

## Item 1: Cover Page



# Form ADV Part 2A Firm Brochure

February 26, 2026

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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 at [info@pacesetterfinancial.com](mailto: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](http://www.adviserinfo.sec.gov). The searchable IARD number for Pacesetter Financial Group is 123287.

Pacesetter Financial Group is a Registered Investment Advisor. 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 version of our Form ADV Part 2 A, Firm Brochure, has been updated since our last annual updating amendment dated February 12, 2025. It reflects the following changes:

- We have updated **Item 4: Advisory Business** and **Item 5: Fees and Compensation** to remove set-up and monitoring services and fees related to 529 College Savings Plans. We still offer ad hoc services related to 529 College Savings Plans, but we no longer have the ability to set plans up for clients or directly monitor plans for clients due to custodial platform changes.
- We have updated our Assets Under Management data under **Item 4: Advisory Business**.
- We have updated **Item 10: Other Financial Industry Activities and Affiliations** to reflect that we no longer share an email domain with Abbott & Associates.

If you would like to receive a complete copy of our updated Firm Brochure, Form ADV Part 2A, a copy of our Brochure Supplement, Form ADV Part 2B, and/or a copy of our Form CRS (Client Relationship Summary), Form ADV Part 3, please contact our office at 217-735-1576 or at [info@pacesetterfinancial.com](mailto:info@pacesetterfinancial.com).

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

Pacesetter Financial Group's website is [www.pacesetterfinancial.com](http://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. Andrew M. Fitzpatrick, CPA, Kristen R.M. Lanning, CFP®, and Andrew H. Hayes, CPA, are the owners of Pacesetter Financial Group, LLC. 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 Clients; and
- Company-Sponsored 401(k) Clients

### Individual Clients

We include the following services in the management of your account(s):

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

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**.

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.

### **Company-Sponsored 401(k) Clients:**

We include the following services in providing investment advice for your 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 plan and participant accounts; and
- Monitoring pre-designed portfolios, and recommending changes, as needed.

With plan sponsors, Pacesetter discusses your needs and goals related to providing a retirement plan to your staff. Along with your Third Party Administrator, we help you determine what type of 401(k) plan might work best for you, and what features you may want to adopt for your plan. At your request, we may assist you in reviewing and approving the forms, agreements, and documents your administrator prepares. We also assist you in working with your Recordkeeper to set up and monitor your plan and participant accounts.

With plan participants, Pacesetter discusses your risk tolerance, time horizon, and financial needs and goals with you. We use the information you give us to recommend a pre-designed portfolio for you. Your 401(k) plan 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 a 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, 2025, Pacesetter Financial Group managed a total of \$170,483,806 in client assets. Of that total, we managed \$140,814,271 on a discretionary basis and \$29,669,535 on a non-discretionary basis. In addition, we advised two (2) Company-Sponsored 401(k) plans with \$2,340,281 in assets that do not count toward our regulatory assets under management.

## 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 contract is terminated.

Additional and/or supplemental services beyond those listed below may also be available. These services may be charged by the hour or as a fixed fee. If you are interested in other services, please speak with your advisor.

### Individual Client Fee Schedule (annual):

	Diversified Portfolio	Fixed Income Portfolio
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%

Regardless of the total amount of assets we manage for you, we charge a minimum of \$100 per year, per client, prorated 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 ( $\frac{1}{4}$ ) 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.

At the beginning of each quarter, we calculate your fee and send you a billing statement. If you pay your bill by check, your bill is immediately due and payable. If your fees are deducted from your account(s), we submit the bill amount to our custodian at least five days after mailing the billing statement to you.

Fees are prorated for accounts opened during each quarter. We mail your first 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, prorated billing for the prior quarter, based on the assets that were deposited and/or transferred into your account(s), PLUS your current quarter billing.

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

- Brokerage commissions or transaction fees;
- Mutual fund fees; and
- Custodian 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 calculate your refund based on the number of full days remaining in the quarter after your termination date. Your termination date is defined as the earlier of the final transfer out from your accounts to another custodian or the date upon which we are delinked from your accounts or your accounts are closed. If your accounts remain open, we may deposit your refund directly into your accounts. If your accounts are closed or we are delinked from them, we will mail a refund check directly to you.

**Company-Sponsored 401(k) Plan Client 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 \$100 per year, per plan, prorated for partial years.

At the beginning of each quarter, we calculate the plan-level fee and send a billing statement to the Plan Administrator. If your plan is new or if it is transferred to our management during the current quarter, you will receive your first billing statement after the end of the first quarter. This first billing statement is calculated both in arrears for the first quarter (prorated based on the date assets were first deposited or transferred in and on the value of the plan at the end of the quarter) and in advance for the next quarter. All subsequent billings will be in advance. If your recordkeeper automatically calculates and deducts your fees from plan assets, they will do so toward the beginning of each quarter. If your custodian does not automatically calculate and deduct your fees from plan assets, we submit the bill amount to your recordkeeper at least five days after mailing your billing statement. Company-Sponsored 401(k) plan fees are deducted directly from participant accounts on a pro-rata basis, based on each participant's account balance in relation to the entire plan balance.

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 remaining in the quarter after your termination date. Your termination date is defined as the latter of the final date assets were in the plan or the final date we assisted you with the management or transfer of your plan.

## **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 \$100 per client, per year, prorated 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 entities.

We share:

- Office space;
- Computer hardware;
- Certain computer software;
- Receptionists;
- Assistants; and
- Phone and fax numbers.

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.

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

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.

Employees of Pacesetter and Abbott & Associates currently invest mostly 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 over a de minimis amount.
  - 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.

## Item 12: Brokerage Practices

Pacesetter Financial Group recommends a custodial broker to you when you open an account through us. In recommending a custodial 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 any custodial broker in connection with client securities transactions.

#### Individual Clients:

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

- Brokerage;
- Custody;
- Access to certain mutual funds and/or 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 custodial broker;

- Facilitates payment of Pacesetter's advisory fees from client accounts;
- Facilitates client electronic signature of custodial broker and advisory forms; and
- Assists with back-office functions, recordkeeping, and client reporting.

Most custodial brokers offer these types of services to the advisors that work with them.

### **Company-Sponsored 401(k) Clients:**

Ascensus Trust Company or Advisor Trust provides your account with access to its institutional trading and custody services, which are generally unavailable to retail clients.

Ascensus Trust Company'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 (Ascensus, LLC or PCS Retirement). Pacesetter does not receive any services directly from Ascensus Trust Company or Advisor Trust.

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

We are not affiliated with Dimensional Fund Advisors (DFA), either. However, we use this family of funds 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;
- 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 work with 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

### 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 custodial broker for your account, it may cost you more than if we had placed the trade through your custodial broker. You may be charged a higher commission than what your custodial 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 custodial broker charges transaction fees on a per-account, per-trade basis, so there is no financial benefit to aggregating client trades.

### Company-Sponsored 401(k) Clients:

Pacesetter does not allow plan participants or sponsors to direct brokerage. However, a sponsor may specify a custodian 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 about the statements and reports you receive, please see **Item 15: Custody**.

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

Pacesetter prepares and sends 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 provide similar information about your portfolio on our password-protected client web portal, and we post the reports we prepare to your client web portal each quarter. You can choose to receive your reports by mail, through the portal, or both. 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 maintain access to them.

### **Company-Sponsored 401(k) Clients:**

Our Investment Advisor Representatives review your account each time we meet with you, generally during enrollment periods. We may 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, contributions, or withdrawals.

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 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](#).

### Individual Clients:

You will receive statements directly from your custodial broker or annuity 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 custodial broker/provider statements.

Pacesetter also sends reports to you. As a matter of client protection, we recommend that you regularly compare the statements your custodial broker or annuity provider 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 custodial broker or annuity provider right away.

### 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 and contact your employer if you believe there is an error.

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

## Item 16: Investment Discretion

### 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 with 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 or non-discretionary authority. When you complete an account application with a custodial broker, you also direct that custodial 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 requiring permission to sell a specific security 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.

### 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 custodial 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 neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

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.

Pacesetter has not been the subject of a bankruptcy petition in the last ten years.

## 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 fire in our building, a tornado, a power outage, or 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 the event of a 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.

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.

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](http://www.pacesetterfinancial.com), or our sister company's website at [www.jmabbott.com](http://www.jmabbott.com) for contact instructions.

### **Individual Clients:**

If you continue to be unable to reach us, and you need access to your Charles Schwab & Co., Inc. account(s), please contact Schwab directly. You can contact Schwab Alliance through its website at [www.schwaballiance.com](http://www.schwaballiance.com) or by telephone at 1-800-515-2157. Your custodial 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 your bank account or other custodial broker account. You may also directly contact the custodian of your annuity, if applicable. Please refer to your most recent statement from your custodial broker or annuity provider for their contact information.

### **Company-Sponsored 401(k) Clients:**

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.

Plan sponsors and administrators can contact Ascensus, LLC through its website at [www.ascensus.com](http://www.ascensus.com), or by telephone at 1-888-652-8087. Plan participants can contact Ascensus, LLC through its web website at [www.ascensus.com](http://www.ascensus.com), or by telephone at 1-888-652-8086.

Plan sponsors and administrators can contact PCS Retirement through its website at [www.pcsretirement.com](http://www.pcsretirement.com), or by telephone at 1-888-684-6653. Plan participants can contact PCS Retirement through its website at [www.pcsretirement.com](http://www.pcsretirement.com), or by telephone at 1-888-621-5491.

Plan administrators and plan sponsors may also contact your third party administrator, FuturePlan, through their website at [www.futureplan.com](http://www.futureplan.com), or by telephone at 1-800-235-9649, for plan administration assistance.