types of services to the advisors that work with them.

For Company-Sponsored 401(k) Clients:

Fidelity, Newport Trust Company, Matrix, or Advisor Trust provides your account with access to its institutional trading and custody services, which are generally unavailable to retail clients. Fidelity's, Newport Trust Company's, Matrix's, and Advisor Trust's services include:

- Brokerage;
- Custody; and
- Access to certain institutional mutual funds.

Access to these services is provided through your Recordkeeper (Newport Group, Inc. or PCS Retirement. Pacesetter does not receive any services directly from Fidelity, Newport Trust Company, Matrix, or Advisor Trust.

Pacesetter is not affiliated with Newport Group or with PCS Retirement. However, we have used Newport Group as the recordkeeper for our own company-sponsored 401(k) plan since 2005. We also recommend Newport Group's recordkeeping services to some of the company-sponsored 401(k) plans that we advise.

We are also not affiliated with Dimensional Fund Advisors (DFA). However, we use this fund family as the core investment for most of our client portfolios. We recommend DFA funds most often, primarily because their investment philosophy is in line with ours.

DFA has relationships with colleges and universities throughout the world. Therefore, they have access to a wide range of market and investment research. As a service to the advisors who use DFA funds in their client portfolios, DFA provides various assistance and educational opportunities, including:

- Charts, graphs, and presentation materials for display or use in client meetings;
- A database and software that allows us to research historical information on DFA funds and various indexes;
- Software that we use to run portfolio simulations;
- An advisor study group, which is coordinated by DFA;
- Conferences, where we learn more about recent research, DFA funds, industry best practices, etc.; and
- An advisors-only website, including research, professional papers, articles, etc.

DFA offers these services to all advisors they approve to recommend and use their funds in client portfolios.

Brokerage for Client Referrals

This item is not applicable—Pacesetter does not receive client referrals from any broker-dealer.

Directed Brokerage

For Individual Clients:

Pacesetter allows clients to direct brokerage, at their discretion. If you direct us to place a trade through a specific broker-dealer, other than the custodian/broker for your account, it may cost you more than if we had placed the trade through your custodian/broker. You may be charged a higher commission than what your custodian/broker would charge, or you may be charged a trade-away fee in addition to a commission.

Pacesetter does not aggregate client orders. We manage client accounts individually, and therefore, make trades individually. This practice allows us to limit the number of trades made for your account. Your custodian/broker charges transaction fees on a per-account, per-trade basis, so there is no financial benefit to aggregating client trades.

For Company-Sponsored 401(k) Clients:

Pacesetter does not allow plan participants or sponsors to direct brokerage. However, sponsors may specify a custodian/broker other than the one we recommend to you, at the time the 401(k) account is to be opened.

None of the 401(k) custodians that we work with charge extra for transactions in your plan, regardless of aggregation of client orders.

Item 13: Review of Accounts

Pacesetter Financial Group reviews client accounts periodically and other-than-periodically, based on the type of account you have. We discuss statements and reports that you receive, below. For more information on the statements and reports you receive, please see ***Item 15: Custody***.

For Individual Clients:

Our Investment Advisor Representatives review your account at least quarterly, for performance and investment purposes. We also review your account quarterly to determine if your portfolio needs rebalanced. In addition, we review your account when you specifically request us to do so, when assets are deposited into your account, or when you have requested a withdrawal. Each time we review your account, we consider your risk tolerance level, any personal or financial changes you have informed us of, and any special needs you have indicated for your account. It is therefore important for you to notify us right away if your personal or financial circumstances have changed.

When we perform quarterly rebalancing reviews, we look to see if your portfolio still meets the asset allocation target we have recommended for your account. If your holding in an asset class is 5% higher or lower than your targeted percentage, we further review your account to see if trades make sense for your circumstances. If trades make sense for your account, and you have given us full discretion, we perform our recommended trades. If your account is a non-discretionary account, and we recommend one or more trades, we will contact you to discuss our recommendations. In this case, we only perform trades upon authorization from you.

Your custodian/broker sends statements directly to you at least quarterly (monthly if there is activity in your account). Your custodian/broker also sends trade confirmations, account change confirmations, and notice of standing authorization for transfers between accounts, directly to you, as applicable.

Pacesetter prepares and mails reports to you on a quarterly basis. The reports we prepare include asset values, asset allocation, and performance information for your portfolio(s). In many cases, we manage several or all of a client's accounts as a single portfolio. If this case applies to you, we will send combined reports, reflecting your total portfolio(s), to you. We also post similar information about your portfolio to our Morningstar password-protected client web portal on a monthly basis. Reports may not be archived on our website (only recent reports may be available, so we recommend you print or save an electronic copy of your reports if you wish to archive them).

For Company-Sponsored 401(k) Clients:

Our Investment Advisor Representatives review your account each time we meet with you, generally during enrollment periods. We also review your account before and/or after each enrollment period, to be sure eligible employees are given enrollment materials and to review enrollment selections.

Each plan sponsor has selected whether or not participants receive quarterly paper statements, based on the sponsor's opinion of their plan participants' needs. Whether or not you receive paper statements, you have electronic access to your account and various reports, including statements, on a daily basis. Your recordkeeper provides this access to you through their password-protected website. Pacesetter does not send any reports to 401(k) participants, sponsors, or administrators.

Item 14: Client Referrals and Other Compensation

This item is not applicable—Pacesetter does not receive compensation from anyone other than our clients, nor do we compensate any non-employee for client referrals.

Item 15: Custody

Pacesetter is considered to have custody of your assets if you give us authorization to deduct our advisory fees directly from your account and/or if you give us standing authorization to make transfers to or from other accounts, such as to your bank account. Otherwise, we do not directly or indirectly hold clients' securities, funds, or cash, and therefore do not assume custody of your securities, funds, or cash.

For more information on the statements and reports you receive, please see ***Item 13: Review of Accounts***.

For Individual Clients:

You will receive statements directly from your custodian/broker, annuity provider, or 529 college savings plan provider. These statements show any fees deducted from your account, any trades or transactions that were placed for your account, and any deposits into or withdrawals from your account during the statement period. You should carefully review your custodian/broker/provider statements.

Pacesetter also sends reports to you. As a matter of client protection, we recommend that you regularly compare the statements your custodian/broker sends to you with the reports that we send to you. If you find an error or discrepancy between the statements, please contact us and/or your custodian/broker right away.

For Company-Sponsored 401(k) Clients:

You have access to your statements on your recordkeeper's password-protected website, and by mail, if applicable. These statements show any fees deducted from your account, any trades or transactions that were placed for your account, and any deposits into or withdrawals from your account during the statement period. You should carefully review your account statements.

Pacesetter does not send additional reports to 401(k) clients.

Item 16: Investment Discretion

For Individual Clients:

Pacesetter Financial Group accepts discretionary authority over client accounts. In fact, we prefer fully discretionary authority because we feel we can provide you better, more seamless service with this arrangement. Discretionary authority eliminates time lags for consultation with you and allows us more flexibility to meet your needs.

At the time you sign a Client Agreement with us, you specify whether you provide us with discretionary authority. When you complete an account application with a custodian/broker, you also direct that custodian/broker to give us certain authorizations and limited power of attorney over your account.

Regardless of whether you give us discretionary or non-discretionary authority, you may list specific limitations to be placed on your account(s). You should list any restrictions you want to impose directly on your Client Agreement. Examples include keeping a minimum amount of cash in your account or excluding a specific asset class from your portfolio.

You can change your selection at any time by completing a new Client Agreement, or by informing us of any changes in writing, with your signature.

For Company-Sponsored 401(k) Clients:

Pacesetter does not accept discretionary authority over 401(k) plans or participant accounts.

Item 17: Voting Client Securities

Pacesetter Financial Group does not vote client proxies. It is your responsibility to vote your proxies, if you see fit.

If proxies are issued for a security held in your account, your custodian/broker will send your proxy material directly to you (the Individual Client account owner or Company-Sponsored 401(k) plan sponsor). Under circumstances where Pacesetter receives your proxy materials inadvertently, we will promptly forward the materials to you.

Upon your request, we can answer questions you may have about your proxy material or we can provide advice to you regarding voting your proxy.

Pacesetter keeps certain records related to proxy voting. We keep a record of:

- Any advice given to you regarding proxy voting, and
- Any proxy material received on your behalf, including the steps we took to forward that material to you.

Item 18: Financial Information

Pacesetter does not currently have, nor do we anticipate, any financial condition that would be reasonably likely to impair our ability to meet our contractual commitments to clients.

Item 19: Requirements for State-Registered Advisers

Item 19 A:

Clayton L. George, CPA/PFS, is Pacesetter's Principal and President; Andrew M. Fitzpatrick, CPA, is Pacesetter's Chief Operations Officer; Kristen R.M. Lanning, CFP®, is Pacesetter's Chief Compliance Officer; Timothy R. Bacus, CFP® is Pacesetter's Marketing Manager. Clayton L. George, Andrew M. Fitzpatrick, Kristen R.M. Lanning, and Andrew H. Hayes are the owners of Pacesetter Financial Group, LLC. Clayton L. George, Andrew M. Fitzpatrick, Kristen R.M. Lanning, and Timothy R. Bacus are Pacesetter's Investment Team members.

Clayton earned a Bachelor of Science degree in Accounting in 1981, and earned his CPA certificate in 1982. He began working for J.M. Abbott & Associates, Ltd., Pacesetter's sister company, in 1983, and became a partner of that firm in 1998. Clayton became an owner of Pacesetter at its inception, in 1997, and became Principal, President, and Managing Member of Pacesetter in 2006. For additional information regarding Clayton's education and business background, see our Brochure Supplement, Form ADV Part 2B.

Andy Fitzpatrick earned a Bachelor of Science degree in Accounting, with a Minor in Construction Management, in 2006. He began working for Abbott & Associates and Pacesetter in 2007. In 2011, Andy earned his CPA certificate. He became a partner in Abbott & Associates in 2020 and an owner of Pacesetter in 2022. For additional information regarding Andy's education and business background, see our Brochure Supplement, Form ADV Part 2B.

Kristen earned a Bachelor of Arts degree in Finance in 1995. She began working for Abbott & Associates and Pacesetter in 2001. She earned certification as a Certified Financial Planner™ (CFP®) Professional in 2009. Kristen became an owner of Pacesetter in 2022. For additional information regarding Kristen's education and business background, see our Brochure Supplement, Form ADV Part 2B.

Tim earned a Bachelor of Christian Ministry degree in 2009 and a Master of Arts in Organizational Leadership in 2014. He began working for Abbott & Associates and Pacesetter in 2017. In 2021, Tim earned certification as a Certified Financial Planner™ (CFP®) Professional. For additional information regarding Tim's education and business background, see our Brochure Supplement, Form ADV Part 2B.

Andy Hayes earned a Bachelor of Science degree in Accountancy in 2001 and began working for Abbott & Associates that same year. He joined Pacesetter in 2007. Andy earned a Master of Arts degree in Accountancy in 2009 and his CPA certificate in 2011. He became a partner in Abbott & Associates in 2016 and an owner of Pacesetter in 2022. Andy provides tax and business consulting

services for Abbott & Associates, and financial analysis and planning for Pacesetter. He also assists in the firm management of both Abbott & Associates and Pacesetter Financial Group.

Item 19 B:

Pacesetter Financial Group is not actively engaged in any other business. However, our employees are also employed by J.M. Abbott & Associates and spend varying amounts of time performing client services related to that business. For more information about our business relationship with Abbott & Associates, see ***Item 10: Other Financial Industry Activities and Affiliations***. For information about how much time each Investment Advisor Representative spends performing services for Abbott & Associates, please see our Brochure Supplement, Form ADV Part 2B.

Item 19 C:

This item is not applicable—Pacesetter does not charge or accept performance-based fees, nor are any of our employees compensated with performance-based fees.

Item 19 D:

This item is not applicable—neither Pacesetter Financial Group, nor any of our employees, has been involved in any arbitration award or liability, or any civil, self-regulatory organization, or administrative proceeding reportable under this item.

Item 19 E:

This item is not applicable—neither Pacesetter, nor any of our employees, has any relationship or arrangement with any issuer of securities.

Item 20: Additional Information

Business Continuity Plan Summary

Pacesetter Financial Group has developed and implemented a Business Continuity Plan to protect our business and your interests during a significant business disruption. A significant business disruption could include a building fire, a tornado, a power outage, and various other natural or man-made disasters. Our plan includes:

- Data back-up and recovery;
- Critical systems checks and alternatives;
- Financial and operational assessments;
- Alternative communications with you, our employees, and our regulators;
- Alternative office space;
- Critical supplier, contractor, bank, and counter-party impact;
- Regulatory reporting; and
- Prompt access to your funds and securities if we are unable to continue operations.

In a significant business disruption to only our company or building, we will transfer our operations to a local site when needed. Our goal is to resume operations within 24 to 48 hours.

In a significant business disruption to our business district, city, or region, we will transfer our operations to a site outside the affected area. Our goal is to resume operations within 1 to 2 weeks.

In case of significant business disruption, our goal is to resume contact with clients through website updates and/or telephone forwarding services within 3 hours, during normal business hours.

Our ability to meet the above timelines will depend upon whether our employees and their families have sustained injury and/or personal property damage.

If during or after a significant business disruption you cannot contact us as you usually do at 217-735-1576, please go to our website at www.pacesetterfinancial.com, or our sister company's website at www.jmabbott.com for contact instructions.

If you continue to be unable to reach us, and you need access to your Individual Client TD Ameritrade or Charles Schwab & Co., Inc. account, please contact TD Ameritrade and/or Schwab directly. You can contact TD Ameritrade through its website at www.advisorclient.com or by telephone at 800-431-3500; you can contact Schwab Alliance through its website at www.schwaballiance.com or by telephone at 800-515-2157. Your custodian/broker can instruct you regarding how to gain prompt access to your funds and securities, including placing buy and sell

orders, issuing checks and wires from your account, or transferring funds via a pre-existing link to bank account or other custodian/broker account. You may also directly contact the custodian of your annuity or 529 savings plan, if applicable. Please refer to your most recent statement from the custodian for their contact information.

If you are a plan participant, sponsor, or administrator for a Company-Sponsored 401(k) plan needing assistance, but unable to reach us, please contact your Recordkeeper. You can contact Newport Group, Inc. through its website at www.newportgroup.com, or by telephone at 888-886-8256. You can contact PCS Retirement through its website at <https://www.pcsretirement.com>, or by telephone at 888-621-5491. Plan administrators and sponsors may also contact FuturePlan, through their website at www.futureplan.com, or by telephone at 866-929-2525, for plan administration assistance.