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**Form ADV Part 2A  
Firm Brochure  
Retirement Plan Services  
March 20, 2017**

This brochure provides information about the qualifications and business practices of Dagel Financial, Inc. If you have any questions about the contents of this brochure, please contact Mr. Elie at (305) 671-3168.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or any state securities administrator. Additional information about the Dagel Financial, Inc. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Click on the "Investment Adviser Search" link and then search for "Investment Adviser Firm" using the firm's IARD number, which is 141780.

While the advisory firm and anyone associated with it may be registered and/or licensed within a particular jurisdiction, that registration and/or licensing in itself does not imply an endorsement by any regulatory authority, nor does it imply a certain level of skill or training on the part of the firm or its associated personnel.

## **Item 2 – Material Changes**

This is a new Form ADV Part 2 brochure exclusively for firm clients and prospective clients that are retirement plan sponsors. The firm maintains a separate Form ADV Part 2 brochure regarding its service offerings for individual and families. Plan sponsors are encouraged to review this entire document. For future filings, this section of the brochure may address only those material changes that have occurred since the firm's last annual updating amendment.

The firm may at any time update this document and either send a copy of its updated brochure or provide a summary of material changes to its brochure and an offer to send an electronic or hard copy form of the updated brochure. Clients are also able to download this brochure from the SEC's Website: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) or may contact our firm at (305) 671-3168 to request a copy at any time.

As with all firm documents, clients and prospective clients are encouraged to review this brochure in its entirety and are encouraged to ask questions at any time prior to or throughout the engagement.

### **Item 3 – Table of Contents**

#### **Form ADV Part 2A – Retirement Plan Services**

Item 1 – Cover Page .....	1
Item 2 – Material Changes .....	2
Item 3 – Table of Contents.....	3
Item 4 - Advisory Business .....	4
Item 5 - Fees and Compensation .....	5
Item 6 - Performance-Based Fees and Side-By-Side Management .....	7
Item 7 - Types of Clients.....	8
Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss.....	8
Item 9 - Disciplinary Information .....	11
Item 10 - Other Financial Industry Activities and Affiliations .....	11
Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	12
Item 12 - Brokerage Practices.....	13
Item 13 - Review of Accounts .....	13
Item 14 - Client Referrals and Other Compensation .....	14
Item 15 - Custody .....	14
Item 16 - Investment Discretion .....	15
Item 17 - Voting Client Securities.....	15
Item 18 - Financial Information .....	15
Item 19 - Requirements for State-Registered Advisers .....	16

#### **Form ADV Part 2B**

Item 1 – Cover Page .....	17
Item 2 – Educational Background and Business Experience.....	18
Item 3 – Disciplinary Information .....	18
Item 4 – Other Business Activities .....	18
Item 5 – Additional Compensation .....	19
Item 6 – Supervision .....	19
Item 7 – Requirements for State-Registered Advisers.....	19

### **Important Information**

Throughout this document Dagele Financial, Inc. shall also be referred to as “the firm,” “firm,” “our,” “we” or “us.” The client or prospective client may be also referred to as “you,” “your,” etc., and refers to a client engagement involving of a single *person* as well as two or more *persons*. In addition, the term “advisor” and “adviser” are used interchangeably where accuracy in identification is necessary (i.e., Internet address, etc.).

## **Item 4 - Advisory Business**

### **Description of the Firm**

Dagel Financial, Inc. is a Florida domiciled corporation formed in 2003. We are not a subsidiary of nor do we control another financial services industry entity. Our registration as an investment advisor in the State of Florida was effective in 2003, and our firm and its associates may register, become licensed or meet certain exemptions to registration and/or licensing in other jurisdictions in which we conduct investment advisory business.

Daniel Elie is our firm's Principal and Chief Compliance Officer (supervisor). He is also the corporation's sole owner. Additional information about Mr. Elie and his professional experience may be found toward the end of this brochure. We provide Fee-Only, hourly, as-needed financial planning and investment advice services to individuals from all walks of life and specialize in providing advice to individuals. These services may be general in nature or focused on a particular area of interest or need, depending on the individual's unique circumstances.

### **Description of Retirement Plan Services Offered**

The firm provides retirement plan consulting services that are intended to assist clients in understanding the scope of their fiduciary duties and responsibilities, guide them in the development of prudent practices and procedures to enable them to discharge their duties and responsibilities, and document their actions and decisions. We offer our plan advisor services exclusively on a nondiscretionary basis as defined in § 3(38) and § 3(21) of the Employee Retirement Income Security Act of 1974 (ERISA).

During or prior to the first meeting, the plan sponsor will be provided with a current Form ADV Part 2 firm brochure that includes a statement involving our privacy policy. Any material conflicts of interest will be disclosed that could be reasonably expected to impair the rendering of unbiased and objective advice. Should the plan sponsor wish to engage our firm for its services, parties must first execute a client services agreement.

### ***Retirement Plan Consultation***

With respect to advisory services provided to a plan sponsor, we may provide the following services which are considered fiduciary services under ERISA:

- Development of an investment policy statement (IPS) that established the investment policies and objectives for the plan;
- Development of recommended asset allocations and portfolio modeling, consistent with the IPS;
- Assistance with selection of specific investment holdings to fulfill the recommended asset allocation;
- Recommendation of periodic rebalancing of assets to maintain the recommended asset allocation;
- Monitoring and measuring investment performance on a periodic basis to maintain adherence to the IPS, including possibly recommending changes to the selected investments; and
- Periodic meetings to discuss investment reports and recommendations.

We may also provide services that are categorized as non-fiduciary\* services under ERISA:

- Educating the client as to its fiduciary responsibilities as a plan sponsor;
- Assistance with monitoring, selecting and supervising service vendors, including coordination of any transition between such vendors; and
- Performing benchmarking studies and fee analysis.

*\*As a registered investment advisor, the firm has a fiduciary duty to act in the client's best interests; this is separate from and unaffected by any categorization of services under ERISA.*

## **Retirement Plan Management**

The plan sponsor will retain final decision-making authority and responsibility for the implementation (or rejection) of any recommendations or advice provided by our firm. Dage1 Financial, Inc. provides advice and recommendations; it does not directly manage the assets of the plan or implement the recommendations made.

### **Wrap Fee Programs**

The firm does not sponsor or serve as a portfolio manager in an investment program involving wrapped fees.

### **Client Assets Under Management**

Due to the type of advisory services Dage1 Financial, Inc. provides, there are no reportable client assets directly under firm management.<sup>1</sup>

### **General Information**

Dage1 Financial, Inc. will use its best judgment and good faith effort in rendering advisory services to you. However, the firm cannot warrant or guarantee any particular level of account performance, that your account will be profitable over time, or that some or all of your planning goals will be met. Past performance is not necessarily indicative of future results.

Except as may otherwise be provided by law, Dage1 Financial, Inc. will not be liable to the client, heirs, or assignees for any loss an account may suffer by reason of an investment decision made or other action taken or omitted in good faith by him or his firm with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; any loss arising from adherence to your direction or your attorney-in-fact may provide; any act or failure to act by a service provider maintaining your investment account. Federal and state securities laws impose liabilities under certain circumstances on persons who act in good faith and, therefore, nothing contained in this document shall constitute a waiver of any rights that you may have under federal and state securities laws.

## **Item 5 - Fees and Compensation**

Forms of payment are based on the types of services being provided, term of service, etc., and will be stated in the engagement agreement with our firm. Published fees may be discounted at our firm's discretion but they are not negotiable.

With prior authorization, payment may be made through a qualified, unaffiliated PCI compliant<sup>2</sup> third-party processor, or withdrawal from accounts held at the custodian of record. Payment requests for advisory fees will be preceded by our firm's invoice, pursuant to state law. Fees paid to our firm in this manner will be noted in account statements received from the custodian of record and/or the plan's third-party administrator.

Alternatively, fees may be paid by check or draft from US-based financial institutions. Our firm does not accept cash, money orders or similar forms of payment for its engagements.

We strive to offer fees that are fair and reasonable in light of the experience of its associates and the services to be provided to you.

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<sup>1</sup> The term "assets under management" as defined by the SEC's 2010 *General Instructions for Part 2 of Form ADV*.

<sup>2</sup> For an explanation of the term "PCI," who the PCI Security Standards Council is, as well as its comprehensive standards to enhance payment card data security, please go to [https://www.pcisecuritystandards.org/security\\_standards/index.php](https://www.pcisecuritystandards.org/security_standards/index.php)

## Method of Compensation and Fee Schedule

The fee for client meetings is determined by applying our hourly rate of \$150 to the time expended by the firm. These fees are charged monthly, in arrears.

The annual fee for services other than client meetings is charged monthly or quarterly in advance, and is based upon the plan's assets, as noted in the table below.

<u>Value of Included Assets</u>	<u>Initial Set-Up Fee</u>	<u>Annual Advisory Fee</u>
Up to \$999,999	\$750	\$1,000
\$1,000,000 or more	\$1,000 plus \$250 for each additional \$1,000,000 of Included Assets above \$1,000,000	\$1,000 plus \$1,000 for each additional \$1,000,000 of Included Assets above \$1,000,000

Accounts will be assessed in accordance with asset values disclosed on the statement the plan sponsor and/or plan participant receives from the custodian of record and/or third-party administrator for the purpose of verifying the computation of the advisory fee. In the rare absence of reportable market values, our firm may seek a third-party opinion from a recognized industry source (e.g., unaffiliated public accounting firm), and the plan sponsor may choose to separately seek such an opinion at its own expense as to the valuation of "hard-to-price" securities if necessary.

The first billing cycle will begin once the agreement is executed and plan assets have settled into the account held by the plan's custodian of record. Fees for partial billing cycles will be prorated based on the remaining days in the reporting period. Advisory fee payments will generally be assessed within the first 10 calendar days of each billing cycle.

Our firm will concurrently send the plan sponsor, plan participant and/or third-party administrator, as may be appropriate, as well as the custodian of record, a written notice ("invoice") each billing period that describes the advisory fees to be deducted. This notice will be delivered prior to the deduction of fees and will include the total fee assessed, covered time period, calculation formula utilized, and reference to the assets under management in which the fee had been based. It is important that the plan sponsor, plan participant and/or third-party administrator, as may be appropriate, verifies the accuracy of fee calculations; the custodian may not consistently verify the accuracy of advisory fee assessments.

Written authorization is required in order for the custodian of record to deduct advisory fees from an account. By signing our firm's client services agreement, as well as the selected custodian account opening documents, the plan sponsor and/or plan participant will be authorizing the withdrawal of both advisory and transactional fees from an account. The withdrawal of these fees will be accomplished by the plan's custodian of record at the request of our firm or the plan's third-party administrator, and those fees will be noted on account statements that the plan sponsor/plan participants receive from the account custodian. Alternatively, the plan sponsor may choose to directly compensate our advisory firm for its services. Our valuation assessment will remain the same as earlier described, and our payment must be received within 10 days of our invoice.

Should the client request services outside the scope of services listed on the initial client agreement, the firm will provide a written estimate of the hourly or fixed fee for the project.

### Additional Client Fees

Unless offset by the plan sponsor or investment manager, any transactional or service fees (sometimes termed *brokerage fees*), retirement plan fees, account termination fees, or wire transfer fees will be borne by the account holder per the fee schedule of the custodian of record and/or third-party administrator. Fees paid to our firm for our

advisory services are separate from any of these fees or other similar charges. Our advisory fees are also separate from any internal fees or other charges associated with mutual funds or other similar investment assessments.

Per annum interest at the current maximum statutory rate may be assessed on fee balances due more than 30 days; we may refer past due accounts to collections for processing. We reserve the right to suspend some or all services once an account is deemed past due.

Additional information about the firm's fees in relationship to its business practices is noted in Item 12 of this document.

#### External Compensation for the Sale of Securities to Clients

Our firm does not charge or receive a commission or mark-up on your purchases, nor will the firm or an associate be paid a commission on your purchase of a securities holding or insurance product that may be recommended to you. We do not receive "trailer" or SEC Rule 12b-1 fees from an investment company that may be recommended to you. Fees charged by such issuers are detailed in prospectuses or product descriptions and you are encouraged to read these documents before investing. Our firm and its associates receive none of these described or similar fees or charges.

You will always have the option to purchase recommended or similar investments through your selected service provider.

#### Termination of Services

Either party may terminate the agreement at any time, which will typically be in writing. If you verbally notify our firm of the termination and, if in two business days following this notification we have not received your notice in writing, we will make a written notice of the termination in our records and send you our own termination notice as a substitute. Our firm will not be responsible for future services upon receipt of a termination notice.

If our Form ADV Part 2 firm brochure was not delivered to you at least 48 hours prior to entering into the investment advisory contract, then you have the right to terminate the engagement without penalty within five business days after entering into the agreement. Should a client terminate our services after this five-day time period, the client may be assessed fees at the firm's current hourly rate for any time incurred in the preparation of the client's analysis or plan.

Dagel Financial, Inc. will return any prepaid, unearned fees (if any) within 30 days of the firm's receipt of termination notice. Our earned fees in excess of any prepaid deposit will be billed at the time of termination and will be due upon your receipt of our invoice. If you have provided all requisite information and such plans or services have not been delivered to you within six months or less time from the date of the engagement, you may be entitled to a refund.

Our return of payment to a client for our services will only be completed via check from our firm's US-based financial institution; no credits or "transaction reversals" will be issued. Return of prepaid fees will never involve a personal check, cash or money order from our firm or from an associate of our firm.

#### **Item 6 - Performance-Based Fees and Side-By-Side Management**

The fees assessed by Dagel Financial, Inc. will not be based on a share of capital gains or capital appreciation (growth) of any portion of managed funds, also known as "performance-based fees." Performance-based compensation creates an incentive for a firm to recommend an investment that may carry a higher degree of risk to a client; therefore, a performance-based fee structure will not be used because of the conflict of interest this type of fee structure poses.

Advisory fees earned by the firm will not be based on side-by-side management, which refers to simultaneously managing accounts that do pay performance-based fees (such as a hedge fund) and those that do not. This type of arrangement, and the conflict of interest it may pose, does not conform to our firm's practices.

## **Item 7 - Types of Clients**

Our firm provides retirement plan services to sponsors of defined benefit plans as well as pooled defined contribution plans. We do not require minimum income, asset levels or other similar preconditions for our services. We reserve the right to waive or reduce certain fees based on unique individual circumstances, special arrangements or pre-existing relationships. We may also decline our services to a prospective client for any non-discriminatory reason.

## **Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss**

### **Methods of Analysis**

When engaged to provide investment advice, the firm will first gather and consider several factors, including your:

- current financial situation
- current, mid-term and long-term needs
- investment goals and objectives
- level of investment knowledge
- tolerance or appetite for risk
- restrictions, if any, on the management of your portfolio

Dagel Financial, Inc. generally employs fundamental analyses; we evaluate economic factors including interest rates, the current state of the economy, or the future growth of an industry sector. Our research may be drawn from sources that include financial periodicals and other information published by economists and other industry professionals, annual reports, prospectuses and filings with regulatory bodies, as well as corporate rating services.

### **Investment Strategies**

Our firm believes that a long term, buy-and-hold investment strategy with periodic rebalancing is preferred over active investment strategies. Investment decisions are made, in our best judgment, to help you achieve your overall financial objectives while minimizing risk exposure. We believe that asset allocation is a key component of investment portfolio design and that the appropriate allocation of assets across diverse investment categories (stock vs. bond, foreign vs. domestic, large cap vs. small cap, etc.) is a primary determinant of portfolio returns and critical to the long-term success of an investor's financial objectives. We recommend rebalancing your portfolio, when necessary, in an attempt to maintain an optimal allocation while minimizing tax exposures, trading costs, etc.

### **Investment Strategy and Method of Analysis Material Risks**

The firm believes its strategies and investment recommendations are designed to produce the appropriate potential return for the given level of risk; however, there is no guarantee that an investment objective or planning goal will be achieved. Each client must be able to bear the risk of loss that is associated with their account, which may include the loss of some of or their entire principal.

Examples of such risk include:

#### ***Company Risk***

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

#### ***Failure to Implement***

As the retirement plan sponsor and plan fiduciary, you are free to accept or reject any or all of the recommendations made to you. While no advisory firm can guarantee future performance, no plan can succeed if it is not implemented.

Clients who choose not to take the steps recommended in their financial plan may face an increased risk that their stated goals and objectives will not be achieved.

### ***Financial Risk***

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

### ***Fundamental Analysis***

The challenge involving fundamental analyses is that information obtained may be incorrect; the analysis may not provide an accurate estimate of earnings, which may be the basis for a security's value. If a security's price adjusts rapidly to new information, a fundamental analysis may result in unfavorable performance.

### ***Inflation Risk***

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

### ***Market Risk***

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

### ***Passive Markets Theory***

A portfolio that employs a passive, efficient markets approach has the risk of generating lower-than-expected returns due to its broad diversification when compared to a portfolio more narrowly focused; the return on each type of asset is a deviation from the average return for the asset class. We believe this variance from the "expected return" is generally low under normal market conditions when a portfolio is made up of diverse, low or non-correlated assets.

### ***Research Data***

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

### ***Socially Conscious Investing***

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

### **Security-Specific Material Risks**

#### ***Equity (Stock) Risk***

Common stocks are susceptible to general stock market fluctuations and to volatile increases or decreases in value as market confidence in and perceptions of their issuers change. If an investor held common stock or common stock

equivalents of any given issuer, they may be exposed to greater risk than if they held preferred stocks and debt obligations of the issuer.

### ***ETF and Mutual Fund Risks***

The risk of owning ETFs and mutual funds reflect their underlying securities (e.g., stocks, bonds, etc.). ETFs and mutual funds also carry additional expenses based on their share of operating expenses and certain brokerage fees, which may result in the potential for some duplication of fees. Also, certain funds may be too large to move quickly in response to market fluctuations, meaning that investors may miss out on gains or be exposed to losses for a longer time than if they were in a more nimble portfolio. We believe that this risk is offset by the benefits of a buy-and-hold approach or by taking advantage of strategies such as dollar-cost averaging which over time can decrease the overall cost of fund purchases. We do not generally recommend leveraged or inverse ETFs to our advisory clients due to their inherent heightened risk.

### ***Fixed Income Risks***

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

#### ***Credit Risk***

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

#### ***Duration Risk***

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

#### ***Interest Rate Risk***

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

#### ***Liquidity Risk***

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

#### ***Reinvestment Risk***

With declining interest rates, investors may have to reinvest interest income or principal at a lower rate.

### ***Index Investing***

You will need to keep in mind that investment vehicles such as certain ETFs and indexed funds have the potential to be affected by “tracking error risk,” which might be defined as a deviation from a stated benchmark. Since the core portfolio attempts to closely replicate a stated benchmark, the source of the tracking error or deviation may come from a satellite portfolio or position, or from a “sample” or “optimized” index fund or ETF that may not as closely align the stated benchmark.

## **QDI Ratios**

While many ETFs and index mutual funds are known for their potential tax-efficiency and higher “qualified dividend income” (QDI) percentages, there are asset classes within these investment vehicles or holding periods within that may not benefit. Shorter holding periods, as well as commodities and currencies (that may be part of an ETF or mutual fund portfolio), may be considered “non-qualified” under certain tax code provisions. A holding’s QDI will be considered when tax-efficiency is an important aspect of the client’s portfolio.

## **Item 9 - Disciplinary Information**

Neither the firm nor its management has been involved in any material criminal or civil action in a domestic, foreign or military jurisdiction, or an administrative enforcement action from any state or federal agency, or self-regulatory organization proceeding that would reflect poorly upon our offering advisory business or its integrity. However, DageL Financial was fined in June 2011 for failing to file its financial statements on time by the Office of Financial Regulation of the State of Florida.

## **Item 10 - Other Financial Industry Activities and Affiliations**

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

Neither the firm, management, nor its associates are registered or have an application pending to register as a Financial Industry Regulatory Authority (FINRA) or National Futures Association (NFA) member firm, nor are we required to be registered with such entities. Neither our firm nor its management is or has a material relationship with any of the following types of entities:

- accountant or an accounting firm
- bank, credit union or thrift institution
- trust company
- lawyer or law firm
- other investment advisor firms (including financial planners and municipal advisors)
- real estate broker or dealer
- pension consultant
- sponsor or syndicator of limited partnerships
- issuer of a security, to include investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund,” and offshore fund)

Upon your request, you may be provided a referral to various professionals, such as an accountant or an attorney. While these referrals are based on the best information made available, the firm does not guarantee the quality or adequacy of the work provided by these referred professionals. There is not an agreement with these entities nor are referral fees received from these professionals for such informal referrals. Any fees charged by these other entities for their services are completely separate from fees charged by our firm.

Daniel Elie is a licensed insurance agent in order to offer education and advice to his clients. He is not paid a commission or renewal payment for this service.

## **Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

Dagel Financial, Inc. holds itself to a *fiduciary standard*, which means the firm and its associates will act in the utmost good faith, performing in a manner believed to be in the best interest of its clients. Our firm believes that business methodologies, ethics rules, and adopted policies are designed to eliminate or at least minimize material conflicts of interest and to appropriately manage any material conflicts of interest that may remain. You should be aware that no set of rules can possibly anticipate or relieve all material conflicts of interest. Our firm will disclose to its advisory clients any material conflict of interest relating to the firm, its representatives, or any of its employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

### **Code of Ethics Description**

The firm has adopted a Code of Ethics that establishes policies for ethical conduct for all its personnel, and accepts the obligation not only to comply with all applicable laws and regulations but also to act in an ethical and professionally responsible manner in all professional services and activities. Firm policies include prohibitions against insider trading, circulation of industry rumors, and certain political contributions, among others. We periodically review and amend our Code of Ethics to ensure that they remain current, and we require firm personnel to annually attest to their understanding of and adherence to the firm's Code of Ethics. A copy of the firm's Code of Ethics is made available to any client or prospective client upon request.

### **Statement Involving Our Privacy Policy**

Dagel Financial, Inc. respects the privacy of all clients and prospective clients; both past and present (collectively termed "customers" per federal guidelines). It is recognized that you have entrusted our firm with nonpublic personal information and it is important that both access persons and customers are aware of firm policy concerning what may be done with that information.

The firm collects personal information about customers from the following sources:

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

The firm does not disclose nonpublic personal information about our customers to anyone, except in the following circumstances:

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

Within the firm, access to customer information is restricted to personnel that need to know that information. All access persons and service providers understand that everything handled in firm offices are confidential and they are instructed to not discuss customer information with someone else that may request information about an account unless they are specifically authorized in writing by the customer to do so. This includes, for example, providing information about a spouse's IRA account or to adult children about parents' accounts, etc.

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

The firm will provide you with its privacy policy on an annual basis per federal law and at any time, in advance, if firm privacy policies are expected to change.

## Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

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

An associate is prohibited from borrowing from or lending to a client unless the client is an approved financial institution.

The firm remains focused on ensuring that its offerings are based upon the needs of its clients; not resultant fees received for such services. We want to also note that you are under no obligation to act on a recommendation from our firm and, if you elect to do so, you are under no obligation to complete them through a service provider whom we may recommend.

### Firm/Related Persons’ Purchases of Same Securities Recommended to Clients and Conflicts of Interest

Dagel Financial, Inc. does not trade for its own account (e.g., proprietary trading). The firm’s related persons may buy or sell securities that are the same as, similar to, or different from, those recommended to clients for their accounts, and this poses a conflict of interest. We mitigate this conflict by ensuring that we have policies and procedures in place to ensure that the firm or a related person will not receive preferential treatment over a client.

In an effort to reduce or eliminate certain conflicts of interest involving personal trading (i.e., trading ahead of client recommendation, etc.), firm policy may require that we periodically restrict or prohibit related parties’ transactions. Any exceptions must be approved by the firm, and we will maintain personal securities transaction records as required.

## **Item 12 - Brokerage Practices**

### Factors Used to Select Broker/Dealers for Client Transactions

Dagel Financial, Inc. does not maintain physical custody of plan assets. Accounts must be maintained by a qualified custodian that is frequently reviewed for its capabilities to serve in that capacity by its respective industry regulatory authority. Our advisory firm is not a custodian nor do we recommend a custodian that is an affiliate. The plan sponsor will determine which custodian is appropriate for plan participants and accounts with that custodian of record will be opened by entering into an agreement with the selected custodian. We do not open an account for a plan sponsor and/or plan participant but we will assist by providing information and education to aid in the account opening process.

All compensation paid to our advisory firm is paid directly by our clients as noted in Item 5. Our firm is not compensated by a custodian if we should make a recommendation of that custodian to a plan sponsor. We do not receive referrals from a recommended custodian, nor are client referrals a factor in our recommendation of a custodian.

### Best Execution

In light of our advisory firm’s services we do not believe we have an ongoing “best execution” review obligation with regard to plan transactions under current industry guidelines.

### Directed Brokerage

We do not direct a custodian to utilize a specific executing broker for plan account trades. The plan sponsor may request their custodian engage a particular broker to execute some or all transactions. Under these circumstances, the plan sponsor will be responsible for negotiating the terms and/or arrangements with the custodian and executing broker; whether the executing broker is affiliated with the plan’s custodian of record or not. In certain instances involving such arrangements, the plan/plan participant may pay higher commissions or other transaction costs, potentially experience greater spreads, or receive less favorable net prices on transactions for their account than would otherwise be the case. Our advisory firm; however, will not be obligated to seek better execution services or prices under these circumstances.

### Aggregating Securities Transactions for Client Accounts

Our firm does not manage plan assets or implement trades for plan sponsors; therefore, we are unable to aggregate (“batch”) trades on behalf of our plan accounts. When transactions are completed independently, an account holder may potentially pay more for their transaction than those accounts where trades have been aggregated.

### **Item 13 - Review of Accounts**

#### Schedule for Periodic Review of Retirement Plan Accounts

Periodic financial check-ups or reviews are recommended and we believe they should occur at least on an annual basis whenever practical. Plan sponsors should contact the firm for additional reviews when considering making changes to the plan. Reviews will be conducted by Mr. Elie and normally involve an analysis and possible revision of the previous allocation. A copy of revised plans or asset allocation reports will be provided to you upon request. Unless provided for in your engagement agreement, reviews are generally conducted under a new or amended agreement and will be assessed at the then published rate.

#### Content of Client Provided Reports and Frequency

Plans and/or plan participants will receive statements sent from their custodian and/or third-party administrator. Each participant is urged to carefully review account statements for accuracy and clarity, and to ask questions when something is not clear.

Our advisory firm does not provide internally created performance reports. Plan sponsors and/or plan participants may receive written portfolio performance reports from a third-party administrator or the custodian of record. Plan sponsors and plan participants are urged to carefully review and compare account statements with any performance report they may receive from any source.

### **Item 14 - Client Referrals and Other Compensation**

There is not a referral fee paid to or received from any other party we may recommend to you; nor is there an established *quid pro quo* for such engagements. Each client retains the option to accept or deny such referral or subsequent services.

Mr. Elie may hold individual membership or serve on boards or committees of professional industry associations. Generally, participation in any of these entities require membership fees to be paid, adherence to ethical guidelines, as well as in meeting experiential and educational requirements. A benefit these entities may provide to the investing public is the availability of online search tools that allow interested parties (prospective clients) to search for individual participants within a selected state or region. These passive websites may provide means for interested persons to contact a participant via electronic mail, telephone number, or other contact information, in order to interview the participating member.

The public may also choose to telephone association staff to inquire about an individual within their area, and would receive the same or similar information. A portion of these participant’s membership fees may be used so that their name will be listed in some or all of these entities’ websites (or other listings). Prospective clients locating our advisory firm or an associate via these methods are not actively marketed by the noted associations. Clients who find our firm in this way do not pay more for their services than clients referred in any other fashion. The firm does not pay these entities for prospective client referrals, nor is there a fee-sharing arrangement reflective of a solicitor engagement.

### **Item 15 - Custody**

Your assets will be maintained by an unaffiliated, qualified custodian, such as a bank, broker/dealer, mutual fund companies or transfer agent. Your assets are not physically maintained by our advisory firm nor any associate of the firm. In keeping with this policy involving client funds or securities, our firm:

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

You will be provided with transaction confirmations and summary account statements sent directly to you from your custodian of record. Typically statements are provided on at least a quarterly basis or as transactions occur within your account. You are urged to carefully review your account statements that you have received directly from your custodian. Dagele Financial, Inc. will not create an account statement for you or serve as the sole recipient of your account statements.

### **Item 16 - Investment Discretion**

Dagele Financial, Inc. does not execute trades for plan sponsors or plan participants. The plan sponsor retains investment discretion and is responsible for implementing (or declining to implement) any recommendation made by our firm.

### **Item 17 - Voting Client Securities**

The plan sponsor or plan participant may periodically receive proxies or other similar solicitations sent directly from the plan's custodian or transfer agent. Should we receive a duplicate copy, note that we do not forward these or any correspondence relating to the voting of your securities, class action litigation, or other corporate actions.

Our firm does not vote proxies on your behalf. We will not offer guidance involving any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise or monitor class action or other litigation involving client assets. However, we will answer limited questions with respect to what a proxy voting request or other corporate matter may be and how to reach the issuer or their legal representative.

The account holder will maintain exclusive responsibility for directing the manner in which proxies solicited by issuers of securities that are beneficially owned by the account holder shall be voted, as well as making all other elections relative to mergers, acquisitions, tender offers or other legal matters or events pertaining to holdings. The account holder should consider contacting the issuer or legal counsel involving specific questions with respect to a particular proxy solicitation or corporate action.

### **Item 18 - Financial Information**

#### **Balance Sheet**

Our advisory firm will not take physical or constructive custody of your assets, we do not serve accounts on a discretionary basis, nor will our engagements require that we collect fees from you of \$500 or more for our advisory services that we have agreed to perform six months or more into the future.

Neither our firm nor its management serve as general partner for a partnership or trustee for a trust in which the firm's advisory clients are either partners of the partnership or beneficiaries of the trust.

Due to the nature of our firm's services and operational practices, an audited balance sheet is not required per statute nor included with this brochure.

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

The firm and its management do not have a financial condition likely to impair its ability to meet commitments to clients.

### Bankruptcy Petitions during the Past 10 Years

The firm and its management have not been the subject of a bankruptcy petition at any time.

### **Item 19 - Requirements for State-Registered Advisers**

For further information involving firm principal executive and management personnel, their business activities as well as material conflicts of interest, please refer to areas previously disclosed in Items 6 and 9 through 11 of this brochure, as well as the accompanying Form ADV Part 2B brochure supplement that immediately follows this page.

### **Business Continuity Plan**

Dagel Financial, Inc. maintains a business continuity and succession contingency plan that is integrated within the organization to ensure it appropriately responds to events that pose a significant disruption to its operations. A statement concerning the current plan is available under separate cover.

**Form ADV Part 2B**

**Item 1 – Cover Page**



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Miami, FL 33186

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[www.dagelfinancial.com](http://www.dagelfinancial.com)

**Daniel Elie**

Owner, Principal, Chief Compliance Officer, Investment Advisor Representative

**Form ADV Part 2B  
Brochure Supplement  
March 20, 2017**

This brochure provides information about Daniel Elie that supplements Dagel Financial, Inc. Form ADV Part 2A firm brochure. You should have received a copy of that brochure. Please contact Mr. Elie at (305) 671-3168 if you did not receive the full brochure or if you have any questions about the contents of this supplement. Additional information about Daniel Elie is available on the Securities and Exchange Commission's (SEC) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 – Educational Background and Business Experience**

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

### **Principal Executive Officers and Management Persons**

Daniel Georges Elie      Year of Birth: 1957 | CRD Number: 2264172  
Owner/Principal/Chief Compliance Officer/Investment Advisor Representative

### **Educational Background and Business Experience**

#### **Educational Background**

Certified Financial Planner (CFP®) (1996)

University of Miami, Miami, FL, LLM (1983), MBA (1982)

State University of Haiti, P-a-P, Haiti, Law Degree (1979)

#### **Business Experience**

Dagel Financial, Inc. Miami, FL (03/2003-Present)  
Owner/Principal/Chief Compliance Officer/Investment Advisor Representative

## **Item 3 – Disciplinary Information**

Registered investment advisors are required to disclose certain material facts about its associated personnel regarding any legal or disciplinary events, including criminal or civil action in a domestic, foreign or military court, or any proceeding before a state, federal or foreign regulatory agency, self-regulatory organization, or suspension or sanction by a professional association for violation of its conduct rules, that would be material to your evaluation of each officer or a supervised person providing investment advice. Mr. Elie has not been the subject of any such reportable event.

## **Item 4 – Other Business Activities**

Principal executives, managers, and investment advisor representatives are required to disclose outside business activities that account for a significant portion of their time or income, or that may present a conflict of interest with their advisory activities.

Daniel Elie also serves as an instructor for Kaplan Education, a provider of securities and insurance licensing prep classes and as an instructor for the Department of Community Education at Miami-Dade College, Kendall Campus. These other business activities do not present material conflicts of interest for the financial planning and investment advice services that are provided by Daniel as the Principal of Dagel Financial, Inc.

Daniel Elie is a licensed insurance agent in order to offer education and advice to his clients. He is not paid a commission or renewal payment for this service.

Mr. Elie is not registered, nor has an application pending to register, as a registered representative of a broker/dealer or associated person of a futures commission merchant, commodity pool operator, or commodity trading advisor. Therefore, he does not receive commissions, bonuses or other compensation based on the sale of securities, including that as a registered representative of a broker/dealer or the distribution or service (“trail”) fees from the sale of mutual funds. Neither Mr. Elie nor his firm has a material relationship with the issuer of a security.

## **Item 5 – Additional Compensation**

Neither Mr. Elie nor his advisory firm is compensated for advisory services involving performance-based fees, and firm policy does not allow associated persons to accept or receive additional economic benefit, such as sales awards or other prizes, for providing advisory services to firm clients.

## **Item 6 – Supervision**

Mr. Elie serves as the firm's Chief Compliance Officer. Because supervising one's self poses a conflict of interest, the firm has adopted policies and procedures to mitigate this conflict, and may use the services of unaffiliated professionals to ensure the firm's oversight obligations are met. Mr. Elie will monitor firm activities and the advice provided by performing the following ongoing reviews:

- Case file documentation when the client relationship is established
- Review of periodic account transactions, if any
- An assessment of your financial situation, objectives, and investment needs
- A review of client correspondence on an as needed basis
- Periodic firm assessment

Questions relative to the firm, its services or this Form ADV Part 2 brochure may be made to the attention of Mr. Elie at (305) 671-3168. Additional information about the firm, other advisory firms, or an associated investment advisor representative is available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

A search of this site for firms may be accomplished by firm name or a unique firm identifier, known as an IARD number. The IARD number for Dagele Financial, Inc. is 141780. The business and disciplinary history, if any, of an investment advisory firm and its representatives may also be obtained by calling the Florida Division of Securities & Retail Franchising at (804) 371-9187.

## **Item 7 – Requirements for State-Registered Advisers**

There have been no reportable awards, sanctions or other matters involving Mr. Elie or our advisory firm in a self-regulatory, administrative, or arbitration proceeding. Neither Mr. Elie nor his firm has been the subject of a bankruptcy petition.

## **About the CFP® Professional Designation**

The **CERTIFIED FINANCIAL PLANNER™**, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.