

ITEM 1 - COVER PAGE

# Claremont Financial Group, Inc.

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## Form ADV, Part 2A Brochure

March 21, 2018

This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Claremont Financial Group, Inc. (“CFG or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at 909-624-9200. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority.

Any reference to or use of the terms “registered investment advisor” or “registered,” does not imply that CFG or any person associated with CFG has achieved a certain level of skill or training.

Additional information about Claremont Financial Group, Inc. is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 107806.

## ITEM 2 - MATERIAL CHANGES

**Revised March 21, 2018**

The purpose of this page is to inform you of any material changes since the previous version of this Disclosure Brochure. If you are receiving this Disclosure Brochure for the first time this section may not be relevant to you.

### Material Changes

There have been no material changes to this Disclosure Brochure since the last filing and distribution to Clients.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of CFG.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 107806. You may also request a copy of this Disclosure Brochure at any time, by contacting us at 909-624-9200.

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## ITEM 4 - ADVISORY BUSINESS

### Description of Advisory Firm

Claremont Financial Group, Inc. ("CFG" or the "Advisor and also "we", "our" or "us") is a privately-owned corporation headquartered in Claremont, California. CFG is registered as an investment advisor with the U.S. Securities and Exchange Commission ("SEC"). CFG was founded in January 1994 and has been registered as an investment advisor since February 2006. Nicholas Scalzo and Gaetan Scalzo are the owners of CFG.

The Advisor serves as a fiduciary to Clients, as defined under applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

### Advisory Services Offered

CFG offers personal financial planning and investment management services to individuals, high net worth individuals, trusts and charitable organizations (each a "Client").

#### Personal Financial Planning Services

CFG offers personal financial planning services for a fee. We specialize in providing advice to professionals, pre-retirees and those who are retired. CFG uses financial strategies consistent with the Client's financial condition, tax status, and risk/reward objectives. Strategies may focus on investments, insurance, taxes, and/or estate plans.

Over the series of planning meetings, we compile written information and analysis, which may include one or more of the following areas:

1. the Client's objectives and financial goals,
2. a review of the Client's assets, liabilities, income and expenses,
3. a review, analysis and recommendations regarding one or more of the subject planning areas previously listed,
4. a summary of findings, and
5. an action guide or "To Do" list.

Personal financial planning (the analysis, written report, and subsequent modifications and services) is a service separate from our investment management services. Clients have full discretion as to how they choose to implement the recommendations discussed in the financial planning phase. CFG will generally recommend implementation of financial plans, using CFG or an affiliate as the investment advisor. There are no requirements to use us, or our affiliate, for investment management services.

The investment management services, described below, are part of the implementation process that occurs once the initial planning has been accomplished. Use of our investment management services is not required. Some Clients may use the services of CFG only for the financial planning; others may choose to use CFG only for investment management services. Many Clients engage CFG for both of these services.

Our personal financial planning services do not include preparation of any kind of income tax, gift, or estate tax returns nor preparation of any legal documents, including wills or trusts. We do not provide Clients with any legal or accounting advice.

We describe fees charged for personal financial planning services below under ***Item 5 - Fees and Compensation***.

#### Investment Management Services

CFG offers asset allocation systems through third-party providers (“Investment Platforms”) including Pacific Financial Group, LLC (formerly The Elements Financial Group, LLC and herein “PFG”), an affiliate of CFG and FTJ FundChoice (“FTJ”). We will use a sub-advisor to manage portfolios for Clients where an asset allocation system is not suitable for a Client.

Through these Investment Platforms, we advise Clients as to the selection of asset allocation models and provide continuous monitoring of the models. We describe the material investment risks under the heading ***Specific Security Risks*** in ***Item 8*** below.

We discuss our discretionary authority below under ***Item 16 - Investment Discretion***. For more information about the restrictions Clients can put on their account[s], see ***Tailored Services and Client Imposed Restrictions*** in this item below.

We describe the fees charged for investment management services below under ***Item 5 - Fees and Compensation***.

Limitations on Investments - In some circumstances, CFG’s advice may be limited to certain types of securities.

Limitation by Issuer - In the event CFG is managing assets within an annuity, CFG is limited to those investment options chosen by the insurance agency.

No Load Mutual Funds - The vast majority of mutual fund investments we recommend are in the form of no load or load waived mutual funds.

Limitation by Client - CFG may also limit advice based on certain Client-imposed restrictions. For more information about the restrictions Clients can put on their accounts, see ***Tailored Services and Client Imposed Restrictions*** in this Item below.

Non-Managed Assets - CFG may offer securities trading activities for non-managed positions in a Client’s managed account[s], acting as an intermediary between the Client and the custodian. We do not provide investment advice regarding that portion of the Client’s managed account designated as non-managed assets nor do we provide opinions as to the merits of any non-managed asset held in the account[s]. We also do not make any judgments as to the appropriateness of assumed risk or suitability of any non-managed investment given the Client’s situation. CFG offers this service at no charge and at our discretion, in consideration of the Client’s other accounts that we manage.

At no time will CFG accept or maintain custody of a Client’s funds or securities. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the Client investment

advisory agreement. For additional information, please see Item 12 – Brokerage Practices and Item 15 - Custody.

### **Tailored Services and Client Imposed Restrictions**

CFG manages Client accounts based on the investment strategy the Client chooses, as discussed below under **Item 8 - Methods of Analysis, Investment Strategies, and Risk of Loss**. CFG applies the selected strategy for each Client based on the Client's individual circumstances and financial situation. We make investment decisions for Clients based on information the Client supplies about their financial situation, goals, and risk tolerance. Our recommendations may not be suitable if the Client does not provide us with accurate and complete information. It is the Client's responsibility to keep CFG informed of any changes to their investment objectives or restrictions.

Generally, CFG does not allow Clients to impose restrictions on investing in certain securities or types of securities in the accounts. CFG reserves the right to not accept and/or terminate management of a Client's account[s] if we feel that a Client wants to put a restriction that limits or prevents us from meeting or maintaining the Client's investment strategy.

### **Wrap Fee Program**

CFG does not sponsor a wrap fee program in connection with their investment management services. However, the Investment Platforms offered by PFG and FTJ are wrap fee programs. A wrap fee program is defined as any advisory program under which a specified fee or fees not based directly upon transactions in a Client's account is charged for investment advisory services (which may include portfolio management or advice concerning the selection of other investment advisers) and the execution of Client transactions. Whenever a fee is charged to a Client for services described in this brochure (whether wrap fee or non-wrap fee), we will receive all or a portion of the fee charged.

A complete description of these programs and related fees, charges, when due and termination procedures are described in the respective manager's disclosure brochures, which you receive at or prior to the time a third party managed account is established.

### **Assets Under Management**

As of December 31, 2017, CFG manages \$97,040,875 in Client assets, all of which are on a discretionary basis. Clients may request more current information at any time by contacting the Advisor.

## **ITEM 5 - FEES AND COMPENSATION**

### **Fee Schedule**

#### Personal Financial Planning Services

CFG offers personal financial planning services at the hourly rates describe below, which are negotiable depending on the nature and complexity of each Client's circumstances. In these instances, we will provide an estimate of the total hours required at the start of the relationship. CFG may also provide services at a reduced rate or waive fees for certain Clients (such as employees and their immediate family members). The current hourly rates charged to Clients are:

- Nicholas Scalzo & Gaetan Scalzo - \$250 / hour
- Senior Associate - \$100 / hour

- Paraplanner - \$75 / hour
- Clerical - \$30 / hour

We believe that financial planning is an on-going process that should last a lifetime. After we conduct the initial risk analysis, we present the recommendations to the Client. The on-going planning is an important service as well. We may incorporate the cost of financial planning services into the investment advisory fees for those Clients making use of CFG’s investment management services; see below for description of services. For such Clients, there will be no additional charge for normal planning services over and above the investment fees. Additional analysis may require additional charges and are negotiable on a client-by-client basis.

We send an invoice to Clients for services provided under our hourly rates at the completion of each key planning task for time incurred. The invoice is payable upon receipt and will include the fee calculation and amount due. We typically do not collect fees in advance for financial planning services.

Investment Management Services

CFG charges an investment advisory fee for its investment management services. For those Clients making use of the investment management services provided by CFG and the asset allocation services of PFG or FTJ, the amount of the investment advisory fee is based upon the total assets under management and billed quarterly, in advance of each calendar quarter, based on the following schedule\*:

Assets Under Management	Annual Fee
First \$250,000	1.50%
Next \$250,000	1.25%
Next \$500,000	1.00%
Next \$1,000,000	0.75%
Next \$2,000,000	0.50%

\*In addition to CFG’s fees noted above, accounts managed on the PFG Platform are charged the platform provider’s fee of no more than 0.60% annually (“Platform fee”), which is non-negotiable. This fee includes accounting and reconciliation duties, trading and research, asset allocation modeling, and the fees of the various strategists involved in the Platform. Clients that have municipal bond managed accounts will pay an additional annual fee of 0.10% on the total market value in the portfolio. This additional fee covers the additional costs of the services provided by the unaffiliated bond manager. PFG will add this fee to the Platform fee and calculate the fee in the same manner as the Platform Fee.

For those Clients making use of the investment management services provided by FTJ, the annual fee is 1.75% of the assets under management. This fee covers the FTJ platform and includes the various strategists involved in the Platform.

Billing Method

With Client authorization, each Platform will automatically calculate and withdraw the Platform fee and CFG’s investment advisory fee from the Client’s account[s] held by an independent custodian. The fees are calculated according to the method outlined in each Platform’s Form ADV 2A - Disclosure Brochure. Typically, the custodian withdraws these fees from the Client’s account[s] during the first month of each quarter based on the Platform’s instruction. All Clients will receive brokerage statements from the

custodian no less frequently than quarterly. The custodian statement will show the deduction of the investment advisory fee and the Platform fee. It is the Client's responsibility to verify the accuracy of the fee calculation. The custodian will not determine whether the fee is properly calculated.

### **Other Fees and Expenses**

CFG's fees do not include custodian fees. Clients pay all brokerage commissions, stock transfer fees, and/or other similar charges incurred in connection with transactions in accounts, from the assets in the account[s]. These charges are in addition to the fees Client pays to CFG. See **Item 12 - Brokerage Practices** below for more information.

The vast majority of our Clients are 100% invested in no load, load or load waived mutual fund shares, or other investment products that pay no commission to CFG, but may charge management fees. No commissionable product will be recommended or sold to any current or new Client of CFG. The Advisor does not receive 12(b)-1 fees, as those fees are retained by custodians and/or Investment Platforms.

Additionally, a limited but increasing number of mutual funds are used in the model portfolios offered on the Investment Platforms. The mutual funds on the Platform typically impose short-term redemption fees for sales occurring within certain periods of time (i.e. 30-180 days) following the purchase of the funds. While the Investment Platforms' programs are not designed for short-term trading purposes, it is possible that in certain limited circumstances, including quarterly rebalancing of model portfolios, Clients may pay short-term redemption fees for certain sales of funds, which have not been held for the required minimum period. These fees, if assessed, will be collected directly by the mutual funds to offset the cost to the funds' shareholders for such trades. The specific funds and model portfolios for which such fees may apply is subject to change on a regular basis.

Each of the mutual funds, ETF's and variable annuity sub-accounts included in the model portfolios will bear its own operating expenses, including compensation to the fund or sub-account advisor. In addition to the participation fees paid to Investment Platforms and to CFG, as an investor in the mutual funds, ETF's or variable annuity sub-accounts, the Client will indirectly bear the operating expenses of the mutual funds, ETF's or sub-accounts as they will affect the net asset value (or share price in the case of an ETF) of each fund. The ratios of fund expenses to assets vary from fund to fund according to the actual amounts of expenses incurred and fluctuations in the fund's daily net assets. Information on the specific expenses for each of the mutual funds will be set forth in the fund's prospectus and periodic reports provided by the fund to the Client. Information concerning the specific expenses of each variable annuity sub-account and any other expenses assessed by each variable annuity issuer are contained in the Prospectus delivered to the Client by the variable annuity issuer.

### **Termination**

#### Investment Management Services

Either party may terminate the advisory agreement at any time by providing written notice to the other party. Upon termination, CFG will refund any prepaid, unearned advisory fees based on the effective date of termination. Upon termination of the agreement, we will send the Client a prorated refund of unearned advisory fees using the following formula:  $(Fees\ Paid) \times (Days\ Remaining\ in\ Quarter) / (Total\ Number\ of\ Days\ in\ Quarter)$ . The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

### Personal Financial Planning Services

In the event that either the Client or CFG wishes to terminate the financial planning agreement before completion of the plan, either party may terminate the agreement at any time by providing written notice to the other party. The Client may terminate the agreement at any time by writing CFG at our office. Upon notice of termination, CFG will provide you with an invoice for services provided through the date of termination. If you paid fees in advance that were more than the amount due for services, CFG will refund any unearned fees to you. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

### **Other Compensation**

We have Advisory Persons who are associated with a non-affiliated registered broker-dealer as either a principal or a registered representative. For more information relating to the compensation they may receive, see below ***Item 10– Other Financial Industry Activities and Affiliations***.

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

CFG does not charge performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a Client. CFG does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund).

## **ITEM 7 - TYPES OF CLIENTS**

CFG offers personal financial planning and investment management services to individuals, high net worth individuals, trusts and charitable organizations. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor.

### **Account Requirements**

Generally, CFG requires Clients who we are providing investment management services to maintain a minimum account size of \$250,000. We generally combine family accounts to meet the account size minimum. We may reduce or waive the account minimum requirements at our discretion.

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

### **Financial Planning**

The financial planning tools CFG uses to create financial plans for Clients rely on various assumptions, such as estimates of inflation, risk, economic conditions, and rates of return on security asset classes. All return assumptions use asset class returns, not returns of actual investments, and do not include fees or expenses that Clients would pay if they invested in specific products.

Financial planning software is only a tool used to help guide CFG and the Client in developing an appropriate plan. CFG cannot guarantee that Clients will achieve the results shown in the plan. Results will vary based on the information provided by the Client regarding the Client's assets, risk tolerance, and personal information. Changes to the underlying assumptions or differences in actual personal, economic, or market outcomes may result in materially different results for the Client. Clients should carefully consider the assumptions and limitations of the financial planning software as disclosed on the financial planning reports. The Client should then discuss the results of the plan with a qualified investment professional before making any changes in their investment or financial planning program.

We do not recommend individual securities to Clients. However, we may make a general recommendation in the financial plan about investing a portion of your financial assets in securities. If the financial plan includes recommendations for investing in securities, you should understand that investing in securities involves risk of loss, and you should be prepared to bear that risk.

### **Methods of Analysis and Investment Strategies**

CFG's general investment strategy is to seek real capital growth proportionate with the level of risk the Client is willing to take. CFG treats each Client account uniquely. Generally, CFG assists Clients to develop an investment policy statement. Topics addressed in a typical investment policy statement may include the investment goals, time horizon, risk tolerance, tax considerations, frequency and type of monitoring and reporting, criteria for investment selection and overall investment strategy.

We design the investment recommendations to satisfy a hierarchy of needs, the first of which is the Client's need for short-term cash flow and liquidity. To meet this requirement CFG recommends a level of short-term reserve funds and suggest appropriate investment vehicles. We then generally make recommendations geared to towards the long-term with emphasis placed on liquidity. We select investments for long-term growth or income potential. However ones that are readily converted to cash, should warrant unforeseen circumstances. After these first two needs appear satisfied, we place the emphasis for the Client's remaining funds on long-term investments without regard to liquidity. Tax reduction strategies may also play an important role in these recommendations.

We typically recommend Clients invest through various Investment Platforms. The Investment Platforms offer model portfolios of mutual funds, exchange traded funds (ETF's), bonds, and variable annuity sub-accounts which are provided by a number of institutional investment strategists and based on the information, research, asset allocation methodology and investment strategies of these institutional strategists.

With respect to Clients investing through a Platform, CFG introduces Clients to investment managers or retains sub-advisors who provide discretionary management of individual portfolios.

Third-party platform providers use a variety of methods of analysis, sources of information, and investment strategies in the management of Client accounts. Details of their methods, sources, and investment strategies are outlined in the third-party providers ADV 2A - Disclosure Brochure, which are provided to Clients engaging those services.

### **Investment Strategies for Managing Portfolios**

CFG may use strategic asset allocation, tactical asset allocation, cash as a strategic asset, and/or long-term holding in the construction and management of Client portfolios.

*Strategic Asset Allocation* - Strategic asset allocation involves periodically rebalancing portfolio in order to maintain a long-term goal for asset allocation regardless of the market conditions.

*Tactical Asset Allocation* - Tactical asset allocation is an active management portfolio strategy that rebalances the percentage of assets held in various asset categories in an effort to take advantage of market pricing anomalies or strong market sectors. This strategy provides an opportunity for CFG to create extra value by taking advantage of certain situations in the marketplace. CFG considers this a moderately active strategy since we return the portfolio to its original strategic asset mix if we achieve desired short-term profits or the perceived opportunity ends.

*Cash as a Strategic Asset* - CFG may use cash as a strategic asset and may at times move or keep Client's assets in cash or cash equivalents. While high cash levels can help protect a Client's assets during periods of market decline, there is a risk that our timing in moving to cash is bad either upon exit or re-entry into the market and we miss positive market moves.

*Long-term Holding* - CFG's strategy consists of investing through a platform where the model of the platform generally is purchasing, holding, and rebalancing a diversified portfolio of securities. We typically intend to hold these investments for the long term except when sales are necessary to rebalance the portfolio or to fund replacement acquisitions.

*Sources of Information* - We may consult with specialists in financial planning, mutual funds, variable annuities, and insurance products. We may also consult with the due diligence/investment research staff who reviews the products of various companies.

### **Investing Involves Risk**

Investing in securities involves risk of loss, and Clients should be prepared to bear that risk.

### **Specific Security Risks**

#### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

#### ETF Risks

The performance of an ETF is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

#### Mutual Fund Risks

The performance of a mutual fund is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

#### General Risks of Owning Securities

The prices of securities held in Client accounts and the income they generate may decline in response to certain events taking place around the world. These include events directly involving the issuers of securities in a Client's account, conditions affecting the general economy, and overall market changes.

Other contributing factors include local, regional, or global political, social, or economic instability and governmental or governmental agency responses to economic conditions. Finally, currency, interest rate, and commodity price fluctuations may also affect security prices and income.

#### Third-Party Investment Advisors and Sub-Advisors Strategies and Risks

The independent third-party investment advisors that we select to be sub-advisors to Client's portfolio will use their own investment process and methods of analysis. The strategies and securities these managers invest in may have different or additional risks than those described in this brochure. Clients can find more information about the strategies and related risks of the sub-advisors in **Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss** in each manager's Form ADV 2 Brochure.

## **ITEM 9 - DISCIPLINARY INFORMATION**

CFG and our Supervised Persons seek to maintain the highest level of business professionalism, integrity, and ethics. CFG does not have any disciplinary information to disclose. CFG values the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 107806.

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

### **Registered Representative of Unaffiliated Broker-Dealer**

Certain Associated Persons of CFG are also either principals or registered securities representatives of Capital Investment Group, Inc. ("CIG"), a non-affiliated dually registered broker-dealer and a member of the Financial Industry Regulation Authority ("FINRA"). Associated Persons of CFG in their own capacities as either principal or registered representative of CIG may recommend securities and/or investment related products offered by CIG or its affiliates. This presents a conflict of interest because these Associated Persons may have an incentive to recommend CIG for executing securities transactions or securities and products for which they receive additional compensation. Clients are under no obligation to act upon any recommendations of the Associated Persons or effect any transactions through the Associated Persons if they decide to follow the recommendations. When acting as registered representatives of CIG, these Associated Persons will be compensated for effecting securities transactions on the normal commission schedule. However, no commissionable product will be recommended or sold to any of CFG's current or new Clients. CFG does not receive 12(b)-1 fees, as those fees are retained by custodians and/or Investment Platforms.

It is also possible for Associated Persons of CFG to receive compensation for the sale of real estate, insurance, collectibles, commodities, and other "non-security" products. This presents a conflict of interest between CFG and CFG's Client. The conflict is based on the fact that CFG is compensated for providing investment management and financial planning services and certain Associated Persons of CFG may also be compensated for selling insurance products, real estate, collectibles, commodities, and other "non-security" products that are recommended as part of the investment management or financial planning process. Therefore, Clients are advised that if they elect to act on such recommendations, the Client is under no obligation to transact the purchase of insurance products through any Associated Person of CFG.

### **Other Investment Advisor**

Nicholas Scalzo and Gaetan Scalzo are both Managing Members of Pacific Financial Group, LLC (formerly The Elements Financial Group, LLC and herein "PFG"), a registered investment advisor, and provider of

one of the Investment Platforms recommended by CFG. As members, Nicholas and Gaetan Scalzo participate in the profits and losses of PFG. As such, they have a conflict of interest in recommending The Elements Financial Group, LLC platform in which they both have a proprietary interest over another platform that they do not have a proprietary interest in.

## **ITEM 11 - CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

### **Code of Ethics**

CFG has implemented a Code of Ethics (the “Code”) that defines our fiduciary commitment to each Client. This Code applies to all persons associated with CFG (our “Supervised Persons”). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. CFG and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of CFG associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest.

CFG’s Code attempts to address specific conflicts of interest that either we have identified or that could likely arise. CFG’s Supervised Persons are required to follow clear guidelines from the Code such as areas of prohibitions of insider trading and adherence to applicable federal securities laws. Additionally, individuals who make investment decisions/securities recommendations to Clients, or who have access to nonpublic information regarding any Clients’ purchase or sale of securities, are subject to personal trading policies governed by the Code (see below).

CFG will provide a complete copy of the Code to any Client or prospective Client upon request.

### **Personal Trading Practices**

CFG and our Supervised Persons may purchase or sell securities for themselves, regardless of whether the transaction would be appropriate for a Client’s account. CFG and our Supervised Persons may purchase or sell securities for themselves that we also recommend for Clients. This includes related securities (e.g., warrants, options, or futures). This presents a potential conflict of interest as we may have an incentive to take investment opportunities from Clients for our own benefit, favor our personal trades over Client transactions when allocating trades, or to use the information about the transactions we intend to make for Clients to our personal benefit by trading ahead of Clients.

Our policies to address these conflicts include the following:

1. We use third-party Investment Platforms and/or sub-advisors for management of all Client accounts. Therefore, we are not aware of the timing of when trades are placed.
2. Our Supervised Persons are required to submit quarterly and annual reports regarding transactions and securities holdings in their personal accounts.

## **ITEM 12 - BROKERAGE PRACTICES**

CFG requires Clients to open one or more custodian accounts in their own name at a third-party custodian. We require Clients open such accounts at either at Charles Schwab & Co., Inc. (“Schwab”), TD Ameritrade, Pershing LLC (“Pershing”), (collectively the “Custodian/Broker”). We are independently

owned, operated, and not affiliated with any of these custodian/brokers. These Custodian/Brokers will hold Client assets in a brokerage account, and buy and sell securities when the third-party platform provider or we instruct them to.

### **Factors Considered in Selecting Broker-Dealers for Client Transactions**

CFG considers several factors in recommending a Custodian/Broker to a Client. We first determine which platform or sub-advisor will be used to service the Client's account. Each platform has relationships with one or more Custodian/Brokers and will require the Client to select a Custodian/Broker that they have an arrangement with. Other factors that we may consider include ease of use, reputation, service execution, pricing and financial strength of the Custodian/Brokers. CFG may also take into consideration the availability of the products and services received or offered (detailed below) by Custodian/Brokers.

### **Research and other Soft Dollar Benefits**

CFG may receive from particular Custodian/Brokers, without cost (or at a discount), support services and/or products that benefit CFG but may not directly benefit our Clients' accounts. Custodian/Brokers make available products and services that may be used to service all or some substantial number of CFG's accounts, including accounts not maintained with these brokers. Custodian/Brokers make these products and services available to us on an unsolicited basis.

Custodian/Brokers may make available products and services that assist CFG in managing and administering Clients' accounts including software and other technology that:

1. provide access to Client account data (such as trade confirmations and account statements);
2. facilitate trade execution and allocate aggregated trade orders for multiple Client accounts;
3. provide research, pricing and other market data;
4. facilitate payment of CFG's fees from our Clients' accounts; and
5. assist with back-office functions, recordkeeping, and Client reporting.

Custodian/Brokers may also offer other services intended to help CFG manage and further develop our business enterprise. These services may include:

1. compliance, legal and business consulting;
2. publications and conferences on practice management and business succession; and
3. access to employee benefits providers, human capital consultants, and insurance providers.

Custodian/Brokers may make available, arrange, and/or pay third-party vendors for the types of services provided to CFG. Custodian/Brokers may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to CFG.

Custodian/Brokers may also provide other benefits such as educational events.

As part of our fiduciary duty to Clients, CFG endeavors at all times to put the interests of our Clients first. Clients should be aware, however, that the receipt of economic benefits by CFG or our Supervised Person in and of itself creates a potential conflict of interest and may indirectly influence CFG's recommendation of Custodian/Brokers for custody and brokerage services.

### Directed Brokerage

CFG will not allow Clients to direct CFG to use a specific broker-dealer to execute transactions. Clients must use the broker-dealers that CFG or platform provider recommends. Not all investment advisors require their Clients to trade through specific brokerage firms. By requiring Clients to use the broker-dealers that the Investment Platforms require, CFG believes we may be able to more effectively manage the Client's portfolio, achieve favorable execution of Client transactions and lower the overall costs to the portfolio.

### **Aggregation and Allocation of Transactions**

Either third-party Investment Platforms will implement transactions for each Client or a sub-advisor. Clients should review the platform's or the sub-advisor's Form ADV 2 Brochure for information regarding order aggregation and allocation of transactions.

## **ITEM 13 - REVIEW OF ACCOUNTS**

### **Managed Account Reviews & Reports**

Generally, each portfolio is reviewed every quarter by the Investment Platforms to evaluate the extent to which the actual allocation matches the target allocation. We offer account reviews to Clients on a quarterly basis. Clients may choose to receive reviews in person, by telephone, or in writing. Nicholas Scalzo, CEO, and Gaetan Thomas Scalzo, CFP®, President, generally conduct all reviews based on a variety of factors. These factors may include but are not limited to stated changes in the model, investment objectives, economic environment, outlook for the securities markets, and the merits of the securities in the accounts. Other members of CFG's team might be involved in the review of accounts from time to time.

In addition, we may conduct a special review of an account based on one or more of the following:

1. A change in the Client's investment objectives, guidelines and/or financial situation;
2. Changes in diversification;
3. Tax considerations; or
4. Material cash deposits or withdrawals.

Each Client receives a written statement from the custodian that includes an accounting of all holdings and transactions in the account for the reporting period. In addition, certain platform providers may provide written reports depending on platform the Client is working with. Details of the account reporting that the third-party platform providers make available to Clients are outlined in each provider's Form ADV 2 Brochure. Applicable disclosure brochures are provided to Clients engaging those services.

### **Financial Plan Reviews & Reports**

Nicholas Scalzo, ChFC®, CLU® (CEO) and Gaetan Scalzo, CFP® (President) are responsible for reviewing Clients' financial plans. Other members of CFG's team might be involved in the review of financial plans from time to time. CFG will generally contact Clients at least annually to discuss any changes in the Client's circumstances and necessary updates to the financial plan. We also work with Clients on an ongoing basis to review the plan as needed or as requested by the Client. Clients receive a copy of all written documents that are developed and discussed during the time we work together. Personal financial planning generally includes the analysis, written report, and subsequent modifications and services. The personal financial

planning is a service separate from our investment management services.

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

### Participation in Institutional Advisor Platform – TD Ameritrade

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

### Participation in Institutional Advisor Platform – Schwab

CFG has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like CFG. As a registered investment advisor participating on the Schwab Advisor Services platform, CFG receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Services that Benefit the Client – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may

be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

Services that May Indirectly Benefit the Client – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

Services that May Only Benefit the Advisor – Schwab also offers other services and financial support to CFG that may not benefit the Client, including: educational conferences and events, financial start-up support, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a potential conflict of interest. CFG believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

#### Participation in Institutional Advisor Platform – Pershing

The Advisor has established an institutional relationship with Pershing to assist the Advisor in managing Client account[s]. Access to the Pershing Institutional platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Pershing. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Additionally, the Advisor may receive the following benefits from Pershing: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

#### Solicitors

If an unaffiliated solicitor introduces a Client to CFG, we may pay that solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, and any corresponding state securities law requirements.

If an unaffiliated solicitor introduces a Client to CFG, that solicitor will disclose the nature of the solicitor relationship with CFG at the time of the solicitation. In addition, the solicitor will provide each prospective Client with a copy of this brochure, and a copy of the written disclosure statement from the solicitor to the Client disclosing the terms and conditions of the arrangement between CFG and the solicitor, including the compensation the solicitor will receive from CFG.

### Professional Referrals

CFG may refer Clients to unaffiliated professionals for a variety of services such as insurance, mortgage brokerage, real estate sales, and estate planning, legal, and/or tax/accounting services. In turn, these professionals may refer Clients to CFG. From time to time, we may enter into agreements with such professionals to refer Clients to each other and compensate one another for such Client referrals. When such arrangements have been made, the Client will be provided a separate disclosure document to outline the arrangement.

CFG only refers Clients to professionals we believe are competent and qualified in their field. It is ultimately the Client's responsibility to evaluate the provider. It is solely the Client's decision whether to engage a recommended firm. Clients are under no obligation to purchase any products or services through these professionals, and CFG has no control over the services provided by another firm. Clients who chose to engage these professionals will sign a separate agreement with the other firm. Fees charged by the other firm are separate from and in addition to fees charged by CFG.

If the Client desires, CFG will work with these professionals or the Client's other advisors (such as an accountant, attorney, or other investment advisor) to help ensure that the provider understands the Client's financial plan/investments and to coordinate services for the Client. CFG does not share information with an unaffiliated professional unless first authorized by the Client.

### **ITEM 15 - CUSTODY**

CFG has limited custody of some of our Clients' funds or securities when the Clients authorize us or our advisory affiliate, PFG, to deduct our management fees directly from the Client's account. A qualified custodian (generally a broker-dealer, bank, trust company, or other financial institution) holds Clients' funds and securities. Clients will receive statements directly from their qualified custodian at least quarterly. The statements will reflect the Client's funds and securities held with the qualified custodian as well as any transactions that occurred in the account, including the deduction of our fee. The fees for Clients participating in the Investment Platforms offered by PFG or FTJ, will generally have management fees directly debited from the Client's custodian account by the platform provider. The platform provider will pay CFG directly for our services.

Clients should carefully review the account statements they receive from the qualified custodian. When Clients receive statements from either CFG or a platform provider as well as from the qualified custodian, they should compare these two reports carefully. Clients with any questions about their statements should contact us at the address or phone number on the cover of this brochure. Clients who do not receive a statement from their qualified custodian at least quarterly should also notify us.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements in these cases, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

### **ITEM 16 - INVESTMENT DISCRETION**

Clients electing to participate in the Investment Platforms offered by PFG or FTJ will be required to execute an investment advisory agreement with CFG granting CFG discretionary authority and limited

power of attorney with respect to the investment of the Client's assets. With this discretionary authority, we retain PFG as a sub-advisor or FTJ as co-advisor to serve as discretionary money manager with respect to the assets of Clients' accounts and to perform the following services:

- buy, sell, invest, reinvest, convey, exchange, convert, transfer, redeem, liquidate or otherwise dispose of securities in the assets of the Clients' accounts in the platform without notice to, or approval of, CFG or Clients, which are consistent with the model portfolios selected by CFG on behalf of Clients;
- allocate investments within the chosen model portfolios, without distinction between principal and income; and
- enter into agreements with Strategists and/or third-party managers to provide manage model portfolios for the platform.

Clients who do not participate in the Investment Platforms will be required to execute an investment advisory agreement with CFG granting CFG discretionary authority and limited power of attorney with respect to the investment of the Client's assets. With this discretionary authority, we retain PFG as a sub-advisor.

## **ITEM 17 - VOTING CLIENT SECURITIES**

### Proxy Voting and Class Actions

CFG does not accept or have the authority to vote Client securities. However, Clients may call us if they have questions about a particular solicitation. CFG will not be deemed have proxy voting authority solely because of providing advice or information about a particular proxy vote to a Client. Clients will receive their proxies or other solicitations directly from their custodian or a transfer agent.

CFG does not instruct or give advice to Clients on whether or not to participate as a member of class action lawsuits and will not automatically file claims on the Client's behalf. However, if a Client notifies us that they wish to participate in a class action, we will provide the Client with any transaction information pertaining to the Client's account[s] needed for the Client to file a proof of claim in a class action.

## **ITEM 18 - FINANCIAL INFORMATION**

Registered investment advisors are required in this item to provide Clients with certain financial information or disclosures about the Advisor's financial condition. CFG does not require the prepayment of more than \$1,200 in fees per Client, six months or more in advance, and does not foresee any financial condition that is reasonably likely to impair our ability to meet contractual commitments to Clients.

**Form ADV, Part 2B (“Brochure Supplements”)**

Individuals covered by this supplement include:

**Nicholas Braun Scalzo, ChFC<sup>®</sup>, CLU<sup>®</sup>**  
**Gaetan Thomas Scalzo, CFP<sup>®</sup>**  
**Matthew John Turnbull**

**Claremont Financial Group, Inc.**

464 North Indian Hill Blvd.  
Claremont, CA 91711  
909-624-9200

March 21, 2018

This combined Form ADV2B (“Brochure Supplements”) provides information about Nicholas Braun Scalzo, Gaetan Thomas Scalzo, and Matthew John Turnbull that supplements the Claremont Financial Group, Inc. (“CFG” or the “Advisor”) Disclosure Brochure. You should have already received a copy of that Disclosure Brochure. Please contact our office at 909-624-9200 if you did not receive our Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement.

Additional information about Nicholas Braun Scalzo, Gaetan Thomas Scalzo, and Matthew John Turnbull is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

# Nicholas Braun Scalzo, ChFC<sup>®</sup>, CLU<sup>®</sup>

## ITEM 2 - EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Nicholas Braun Scalzo, ChFC<sup>®</sup>, CLU<sup>®</sup>, Co-owner and Chief Executive Officer, b. 1969

### *Education:*

Attended California State University, Fullerton, 1987-1992

Chartered Life Underwriter designation from the American College for Financial Planning, 2006

### *Business Background:*

Pacific Financial Group, LLC (The Elements Financial Group, LLC) - Managing Member & CEO, December 2006 to present

Claremont Financial Group, Inc. - Co-owner and CEO, October 2005 to present

Capital Investment Group, Inc. - Registered Principal, December 2011 to present

Pacific Financial Associates – Registered Representative, September 2005 to December 2011

Associated Securities Corp. -Registered Representative, July 2002 to October 2005

Royal Alliance Inc. - Registered Representative, January 2000 to July 2002

Centaurus Financial Inc. - Registered Representative, July 1995 to January 2000

### Professional Designations

Nicholas Braun Scalzo holds the following professional designations:

#### *Chartered Financial Consultant<sup>®</sup>*

The ChFC<sup>®</sup> designation is conferred by The American College. To earn the credential, each ChFC<sup>®</sup> candidate must take a proctored exam for 6 core and 2 elective courses, have 3 years of full-time business experience within the five years preceding the awarding of the designation, and also complete a minimum of 30 hours of continuing education every two years. More information regarding the ChFC<sup>®</sup> is available at <http://www.theamericancollege.edu/financial-planning/chfc-advanced-financial-planning>.

#### *Chartered Life Underwriter<sup>®</sup>*

The CLU<sup>®</sup> designation is conferred by The American College. To earn the credential, each CLU<sup>®</sup> candidate must take a proctored exam for each course of study, have 3 years of full-time business experience within the five years preceding the awarding of the designation, and also complete a minimum of 30 hours of continuing education every two years. More information regarding the CLU<sup>®</sup> can be found at <http://www.cluhigheststandard.com/>.

## ITEM 3 - DISCIPLINARY INFORMATION

The Advisor and its Advisory Persons

value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on anyone providing services to you. There are no legal or disciplinary events to disclose regarding Nicholas B. Scalzo.

However, we do encourage you to independently view the background of Nicholas B. Scalzo on the Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov> by searching with his full name or Individual CRD# 2486415.

#### **ITEM 4 - OTHER BUSINESS ACTIVITIES**

Nicholas Scalzo is a Co-owner and the CEO of CFG. He is also a Managing Member and the CEO of The Elements Financial Group, LLC ("Elements"), of one of the platforms recommended by CFG. As a Member, Nicholas Scalzo participates in the profits and losses of Elements. As such, he has a conflict of interest in recommending the Elements platform in which he has a proprietary interest over another platform that he does not have a proprietary interest in.

Mr. Scalzo is also a registered representative with Capital Investment Group, Inc. ("CIG"). CIG is a non-affiliated dually registered broker-dealer and a member of the Financial Industry Regulation Authority ("FINRA"). In his own capacity as a registered representative of CIG, Mr. Scalzo may recommend securities and/or investment related products offered by CIG or its affiliates. This presents a conflict of interest because he may have an incentive to recommend CIG for executing securities transactions or securities and products for which he will receive additional compensation. If a Client decides to follow Mr. Scalzo's recommendations Clients are under no obligation to effect transactions through Mr. Scalzo. He will be compensated for effecting securities transactions on the normal commission schedule. However, no commissionable product will be recommended or sold to any of CFG's current or new Clients. CFG does not receive 12(b) fees, as those fees are retained by custodians and/or investment platforms.

It is also possible that Mr. Scalzo will also receive compensation for the sale of real estate, insurance, collectibles, commodities, and other "non-security" products. This presents a conflict of interest between CFG and CFG's Client. The conflict is based on the fact that CFG is compensated for providing investment management and financial planning services and Mr. Scalzo may also be compensated for selling insurance products, real estate, collectibles, commodities, and other "non-security" products that are recommended as part of the investment management or financial planning process. Therefore, Clients are advised that if they elect to act on such recommendations, the Client is under no obligation to transact the purchase of insurance products through any Associated Person of CFG.

#### **ITEM 5 - ADDITIONAL COMPENSATION**

The additional compensation that Nicholas Scalzo may receive is outlined above in *Item 4 – Other Business Activities*.

#### **ITEM 6 - SUPERVISION**

Nicholas Scalzo is a Co-owner and CEO of CFG and is also supervised by Gaetan Scalzo, Co-owner and President. Mr. Scalzo is also supervised by Matthew J. Turnbull, Chief Compliance Officer. Mr. Turnbull can be reached at 909-264-9200.

# Gaetan Thomas Scalzo, CFP®

## ITEM 2 - EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

**Gaetan Thomas Scalzo, CFP®**, Co-owner and President, b. 1966

### *Education:*

Attended Orange Coast Community College from 1985-1988

Certified Financial Planner, certification May 2006

### *Business Background:*

Pacific Financial Group, LLC (formerly The Elements Financial Group, LLC) – Managing Member, December 2006 to present

Claremont Financial Group, Inc. – Co-owner and President, October 2005 to present

Capital Investment Group, Inc. - Registered Representative, December 2011 to present

Pacific Financial Associates, Inc. – Registered Representative, November 2005 to December 2011

Associated Securities Corp. – Registered Representative, August 2002 to November 2005

Royal Alliance Inc. – Registered Representative, January 2000 to August 2002

Centaurus Financial Inc. – Registered Representative, May 1997 to January 2000

Southland Micro Systems – Import Broker, March 1996 to May 1997

Hempstead CO. – Intl. Sales, December 1996 to March 1997

CA Community News – Account Rep, October 1993 to February 1996

### Professional Designations

Gaetan Scalzo holds the following professional designation:

#### *Certified Financial Planner*

The CERTIFIED FINANCIAL PLANNER™ and CFP® (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 CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, 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.

### **ITEM 3 - DISCIPLINARY INFORMATION**

The Advisor and its Advisory Persons value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on anyone providing services to you. There are no legal or disciplinary events to disclose regarding Gaetan T. Scalzo.

However, we do encourage you to independently view the background of Gaetan T. Scalzo on the Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov> by searching with his full name or Individual CRD# 2898363.

### **ITEM 4 - OTHER BUSINESS ACTIVITIES**

Gaetan Scalzo is a Co-owner and the President of CFG. He is also a Managing Member of The Elements Financial Group, LLC ("Elements"), of one of the platforms recommended by CFG. As a Member, Gaetan Scalzo participates in the profits and losses of Elements. As such, he has a conflict of interest in recommending the Elements platform in which he has a proprietary interest over another platform that he does not have a proprietary interest in.

Mr. Scalzo is also a registered representative with Capital Investment Group, Inc. ("CIG"). CIG is a non-affiliated dually registered broker-dealer and a member of the Financial Industry Regulation Authority ("FINRA"). In his own capacity as a registered representative of CIG, Mr. Scalzo may recommend securities and/or investment related products offered by CIG or its affiliates. This presents a conflict of interest because he may have an incentive to recommend CIG for executing securities transactions or securities and products for which he will receive additional compensation. If a Client decides to follow Mr. Scalzo's recommendations Clients are under no obligation to effect transactions through Mr. Scalzo. He will be compensated for effecting securities transactions on the normal commission schedule. However, no commissionable product will be recommended or sold to any of CFG's current or new

Clients. CFG does not receive 12(b) fees, as those fees are retained by custodians and/or investment platforms.

It is also possible that Mr. Scalzo will also receive compensation for the sale of real estate, insurance, collectibles, commodities, and other "non-security" products. This presents a conflict of interest between CFG and CFG's Client. The conflict is based on the fact that CFG is compensated for providing investment management and financial planning services and Mr. Scalzo may also be compensated for selling insurance products, real estate, collectibles, commodities, and other "non-security" products that are recommended as part of the investment management or financial planning process. Therefore, Clients are advised that if they elect to act on such recommendations, the Client is under no obligation to transact the purchase of insurance products through any Associated Person of CFG.

#### **ITEM 5 - ADDITIONAL COMPENSATION**

The additional compensation that Gaetan Scalzo may receive is outlined above in *Item 4 – Other Business Activities*.

#### **ITEM 6 - SUPERVISION**

Gaetan Scalzo is a Co-owner and the President of CFG and is also supervised by Nicholas Scalzo, Co-owner and CEO. Mr. Scalzo is also supervised by Matthew J. Turnbull, Chief Compliance Officer. Mr. Turnbull can be reached at 909-264-9200.

# Matthew John Turnbull

## ITEM 2 - EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Matthew John Turnbull, Adviser, b. 1971

### *Education:*

Attended Mesa College, 1990-1991

### *Business Background:*

Claremont Financial Group, Inc. – Investment Advisor Representative, February 2006 to present

Claremont Financial Group, Inc. – Chief Compliance Officer, January 2017 to present

Capital Investment Group, Inc. - Registered Representative, December 2011 to present

Pacific Financial Associates – Registered Representative, June 2007 to December 2011

## ITEM 3 - DISCIPLINARY INFORMATION

The Advisor and its Advisory Persons value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on anyone providing services to you. There are no legal or disciplinary events to disclose regarding Matthew J. Turnbull.

However, we do encourage you to independently view the background of Matthew J. Turnbull on the Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov> by searching with his full name or Individual CRD# 3020996.

## ITEM 4 - OTHER BUSINESS ACTIVITIES

Matthew Turnbull's primary business is providing investment advice through Claremont Financial Group, Inc.

Mr. Turnbull is also a registered representative with Capital Investment Group, Inc. ("CIG"). CIG is a non-affiliated dually registered broker-dealer and a member of the Financial Industry Regulation Authority ("FINRA"). In his own capacity as a registered representative of CIG, Mr. Turnbull may recommend securities and/or investment related products offered by CIG or its affiliates. This presents a conflict of interest because he may have an incentive to recommend CIG for executing securities transactions or securities and products for which he will receive additional compensation. If a Client decides to follow Mr. Turnbull's recommendations Clients are under no obligation to effect transactions through Mr. Turnbull. He will be compensated for effecting securities transactions on the normal commission schedule. However, no commissionable product will be recommended or sold to any of CFG's current or new Clients. CFG does not receive 12(b) fees, as those fees are retained by custodians and/or investment platforms.

It is also possible that Mr. Turnbull will also receive compensation for the sale of insurance products. This presents a conflict of interest between CFG and CFG's Client. The conflict is based on the fact that CFG is compensated for providing investment management and financial planning services and Mr. Turnbull may also be compensated for selling insurance products that are recommended as part of the investment management or financial planning process. Therefore, Clients are advised that if they elect to act on such recommendations, the Client is under no obligation to transact the purchase of insurance products through any Associated Person of CFG.

**ITEM 5 - ADDITIONAL COMPENSATION**

Matthew Turnbull's receives compensation from his regular salary of Claremont Financial Group, Inc. In addition, Claremont Financial Group, Inc. also compensates Mr. Turnbull for providing investment advice to a select group of Claremont Financial Group, Inc.'s Clients. This additional compensation is based on a percentage of the assets held in these Client's portfolios.

**ITEM 6 - SUPERVISION**

Mr. Turnbull is an Investment Advisor Representative with CFG its Chief Compliance Officer. Mr. Turnbull is primarily supervised by Gaetan Scalzo (President). Mr. Turnbull is also supervised by Matthew J. Turnbull, Chief Compliance Officer. Mr. Turnbull can be reached at 909-264-9200.

# **Claremont Financial Group, Inc.**

## **Privacy Policy**

**Effective: March 21, 2018**

Claremont Financial Group, Inc.  
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Claremont, CA 91711-4650  
Phone: (909) 624-9200 \* Fax: (909) 624-1937  
[www.claremontfinancial.com](http://www.claremontfinancial.com)

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### **Our Commitment to You**

Claremont Financial Group, Inc. (“CFG” or the “Advisor”) is committed to safeguarding the use of your personal information that we have as your Investment Advisor.

CFG (also referred to as “we”, “our” and “us” throughout this notice) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust.

CFG does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and proper business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Privacy Policy.

### **Why you need to know?**

Registered Investment Advisors (“RIAs”) share some of your personal information. Federal and State laws give you the right to limit some of this sharing. Federal and State laws require RIAs to disclose how we collect, share, and protect your personal information.

### **What information do we collect from you?**

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

### **What sources do we collect information from in addition to you?**

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic safeguards. These include computer safeguards such as passwords, as well as secured files and buildings. Our employees are advised about CFG's need to respect the confidentiality of each client's non-public personal information. We train our employees on their responsibilities

We require third parties that assist in providing our services to you to protect the personal information they receive. This includes contractual language in our third-party agreements.

**How we share your information?** RIAs do need to share personal information regarding its clients to effectively implement the RIA's services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Sharing	Limitations
<p><b>Servicing our Clients</b></p> <p>We may share non-public personal information with non-affiliated third parties (such as brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.</p>	CFG may share this information.	Clients cannot limit the Advisor's ability to share.
<p><b>Administrators</b></p> <p>We may disclose your non-public personal information to companies we hire to help administer our business. Companies that we hire to provide services of this nature are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.</p>	CFG may share this information.	Clients cannot limit the Advisor's ability to share.
<p><b>Marketing Purposes</b></p> <p>CFG does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where CFG or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b></p>	CFG does not share personal information.	Clients cannot limit the Advisor's ability to share.
<p><b>Authorized Users</b></p> <p>In addition, your non-public personal information may also be disclosed to you and persons that we believe to be your authorized agent or representative.</p>	CFG does share personal information.	Clients can limit the Advisor's ability to share.
<p><b>Information About Former Clients</b></p> <p>CFG does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.</p>	CFG does not share personal information regarding former clients	Clients can limit the Advisor's ability to share.

### State-specific Regulations

California	In response to a California law, to be conservative, we assume accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties, except as permitted by California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws.
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**Changes to our Privacy Policy**

We will send you a notice of our Privacy Policy annually for as long as you maintain an ongoing relationship with us.

Periodically, we may revise our Privacy Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

**Any Questions?** You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (909) 624-9200.