January 1st, 2025

Form CRS Disclosure (Relationship Summary) - 4Thought Financial Group Inc.

4Thought Financial Group Inc. is registered with the US Securities and Exchange Commission as an Investment Adviser. Brokerage and investment advisory services and fees differ and it is important for the retail investor to understand the differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

4Thought Financial Group Inc. offers investment advisory services to retail clientele. This includes an investment portfolio management wrap fee program and financial planning services (each offered separately).

Investment Portfolio Management (Wrap Fee Program): We can implement your investment planning through continuous portfolio management in a wrap fee advisory account. This includes algorithm-based weekly (or even daily) portfolio analysis and trading, cash flow management, rebalancing, reallocations, securities replacement, daily electronic account-level performance and custodial reporting, on-demand consolidated performance reporting, both electronic and individualized communications, and annual or more frequent client objective reviews. 4Thought manages all accounts on a discretionary trading authorization basis. We recommend to clients one or more proprietary Separately Managed Account (SMA) strategies, each of which is managed according to a specific mandate using a formula-driven (algorithmic) process. We customize the mix of SMAs for each household. 4Thought also accepts the discretionary authority to transfer funds between client's accounts of the same registration maintained with the same custodian. The program has a minimum investment of $500.00 for taxable accounts and $10,000.00 for IRAs.

Financial Planning: Our firm provides retainer fee comprehensive financial planning and area-specific financial planning services to retail clients. Depending on your situation, this may include advice on investment planning, estate planning, business succession, and fringe benefits (or all four). For retainer fee arrangements, the analysis and recommendations are provided on a continuous basis as we progress through a checklist of client issues to address, and then repeat the process perpetually. The firm has no discretionary authority, and the implementation of recommendations is based on your own decision to do so. MORE INFO

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

What fees will I pay?

Investment Portfolio Management (Wrap Fee Program): An annual percentage of assets under management (asset-based) wrap fee will be deducted directly from your account quarterly in arrears. An asset-based fee provides an incentive for the advisor to encourage the investor to increase the assets in their account. The fee for model-driven accounts ranges from 0.55%/year to 1.85%/year for account sizes under $10 million, with discounts over that level. The fee may fall outside these ranges for custom accounts. Your fee percentage is disclosed in your Investment Advisory Agreement and/or during an electronic account opening process. The wrap fee covers our investment advisory services, as well as most custody and brokerage costs. As a result, you may pay more than if you were to pay an asset-based advisory fee that does not include them. Our wrap fee does not cover certain one-time charges that may be assessed by the custodian/brokerage firm based on special requests such as paper delivery or outbound transfer fees. To the extent that mutual funds or exchange traded funds are held in your account, fees payable to 4Thought are in addition to the internal fund expenses.

Financial Planning: Fees for this service are based on the complexity of the planning to be done. The dollar amount of your fee is disclosed in your financial planning agreement. There is a minimum fee of $100.00 per month for retainer fee comprehensive financial planning, with no maximum (automatically increased by a 3% inflation adjustment annually). Retainer fees are automatically charged to your credit card or bank account. There are no minimum or maximum fees for One-Time or Hourly Rate arrangements.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. MORE INFO

Help me understand how these fees and costs might affect my investments. If I give you $10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

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

The SMA strategies we use to manage your account(s) are also marketed to non-retail clientele such as retirement plans and other registered investment advisers as a packaged program, and therefore could be seen as the use of a proprietary product/service when utilized for our retail clients. This poses a possible conflict of interest when our representatives offer their use to financial planning clients, as we will receive a fee for management of the accounts if you choose to implement through us. 4Thought and its advisors are licensed as life insurance brokers and will generally receive commissions for the sale of such products, which provides an incentive to recommend them based on potential compensation. 4Thought enters into agreements providing compensation to accountants and other solicitors who refer clients to the firm. This compensation is a portion of the fee you pay to us, and gives these solicitors a monetary incentive to refer clientele. MORE INFO

How might your conflicts of interest affect me, and how will you address them?

How do your financial professionals make money?

4Thought employs representatives compensated through a combination of salary/bonus, and others that are compensated solely based on the business (financial planning cases, investment assets, and insurance sales) that they can bring in and maintain under 4Thought's management. In both cases, the professionals have a financial incentive to attempt to attract and retain new clients, assets, and insurance contracts.

Do you or your financial professionals have legal or disciplinary history?

Yes. Please refer to Investor.gov/CRS for a free and simple search tool to research our firm and professionals.

As a financial professional, do you have any disciplinary history? For what type of conduct?

Additional information can be obtained in 4Thought's Firm Brochure (ADV Part 2) and Wrap Fee Program Brochure, which are attached here and also available on our website at www.4tfg.com. You may also email us at info@4tfg.com or call us at (516) 300-1617 to request up-to-date information and a copy of this Form CRS.

Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?

4Thought Financial Group Inc.
6851 Jericho Turnpike, Suite 120, Syosset, NY 11791
(516) 300-1617
www.4TFG.com

BROCHURE

January 1st, 2025

This brochure provides information about the qualifications and business practices of 4Thought Financial Group Inc. If you have any questions about the contents of this brochure, please contact us at 516-300-1617 or info@4TFG.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about 4Thought Financial Group Inc. is available on the SEC's website at www.adviserinfo.sec.gov.

Material Changes

Material (and immaterial) changes to 4Thought Financial Group Inc.'s policies, practices or conflicts of interest since our last Brochure dated July 1st, 2024 include:

- Update of firm assets under management. (Immaterial change)

Table of Contents

Advisory Business

4Thought Financial Group Inc. ("4Thought" or the "firm") is an investment advisory services (money management) and financial planning firm with an additional business line in economic research publishing. The firm was registered as an investment adviser (RIA) in 2012, and was originally incorporated in 2010. The principal owners (voting shareholders) are Jesse Mackey, Daniel Mackey, and Martin E. Levine. The firm is also licensed as an insurance brokerage in New York state.

4Thought Financial Group provides portfolio management services to the clients of third party registered investment advisers under Separately Managed Account platform, sub-advisory, assets-under-advisory, and Wrap Fee Program solicitation arrangements. The firm also provides financial planning and investment advisory services directly to end-user individuals, family offices, trusts, pension plans and other retirement plans, corporations (including insurance companies), and non-profit/tax-exempt organizations. 4Thought also establishes solicitation arrangements with accountants and other Non-RIA solicitors.

Investment Advisory Services for Direct Clients

The firm provides investment advisory services under several possible fee arrangements (see "Fees and Compensation" below). These services include ongoing investment portfolio management services through directly-managed discretionary accounts (including sponsored wrap fee programs), introduction to pre-qualified third party investment portfolio management services, and independent portfolio advisory for client implementation through vendors not associated with 4Thought Financial Group.

Directly Managed Accounts

For clients who have already developed their investment plan through 4Thought Financial Group, with a third party advisory firm, or without the aid of an adviser, 4Thought Financial Group will implement their plan with the creation and management of an investment portfolio in a wrap fee program managed account (which may be sponsored by 4Thought Financial Group – Please see separate Wrap Fee Program Brochure for detailed information on this program). Upon completion of a financial planning process or the firm's Portfolio Assessment Questionnaire (in either paper or electronic form) to gauge risk tolerance, objectives, investment time horizon, and philosophical preferences, 4Thought Financial Group will generate an investment proposal, implement it, and will provide ongoing portfolio management and communication directly to end-user investor clients. We may manage portfolios (depending on program selected) using non-proprietary exchange-traded funds (ETFs), institutional share class mutual funds, no-load funds, and load-waived funds, as well as individual securities (bonds and stocks). 4Thought Financial Group does not use any proprietary mutual funds or ETFs in any of its programs. However, 4Thought uses proprietarily developed Separately Managed Account (SMA) strategies when directly managing client accounts. These SMA strategies are also marketed to third party advisory firms as a named and packaged program, and therefore could be seen as the use of a proprietary product/service when utilized for the individual private clients of 4Thought. This poses a possible conflict of interest when 4Thought's representatives recommend or offer the use of its directly managed accounts in the implementation of fee financial plans for its private individual clients, as 4Thought will receive a fee for management of the accounts if clients choose to implement through 4Thought. This fee and the quality/character of the investment advisory services may differ from services available elsewhere if the client were to implement their investment portfolio through a third party (with or without the introduction of 4Thought). 4Thought utilizes a Multi-Method Investing® methodology and Risk Premium Capital Allocation (RPCA) in constructing and managing client portfolios (see "Methods of Analysis, Investment Strategies and Risk of Law" below for more information).

Introductions to Third Party Investment Advisory Programs

As part of the implementation of a financial plan or separately, the firm may introduce clients to third party specialist separately managed accounts (SMAs) or comprehensive portfolio management programs (turnkey asset management programs). The firm reviews and approves any firms introduced to clients and 4Thought will receive a portion of the third party firm's ongoing asset management fee for introductions it makes.

Independent portfolio advisory for client implementation

Clients may use the firm in a consulting role to review an individual investment portfolio or investment objective and provide independent recommendations for client implementation through third party sources, for which 4Thought Financial Group will receive no referral compensation.

Personal Financial Planning Services for Direct Clients:

Our firm provides personal comprehensive financial planning and modular (area-specific) financial planning services directly to private clients. We provide these services under one of several possible fee arrangements (see "Fees and Compensation" below), which may be selected by the client and/or recommended by the investment adviser representative. Our financial planning services may include one or more of the below elements, depending on the client's situation:

Investment Planning
- Retirement Cash Flow Analysis
- Investment Portfolio Analysis
- Educational Planning

Estate Planning
- Will and Trust Reviews
- Family governance
- Intergenerational planning
- Charitable Giving Strategies
- Family Foundation Creation and Management

Business Succession Planning
- Retirement Succession
- Disability Succession
- Death Succession

Fringe Benefits Planning
- Pension and 401k Plans
- Employer/Employee Benefits
- Deferred Compensation

Investment Advisory Services Support for Other Registered Investment Advisers and Non-RIA Solicitors

4Thought Financial Group develops solicitation and sub-advisory arrangements with third party registered investment advisers, Separately Managed Account platforms/custodians, and Non-RIA Solicitors (mostly accountants) in order for these firms and individuals to provide access to our suite of investment advisory services for their end-user clients. We directly manage investment portfolios for their clients through a shared compensation arrangement through either 4Thought-sponsored wrap fee programs or third party firm sponsored wrap fee programs. In addition, 4Thought offers its intellectual property only in the form of portfolio management trading signals through "assets under advisory" platforms provided by certain custodial sponsors, in which 4Thought does not take direct control of trading client accounts. 4Thought provides three basic lines of services to client firms - Separately Managed Accounts (SMAs), a turnkey asset management (Wrap Fee) program, and Assets Under Advisory Services.

Separately Managed Accounts

Third party registered investment advisers are able to access 4Thought's separately managed accounts (SMAs) as part of the overall portfolio management that they may provide to their own end-user clients. 4Thought Financial Group generally will have no direct contact with the end-user clients under this arrangement (unless specifically requested by a third party advisor on an as-needed basis), but will have discretionary authority over the management of the end-user client's account, to be managed according to an agreed-upon mandate. 4Thought Financial Group is a service provider to the third party firm under this arrangement. Separate Accounts may be offered through SMA "platforms", in which the end-user client's advisor (from a third party RIA) enlists 4Thought to manage the account for the client through a Custodian and/or Broker-Dealer of their choosing (with whom 4Thought will have previously established an agreement for services as a manager available on the platform). Similarly, a 4Thought Separate Account may in some cases be offered as a "Designated Investment Alternative" within ERISA retirement plans through agreements with platforms that offer such portfolio management services to ERISA plans. Such platforms in some cases require that as a portfolio manager 4Thought take on the role of a 3(38) Fiduciary with respect to determining the appropriateness of services offered to the plan (but not with respect to the appropriateness of services for the individual plan participants, since 4Thought has no contact with these participants).

The firm currently offers 10 model-driven SMA strategies, plus custom portfolio management on request: (The additional 9 strategies labeled Fixed Income Plus Tax Sensitive, Fixed Income Plus High Yield, Global Thematic Distribution, Global Opportunistic Accumulation, Global Opportunistic Distribution, Thematic Systematic Investing, Global Selective Distribution, Multi-Contingency Conservative, and Multi-Contingency Aggressive below are no longer offered)

Custom/ Liability-Driven Investing

- The Custom/Liability-Driven Investing SMA is 100% customizable and made available for multiple purposes. It can be used to create a structured liability-driven investing portfolio, to address client-directed modifications to our other model-driven SMAs, or to manage a completely customized portfolio for a discerning client or advisor (at slightly higher expense than model-driven SMAs). In addition, it can be used to address third party advisor needs such as the involvement of 4Thought in client relationship management.

Fixed Income Plus

- Provides a diversified core bond allocation, with a primary component that attempts nominal capital preservation using laddered target date bond exchange traded funds and/or laddered individual bonds, and a secondary variable component that seeks higher income potential and hedging against potential interest rate rises and inflation through actively managed non-laddered bond ETFs (diversified by type, sector, maturity, and geography). The target asset allocation is 100% Bonds/ Credit Markets. The primary benchmark is the Barclays US Aggregate 1-5 Year TR USD Index. As of November 1st, 2023, the Fixed Income Plus – Tax Neutral Composite was renamed the Fixed Income Plus Composite.

Global Strategic Allocation

- This growth-focused portfolio provides long term strategic asset allocation exposures to stock, bond, and hard asset markets on a global basis (domestic, international developed, and emerging markets) with attention to managing political and currency risks through diversification and hedging. Diversity, security selection, and ongoing rebalancing of the portfolio are the focus of management. The objective is long term portfolio growth and inflation protection reasonably consistent with the performance of the global stock markets, but with greater asset-type diversity. The target asset allocation range is 60-100% Stock Markets/ 0-40% Diversifying Credit and Hard Asset Markets. Allocations may deviate from specific targets based on market value changes and management decisions. The primary benchmark is the S&P 500 TR USD Index. As of November 1st, 2023, the Global Strategic Accumulation Composite was renamed the Global Strategic Allocation Composite.

Traditional Strategic Allocation

- This portfolio provides a traditional US-centric strategic asset allocation investment approach in a simplified ETF-based structure for the all-stock investor. The portfolio is appropriate for accumulation phase investors with a very long time horizon, those seeking significantly above-inflation long term returns, or those seeking to complement a pre-existing fixed income portfolio in a tax efficient manner. The portfolio is composed of a diversified US-centric stock allocation (ETFs), with minor allocations to international developed and emerging markets. The percentage split between each of the components is rebalanced on an ongoing basis. The target asset allocation is 100% Stock/Equity Markets. The primary benchmark is the S&P 500 TR USD Index. As of November 1st, 2023, the Traditional Stock Allocation Composite was renamed the Traditional Strategic Allocation Composite.

Opportunistic Unconstrained Allocation

- This portfolio uses an unconstrained all-asset-class tactical allocation method to provide the potential for reduction of risks associated with the financial system (“systematic risk”). The objectives are low correlation with the equity and fixed income markets and long term total returns in excess of inflation. These goals are pursued through algorithmic active portfolio manipulation using an opportunistic probability-based statistical analysis methodology. The strategy attempts to both protect to the downside and perform well on the upside by tactically altering the asset class allocation, and may move up to 100% of the portfolio to the asset class or security deemed most favorable at any given time (including cash). This entails significant management and algorithm-related risks. The portfolio remains liquid, with no lock-up periods or surrender charges that apply, and provides investment method diversification when paired with more traditional approaches. The asset allocation is 100% Unconstrained (Allocations to all asset classes are permitted). The inception date for the composite is June 1st, 2012 and the composite creation date is February 4th, 2013. The primary benchmark is the Bloomberg Barclays US Treasury US TIPS TR USD Index. The benchmark was changed on June 30th, 2017 due to discontinuation of the previous index (Deutsche Bank Hedge Fund TR USD Index). As of November 1st, 2023, the Opportunistic Systematic Investing Composite was renamed the Opportunistic Unconstrained Allocation Composite.

Selective Stock Allocation

- This portfolio is intended to provide the potential for long term market outperformance through a highly concentrated individual stock and/or ETF portfolio. A larger initial global all-cap list of securities is first screened through a multi-factor fundamental, technical, and quantitative model to select the final concentrated portfolio, which is composed of a very limited number of securities (typically 4, but up to 25). It is then continuously reallocated and rebalanced based on algorithmic analysis. This portfolio is not diversified and represents significant concentration risks to the investor. Volatility is not a consideration in this portfolio's goal of achieving high long term growth. The target asset allocation is 100% Stock/Equity/Hard Asset Markets. A 0-3% allocation to cash deposits/ money market is maintained for operational purposes. The inception date for the composite is June 1st, 2012 and the composite creation date is January 14th, 2013. The primary benchmark is the S&P 500 TR USD Index. As of January 24th, 2014 the composite name was changed from Global Thematic to Global Thematic Accumulation. As of November 1st, 2023, the Global Thematic Accumulation Composite was renamed the Selective Stock Allocation Composite.

Multi-Method Unconstrained

- This portfolio provides a coordinated multi-methodology investment approach in a single simplified portfolio structure for the high risk tolerance long term investor. The portfolio is appropriate for accumulation phase investors with a time horizon of at least one or more market cycles, those seeking significantly above-inflation returns, or those seeking a very high immediate income (and willing to accept potentially high volatility). The portfolio is unconstrained in its ability to allocate or shift between four investing method components: A portion that may be allocated to laddered target date or other bond exchange traded funds; a diversified strategic global all-cap stock (ETF) portfolio; a portion that is managed on an unconstrained basis and is opportunistically shifted up to 100% to the asset class(es) (ETFs) determined to be the most favorably priced at any given time; and a portion that may be allocated to selected individual stocks. The percentage split between each of the portfolio components is rebalanced/reallocated on an ongoing basis. The asset allocation is 100% Unconstrained (Allocations to all asset classes are permitted). A 0-3% allocation to cash deposits/ money market is maintained for operational purposes. The primary benchmark is the Bloomberg Barclays US Treasury US TIPS TR USD Index. As of November 1st, 2023, the Multi-Contingency Unconstrained Composite was renamed the Multi-Method Unconstrained Composite.

Multi-Method Constrained

- This portfolio provides a coordinated multi-methodology investment approach in a single simplified portfolio structure for the moderate risk tolerance investor. The portfolio is appropriate for accumulation phase investors with an intermediate time horizon, those seeking slightly above-inflation returns, or those seeking a moderate immediate income. A minimum of 50% of the portfolio (but up to 100%) is allocated to laddered target date or other bond exchange traded funds at all times. The remainder may be allocated amongst three additional method components: A diversified strategic global all-cap stock (ETF) portfolio; a portion that is managed on an unconstrained basis and is opportunistically shifted up to 100% to the asset class(es) (ETFs) determined to be the most favorably priced at any given time; and a portion that may be allocated to selected individual stocks. The percentage split between each of the portfolio components is rebalanced/reallocated on an ongoing basis. The target asset allocation is 50%-100% Bond/Credit Markets, 0-50% Stock/Equity Markets and Unconstrained. A 0-3% allocation to cash deposits/ money market is maintained for operational purposes. The primary benchmark is a blended index composed of 50% Barclays US Aggregate 1-5 Year TR USD/ 40% S&P 500 TR USD/ 10% Bloomberg Barclays US Treasury US TIPS TR USD (rebalanced monthly). The benchmark was changed on June 30th, 2017 due to discontinuation of a previous index component (Deutsche Bank Hedge Fund TR USD Index). As of November 1st, 2023, the Multi-Contingency Moderate Composite was renamed the Multi-Method Constrained Composite.

Traditional Aggressive Allocation

- This portfolio provides a traditional US-centric strategic asset allocation investment approach in a simplified ETF-based structure for the aggressive risk tolerance investor. The portfolio is appropriate for accumulation phase investors with a long time horizon, those seeking significantly above-inflation returns, or those seeking a high immediate income. Approximately 25% of the portfolio is composed of laddered fixed maturity date and variable corporate bond exchange traded funds, with 75% in a diversified US-centric stock allocation (ETFs). The percentage split between each of the components is rebalanced on an ongoing basis. The target asset allocation is 25% Bond/Credit Markets, 75% Stock/Equity Markets. The primary benchmark is a blended index composed of 25% Barclays US Aggregate 1-5 Year TR USD/ 75% S&P 500 TR USD (rebalanced monthly).

Traditional Moderate Allocation

- This portfolio provides a traditional US-centric strategic asset allocation investment approach in a simplified ETF-based structure for the moderate risk tolerance investor. The portfolio is appropriate for accumulation phase investors with an intermediate time horizon, those seeking slightly above-inflation returns, or those seeking a moderate immediate income. Approximately 50% of the portfolio is composed of laddered fixed maturity date and variable corporate bond exchange traded funds, with 50% in a diversified US-centric stock allocation (ETFs). The percentage split between each of the components is rebalanced on an ongoing basis. The target asset allocation is 50% Bond/Credit Markets, 50% Stock/Equity Markets. The primary benchmark is a blended index composed of 50% Barclays US Aggregate 1-5 Year TR USD/ 50% S&P 500 TR USD (rebalanced monthly).

Traditional Conservative Allocation

- This portfolio provides a traditional US-centric strategic asset allocation investment approach in a simplified ETF-based structure for the conservative risk tolerance investor. The portfolio is appropriate for accumulation phase investors with a short time horizon, those seeking inflation-adjusted capital preservation, or those seeking a modest immediate income. Approximately 75% of the portfolio is composed of laddered fixed maturity date and variable corporate bond exchange traded funds, with 25% in a diversified US-centric stock allocation (ETFs). The percentage split between each of the components is rebalanced on an ongoing basis. The target asset allocation is 75% Bond/Credit Markets, 25% Stock/Equity Markets. The primary benchmark is a blended index composed of 75% Barclays US Aggregate 1-5 Year TR USD/ 25% S&P 500 TR USD (rebalanced monthly).

Fixed Income Plus - Tax Sensitive (No longer offered)

- Attempts nominal capital preservation of principal through laddered fixed maturity date national municipal bond exchange traded funds and/or laddered individual municipal bonds (held to maturity), and hedging against potential interest rate rises and inflation through actively managed floating rate securities, treasury inflation protected securities, and long term non-laddered bond components. The asset allocation is 100% Bonds/ Credit Markets. The primary benchmark is the Barclays Municipal 1-5 Year TR USD Index. The composite termination date was May 31st, 2017.

Fixed Income Plus - High Yield (No longer offered)

- Provides US high yield fixed income exposures with the ability to hold to maturity and potential for high current income through laddered fixed maturity date high yield corporate bond exchange traded funds and/or individual corporate high yield bonds (held to maturity). Also provides hedging against potential interest rate rises and inflation through actively manipulated floating rate securities, treasury inflation protected securities, and long term non-laddered bond components. The asset allocation is 100% Bonds/ Credit Markets. The primary benchmark is the Barclays US Aggregate 1-5 Year TR USD Index. The composite termination date was December 31st, 2017.

Global Thematic Distribution (No longer offered)

- This portfolio is intended to provide the potential for above-average dividend yield through a highly concentrated theme-driven individual stock and/or ETF portfolio. A very limited number of individual stocks and/or ETFs (typically 4, but up to 25) provide exposure to sectors, industries, geographies, or themes expected by management to result in long term above-average yield/income. A watch-list portfolio of potential holdings is first selected subjectively based on themes of global economic development and human advancement. This potential list is then screened through a multi-factor fundamental, technical, and quantitative model to select a final concentrated portfolio, which is continuously reallocated and rebalanced based on management's analysis. This portfolio is not diversified and represents significant concentration risks to the investor. Portfolio volatility is not a consideration in this portfolio's goal of achieving high long term yield. The asset allocation is 100% Stock/Equity/Hard Asset Markets. The primary benchmark is the S&P 500 TR USD Index. The composite termination date was December 31st, 2017.

Global Opportunistic Accumulation (No longer offered)

- This aggressive growth portfolio uses an unconstrained allocation method that provides the potential for reduction of risks associated with the financial system ("systematic risk") through low correlation with the equity and fixed income markets, while targeting growth and inflation protection. These goals are pursued through highly active portfolio manipulation using an opportunistic probability-based statistical analysis methodology (with a discretionary model intervention management overlay). Long term growth with low correlation to the global stock and bond market indexes is attempted, in an effort to both protect to the downside where possible and perform well on the upside by moving up to *100% of the portfolio* to the asset class / security deemed most favorable at any given time. This entails significant management-related risks. The portfolio remains liquid, with no lock-up periods or surrender charges that apply, and provides investment philosophy diversification. The asset allocation is 100% Unconstrained. The primary benchmark is the Bloomberg Barclays US Treasury US TIPS TR USD Index. The benchmark was changed on June 30th, 2017 due to discontinuation of the previous index (Deutsche Bank Hedge Fund TR USD Index). The composite termination date was July 31st, 2020.

Global Opportunistic Distribution (No longer offered)

- This portfolio uses an income-focused unconstrained method to provide the potential for reduction of risks associated with the financial system ("systematic risk") through low correlation with the equity and fixed income markets, while targeting modest total return income and inflation protection. These goals are attempted through highly active portfolio manipulation using an opportunistic probability-based statistical analysis methodology. Special efforts are taken to protect to the downside where possible, to generate income on the upside on a total return basis, and to provide low correlation with the global stock and bond markets, by tactically manipulating allocations to cash and the multiple components in the potential asset type list. This entails significant management-related risks. The portfolio remains liquid, with no lock-up periods or surrender charges that apply, and provides investment philosophy diversification. The asset allocation is 100% Unconstrained. The primary benchmark is the Bloomberg Barclays US Treasury US TIPS TR USD Index. The benchmark was changed on June 30th, 2017 due to discontinuation of the previous index (Deutsche Bank Hedge Fund TR USD Index). The composite termination date was August 31st, 2020.

Global Selective Distribution (No longer offered)

- This income-focused portfolio provides selective exposures to securities in the stock, bond, and hard asset markets on a global basis. The focuses of management are the maintenance of a relatively concentrated securities portfolio through a multi-factor algorithmic selection process; asset-type and sector-based diversity; the generation of income for withdrawals; and ongoing rebalancing of the portfolio. The objective is to provide higher income than the broader equity and fixed income markets while allowing the principal to adjust with inflation (on average, over the long term). The relative concentration of the portfolio amongst a limited number of individual securities means that assets are more exposed to the idiosyncratic risks of these securities than a more diverse portfolio. The target asset allocation ranges are 20-40% Bond and Credit Markets/ 40-80% Stock Markets/ 0-20% Hard Asset Markets. A 0-5% allocation to cash deposits/ money market is maintained for operational purposes. Allocations are permitted to deviate significantly from targets based on market value changes prior to rebalancing. The inception date for the composite is June 1st, 2012 and the composite creation date is February 4th, 2013. The primary benchmark is a blended index composed of 40% Barclays US Aggregate 1-5 Year TR USD Index / 60% S&P 500 TR USD Index (rebalanced monthly). The name of the composite was changed from Global Strategic Distribution to Global Selective Distribution on January 1st, 2018. The composite termination date was August 31st, 2020.

Thematic Systematic Investing (No longer offered)

- This portfolio is optimized for ongoing systematic investors and intended to provide the potential for long term market outperformance through a concentrated individual stock and/or ETF portfolio. A larger initial global all-cap list of securities is first screened through a fundamental analysis security selection algorithm and ranked for valuation. New investment cash flows and any security sale proceeds are invested in the security deemed to be the most undervalued. Once securities previously purchased are no longer deemed to be favorably priced, they are sold and reinvested in a newly calculated favorably-priced security. This portfolio is not necessarily diversified and may represent significant concentration risks to the investor. Portfolio volatility is not a consideration in this portfolio's goal of achieving high long term growth. The target asset allocation is 100% Stock/Equity/Hard Asset Markets. A 0-3% allocation to cash deposits/ money market is maintained for operational purposes. The inception date for the composite is March 1st, 2014 and the composite creation date is March 4th, 2014. A break in the performance track record occurred from the period 7/1/14 to 7/31/14 due a lack of accounts in the composite. The primary benchmark is the S&P 500 TR USD Index. The composite termination date was July 31st, 2020.

Multi-Contingency Aggressive (No longer offered)

- This portfolio provides a coordinated multi-methodology investment approach in a single simplified portfolio structure for the aggressive risk tolerance investor. The portfolio is appropriate for accumulation phase investors with a long time horizon, those seeking significantly above-inflation returns, or those seeking a high immediate income. A minimum of 25% of the portfolio (but up to 100%) is allocated to laddered target date or other bond exchange traded funds at all times. The remainder may be allocated amongst three additional method components: A diversified strategic global all-cap stock (ETF) portfolio; a portion that is managed on an unconstrained basis and is opportunistically shifted up to 100% to the asset class(es) (ETFs) determined to be the most favorably priced at any given time; and a portion that may be allocated to selected individual stocks. The percentage split between each of the portfolio components is rebalanced/reallocated on an ongoing basis. The target asset allocation is 25%-100% Bond/Credit Markets, 0-75% Stock/Equity Markets and Unconstrained. A 0-3% allocation to cash deposits/ money market is maintained for operational purposes. The primary benchmark is a blended index composed of 25% Barclays US Aggregate 1-5 Year TR USD/ 50% S&P 500 TR USD/ 25% Bloomberg Barclays US Treasury US TIPS TR USD (rebalanced monthly). The benchmark was changed on June 30th, 2017 due to discontinuation of a previous index component (Deutsche Bank Hedge Fund TR USD Index) and inconsistency of the previous blended index mix with the composite mix. The composite termination date was April 30th, 2023.

Multi-Contingency Conservative (No longer offered)

- This portfolio provides a coordinated multi-methodology investment approach in a single simplified portfolio structure for the conservative risk tolerance investor. The portfolio is appropriate for accumulation phase investors with a short time horizon, those seeking inflation-adjusted capital preservation, or those seeking a modest immediate income. A minimum of 75% of the portfolio (but up to 100%) is allocated to laddered target date or other bond exchange traded funds at all times. The remainder may be allocated amongst three additional method components: A diversified strategic global all-cap stock (ETF) portfolio; a portion that is managed on an unconstrained basis and is opportunistically shifted up to 100% to the asset class(es) (ETFs) determined to be the most favorably priced at any given time; and a portion that may be allocated to selected individual stocks. The percentage split between each of the portfolio components is rebalanced/reallocated on an ongoing basis. The target asset allocation is 75%-100% Bond/ Credit Markets, 0-25% Stock/Equity Markets and Unconstrained. A 0-3% allocation to cash deposits/ money market is maintained for operational purposes. The primary benchmark is a blended index composed of 75% Barclays US Aggregate 1-5 Year TR USD/ 20% S&P 500 TR USD/ 5% Bloomberg Barclays US Treasury US TIPS TR USD (rebalanced monthly). The benchmark was changed on June 30th, 2017 due to discontinuation of a previous index component (Deutsche Bank Hedge Fund TR USD Index). The composite termination date was April 30th, 2023.

Turnkey Asset Management (Wrap Fee) Program

Upon completion of a Portfolio Assessment Questionnaire, 4Thought Financial Group will develop and manage a diversified investment portfolio for partnered Registered Investment Adviser firms' clients on an ongoing basis utilizing our Multi-Method Investing® Separately Managed Account strategies and Risk Premium Capital Allocation methodologies. The third party firm acts as an RIA Solicitor for 4Thought Financial Group's Wrap Fee Program services under this arrangement. Turnkey asset management is available for individual accounts though our standard wrap fee program and also for group ERISA Plans through the 4Thought Retirement Plan Services program. Please see the separate Wrap Fee Program Brochure for additional information on both of these.

Assets Under Advisory Services

4Thought Financial Group provides portfolio management trading signals and allocation changes for the same investment strategies offered in its Separately Managed Accounts to third party Registered Investment Advisers through custodial programs/platforms established for this purpose. In these engagements, 4Thought is only providing its intellectual property under an "Assets under advisory" arrangement, and does not take direct discretionary control over the trading of client accounts (execution is at the discretion/responsibility of the third party firm).

Financial Planning Services Support for Other Registered Investment Advisers and Non-RIA Solicitors

4Thought Financial Group develops solicitation arrangements with third party registered investment advisers and Non-RIA Solicitors (mostly accountants) in order for these firms and individuals to provide access to our series of financial planning services for their end-user clients. Such arrangements may involve shared compensation. We will also aid these firms in growing this client value-add line of business through marketing consulting.

Customization

The firm generally tailors its advisory services to the individual needs of clients based on the client's completion of a Portfolio Assessment Questionnaire and/or a financial planning process. Depending on the service or program, clients may impose restrictions on investing in certain securities or types of securities. These restrictions are generally available through the use of custom portfolio management, which is priced on a case-by-case basis but is typically more expensive than a comparable model-driven portfolio. Information on the level of customization in each service or program is as follows:

Investment Advisory Services for Direct Clients

Directly Managed Accounts

- We customize the services for the individual clients, but they are generally based on portfolio modeling utilized for a large number of clients. In model-driven portfolios, clients may not impose restrictions on investing in certain securities or types of securities. However, customized portfolio modeling that takes client-imposed restrictions into account may be available in certain situations at additional cost.

Introductions to Third Party Investment Advisory Programs

- Customization level is dependent on the third party adviser's program and is disclosed in their Form ADV.

Independent portfolio advisory for client implementation

- Complete analysis and recommendation customization within any limitations imposed through third party resources utilized (e.g., retirement plans).

Personal Financial Planning Services for Direct Clients

- Complete customization.

Investment Advisory Services Support for other Registered Investment Advisers and Non-RIA Solicitors

Turnkey Asset Management (Wrap Fee) Program

- We customize these services for the individual client, but they are generally based on portfolio modeling that is utilized for a large number of clients. In model-driven portfolios, clients may not impose restrictions on investing in certain securities or types of securities. However, customized portfolio modeling that takes client-imposed restrictions into account may be available in certain situations at additional cost.

Specialized Separately Managed Accounts

- Specialized SMA portfolios generally are model-driven and are not customized to individual clients in terms of the internal holdings and management within the account, except for the “Custom/ Liability-Driven SMA”, which provides complete customization capabilities within a single account (when requested by advisors and clients in special situations). However, a portfolio of multiple specialized SMAs is most often customized to the client situation by selecting the appropriate SMA strategies and altering the percentage splits between strategies.

Assets Under Advisory Services

- These services are model-driven only, and are not directly customizable to the end-user client by 4Thought. Customization is performed through the efforts of the third party Registered Investment Adviser firm using our services by selecting the appropriate model strategies and altering the percentage splits between strategies.

Financial Planning Services Support for other Registered Investment Advisers and Non-RIA Solicitors

- Complete customization.

Publishing

4Thought Financial Group publishes through several venues. These include proprietary periodical publications, which are available to 4Thought Financial Group clients, advisors, third party firms, and to the general public. Another venue for publishing is through third party regional, national, and internationally distributed publications, which our employees pursue on a freelance basis. 4Thought Financial Group utilizes in-house theorists, researchers and authors to generate content for publication on both a paid and unpaid basis. We write on personal financial planning, investment management, global economic development and human advancement.

Marketing Plan, Business Development, and Optimization Consulting

4Thought Financial Group guides third party firms through the process of developing and implementing a marketing plan in order to fully develop the new line of business or “value-add” that they are seeking to provide to clients in financial planning and investment advisory services.

Assets Under Management

As of December 31st, 2024, 4Thought managed $174,441,191.90 in assets on a discretionary basis and $4,031,686.09 on a non-discretionary basis (composed of third party management programs on which 4Thought maintains oversight agreements), for total assets under management of $178,472,877.99 (excluding any assets under advisory arrangements).

Fees and Compensation

Investment Advisory Services for Direct Clients

Directly Managed Accounts and Sponsored Wrap Fee Program

Annual Percentage of Assets Under Management (AUM) Fee

- For accounts managed directly by 4Thought Financial Group on a discretionary basis an annual percentage of assets under management fee will be calculated and deducted directly from the client account, either through a 4Thought-sponsored Wrap Fee Program (See separate Wrap Fee Program Brochure for details), or through a wrap fee program sponsored by a third party firm. The fee shall be paid quarterly and covers the investment advisory services of 4Thought, as well as charges for execution of transactions through the brokerage firm, clearance of funds and securities through the custodian, custody of account assets with the custodian and electronic account reporting by the custodian (Client requests for paper delivery of reporting by the custodian may require additional charges. Please refer to the custodian agreement for details on this and any other potential ancillary charges). As a result, the client may pay more or less for these services than if they were purchased separately. The fee may be paid either in advance or in arrears, depending on the brokerage firm and/or custodian selected by the client and the billing arrangement established between 4Thought and the brokerage firm/ custodian. The client should refer to the separate agreement with the selected brokerage firm and/or custodian for information on whether in advance or in arrears billing applies and for specific details on the calculation and timing of fee billing. In the case of in arrears billing, the first payment is due at the end of the first calendar quarter of management by 4Thought. For the first partial quarter and each quarter thereafter, the schedule of fees shall be applied to the average daily fair market value of the assets in the account during the quarter, as calculated after quarter-end. For the initial partial quarter, the fee shall be determined by daily proration. In the case of in advance billing, the first payment is due upon acceptance of the Investment Advisory Agreement and is based upon the opening value of the account. Thereafter, the schedule of fees is applied to the fair market value of the assets of the account as of the last business day of the prior quarterly period. For the initial partial quarter, the fee is determined by daily proration. Also for in advance billing, the treatment of fee calculation on partial additions and withdrawals during a quarter will vary depending on the brokerage firm and/or custodian selected by the client. 4Thought may invest assets of the Account in shares of investment companies ("Funds"). With respect to mutual funds or ETFs held in a client's account, fees payable to 4Thought Financial Group are in addition to expenses and ordinary fees borne by these holdings. 4Thought Financial Group's fees could be avoided if the client invested directly in mutual funds and ETFs. The account assets invested in the Funds will be included in calculating the value of the account for purposes of computing the fees and the same assets will also be subject to the advisory and other fees and expenses as set forth in the prospectuses of the Funds, paid by the Funds but ultimately borne by the investor. Upon termination of the advisory agreement, the advisory fee is prorated to the date of termination, for both in arrears and in advance billing. In the case of in advance billing, any prepaid fees with respect to those days after the termination are promptly returned to the client. The client should refer to the separate agreement with the selected brokerage firm and/or custodian for information related to any termination fees that may be incurred or other considerations such as difficulties related to the in-kind transfer of fractional shares of securities. The client may wish to request that 4Thought liquidate any fractional shares held in the account prior to termination of the Investment Advisory Agreement for ease of outbound transfers. The minimum initial investments in the below table may be waived by 4Thought under certain circumstances, such as for subscription/retainer fee financial planning clients, for clients that establish a minimum recurring systematic investment bank link, or for participants in the 4Thought Retirement Plan Services program. The annual AUM fee percentage is determined in the discretion of the associated 4Thought IAR(s) or centrally by management in the case of clients introduced through a web-based interface. The actual advisory fee to be paid by each client is disclosed at opening of the account in the Investment Advisory Agreement and/or during the custodial account opening process (for accounts opened electronically), and is based on the ranges stated in the following tables:

Standard Program Total Fees	Model-Driven Portfolios	Custom
Minimum Initial Investment	$500 Non-Qualified (NQ) $10,000 Qualified (Q)	$500 NQ $10,000 Q
$0-$10,000,000	0.55% - 1.85%	0.55% - 1.85%
$10,000,000+	0.35% - 1.65%	0.35% - 1.65%

Retirement Plan Services Fees	Discretionary Managed Accounts and QDIA	Participant Directed Investment Options
Custody/Brokerage Fees	0.08%	0.08%
Portfolio Management Fees	0.47%	0.47%
IAR/Solicitor Fees	0% - 1.00%	0% - 1.00%
Total Fees	0.55% - 1.55%	0.55% - 1.55%

The fees stated in the table above for "Retirement Plan Services Fees" are pertinent only to the 4Thought Wrap Fee Program, whereas the "Standard Program Total Fees" are pertinent to both the 4Thought Wrap Fee Program and third party sponsored wrap programs with whom 4Thought establishes agreements.

4Thought reserves the ability to reduce both the minimum initial investment and the lower limit of the fee ranges stated above as it deems appropriate.

Depending on the source of the client introduction, the annual AUM fee percentage may be determined in the discretion of the associated 4Thought Investment Adviser Representatives ("IAR(s)"), or centrally by 4Thought management (in the case of clients introduced through a web-based interface). 4Thought employs Investment Adviser Representatives compensated through a combination of salary/bonus, and other IARs that are compensated solely through a percentage of assets under management (non-salaried). IARs of 4Thought who recommend the program to a client may receive compensation as a result of the client's participation in the program. The amount of this compensation may be more than what the IAR would receive if the client participated in other programs or paid separately for investment advice, brokerage and other services. Accordingly, in many cases, the IAR may have a financial incentive to recommend the program over other programs or services. In the cases of client introductions from non-salaried 4Thought IARs compensated on the basis of assets under management, compensation paid to the RIA/IAR is a contact-based percentage of the amount of the total fee that exceeds 0.55% for model-driven portfolios (0.35% for accounts with an initial investment of $10M+). This 0.55% (or 0.35%) amount may be different for custom-managed non-model portfolios, in which it is priced on a case-by-case basis by 4Thought management.

<u>Introductions to Third Party Investment Advisory Programs</u>

Solicitor markup or compensation share for introduction to third party RIA

- 4Thought Financial Group and associated IARs will receive a portion of any client fees derived from introduction to a third party registered investment adviser. Pricing is determined in accordance with the Form ADV of the third party RIA and the solicitation agreement between the RIA and 4Thought Financial Group.

<u>Independent portfolio advisory for client implementation</u>

All independent portfolio advisory fees are priced at the discretion of the associated IAR(s) based on the complexity of the individual client situation and labor involved, with a minimum fee as indicated.

One-Time Consultation Fees

- One time single-objective portfolio allocation analysis with recommendations for client implementation outside of 4Thought Financial Group
- Minimum Fee: $400

Subscription Fees

- Subscription for objective ongoing model-driven portfolio recommendations for client implementation through non-4Thought Financial Group services providers.
- Minimum Fee: $100/month

Hourly Rate Consultation Fees

- Customized client-requested specific investment research/advice for client implementation through non-4Thought Financial Group services providers.
- Minimum Fee: $200/hour

Personal Financial Planning Services for Direct Clients

All financial planning services fees are based on the complexity of the planning to be done for the client and are priced without limitation by the Investment Adviser Representative(s) associated with the case, or centrally by management in the case of clients introduced through a web-based interface. Fees are negotiable. Fee payment can occur under three different arrangements, depending on the type of service sought by the client or recommended by the IAR(s). There are no minimum or maximum fees for One-Time or Hourly Rate Consultation arrangements. However, there is a minimum fee of $100.00 per month for Subscription/Retainer fee comprehensive financial planning, with no maximum (automatically increased by a 3% inflation adjustment annually). Once recommendations have been delivered, the client has the option of implementing the planning independently or through 4Thought Financial Group. If implementing through 4Thought, we will provide proposed implementation as well, which will be paid for by the client separately. IARs of 4Thought who recommend implementation directly through 4Thought may receive additional compensation as a result. The amount of this compensation may be more than what the IAR would receive if the client participated in other programs. Accordingly, in many cases, the IAR may have a financial incentive to recommend 4Thought's implementation services over other programs or services. One or more of the below financial planning fee arrangements may apply to a specific client case, but all fees will be quoted and formally accepted by the client prior to the provision of services.

One-time Fee:

- Includes development of a complete financial plan (comprehensive or area-specific) with delivery of formal recommendations and/or a final document. Half of the fee is paid up front with signature of a client agreement, and the remaining half is paid at delivery of recommendations/final document.

Subscription/Retainer Fee:

- Ongoing comprehensive financial planning advisory service includes regular consultation and adviser availability to the client to coordinate and address issues related to investment planning, estate planning, business succession planning, and fringe benefits planning. and may also include online total financial life aggregation where appropriate. Initial fees are quoted as a pre-determined fixed amount by the associated 4Thought IAR(s), with the total initial fee based on the complexity level of the planning. The minimum initial fee is $100/month (with no maximum) and it is automatically increased by a 3% compound interest inflation adjustment annually. The fee may be paid monthly, quarterly, or annually in advance (paid via automatic recurring credit card payment). The inflation increase is delayed, beginning in January following the first full calendar year of services. Fees paid in advance for more than one month of services will be prorated and refunded if the client terminates the engagement prior to the end of the billing period.

Hourly Rate Consultation Fee:

- IARs retain the ability to charge an hourly rate for incidental services related to financial planning with prior notice to the client. These fees are billed and paid in arrears.

Investment Advisory Services Support for Other Registered Investment Advisers and Non-RIA Solicitors

Turnkey Asset Management (Wrap Fee) Program

- For clients introduced by third party RIA solicitors and Non-RIA Solicitors and managed directly by 4Thought Financial Group through the sponsored Wrap Fee Program on a discretionary basis, the total annual fee percentage is determined in the discretion of the third party RIA firm (in the case of an introducing RIA) or by the Non-RIA Solicitor (in the case of an introducing accountant) with a negotiable markup to a base minimum program fee. This negotiable markup is limited in that the same maximum total client fees apply as listed in the above tables under the section entitled Investment Advisory Services for Direct Clients – Directly Managed Accounts. The details of fee billing are provided in 4Thought's Wrap Fee Program Brochure. The base minimum program fee is mandated by 4Thought Financial Group and determined by the table listed below under "Separately Managed Accounts."

Assets Under Advisory Services

- For assets under advisory services provided through third party custodial program/ platforms to RIAs who would like to offer 4Thought's investment strategies to their clients while taking the responsibility and discretion for actual implementation, the advisory fee amounts and structure will vary based on the preset agreements established with the custodial programs. 4Thought's compensation under these arrangements is in the form of an annual percentage of the assets under advisory.

Separately Managed Accounts

- For separately managed accounts provided through third party SMA "platforms" by RIAs who would like to offer 4Thought's services to their clients with their own choice of custodian and/or broker-dealer, the advisory fee amounts and structure will vary based on the preset agreements established with those platforms/ RIAs.
- For separately managed accounts managed directly by 4Thought Financial Group on a discretionary basis that have been introduced by third party registered investment adviser firms not requiring the use of their own platform custodian and/or broker-dealer (RIA Solicitors), an annual percentage of assets under management fee will be calculated and deducted directly from the client account on a quarterly basis, either in advance or in arrears, depending on the brokerage and custodian selected by the Client. For partial quarters, the fee is determined by daily proration. Upon termination of the advisory agreement, the advisory fee is prorated to the date of termination and any prepaid fees with respect to those days after the termination are promptly returned to the client. Third party RIAs that choose to use 4Thought SMAs as part of a larger portfolio management program for their clients retain the right to charge their own additional advisory fee to the end user client, as determined by the Form ADV of that firm. Each of 4Thought Financial Group's SMAs have a standard fee, as outlined below:

Standard Program Total Fees	Model-Driven Portfolios	Custom
Minimum Initial Investment	$10,000	$100,000
$0-$10,000,000	0.55%	0.55%
$10,000,000+	0.35%	0.35%

4Thought reserves the ability to reduce both the minimum initial investment and the standard fee stated in the above table as it deems appropriate.

All investment advisory fees for directly managed accounts that are expressed as an annual percentage of assets under management are deducted directly from client accounts on a quarterly basis, and clients will receive no separate bill for which a payment must be remitted. Clients will receive a bill for fees for financial planning or investment advisory services that are expressed as a one-time or hourly fee, at the time the fee is incurred. Subscription/retainer fees for financial planning services are automatically charged to a client credit card or deducted from a bank account on recurring basis, and are also automatically adjusted upward for the annual inflation fee increase on a pre-approved recurring basis as disclosed in the client-signed Financial Planning Agreement.

Financial Planning Services Support for Other Registered Investment Advisers and Non-RIA Solicitors

All fees are determined in exactly the same manner as above under "Personal Financial Planning Services for Direct Clients." However, a portion of the fee paid by the end-user client is used to compensate referring RIA Solicitors and Non-RIA Solicitors (such as accountants), as determined in a separate solicitation agreement with the third party firm or individual. This arrangement is disclosed and accepted by the client in writing, with evidence maintained in the client file.

Performance-Based Fees and Side-by-Side Management

4Thought Financial Group does not charge performance-based fees.

Types of Clients

4Thought Financial Group generally provides investment advice to individuals, family offices, trusts, pension plans and other retirement plans, corporations (including insurance companies), non-profit and tax-free organizations, and other registered investment advisers.

4Thought Financial Group does not require a minimum account size as a firm. However, certain model portfolios or programs do have minimum initial investment requirements, as described above under "Fees and Compensation – Turnkey Asset Management Programs" and "– Separately Managed Accounts." The minimum initial investments for each strategy may be waived by 4Thought under certain circumstances, such as for subscription/retainer fee financial planning clients, for clients that establish a minimum recurring systematic investment bank link, or for participants and plan sponsors of the 4Thought Retirement Plan Services program. Please see the separate Wrap Fee Program Brochure for additional information on the features of this program.

Methods of Analysis, Investment Strategies and Risk of Loss

Directly managed accounts for direct clients, the turnkey asset management program, and specialized separately managed accounts managed directly by 4Thought Financial Group

Methods of determining portfolio objectives/suitability for the client

Financial Planning

For clients who have already developed their investment plan through 4Thought Financial Group during a financial planning process, 4Thought Financial Group may implement the plan with the creation and management of an investment portfolio in a fee advisory account. This will not necessarily require the completion of a separate questionnaire.

Portfolio Assessment Questionnaire

For clients who have not gone through a financial planning process with 4Thought Financial Group, upon completion of a paper or electronic form Portfolio Assessment Questionnaire to gauge risk tolerance, objectives, investment time horizon, and contingency preferences, 4Thought Financial Group will generate an investment proposal, implement it, and will provide ongoing portfolio management and communication directly to individual investor clients.

Third Party RIA Introduction

For end-user clients that are referred to 4Thought Financial Group through a third party RIA firm for specialized separately managed account services or assets under advisory services, 4Thought Financial Group depends on the referring RIA for suitability and investment objectives determination.

Portfolio Construction

Overall Methodology: Multi-Method Investing® and RPCA

4Thought Financial Group utilizes Multi-Method Investing® and Risk Premium Capital Allocation (RPCA) in the development and management of investment advisory accounts for clients. By diversifying client portfolios at the level of the investment methodology (four methods are used to capitalize on four potential risk premiums under "Risk Premium Capital Allocation"), we attempt to increase the probability that our clients' personal and investment objectives will be achieved over time. We may construct portfolios by applying one investment method towards each investment goal, or may include multiple investment methods for a single goal, depending on the situation. Four primary methods of investment are utilized by 4Thought Financial Group in direct management of investment advisory accounts:

Liability-Driven Investing

(May apply to Custom/Liability-Driven, Fixed Income Plus, Multi-Method Portfolios, and Traditional Allocation Portfolios)

For a series of known specific investor liabilities or risks, we select, buy, and hold a matching series of investment instruments in an attempt to directly offset the liabilities/risks and ensure that investor goals are achieved regardless of the performance of the broader financial markets. This method generally will feature no guideline or restriction on the appropriate allocation of assets, and up to 100% of the portfolio may be invested in a single product/security/asset if this is deemed appropriate to achieve goals (although this is usually not the case). In many cases, the methodology may include the heavy use of "guaranteed" insurance products, fixed income instruments, or derivative securities, each of which may entail significant issuer credit risks or insurance/hedging costs. The investor accepts these costs/risks in the pursuit of greater predictability in the achievement of his/her highly specific financial goals.

Strategic Asset Allocation

(May apply to Global Strategic Allocation, Multi-Method Portfolios, and Traditional Allocation Portfolios)

This method focuses on building diversified portfolios of stocks, bonds, and hard assets in an attempt to reduce the level of risk undertaken in attempting to achieve a target rate of return. The portfolio manager generally adheres to a strategic fully invested methodology and applies Modern Portfolio Theory, in which the major asset allocation components of the portfolio experience little or no tactical shifting in expectation of changes in the financial markets, while the sub-components of the portfolio may be actively traded by specialized money managers (depending on whether index-based or active implementation has been utilized). Rebalancing is used as a systematic means to attempt to buy low and sell high, and to limit portfolio volatility. The overlay portfolio manager attempts to reduce transaction costs such as the bid-ask spread to the investor and to limit the possibility of human error detracting from the performance of the portfolio over the long term. Portfolios managed using only this method cannot in theory or in practice limit financial systemic risk as it applies to an investor portfolio.

Opportunistic/Tactical/Absolute Return Investing:
(May apply to Opportunistic Unconstrained Allocation, and Multi-Method Portfolios)

In the various Opportunistic, Tactical Asset Allocation, and Absolute Return sub-methodologies, portfolio managers may have no constraint to use any predetermined asset allocation, and instead may have the flexibility to actively shift up to 100% of the portfolio to any class of assets that the portfolio manager deems appropriate. The objective is often to limit the downside risk to the portfolio (not necessarily through diversification, but often through active trading-based risk management) while capturing upside returns; or to achieve the maximum return available during any given short time period regardless of broader market performance (potentially using leverage, shorting, or derivatives). The portfolio manager mandate may incorporate both of these objectives. This unconstrained methodology and the ability to tactically shift to cash means that the portfolio manager is theoretically capable of limiting financial/economic system risks as they apply to the investor's portfolio, and of producing superior market-relative performance. However, the lack of constraints on the portfolio managers may also result in substantial costs and risk. Mutual fund and SMA components of such portfolios are generally prone to higher internal costs (i.e., the bid-ask spread, expense ratios). Also, opportunistic methods may be highly subject to human error and/or quantitative model error, resulting in potential underperformance of the markets in general if the managers do not succeed in their mandate.

Selective/Concentrated/Thematic Investing:
(May apply to Selective Stock Allocation and Multi-Method Portfolios)

In the Selective/Concentrated and Thematic Investing philosophical category, portfolios managers will generally set a concentrated or non-diversified initial allocation and manage individual positions in a very focused manner, in some cases attempting to purchase new holdings at opportunistic value prices when possible. This methodology will typically define asset classes differently than more conventional asset allocation, such as into country-based components, industry/economic sector components, and specific themes, potentially with no attention to style or market capitalization. Portfolios are typically highly concentrated in certain areas based on the portfolio manager's probability-determined future-focused capital market assumptions, which may place little or no merit in historical averages. In this sense, portfolios are not "fully diversified." Concentrated positions may be defined based on valuations and/or thematically, where the theme is expected to result in long term superior sector or security performance. This investment methodology is most aptly applied for investors that have a very long time horizon and are capable of tolerating high volatility in their portfolio. Investors must be aware of the risks associated with having a portfolio invested in this manner. While the potential for high returns may exist, the portfolio may also be at risk of substantial loss. In addition, investors must recognize that even if concentrated positions do eventually appreciate in value over the long term, long intervening periods of time may exist in which the positions decrease in value substantially or exhibit high degrees of volatility. If the investor is comfortable with accepting these risks in order to pursue the potential returns associated, then this is an option to be considered for the portfolio objective in question. Alternatively, the inclusion of such a philosophical component as part of the broader portfolio for an investment objective may at times provide an effective hedge against underperformances elsewhere in the aggregate investor portfolio.

Investment Vehicles and Portfolio Construction Logistics

Depending on the portfolio modeling used, accounts may contain individual bonds, exchange traded funds, institutional share class, load-waived and no-load mutual funds, individual stocks, options, and potentially other types of securities. During a planning process, additional types of assets may be recommended for purchase outside of the managed accounts, including annuities and life insurance products. Within managed accounts, we may use specialized modeling for various investor objectives of capital preservation/savings, distribution/income, and accumulation/growth. Each Separately Managed Account strategy (other than custom portfolios) is managed to follow a preset formula or process designed to systematically implement the SMA mandate, with human intervention occurring only as necessary to adjust or refine the preset formula.

Manager/Holding Due Diligence

4Thought Financial Group uses an open architecture security selection methodology within each managed account strategy. The firm does not have any proprietary products or funds. This means that the portfolio will include what we believe are the most suitable stocks, bonds, ETFs, and fund managers from the universe of securities that are publicly available. The firm utilizes both proprietary and independent third party research in surveying the field of available fund managers and individual stock/bond securities for potential inclusion in the portfolio model. A set of proprietary criteria is utilized in determining final selections for each subcomponent holding. A different set of criteria is applied in each investment model or separately managed account.

Ongoing Implementation

Once we construct a portfolio, we will continuously manage it. This will involve systematic investments and withdrawals management; the rebalancing of your account to the appropriate split between your investment methodologies and each of their sub-components (which will occur with a different frequency depending on the portfolio goals); opportunistic and selective rebalancing when deemed appropriate; the monitoring of selected managers and holdings with replacement when necessary; continuous updating of the portfolio to adjust for industry/methodology changes; detailed performance reporting on your accounts, and regular portfolio review/adjustment to ensure that your portfolio continues to be appropriate for your goals and situation. We also incorporate a formalized electronically documented annual review process initiated by an emailed request to complete an electronic questionnaire.

Investing in securities involves risk of loss that clients should be prepared to bear.

In addition to the risks noted in the description of each 4Thought investment method, material risks involved in investing in one of our investment programs include:

Market Risk – All securities are subject to market risk. The values of the securities held by a client may fall rapidly or unpredictably due to a variety of factors, including changing economic, political or market conditions.

Foreign Securities Risks – The risks may be enhanced depending on the market (e.g., whether the country is developed or developing). The risks of foreign investment include: less liquidity, enhanced volatility due to currency, social and political instability, restrictions on foreign investment and repatriation of capital, less complete and reliable information about foreign companies, reduced government supervision of some foreign securities markets, lower responsiveness of foreign management to shareholder concerns, economic issues or developments in foreign countries, and, in some cases, emerging markets risks, including limited trading volume, expropriation, devaluation or other adverse political or social developments.

Active and Tactical Management Risks – Active and tactical management involves the risks that the investment decisions made by a manager in using one or both of these strategies may prove to be incorrect, may not produce the returns expected by the manager and may cause an account to lose value.

Mutual Fund/ETF Risk – As a shareholder of mutual funds or ETFs, clients bear their proportionate share of the underlying fund's fees and expenses. As a result, a client's cost of investing may be higher than investment strategies that invest directly in stocks. In addition, a client's investments in mutual funds or ETFs are subject to the particular risks described in the mutual funds/ETFs' prospectuses, copies of which are provided to the client and which 4Thought Financial Group urges the client to read.

Equity Securities Risk – To the extent a client's account invests in equity investments (i.e., stocks), a particular stock, an industry or stocks in general may fall in value. The value of a client's account will go up and down with the prices of the securities in which the account invests. The prices of stocks change in response to many factors, including the historical and prospective earnings of the issuer, the value of its assets, management decisions, decreased demand for an issuer's products or services, increased production costs, general economic conditions, interest rates, currency exchange rates, geopolitical risks investor perceptions and market liquidity.

Fixed Income Securities Risks – To the extent a client's account invests in fixed income securities (i.e., bonds), the investment may be subject to call risk if call provisions exist, which is the possibility that an issuer may redeem the security before maturity (a call) at a price below its current market price. An increased likelihood of a call may reduce the security's price. If a fixed income security is called, an account may have to reinvest the proceeds in other fixed income securities with lower interest rates, higher credit risk, or other less favorable characteristics.

Debt obligations are also generally subject to the risk that the issuer may be unable to make principal and interest payments when they are due. In addition, securities could lose value because of a loss of confidence in the ability of the borrower to pay back debt. Non-investment grade debt – also known as "high-yield bonds" or "junk bonds" – has a higher risk of default and tends to be less liquid than higher-rated securities.

Fixed income securities are subject to the risk that the securities could lose value because of interest rate changes. For example, bonds tend to decrease in value if interest rates rise. Debt obligations with longer maturities sometimes offer higher yields, but are subject to greater price shifts as a result of interest rate changes than debt obligations with shorter maturities.

Certain fixed income securities, including mortgage-backed securities carry prepayment risks. Prices and yields of mortgage-backed securities assume that the underlying mortgages will be paid off according to a preset schedule. If the underlying mortgages are paid off early, for example when homeowners refinance as interest rates decline, an account may be forced to reinvest the proceeds in lower yielding, high-priced securities. This may reduce an account's total return.

Risks Associated With Options on Securities − There are several risks associated with transactions in options on securities. For example, there are significant differences between the securities and options markets that could result in an imperfect correlation between these markets, causing a given transaction not to achieve its objectives. A decision as to whether, when and how to use options involves the exercise of skill and judgment, and even a well-conceived transaction may be unsuccessful to some degree because of market behavior or unexpected events. As the writer of a covered call option, a client forgoes, during the option's life, the opportunity to profit from increases in the market value of the security covering the call option above the sum of the premium and the strike price of the call, but has retained the risk of loss should the price of the underlying security decline. The writer of an option has no control over the time when it may be required to fulfill its obligation as a writer of the option. Once an option writer has received an exercise notice, it cannot effect a closing purchase transaction in order to terminate its obligation under the option and must deliver the underlying security at the exercise price. If a put or call option purchased by a client is not sold when it has remaining value, and if the market price of the underlying security remains equal to or greater than the exercise price (in the case of a call), or remains less than or equal to the exercise price (in the case of a put), the client will lose its entire investment in the option. Also, where a put or call option on a particular security is purchased to hedge against price movements in a related security, the price of the put or call option may move more or less than the price of the related security. There can be no assurance that a liquid market will exist when a client seeks to close out an option position. If trading were suspended in an option purchased by a client, the client would not be able to close out the option. If restrictions on exercise were imposed, a client might be unable to exercise an option it has purchased. If a client were unable to close out an option that it had purchased on a security, it would have to exercise the option in order to realize any profit or the option may expire worthless. If a client were unable to close out a covered call option that it had written on a security, it would not be able to sell the underlying security unless the option expired without exercise.

Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of 4Thought Financial Group's advisory business or the integrity of 4Thought's management.

Other Financial Industry Activities and Affiliations

4Thought uses proprietarily developed Separately Managed Account (SMA) strategies when directly managing client accounts. These SMA strategies are also marketed to third party advisory firms as a named and packaged program to be used with their clients, and therefore could be seen as the use of a proprietary product/service when utilized for the individual private clients of 4Thought. This poses a possible conflict of interest when 4Thought's representatives recommend or offer the use of its directly managed accounts in the implementation of fee financial plans for its private individual clients, as 4Thought will receive an investment advisory/ portfolio management fee for management of the accounts if clients choose to implement through 4Thought. This fee and the quality/character of the investment advisory services may differ from services available elsewhere if the client were to implement their investment portfolio through a third party (with or without the introduction of 4Thought). Recognizing this conflict of interests for financial planning fee clients, 4Thought discloses it and offers the additional options to either use third party asset management firms with whom 4Thought has contracted (and will receive a solicitation or advisory fee), or to direct the client in implementing their investment portfolio on their own through third parties of their choice (for which 4Thought will receive no investment advisory or solicitation fee compensation).

As part of the implementation of a financial plan designed by 4Thought Financial Group, the firm may recommend pre-approved third party specialist investment advisory firms with whom the firm has established solicitation agreements. The third party advisory firms will pay 4Thought Financial Group a solicitation/advisory/referral fee which is a portion of the advisory fee paid by the client to the third party firm. The third party firms may also provide 4Thought Financial Group with economic benefits in the form of marketing/sales support. This arrangement presents a material conflict of interest for 4Thought Financial Group since it has an economic incentive to recommend third party advisers who pay it a higher solicitation/referral fee and/or provide marketing/sales support over advisers who pay it lower fees and/or who do not provide the firm with the same level of support. Recognizing this conflict of interest, 4Thought Financial Group performs ongoing due diligence on any recommended third party providers to ensure that any introductions are suitable to the specific client situation, and also uses multiple providers (sometimes with redundant programs) in order to ensure that client costs remain competitive with the broader market for these services. In addition, for clients paying a financial planning fee, 4Thought offers to direct the client in implementing their investment portfolio on their own through third parties of their choice (for which 4Thought will receive no investment advisory or solicitation fee compensation).

In conjunction with the opening of an investment advisory account with 4Thought, clients may be offered to engage in a separate securities lending agreement or loan advance program directly with their account custodian/ clearing firm. The custodian will use the client's 4Thought-managed advisory account as the basis for loaned securities or collateral. Under such arrangements, 4Thought offers these optional services as an intermediary and as a value-add to clients only, and will receive no direct monetary compensation for such arrangements in the form of fees or commissions.

4Thought Financial Group is also licensed as an insurance brokerage. This provides the firm with the means for the full implementation of financial plans for clients, as some aspects of financial planning may call for the clients' acquisition of insurance products, such as life insurance, disability insurance, long-term care insurance and property and casualty insurance, from third party providers. 4Thought Financial Group and its insurance brokers will generally receive insurance commissions for the sale of such products. This may give 4Thought Financial Group an incentive to recommend insurance products based on the compensation it or its insurance brokers receive rather than the client's needs. Recognizing this conflict of interest, 4Thought Financial Group performs ongoing due diligence on any recommended third party providers to ensure that any introductions are suitable to the specific client situation, and also uses multiple providers (sometimes with redundant programs) in order to ensure that client costs remain competitive with the broader market for these services.

4Thought Financial Group is approved for the provision of continuing education course credits (CPE) related to "Advisory Services" to Certified Public Accountants (CPAs) in New York State.

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

4Thought Financial Group has adopted a code of ethics which sets forth certain standards of business conduct that govern the personal investment activities of the firm's employees and officers, including the standard that the interests of advisory clients must be placed first at all times. The code of ethics requires access persons to report their personal securities transactions on a quarterly basis and their securities holdings upon commencement of employment (or upon becoming an access person) and annually thereafter. Access persons also must obtain approval before they acquire any ownership interest in any security in an initial public offering or limited offering. The code of ethics applies not only to transactions by the individual, but also to transactions for accounts in which the person has an interest individually, jointly or as guardian, executor or trustee, or in which the person or the person's spouse, minor children or other dependents residing in the same household have an interest. Compliance with the code of ethics is a condition of employment. The code of ethics requires all employees and officers to comply with applicable securities laws and to promptly report any violation of the code. Clients may obtain a copy of the firm's code of ethics from 4Thought Financial Group upon request.

The firm's officers and employees may invest in securities that are recommended for purchase or sale by clients. The firm's officers and employees face a conflict of interest when they buy or sell securities at or about the same time that 4Thought Financial Group buys or sells the same securities for client accounts or recommends that clients buy or sell the same securities, because the firm's officers or employees could take advantage of the information regarding the client transactions and execute their trades prior to the clients (commonly called "front running"). However, 4Thought Financial Group's compliance manual provides that securities transactions for the firm's officers and employees are aggregated with those of clients trading through the same brokerage firm, as described below under "Brokerage Practices." Please refer to this section for greater detail on potential conflicts and the safeguards in place.

4Thought Financial Group Inc. claims compliance with the Global Investment Performance Standards (GIPS®). This claim is applicable to directly managed discretionary accounts only. Upon request you may receive a copy of an independent verification report, a GIPS Report for a portfolio composite, or a copy of the 4Thought GIPS Policies and Procedures document.

Brokerage Practices

Separately Managed Account strategies offered to end-user clients by third party RIAs through SMA "platforms" may direct transactions and custody of 4Thought managed accounts based on pre-established agreements with the platform and RIA. In the absence of such platform arrangements, by agreement and instruction from the client, 4Thought Financial Group places transactions through the brokerage firm specified by the client ("Brokerage Firm"). 4Thought will not seek better execution services or prices from other broker-dealers. This is often called a directed brokerage arrangement. Not all investment advisers require their clients to direct brokerage to a particular firm. By directing brokerage to the Brokerage Firm, 4Thought Financial Group may be unable to obtain favorable execution of client transactions, and this may cost clients more money. Such direction may result in the client paying higher brokerage commissions or receiving less favorable prices than might otherwise be possible. Since 4Thought Financial Group's management fee covers charges for execution of transactions, clients may pay more or less for the firm's services than if they paid for investment advice and execution separately. For clients that elect to use 4Thought's sponsored wrap fee program, additional detailed information is available on this service in the separate Wrap Fee Program Brochure.

4Thought Financial Group's policy is to aggregate client trade orders when possible and advantageous to clients. Clients participating in aggregated transactions receive an average share price. Partially filled orders are allocated on a pro rata basis. Transactions for the firm's officers and employees are aggregated with the transactions of clients who trade at the same Brokerage Firm, unless the order is only partially executed. When aggregated with client transactions, firm officers and employees' transactions are treated the same as clients, with officers and employees receiving the same average price as clients using the same Brokerage Firm. However, 4Thought requests trades for its clients (including the firm's officers and employees) in the same securities on the same day through multiple Brokerage Firms based on the specifications of each client. Because each Brokerage Firm has its own trade execution practices, differences in the timing and price of execution may exist between client accounts and officer/employee accounts using different Brokerage Firms, even when 4Thought releases trades for execution to each brokerage firm at the same time for the same investment strategy. Although 4Thought makes every attempt to achieve the same price and time of execution for all clients in the same strategy by bunching orders for bulk execution to allocate on an average price basis amongst client accounts, and by timing order releases to Brokerage Firms to attempt simultaneous execution, differences in the price and time of execution will inevitably exist between client accounts traded at different Brokerage Firms. This is especially true in situations in which a brokerage firm only releases trades for execution during certain times of the trading day, referred to as window trading. The price of execution for a brokerage firm that uses window trading is likely to differ from the price of execution for a brokerage firm that does not use window trading because of the timing of execution (even if Adviser releases the trades to both brokerage firms at the same time). 4Thought strongly recommends that the client review the brokerage and trade execution practices of the directed Brokerage Firm prior to signing an agreement with such Brokerage Firm.

4Thought Financial Group may receive from the Brokerage Firm with or without cost (and/or at a discount) support services and/or products, certain of which assist 4Thought Financial Group to better monitor and service client accounts. The Brokerage Firm may provide 4Thought Financial Group investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by the firm in furtherance of its investment advisory business operations.

Certain of the support services and/or products that 4Thought Financial Group may receive from the Brokerage Firm may assist the firm in managing and administering client accounts. Other services or products may not directly provide client account assistance, but rather may assist the firm to manage and further develop its business enterprise. 4Thought Financial Group may use these services and other support in servicing any or all of its clients to different degrees and levels. 4Thought Financial Group receives substantial benefit from the Brokerage Firms it offers to clients since the support the Brokerage Firms provide relieve 4Thought Financial Group from having to maintain some of its own computer software and other back-office and recordkeeping systems.

Review of Accounts

For directly managed accounts, 4Thought Financial Group's portfolio management team reviews the account at least weekly for ongoing adjustment and portfolio update purposes. 4Thought Financial Group provides clients with directly managed accounts with detailed performance reporting which shows the value of the account and performance of the client's account(s) relative to benchmarks, both through daily or more frequently updated online reporting and through on-demand aggregated performance reporting. An annual review is conducted and documented for all direct end-user clients through electronic means centrally by 4Thought management/operations, and clients consent to this process at the time of account opening on signature of the Investment Advisory Agreement. This review is initiated by an emailed request to complete an online questionnaire, and is dependent on the responsiveness of the client to the request for effective completion. Responses to the questionnaire are automatically compared to existing known client objectives, and 4Thought is automatically notified of any changes to objectives. This prompts 4Thought to take action to contact the client to make any necessary adjustments. In addition, in the case of clients not introduced through a web-based interface or for those introduced through a third party Registered Investment Adviser, the client's investment adviser representative may offer the annual (or more frequent) review of the client's account(s) with the client at an in-person, web-based or telephone meeting. The custodian selected by the client provides clients with statements on at least a quarterly basis and confirmation notices as transactions are executed in electronic format. If paper printed documents are required by the client, an additional custodial charge may apply, depending on the custodian chosen.

For financial plans provided on a subscription/retainer fee basis, the client's investment adviser representative conducts ongoing reviews of the client's financial plan for topic-specific considerations, continuous plan improvements and to ensure continued appropriateness of plans/recommendations.

Client Referrals and Other Compensation

4Thought Financial Group may receive discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support and/or other products used by the firm in furtherance of its investment advisory business from certain distributors and/or wholesalers. These arrangements present a conflict of interest for 4Thought Financial Group since it has an economic incentive to do business with these distributors or wholesalers. However, 4Thought Financial Group does not favor these distributors or wholesalers over other distributors, wholesalers or product sponsors.

4Thought uses proprietarily developed Separately Managed Account (SMA) strategies when directly managing client accounts. These SMA strategies are also marketed to third party advisory firms as a named and packaged program to be used with their clients, and therefore could be seen as the use of a proprietary product/service when utilized for the individual private clients of 4Thought. This poses a possible conflict of interest when 4Thought's representatives recommend or offer the use of its directly managed accounts in the implementation of fee financial plans for its private individual clients, as 4Thought will receive an investment advisory/ portfolio management fee for management of the accounts if clients choose to implement through 4Thought. This fee and the quality/character of the investment advisory services may differ from services available elsewhere if the client were to implement their investment portfolio through a third party (with or without the introduction of 4Thought). Recognizing this conflict of interests for financial planning fee clients, 4Thought discloses it and offers the additional options to either use third party asset management firms with whom 4Thought has contracted (and will receive a solicitation or advisory fee), or to direct the client in implementing their investment portfolio on their own through third parties of their choice (for which 4Thought will receive no investment advisory or solicitation fee compensation).

As part of the implementation of a financial plan designed by 4Thought Financial Group, the firm may recommend pre-approved third party specialist investment advisory firms with whom the firm has established solicitation agreements. The third party advisory firms will pay 4Thought Financial Group a solicitation/advisory/referral fee which is a portion of the advisory fee paid by the client to the third party firm. The third party firms may also provide 4Thought Financial Group with economic benefits in the form of marketing/sales support. This arrangement presents a material conflict of interest for 4Thought Financial Group since it has an economic incentive to recommend third party advisers who pay it a higher solicitation/referral fee and/or provide marketing/sales support over advisers who pay it lower fees and/or who do not provide the firm with the same level of support. Recognizing this conflict of interest, 4Thought Financial Group performs ongoing due diligence on any recommended third party providers to ensure that any introductions are suitable to the specific client situation, and also uses multiple providers (sometimes with redundant programs) in order to ensure that client costs remain competitive with the broader market for these services. In addition, for clients paying a financial planning fee, 4Thought offers to direct the client in implementing their investment portfolio on their own through third parties of their choice (for which 4Thought will receive no investment advisory or solicitation fee compensation).

From time to time 4Thought Financial Group may enter into agreements providing cash compensation to other investment advisers, accountants, and other persons who refer clients to the firm ("solicitors"). These agreements require that the solicitor meet certain disclosure and other requirements, as well as comply with other applicable laws and regulations including state securities laws. The terms of the agreements differ somewhat depending upon the circumstances, but generally provide either for compensation equal to a specified percentage of the fees received by 4Thought Financial Group from clients referred, or for fixed compensation.

In addition to normal investment advisory fee and financial planning fee compensation provided to Investment Adviser Representatives of 4Thought for their direct work with end-user individual clients previously referenced in this document, 4Thought may offer additional compensation arrangements to its IARs by signed addendum to the IAR Agreement. In one such addendum, an IAR may receive compensation via an "Override" arrangement, in which the IAR is paid on an ongoing basis for the referral/introduction of a new IAR hire/ recruit, a Non-RIA Solicitor, or an RIA Solicitor of 4Thought's services. The amount of such compensation to the introducing IAR is based on a percentage of the income from end-user client investment advisory fees or financial planning fees to the firm derived from the formalized relationship developed between the introduced IAR/ Non-RIA Solicitor/ RIA Solicitor and 4Thought. The above "Override" arrangements may also be offered to Non-RIA Solicitors (as opposed to IARs) by signed addendum to the Solicitor Agreement, provided the Solicitor maintains appropriate licensing to receive this compensation. In another optional addendum to the IAR Agreement, the "Practice Succession" arrangement allows an IAR to be compensated on his/her client book of investment advisory fee business in the events of the IAR's semi-retirement/outsourcing, full retirement, disability, or death, provided that he/she maintains the appropriate licensing with regulatory authorities and affiliations with 4Thought to receive such compensation, and also meets certain minimum requirements. This is intended to attract/retain talented IARs for employment and to permit the continuity of the client experience in working with 4Thought as a firm, as new servicing IARs are assigned to client cases in any of the aforementioned IAR retirement/disability/death scenarios.

As part of the implementation of a financial plan designed by 4Thought Financial Group, the firm may recommend the purchase of an insurance policy(ies) through its own insurance brokerage or from an insurance brokerage firm with whom the firm has a joint marketing arrangement. Although the insurance brokerages may not be compensated as solicitors unless they are or their employees are registered as investment advisers or investment adviser representatives, respectively, they may receive insurance commissions that result from the implementation of a financial plan, provided they are appropriately insurance licensed.

Custody

4Thought Financial Group may be deemed to have custody of client assets when it deducts advisory fees from client accounts. However, 4Thought shall not otherwise act as custodian for assets of the Account or take or have possession of any assets of the Account.

The assets of directly managed accounts shall be held by any bank, trust company, or securities broker-dealer designated by the client as custodian ("Custodian"), and clients direct the Custodian to send copies of the Custodian's periodic statements of the account to 4Thought, in order that from time to time it may reconcile its records to those of the Custodian. Such reconciliations are solely for 4Thought's own internal purposes in the administration of the account, and 4Thought undertakes no responsibility or liability for any act or omission of the Custodian whether or not disclosed in the statements of the Custodian received by 4Thought. Clients authorize 4Thought to receive from the Custodian duplicate confirmations of all transactions in the account.

Clients will receive at least quarterly account statements from the clients' custodian and we urge clients to carefully review those statements. The Custodian shall provide an inventory and appraisal of the securities in the Account to Client following each month in which there is activity in the Account, or if there is no activity, at the end of each quarterly period, which shall set forth all transactions in the Account during such quarter. The Custodian shall also provide Client a confirmation of each transaction executed in the Account. The Custodian may provide options for electronic and/or paper delivery of documents. The Client should refer to the terms and conditions of the separate agreement with the Custodian for information on delivery practices. Electronic delivery is the standard practice and the Client may incur additional expenses from the Custodian if paper delivery is requested. In computing the value of any investment of the Account, each security listed on any national securities exchange or on NASDAQ shall be valued at the closing price on the valuation date. Any other security or investment shall be valued in such manner as shall be determined in good faith by the Custodian to reflect its fair market value.

4Thought delivers *all communications* (including but not limited to Form CRS, Form ADV Part 2, Wrap Fee Program Brochure, and Privacy Policy Notice updates, as well as the required Annual Review process) electronically via email notification and a secure web portal, which may differ from the arrangement with the client-selected Custodian.

Investment Discretion

For directly managed accounts, 4Thought Financial Group accepts discretionary authority to manage securities accounts on behalf of clients pursuant to an investment advisory agreement in which the client appoints the firm as its agent and attorney-in-fact with full investment power and authority on behalf of the client's account. Clients generally may not place any limitations on discretionary authority. However, in certain situations and for an additional cost, clients may be able to impose restrictions on investing in certain securities or types of securities. 4Thought also accepts the discretionary authority to transfer funds (securities and cash) between 2 or more of a client's accounts of the same registration maintained with the same qualified custodian, provided that a record of this authority is maintained with the client's custodian. This discretion on internal transfers is authorized by the client on signature of an investment advisory agreement or a separate authorization document for these purposes.

Voting Client Securities

4Thought Financial Group does not have authority to vote client securities, except where explicitly requested by the client through agreements with third-party platforms or custodians through which 4Thought Separately Managed Accounts or sub-advisory services may be offered. In the absence of such program-specific requests, clients will receive their proxies or other solicitations directly from their custodian. Clients may contact 4Thought Financial Group with questions about a particular solicitation.

Financial Information

4Thought Financial Group does not believe there is any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients.

MARTIN E. LEVINE

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BROCHURE SUPPLEMENT

January 1st, 2022

This supplement brochure provides information about Martin E. Levine that supplements the 4Thought Financial Group Inc. brochure. You should have received a copy of that brochure. Please contact Jesse Mackey, Chief Investment Officer if you did not receive our brochure or if you have questions about the contents of this supplement.

Additional information about Martin E. Levine is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Year of Birth: 1953

Education: Martin E. Levine has a BBA from the University of Miami and an MBA from St. Johns University.

Business Experience: Mr. Levine is a voting shareholder and the Chief Marketing Officer of 4Thought Financial Group. He specializes in estate, retirement, investment and business succession planning at 4Thought. He is a specialist in financial advisory services for widows, having authored the "Widow's Survival Guide" in 1998. In 2011 a revised edition of the "Widow's Survival Guide" was published, which includes helpful websites and updated information. He also works with clients to develop tax savings strategies that involve charitable giving and planning.

Professional Designations: Mr. Levine is a certified public accountant (CPA), holds a ChFC (Chartered Financial Consultant) designation and the CAP (Chartered Advisor in Philanthropy) designation.

We must provide you with sufficient explanation of the minimum qualifications required for these designations to allow you to understand the value of the designation.

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members (as well as any non-AICPA members whose state board of accountancy has adopted either the AICPA *Code of Professional Conduct* or similar ethical code) are required to follow a rigorous *Code of Professional Conduct* which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's *Code of Professional Conduct* within their state accountancy laws or have created their own.

The ChFC program is administered by the American College, Bryn Mawr, Pennsylvania. This designation has a curriculum of seven required courses and two elective courses that focus on various areas of personal financial planning. In addition to successful completion of nine exams on areas of financial planning, including income tax, insurance, investment and estate planning, candidates are required to have a minimum of three years of full-time, relevant business experience and agree to adhere to the American College's code of ethics. The designation requires 30 hours of continuing education every two years.

The CAP program is administered by the American College, Bryn Mawr, Pennsylvania. This designation has a curriculum of three required graduate-level courses in philanthropy offered through the American College. In addition to successful completion of three exams, candidates are required to have a minimum of three years of full-time, relevant business experience and agree to adhere to the American College's code of ethics. The designation requires 15 hours of continuing education every two years.

Disciplinary Information

Mr. Levine does not have any disciplinary information to report.

Other Business Activities

Mr. Levine is a licensed life and health insurance broker in several states.

Additional Compensation

Mr. Levine may receive commissions or other compensation based on the sale of insurance products.

Supervision

Mr. Levine’s investment activities are supervised by Jesse Mackey, Chief Compliance Officer, (516) 300-1617.

JESSE MACKEY

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BROCHURE SUPPLEMENT

January 1st, 2022

This supplement brochure provides information about Jesse Mackey that supplements the 4Thought Financial Group Inc. brochure. You should have received a copy of that brochure. Please contact Jesse Mackey, Chief Investment Officer if you did not receive our brochure or if you have questions about the contents of this supplement.

Additional information about Jesse Mackey is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Year of Birth: 1980

Education: Jesse Mackey has a Bachelor's degree from Colgate University in Economics and an MBA from Thunderbird School of Global Management in International Securities Investment, International Development and Entrepreneurship.

Business Experience: Mr. Mackey is a voting shareholder and the Chief Executive Officer/ Chief Investment Officer of 4Thought Financial Group Inc. He provides investment planning and investment management services for financial advisors and third party firms to service their clients. He spearheads the economic theory, research and publishing activities of the firm, having been published in the Journal of Financial Planning, CPA Journal, The National Conference of CPA Practitioners (NCCPAP) Journal of the CPA Practitioner, AdvisorFYI.com, FREE Magazine, and several other publications - including 4Thought's proprietary self-publications. He has been quoted/profiled in news outlets such as US News & World Report, Yahoo Finance, Pensions & Investments, Newsday, and LI Business News. Mr. Mackey is the former President/COO of National Network of Accountants Investment Advisors, Inc. and a former Investment Specialist at Park Avenue Securities, LLC. He began his career working in the financial services industry with JPMorgan Chase, AXA Financial, and MassMutual.

Professional Designations: Mr. Mackey does not hold any professional designations.

Disciplinary Information

Mr. Mackey does not have any disciplinary information to report.

Other Business Activities

Mr. Mackey is a licensed life and health insurance broker in several states.

Additional Compensation

Mr. Mackey may receive commissions or other compensation based on the sale of insurance products.

Supervision

Mr. Mackey is the Chief Compliance Officer of 4Thought Financial Group (as well as the CEO/CIO) and is therefore responsible for monitoring the advice provided to clients by 4Thought Financial Group Investment Adviser Representatives.

DANIEL MACKEY

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BROCHURE SUPPLEMENT

January 1st, 2022

This supplement brochure provides information about Daniel Mackey that supplements the 4Thought Financial Group Inc. brochure. You should have received a copy of that brochure. Please contact Jesse Mackey, Chief Investment Officer if you did not receive our brochure or if you have questions about the contents of this supplement.

Additional information about Daniel Mackey is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Year of Birth: 1988

Education: Daniel Mackey has a Bachelor's degree from Quinnipiac University in Accounting

Business Experience: Daniel is a voting shareholder as well as the Chief Financial Officer and an Investor Relations Officer of 4Thought Financial Group Inc. He is an Investment Adviser Representative (IAR), by which he provides comprehensive financial planning and investment advisory services to individuals, institutions, and third party Registered Investment Adviser firms. Daniel started his professional career at 4Thought Financial Group. He began as an Operations Associate and later became the firm's Operations Manager.

Professional Designations: Mr. Mackey does not hold any professional designations.

Disciplinary Information

Mr. Mackey does not have any disciplinary information to report.

Other Business Activities

Mr. Mackey is a licensed life and health insurance broker in several states.

Additional Compensation

Mr. Mackey may receive commissions or other compensation based on the sale of insurance products.

Supervision

Daniel Mackey's investment activities are supervised by Jesse Mackey, Chief Compliance Officer, (516) 300-1617.

4THOUGHT FINANCIAL GROUP INC.
6851 Jericho Tpke, Suite 120, Syosset, NY 11791

PRIVACY NOTICE

FACTS	WHAT DOES 4THOUGHT FINANCIAL GROUP INC. ("4THOUGHT") DO WITH YOUR PERSONAL INFORMATION?
WHY?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
WHAT?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: • Social Security number • income • account balances • payment history • investment experience • risk tolerance When you are *no longer* our customer, we continue to share your information as described in this notice.
HOW?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons 4Thought chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does 4Thought share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), response to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes – to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes – information about your transactions and experiences	No	We don't share
For our affiliates' everyday business purposes – information about your creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share

For nonaffiliates to market to you	No	We don't share

Questions? (516) 300-1617 or go to www.4TFG.com	
Who we are	
Who is providing this notice?	4Thought Financial Group Inc.
What we do	
How does 4Thought protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does 4Thought collect my personal information?	We collect your personal information, for example, when you • open an account • make deposits or withdrawals from your account • enter into an investment advisory contract • seek advice about your investments • tell us about your investment or retirement portfolio We also collect your personal information from others, such as your other advisors, affiliates, or other companies.
Why can't I limit all sharing?	Federal law gives you the right to limit only • sharing for affiliates' everyday business purposes–information about your creditworthiness • affiliates from using your information to market to you • sharing for nonaffiliates to market to you State laws and individual companies may give you additional rights to limit sharing.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. • *4Thought does not share with our affiliates.*
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. • *4Thought does not share with nonaffiliates so they can market to you.*
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. • *4Thought does not jointly market.*

4Thought Financial Group Inc.

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WRAP FEE PROGRAM BROCHURE

January 1st, 2025

This wrap fee program brochure provides information about the qualifications and business practices of 4Thought Financial Group Inc. If you have any questions about the contents of this brochure, please contact us at 516-300-1617 or info@4TFG.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Registration with the SEC does not imply any particular level of skill or training.

Additional information about 4Thought Financial Group Inc. is available on the SEC's website at www.adviserinfo.sec.gov.

Material Changes

Material (and immaterial) changes to 4Thought Financial Group Inc.'s policies, practices or conflicts of interest since our last Brochure dated January 1st, 2024 include:

- Update/correction of Separate Account strategy names in the "Methods of Analysis, Investment Strategies and Risk of Loss" section.

Table of Contents

Services, Fees and Compensation

Services

4Thought Financial Group Inc. ("4Thought" or the "firm") provides investment advisory services and acts as a wrap fee program sponsor to individuals, family offices, trusts, pension plans and other retirement plans, corporations, non-profit/tax-exempt organizations, and other registered investment advisers (under RIA Solicitor arrangements), in accordance with the investment objective(s) of the client.

4Thought also provides portfolio management services to the clients of third party registered investment advisers through sub-advisory, assets-under-advisory, and Separately Managed Account platforms (in which another firm acts as wrap program sponsor). The firm also provides financial planning services. These services are described in a separate brochure, a copy of which is available upon request.

For clients who have already developed their investment plan through 4Thought Financial Group, with a third party advisory firm, or without the aid of an advisor, 4Thought Financial Group will implement their plan with the creation and management of an investment portfolio in a wrap fee managed account. Upon completion of a financial planning process or the firm's Portfolio Assessment Questionnaire (in either paper or electronic form) to gauge risk tolerance, objectives, investment time horizon, and philosophical preferences, 4Thought Financial Group will generate an investment proposal, implement it, and will provide ongoing portfolio management and communication to third party firm advisors referring clientele and to the end user client, as is appropriate for the situation. We may manage portfolios (depending on program selected) using non-proprietary exchange-traded funds (ETFs), institutional share class mutual funds, no-load funds, and load-waived funds, as well as individual securities (bonds and stocks). 4Thought Financial Group does not use any proprietary mutual funds or ETFs in any of its programs. However, 4Thought uses proprietarily developed Separately Managed Account (SMA) strategies. 4Thought utilizes a Multi-Method Investing® methodology and Risk Premium Capital Allocation (RPCA) in constructing and managing client portfolios (see "Portfolio Manager Selection and Evaluation – Methods of Analysis, Investment Strategies and Risk of Loss" below for more information).

The firm offers 10 model-driven SMAs (and custom portfolios on request with prior approval):

Custom/ Liability-Driven Investing

- Custom/Liability-Driven Investing SMAs are 100% customizable and made available for multiple purposes. They can be used to create a structured liability-driven investing portfolio, to address client-directed modifications to our other model-driven SMAs, or to manage a completely customized portfolio for a discerning client or advisor (typically at slightly higher expense than comparable model-driven SMAs). In addition they can be used to address third party advisor needs such as the involvement of 4Thought in client relationship management.

Fixed Income Plus

- Provides a diversified core bond allocation, with a primary component that attempts nominal capital preservation using laddered target date bond exchange traded funds and/or laddered individual bonds, and a secondary variable component that seeks higher income potential and hedging against potential interest rate rises and inflation through actively managed non-laddered bond ETFs (diversified by type, sector, maturity, and geography). The target asset allocation is 100% Bonds/ Credit Markets. The primary benchmark is the Barclays US Aggregate 1-5 Year TR USD Index. As of November 1st, 2023, the Fixed Income Plus – Tax Neutral Composite was renamed the Fixed Income Plus Composite.

Global Strategic Allocation

- This growth-focused portfolio provides long term strategic asset allocation exposures to stock, bond, and hard asset markets on a global basis (domestic, international developed, and emerging markets) with attention to managing political and currency risks through diversification and hedging. Diversity, security selection, and ongoing rebalancing of the portfolio are the focus of management. The objective is long term portfolio growth and inflation protection reasonably consistent with the performance of the global stock markets, but with greater asset-type diversity. The target asset allocation range is 60-100% Stock Markets/ 0-40%

Diversifying Credit and Hard Asset Markets. Allocations may deviate from specific targets based on market value changes and management decisions. The primary benchmark is the S&P 500 TR USD Index. As of November 1st, 2023, the Global Strategic Accumulation Composite was renamed the Global Strategic Allocation Composite.

Traditional Strategic Allocation

- This portfolio provides a traditional US-centric strategic asset allocation investment approach in a simplified ETF-based structure for the all-stock investor. The portfolio is appropriate for accumulation phase investors with a very long time horizon, those seeking significantly above-inflation long term returns, or those seeking to complement a pre-existing fixed income portfolio in a tax efficient manner. The portfolio is composed of a diversified US-centric stock allocation (ETFs), with minor allocations to international developed and emerging markets. The percentage split between each of the components is rebalanced on an ongoing basis. The target asset allocation is 100% Stock/Equity Markets. The primary benchmark is the S&P 500 TR USD Index. As of November 1st, 2023, the Traditional Stock Allocation Composite was renamed the Traditional Strategic Allocation Composite.

Opportunistic Unconstrained Allocation

- This portfolio uses an unconstrained all-asset-class tactical allocation method to provide the potential for reduction of risks associated with the financial system ("systematic risk"). The objectives are low correlation with the equity and fixed income markets and long term total returns in excess of inflation. These goals are pursued through algorithmic active portfolio manipulation using an opportunistic probability-based statistical analysis methodology. The strategy attempts to both protect to the downside and perform well on the upside by tactically altering the asset class allocation, and may move up to 100% of the portfolio to the asset class or security deemed most favorable at any given time (including cash). This entails significant management and algorithm-related risks. The portfolio remains liquid, with no lock-up periods or surrender charges that apply, and provides investment method diversification when paired with more traditional approaches. The asset allocation is 100% Unconstrained (Allocations to all asset classes are permitted). The inception date for the composite is June 1st, 2012 and the composite creation date is February 4th, 2013. The primary benchmark is the Bloomberg Barclays US Treasury US TIPS TR USD Index. The benchmark was changed on June 30th, 2017 due to discontinuation of the previous index (Deutsche Bank Hedge Fund TR USD Index). As of November 1st, 2023, the Opportunistic Systematic Investing Composite was renamed the Opportunistic Unconstrained Allocation Composite.

Selective Stock Allocation

- This portfolio is intended to provide the potential for long term market outperformance through a highly concentrated individual stock and/or ETF portfolio. A larger initial global all-cap list of securities is first screened through a multi-factor fundamental, technical, and quantitative model to select the final concentrated portfolio, which is composed of a very limited number of securities (typically 4, but up to 25). It is then continuously reallocated and rebalanced based on algorithmic analysis. This portfolio is not diversified and represents significant concentration risks to the investor. Volatility is not a consideration in this portfolio's goal of achieving high long term growth. The target asset allocation is 100% Stock/Equity/Hard Asset Markets. A 0-3% allocation to cash deposits/ money market is maintained for operational purposes. The inception date for the composite is June 1st, 2012 and the composite creation date is January 14th, 2013. The primary benchmark is the S&P 500 TR USD Index. As of January 24th, 2014 the composite name was changed from Global Thematic to Global Thematic Accumulation. As of November 1st, 2023, the Global Thematic Accumulation Composite was renamed the Selective Stock Allocation Composite.

Multi-Method Unconstrained

- This portfolio provides a coordinated multi-methodology investment approach in a single simplified portfolio structure for the high risk tolerance long term investor. The portfolio is appropriate for accumulation phase investors with a time horizon of at least one or more market cycles, those seeking significantly above-inflation returns, or those seeking a very high immediate income (and willing to accept potentially high volatility). The portfolio is unconstrained in its ability to allocate or shift between four investing method components: A portion that may be allocated to laddered target date or other bond exchange traded funds; a diversified strategic global all-cap stock (ETF) portfolio; a portion that is managed on an unconstrained basis and is opportunistically shifted up to 100% to the asset class(es) (ETFs) determined to be the most favorably priced at any given time; and a portion that may be allocated to selected individual stocks. The percentage split between each of the portfolio components is rebalanced/reallocated on an ongoing basis. The asset allocation is 100% Unconstrained (Allocations to all asset classes are permitted). A 0-3% allocation to cash deposits/ money market is maintained for operational purposes. The primary benchmark is the Bloomberg Barclays US Treasury US TIPS TR USD Index. As of November 1st, 2023, the Multi-Contingency Unconstrained Composite was renamed the Multi-Method Unconstrained Composite.

Multi-Method Constrained

- This portfolio provides a coordinated multi-methodology investment approach in a single simplified portfolio structure for the moderate risk tolerance investor. The portfolio is appropriate for accumulation phase investors with an intermediate time horizon, those seeking slightly above-inflation returns, or those seeking a moderate immediate income. A minimum of 50% of the portfolio (but up to 100%) is allocated to laddered target date or other bond exchange traded funds at all times. The remainder may be allocated amongst three additional method components: A diversified strategic global all-cap stock (ETF) portfolio; a portion that is managed on an unconstrained basis and is opportunistically shifted up to 100% to the asset class(es) (ETFs) determined to be the most favorably priced at any given time; and a portion that may be allocated to selected individual stocks. The percentage split between each of the portfolio components is rebalanced/reallocated on an ongoing basis. The target asset allocation is 50%-100% Bond/Credit Markets, 0-50% Stock/Equity Markets and Unconstrained. A 0-3% allocation to cash deposits/ money market is maintained for operational purposes. The primary benchmark is a blended index composed of 50% Barclays US Aggregate 1-5 Year TR USD/ 40% S&P 500 TR USD/ 10% Bloomberg Barclays US Treasury US TIPS TR USD (rebalanced monthly). The benchmark was changed on June 30th, 2017 due to discontinuation of a previous index component (Deutsche Bank Hedge Fund TR USD Index). As of November 1st, 2023, the Multi-Contingency Moderate Composite was renamed the Multi-Method Constrained Composite.

Traditional Aggressive Allocation

- This portfolio provides a traditional US-centric strategic asset allocation investment approach in a simplified ETF-based structure for the aggressive risk tolerance investor. The portfolio is appropriate for accumulation phase investors with a long time horizon, those seeking significantly above-inflation returns, or those seeking a high immediate income. Approximately 25% of the portfolio is composed of laddered fixed maturity date and variable corporate bond exchange traded funds, with 75% in a diversified US-centric stock allocation (ETFs). The percentage split between each of the components is rebalanced on an ongoing basis. The target asset allocation is 25% Bond/Credit Markets, 75% Stock/Equity Markets. The primary benchmark is a blended index composed of 25% Barclays US Aggregate 1-5 Year TR USD/ 75% S&P 500 TR USD (rebalanced monthly).

Traditional Moderate Allocation

- This portfolio provides a traditional US-centric strategic asset allocation investment approach in a simplified ETF-based structure for the moderate risk tolerance investor. The portfolio is appropriate for accumulation phase investors with an intermediate time horizon, those seeking slightly above-inflation returns, or those seeking a moderate immediate income. Approximately 50% of the portfolio is composed of laddered fixed maturity date and variable corporate bond exchange traded funds, with 50% in a diversified US-centric stock allocation (ETFs). The percentage split between each of the components is rebalanced on an ongoing basis. The target asset allocation is 50% Bond/Credit Markets, 50% Stock/Equity Markets. The primary benchmark is a blended index composed of 50% Barclays US Aggregate 1-5 Year TR USD/ 50% S&P 500 TR USD (rebalanced monthly).

Traditional Conservative Allocation

- This portfolio provides a traditional US-centric strategic asset allocation investment approach in a simplified ETF-based structure for the conservative risk tolerance investor. The portfolio is appropriate for accumulation phase investors with a short time horizon, those seeking inflation-adjusted capital preservation, or those seeking a modest immediate income. Approximately 75% of the portfolio is composed of laddered fixed maturity date and variable corporate bond exchange traded funds, with 25% in a diversified US-centric stock allocation (ETFs). The percentage split between each of the components is rebalanced on an ongoing basis. The target asset allocation is 75% Bond/Credit Markets, 25% Stock/Equity Markets. The primary benchmark is a blended index composed of 75% Barclays US Aggregate 1-5 Year TR USD/ 25% S&P 500 TR USD (rebalanced monthly).

The firm generally tailors its advisory services to the individual needs of clients based on the client's completion of a Portfolio Assessment Questionnaire and/or a financial planning process. We customize the services for the individual clients, but they are generally based on portfolio modeling utilized for a large number of clients. In model-driven portfolios, clients may not impose restrictions on investing in certain securities or types of securities. However, customized portfolio modeling that takes client-imposed restrictions into account may be available in certain situations at additional cost.

Fees

An annual percentage of assets under management fee will be calculated and deducted directly from the client account. The fee shall be paid quarterly and covers the investment advisory services of 4Thought, as well as charges for execution of transactions through the brokerage firm, clearance of funds and securities through the custodian, custody of account assets with the custodian and electronic account reporting by the custodian (Client requests for paper delivery of reporting by the custodian may require additional charges. Please refer to the custodian agreement for details on this and any other potential ancillary charges). As a result, the client may pay more or less for these services than if they were purchased separately. Factors that bear upon the cost of the program in relation to the cost of the same services purchased separately include, among other things, the type and size of the account and the historical and/or expected size or number of transactions in the account. The fee does not cover certain charges that may be assessed by the custodian/brokerage firm from time to time based on special requests from Client.

The fee is paid quarterly in arrears. The client should refer to the separate agreement with the brokerage firm/ custodian for information on specific details on the calculation and timing of fee billing. The first payment is due at the end of the first calendar quarter of management by 4Thought. For the first partial quarter and each quarter thereafter, the schedule of fees shall be applied to the average daily fair market value of the assets in the account during the quarter, as calculated after quarter-end. For the initial partial quarter, the fee shall be determined by daily proration.

4Thought may invest assets of the account in shares of investment companies ("Funds"). With respect to mutual funds or ETFs held in a client's account, fees payable to 4Thought Financial Group are in addition to expenses and ordinary fees borne by these holdings. 4Thought Financial Group's fees could be avoided if the client invested directly in mutual funds and ETFs. The account assets invested in the Funds will be included in calculating the value of the account for purposes of computing the fees and the same assets will also be subject to the advisory and other fees and expenses as set forth in the prospectuses of the Funds, paid by the Funds but ultimately borne by the investor.

Upon termination of the advisory agreement, the advisory fee is prorated to the date of termination. The client should refer to the separate agreement with the brokerage firm/ custodian for information related to any termination fees that may be incurred or other considerations such as difficulties related to the in-kind transfer of fractional shares of securities. The client may wish to request that 4Thought liquidate any fractional shares held in the account prior to termination of the Investment Advisory Agreement for ease of outbound transfers.

The minimum initial investments in the below table(s) may be waived by 4Thought under certain circumstances, such as for subscription/retainer fee financial planning clients; for clients that establish a minimum recurring systematic investment bank link; and for plan participants in the 4Thought Retirement Plan Services program. The actual total advisory fee to be paid by each client is disclosed at opening of the account in the Investment Advisory Agreement and/or during the custodial account opening process (for accounts opened electronically), and is based on the ranges stated in the following table(s):

Standard Program Total Fees	Model-Driven Portfolios	Custom
Minimum Initial Investment	$500 Non-Qualified (NQ) $10,000 Qualified (Q)	$500 NQ $10,000 Q
$0-$10,000,000	0.55% - 1.85%	0.55% - 1.85%
$10,000,000+	0.35% - 1.65%	0.35% - 1.65%

Retirement Plan Services Fees	Discretionary Managed Accounts and QDIA	Participant Directed Investment Options
Custody/Brokerage Fees	0.08%	0.08%
Portfolio Management Fees	0.47%	0.47%
IAR/Solicitor Fees	0% - 1.00%	0% - 1.00%
Total Fees	0.55% - 1.55%	0.55% - 1.55%

4Thought reserves the ability to reduce both the minimum initial investment and the lower limit of the fee ranges stated above as it deems appropriate.

Depending on the source of the client introduction, the annual AUM fee percentage may be determined in the discretion of the referring third party Registered Investment Adviser, the associated 4Thought Investment Adviser Representatives (“IAR(s)”), or centrally by 4Thought management (in the case of clients introduced through a web-based interface). 4Thought employs Investment Adviser Representatives compensated through a combination of salary/bonus, and other IARs that are compensated solely through a percentage of assets under management (non-salaried). IARs of 4Thought who recommend the program to a client may receive compensation as a result of the client’s participation in the program. The amount of this compensation may be more than what the IAR would receive if the client participated in other programs or paid separately for investment advice, brokerage and other services. Accordingly, in many cases, the IAR may have a financial incentive to recommend the program over other programs or services. In the cases of client introductions from third-party Registered Investment Advisers and assigned non-salaried 4Thought IARs compensated on the basis of assets under management, compensation paid to the RIA/IAR is a contract-based percentage of the amount of the total fee that exceeds 0.55% for model-driven portfolios (0.35% for accounts with an initial investment of $10M+). This 0.55% (or 0.35%) amount may be different for custom-managed non-model portfolios, in which it is priced on a case-by-case basis by 4Thought management.

Account Requirements and Types of Clients

4Thought Financial Group provides portfolio manager services to individuals, family offices, trusts, pension plans and other retirement plans, corporations, non-profit and tax-free organizations, and other registered investment advisers.

Clients are required to establish an account with a custodian/brokerage firm with whom 4Thought has pre-negotiated pricing as part of the Wrap Fee Program for the purposes of custody, clearing, and brokerage. Please refer to the separate agreement with the custodian/brokerage firm for details on their services. 4Thought Financial Group’s minimum initial investment requirements are described above under “Fees.” The minimum initial investments for each strategy may be waived by 4Thought under certain circumstances, such as for subscription/retainer fee financial planning clients, for clients that establish a minimum recurring systematic investment bank link, and for plan participants in the 4Thought Retirement Plan Services program.

Portfolio Manager Selection and Evaluation

4Thought manages all sponsored wrap fee program accounts directly on a discretionary trading authorization basis, and does not outsource portfolio management to third party "Portfolio Managers" in its wrap fee program, except to the extent that investment companies ("funds" – typically exchange traded funds) are used within an account. Instead, 4Thought offers and recommends to clients one or more proprietarily managed Separately Managed Account (SMA) strategies, each of which is centrally managed (at the firm level) according to a specific mandate using a different formula-driven (algorithmic) process. Each of these strategies is developed and implemented centrally at the firm level by the Portfolio Management Team, and is not dependent on the abilities of an individual Investment Adviser Representative or "Portfolio Manager".

The Portfolio Management Team consists of a Chief Investment Officer (CIO), a group Investment Committee, and Portfolio Team members. The CIO takes ownership of the firm-level and strategy-level creative process, seeks Investment Committee approval, and manages implementation. The Investment Committee reviews and approves the CIO creative process, provides input, and elects a new CIO from the Portfolio Team Member pool in a succession event. Portfolio Team Members aid in the implementation of portfolio mandates under the direction of the CIO. Duties include tasks such as operational management; raw data processing and analysis according to pre-set formula; trading system model setting; block trade generation, account customizations, and ensuring proper execution/allocation. Portfolio Team Members are cross-trained in the formulaic decision making processes behind each of the portfolio strategies offered by 4Thought through both group training and individual role assignments by the CIO. They are also able to provide input in the creative process of portfolio formula design. This cross training in each strategy/formula process ensures that the Investment Committee can appoint from inside the company in the event of a succession event for the CIO, thereby allowing continuity for the client firms that utilize the 4Thought strategies, as well as for the end user investor client.

For cases in which end-user Clients work with 4Thought through an introducing third party RIA Solicitor, a 4Thought IAR will not be assigned to the case, and the 4Thought Portfolio Management Team works directly with the third-party RIA/IAR(s) to ensure the appropriate provision of services to the end-user client. For cases in which end-user Clients work directly with 4Thought (and not through an introducing third party Registered Investment Adviser), 4Thought's central management will assign one or more individual Investment Adviser Representatives to the case. IARs of 4Thought do not have trading discretion on client accounts and do not act as "Portfolio Managers". Investment Adviser Representatives instead act as a liaison between the Client and the central management team, and are responsible for communicating changes in needs/objectives/circumstances between the two parties, and for providing advice/recommendations to clientele related to their investment advisory accounts (and potentially broader financial planning and wealth management concerns – if such services have been elected separately).

Performance and Verification

4Thought Financial Group Inc. ("4Thought") claims compliance with the Global Investment Performance Standards (GIPS®) and prepares and presents performance reports in compliance with the GIPS standards. 4Thought is annually independently verified for these purposes. The verification report(s) is/are available upon request.

A firm that claims compliance with the GIPS standards must establish policies and procedures for complying with all the applicable requirements of the GIPS standards. Verification provides assurance on whether the firm's policies and procedures related to composite and pooled fund maintenance, as well as the calculation, presentation, and distribution of performance, have been designed in compliance with the GIPS standards and have been implemented on a firm-wide basis. Verification does not provide assurance on the accuracy of any specific performance report.

The firm definition excludes any third-party asset management programs over which 4Thought maintains oversight advisory agreements on behalf of its clients, any arrangements under which 4Thought provides recommendations for client self-implementation, and any assets under advisory but not under direct management (in which 4Thought provides allocation changes or trading signals to third party firms but does not take discretion over the trading of client accounts). A list of all composite and pooled fund investment strategies offered by the firm, with a description of each strategy, is available upon request. The type of portfolios in which each strategy is available (segregated account, limited distribution pooled fund, or broad distribution pooled fund) is indicated in the description of each strategy.

Results are based on fully discretionary accounts under management, including those accounts no longer with the firm. Policies and Procedures for valuing portfolios, calculating performance, and preparing compliant presentations are available upon request.

Past performance is not indicative of future results.

GIPS® is a registered trademark of CFA Institute. CFA Institute does not endorse or promote this organization, nor does it warrant the accuracy or quality of the content contained in reports.

Advisory Business

4Thought Financial Group Inc. provides investment advisory and portfolio management services while acting as a wrap fee program sponsor to individuals, family offices, trusts, pension plans and other retirement plans, corporations, non-profit/tax-exempt organizations, and other registered investment advisers (under RIA Solicitor arrangements), in accordance with the investment objective(s) of the client.

4Thought also provides portfolio management services to the clients of third party registered investment advisers through sub-advisory, assets-under-advisory, and Separately Managed Account platforms (in which another firm acts as wrap program sponsor). The firm also provides financial planning services. These services are described in a separate brochure, a copy of which is available upon request.

4Thought directly manages client accounts on a discretionary trading authorization basis only through wrap fee accounts, both as a sponsor through the wrap fee program described in this document, and through other wrap fee programs sponsored by third parties. It does not manage other types of accounts with trading authorization, and there is therefore no difference between 4Thought's management of wrap fee accounts and its management of other types of accounts.

In model-driven portfolios, clients may not impose restrictions on investing in certain securities or types of securities. However, customized portfolio modeling that takes client-imposed restrictions into account may be available in certain situations at additional cost.

Performance-Based Fees and Side-by-Side Management

4Thought Financial Group does not charge performance-based fees.

Methods of Analysis, Investment Strategies and Risk of Loss

<u>Methods of determining portfolio objectives/suitability for the client</u>

Portfolio Assessment Questionnaire

Upon completion of a paper or electronic form Portfolio Assessment Questionnaire to gauge risk tolerance, objectives, investment time horizon, and contingency preferences, 4Thought Financial Group will generate an investment proposal, implement it, and provide ongoing portfolio management. An assigned Investment Adviser Representative(s) of 4Thought (or of a third party Registered Investment Adviser if applicable) will act as a liaison for maintaining ongoing communication between the client and 4Thought's central management for the purposes of continuous adjustment and portfolio updating to the needs of the client. In the case of clients introduced through an electronic interface, this ongoing communication and updating is provided by 4Thought's central management, salaried personnel, and automated electronic systems.

<u>Portfolio Construction</u>

Overall Methodology: Multi-Method Investing® and RPCA

4Thought Financial Group utilizes Multi-Method Investing® and Risk Premium Capital Allocation (RPCA) in the development and management of investment advisory accounts for clients. By diversifying client portfolios at the level of the investment method (four methods are used to capitalize on four potential risk premiums under "Risk Premium Capital Allocation"), we attempt to increase the probability that our clients' personal and investment objectives will be achieved over time. We may construct portfolios by applying one investment method towards each investment goal, or may include multiple investment methods for a single goal, depending on the situation. Four primary methods of investment are utilized by 4Thought Financial Group in direct management of investment advisory accounts:

Liability-Driven Investing
(May apply to Custom/Liability-Driven Investing, Fixed Income Plus, Multi-Method Portfolios, and Traditional Allocation Portfolios)

For a series of known specific investor liabilities or risks, we select, buy, and hold a matching series of investment instruments in an attempt to directly offset the liabilities/risks and ensure that investor goals are achieved regardless of the performance of the broader financial markets. This method generally will feature no guideline or restriction on the appropriate allocation of assets, and up to 100% of the portfolio may be invested in a single product/security/asset if this is deemed appropriate to achieve goals (although this is usually not the case). In many cases, the methodology may include the heavy use of "guaranteed" insurance products, fixed income instruments, or derivative securities, each of which may entail significant issuer credit risks or insurance/hedging costs. The investor accepts these costs/risks in the pursuit of greater predictability in the achievement of his/her highly specific financial goals.

Strategic Asset Allocation
(May apply to Global Strategic Allocation, Multi-Method Portfolios, and Traditional Allocation Portfolios)

This method focuses on building diversified portfolios of stocks, bonds, and hard assets in an attempt to reduce the level of risk undertaken in attempting to achieve a target rate of return. The portfolio manager generally adheres to a strategic fully invested methodology and applies Modern Portfolio Theory, in which the major asset allocation components of the portfolio experience little or no tactical shifting in expectation of changes in the financial markets, while the sub-components of the portfolio may be actively traded by specialized money managers (depending on whether index-based or active implementation has been utilized). Rebalancing is used as a systematic means to attempt to buy low and sell high, and to limit portfolio volatility. The overlay portfolio manager attempts to reduce transaction costs such as the bid-ask spread to the investor and to limit the possibility of human error detracting from the performance of the portfolio over the long term. Portfolios managed using only this method cannot in theory or in practice limit financial systemic risk as it applies to an investor portfolio.

Opportunistic/Tactical/Absolute Return Investing:
(May apply to Opportunistic Unconstrained Allocation and Multi-Method Portfolios)

In the various Opportunistic, Tactical Asset Allocation, and Absolute Return sub-methodologies, portfolio managers may have no constraint to use any predetermined asset allocation, and instead may have the flexibility to actively shift up to 100% of the portfolio to any class of assets that the portfolio manager deems appropriate. The objective is often to limit the downside risk to the portfolio (not necessarily through diversification, but often through active trading-based risk management) while capturing upside returns; or to achieve the maximum return available during any given short time period regardless of broader market performance (potentially using leverage, shorting, or derivatives). The portfolio manager mandate may incorporate both of these objectives. This unconstrained methodology and the ability to tactically shift to cash means that the portfolio manager is theoretically capable of limiting financial/economic system risks as they apply to the investor's portfolio, and of producing superior market-relative performance. However, the lack of constraints on the portfolio managers may also result in substantial costs and risk. Mutual fund and SMA components of such portfolios are generally prone to higher internal costs (i.e., the bid-ask spread, expense ratios). Also, opportunistic methods may be highly subject to human error and/or quantitative model error, resulting in potential underperformance of the markets in general if the managers do not succeed in their mandate.

Selective/Concentrated/Thematic Investing:
(May apply to Selective Stock Allocation and Multi-Method Portfolios)

In the Selective/Concentrated and Thematic Investing philosophical category, portfolios managers will generally set a concentrated or non-diversified initial allocation and manage individual positions in a very focused manner, in some cases attempting to purchase new holdings at opportunistic value prices when possible. This methodology will typically define asset classes differently than more conventional asset allocation, such as into country-based components, industry/economic sector components, and specific themes, potentially with no attention to style or market capitalization. Portfolios are typically highly concentrated in certain areas based on the portfolio manager's probability-determined future-focused capital market assumptions, which may place little or no merit in historical averages. In this sense, portfolios are not "fully diversified." Concentrated positions may be defined based on valuations and/or thematically, where the theme is expected to result in long term superior sector or security performance. This investment methodology is most aptly applied for investors that have a very long time horizon and are capable of tolerating high volatility in their portfolio. Investors must be aware of the risks associated with having a portfolio invested in this manner. While the potential for high returns may exist, the portfolio may also be at risk of substantial loss. In addition, investors must recognize that even if concentrated positions do eventually appreciate in value over the long term, long intervening periods of time may exist in which the positions decrease in value substantially or exhibit high degrees of volatility. If the investor is comfortable with accepting these risks in order to pursue the potential returns associated, then this is an option to be considered for the portfolio objective in question. Alternatively, the inclusion of such a philosophical component as part of the broader portfolio for an investment objective may at times provide an effective hedge against underperformances elsewhere in the aggregate investor portfolio.

Investment Vehicles and Portfolio Construction Logistics

Depending on the portfolio modeling used, accounts may contain individual bonds, exchange traded funds, institutional share class, load-waived and no-load mutual funds, individual stocks, options, and potentially other types of securities. During a planning process, additional types of assets may be recommended for purchase outside of the managed accounts, including annuities and life insurance products. Within managed accounts, we may use specialized modeling for various investor objectives of capital preservation/savings, distribution/income, and accumulation/growth. Each Separately Managed Account strategy (other than custom portfolios) is managed to follow a preset formula or process designed to systematically implement the SMA mandate, with human intervention occurring only as necessary to adjust or refine the preset formula.

Manager/Holding Due Diligence

4Thought Financial Group uses an open architecture security selection methodology within each managed account strategy. The firm does not have any proprietary products or funds. This means that the portfolio will include what we believe are the most suitable stocks, bonds, ETFs, and fund managers from the universe of securities that are publicly available. The firm utilizes both proprietary and independent third party research in surveying the field of available fund managers and individual stock/bond securities for potential inclusion in the portfolio model. A set of proprietary criteria is utilized in determining final selections for each subcomponent holding. A different set of criteria is applied in each investment model or separately managed account.

Ongoing Implementation

Once we construct a portfolio, we will continuously manage it. This will involve systematic investments and withdrawals management; the rebalancing of your account to the appropriate split between your investment methods and each of their sub-components (which will occur with a different frequency depending on the portfolio goals); opportunistic and selective rebalancing when deemed appropriate; the monitoring of selected managers and holdings with replacement when necessary; continuous updating of the portfolio to adjust for industry/methodology changes; detailed performance reporting on your accounts, and regular portfolio review/adjustment to ensure that your portfolio continues to be appropriate for your goals and situation. We also incorporate a formalized electronically documented annual review process initiated by an emailed request to complete an electronic questionnaire.

Risks

Investing in securities involves risk of loss that clients should be prepared to bear.

In addition to the risks noted in the description of each 4Thought investment method, material risks involved in investing in our investment programs include:

Market Risk – All securities are subject to market risk. The values of the securities held by a client may fall rapidly or unpredictably due to a variety of factors, including changing economic, political or market conditions.

Foreign Securities Risks – The risks may be enhanced depending on the market (e.g., whether the country is developed or developing). The risks of foreign investment include: less liquidity, enhanced volatility due to currency, social and political instability, restrictions on foreign investment and repatriation of capital, less complete and reliable information about foreign companies, reduced government supervision of some foreign securities markets, lower responsiveness of foreign management to shareholder concerns, economic issues or developments in foreign countries, and, in some cases, emerging markets risks, including limited trading volume, expropriation, devaluation or other adverse political or social developments.

Active and Tactical Management Risks – Active and tactical management involves the risks that the investment decisions made by a manager in using one or both of these strategies may prove to be incorrect, may not produce the returns expected by the manager and may cause an account to lose value.

Mutual Fund/ETF Risk – As a shareholder of mutual funds or ETFs, clients bear their proportionate share of the underlying fund's fees and expenses. As a result, a client's cost of investing may be higher than investment strategies that invest directly in stocks. In addition, a client's investments in mutual funds or ETFs are subject to the particular risks described in the mutual funds/ETFs' prospectuses, copies of which are provided to the client and which 4Thought Financial Group urges the client to read.

Equity Securities Risk – To the extent a client's account invests in equity investments (i.e., stocks), a particular stock, an industry or stocks in general may fall in value. The value of a client's account will go up and down with the prices of the securities in which the account invests. The prices of stocks change in response to many factors, including the historical and prospective earnings of the issuer, the value of its assets, management decisions, decreased demand for an issuer's products or services, increased production costs, general economic conditions, interest rates, currency exchange rates, geopolitical risks investor perceptions and market liquidity.

Fixed Income Securities Risks – To the extent a client's account invests in fixed income securities (i.e., bonds), the investment may be subject to call risk if call provisions exist, which is the possibility that an issuer may redeem the security before maturity (a call) at a price below its current market price. An increased likelihood of a call may reduce the security's price. If a fixed income security is called, an account may have to reinvest the proceeds in other fixed income securities with lower interest rates, higher credit risk, or other less favorable characteristics.

Debt obligations are also generally subject to the risk that the issuer may be unable to make principal and interest payments when they are due. In addition, securities could lose value because of a loss of confidence in the ability of the borrower to pay back debt. Non-investment grade debt – also known as "high-yield bonds" or "junk bonds" – has a higher risk of default and tends to be less liquid than higher-rated securities.

Fixed income securities are subject to the risk that the securities could lose value because of interest rate changes. For example, bonds tend to decrease in value if interest rates rise. Debt obligations with longer maturities sometimes offer higher yields, but are subject to greater price shifts as a result of interest rate changes than debt obligations with shorter maturities.

Certain fixed income securities, including mortgage-backed securities carry prepayment risks. Prices and yields of mortgage-backed securities assume that the underlying mortgages will be paid off according to a preset schedule. If the underlying mortgages are paid off early, for example when homeowners refinance as interest rates decline, an account may be forced to reinvest the proceeds in lower yielding, high-priced securities. This may reduce an account's total return.

Risks Associated With Options on Securities – There are several risks associated with transactions in options on securities. For example, there are significant differences between the securities and options markets that could result in an imperfect correlation between these markets, causing a given transaction not to achieve its objectives. A decision as to whether, when and how to use options involves the exercise of skill and judgment, and even a well-conceived transaction may be unsuccessful to some degree because of market behavior or unexpected events. As the writer of a covered call option, a client forgoes, during the option's life, the opportunity to profit from increases in the market value of the security covering the call option above the sum of the premium and the strike price of the call, but has retained the risk of loss should the price of the underlying security decline. The writer of an option has no control over the time when it may be required to fulfill its obligation as a writer of the option. Once an option writer has received an exercise notice, it cannot effect a closing purchase transaction in order to terminate its obligation under the option and must deliver the underlying security at the exercise price. If a put or call option purchased by a client is not sold when it has remaining value, and if the market price of the underlying security remains equal to or greater than the exercise price (in the case of a call), or remains less than or equal to the exercise price (in the case of a put), the client will lose its entire investment in the option. Also, where a put or call option on a particular security is purchased to hedge against price movements in a related security, the price of the put or call option may move more or less than the price of the related security. There can be no assurance that a liquid market will exist when a client seeks to close out an option position. If trading were suspended in an option purchased by a client, the client would not be able to close out the option. If restrictions on exercise were imposed, a client might be unable to exercise an option it has purchased. If a client were unable to close out an option that it had purchased on a security, it would have to exercise the option in order to realize any profit or the option may expire worthless. If a client were unable to close out a covered call option that it had written on a security, it would not be able to sell the underlying security unless the option expired without exercise.

Voting Client Securities

4Thought Financial Group does not have authority to vote client securities. Clients will receive their proxies or other solicitations directly from their custodian. Clients may contact 4Thought Financial Group with questions about a particular solicitation.

Client Information Provided to Portfolio Managers

At or prior to opening an account, clients are required to complete a Portfolio Assessment Questionnaire either electronically through the 4Thought Financial Group website at www.4tfg.com (for digital clients introduced through the web interface), or under the guidance of an Investment Adviser Representative (either of 4Thought or a contracted soliciting third party Registered Investment Adviser). Upon completion of a paper or electronic form Portfolio Assessment Questionnaire to gauge risk tolerance, objectives, investment time horizon, and preferences, 4Thought Financial Group's central Portfolio Management Team will generate an investment proposal, implement it, and provide ongoing portfolio management. An assigned Investment Adviser Representative(s) of 4Thought (or of a third party Registered Investment Adviser if applicable) will act as a liaison for maintaining ongoing communication between the client and 4Thought's Portfolio Management Team for the purposes of continuous adjustment and portfolio updating to the needs of the client. In the case of clients introduced through an electronic interface, this ongoing communication and updating is provided by 4Thought's central management, salaried personnel, and automated electronic systems. 4Thought also sends an annual request to clients to complete an electronic questionnaire. The clients' answers to the questionnaire are communicated directly to the Portfolio Management Team and are used to reassess needs and implement any necessary adjustments.

Client Contact with Portfolio Managers

Clients and third party RIA firms may contact and consult with the Portfolio Management Team and/or their assigned 4Thought Investment Adviser Representatives during 4Thought's regular business hours.

Additional Information

Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of 4Thought Financial Group's advisory business or the integrity of 4Thought's management.

Other Financial Industry Activities and Affiliations

4Thought uses proprietarily developed Separately Managed Account (SMA) strategies when directly managing client accounts. These SMA strategies are also marketed to third party advisory firms as a named and packaged program to be used with their clients, and therefore could be seen as the use of a proprietary product/service when utilized for the individual private clients of 4Thought. This poses a possible conflict of interest when 4Thought's representatives recommend or offer the use of its directly managed accounts in the implementation of fee financial plans for its private individual clients, as 4Thought will receive an investment advisory/ portfolio management fee for management of the accounts if clients choose to implement through 4Thought. This fee and the quality/character of the investment advisory services may differ from services available elsewhere if the client were to implement their investment portfolio through a third party (with or without the introduction of 4Thought). Recognizing this conflict of interests for financial planning fee clients, 4Thought discloses it and offers the additional options to either use third party asset management firms with whom 4Thought has contracted (and will receive a solicitation or advisory fee), or to direct the client in implementing their investment portfolio on their own through third parties of their choice (for which 4Thought will receive no investment advisory or solicitation fee compensation).

In conjunction with the opening of an investment advisory account with 4Thought, clients may be offered to engage in a separate securities lending agreement or loan advance program directly with their account custodian/clearing firm. The custodian will use the client's 4Thought-managed advisory account as the basis for loaned securities or collateral. Under such arrangements, 4Thought offers these optional services as an intermediary and as a value-add to clients only, and will receive no direct monetary compensation for such arrangements in the form of fees or commissions.

4Thought Financial Group is also licensed as an insurance brokerage. This provides the firm with the means for the full implementation of financial plans for clients, as some aspects of financial planning may call for the clients' acquisition of insurance products, such as life insurance, disability insurance, long-term care insurance and property and casualty insurance, from third party providers. 4Thought Financial Group and its insurance brokers will generally receive insurance commissions for the sale of such products. This may give 4Thought Financial Group an incentive to recommend insurance products based on the compensation it or its insurance brokers receive rather than the client's needs. Recognizing this conflict of interest, 4Thought Financial Group performs ongoing due diligence on any recommended third party providers to ensure that any introductions are suitable to the specific client situation, and also uses multiple providers (sometimes with redundant programs) in order to ensure that client costs remain competitive with the broader market for these services.

4Thought Financial Group is approved for the provision of continuing education course credits (CPE) related to "Advisory Services" to Certified Public Accountants (CPAs) in New York State.

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

4Thought Financial Group has adopted a code of ethics which sets forth certain standards of business conduct that govern the personal investment activities of the firm's employees and officers, including the standard that the interests of advisory clients must be placed first at all times. The code of ethics requires access persons to report their personal securities transactions on a quarterly basis and their securities holdings upon commencement of employment (or upon becoming an access person) and annually thereafter. Access persons also must obtain approval before they acquire any ownership interest in any security in an initial public offering or limited offering. The code of ethics applies not only to transactions by the individual, but also to transactions for accounts in which the person has an interest individually, jointly or as guardian, executor or trustee, or in which the person or the person's spouse, minor children or other dependents residing in the same household have an interest. Compliance with the code of ethics is a condition of employment. The code of ethics requires all employees and officers to comply with applicable securities laws and to promptly report any violation of the code. Clients may obtain a copy of the firm's code of ethics from 4Thought Financial Group upon request.

The firm's officers and employees may invest in securities that are recommended for purchase or sale by clients. The firm's officers and employees face a conflict of interest when they buy or sell securities at or about the same time that 4Thought Financial Group buys or sells the same securities for client accounts or recommends that clients buy or sell the same securities, because the firm's officers or employees could take advantage of the information regarding the client transactions and execute their trades prior to the clients (commonly called "front running"). However, 4Thought Financial Group's compliance manual provides that securities transactions for the firm's officers and employees are aggregated with those of clients trading through the same brokerage firm.

Review of Accounts

4Thought Financial Group's portfolio management team reviews and analyzes accounts at least weekly for ongoing adjustment and portfolio update purposes. 4Thought Financial Group provides clients with detailed performance reports which show the value of the account and performance of the client's account relative to benchmarks, both through daily or more frequently updated online reporting and through on-demand aggregated performance reporting. For accounts managed through the 4Thought Retirement Plan Services program, reviews are conducted at least annually by 4Thought and/or an introducing third party RIA at the plan sponsor / trustee level. Both plan sponsors and their participants have on-demand online access to their accounts through their Custodian, and participants have the option of electing (or staying in by default) a Qualified Default Investment Alternative (QDIA), which provides a balanced diversified managed account portfolio. An annual review is offered, conducted, and documented for all clients through electronic means centrally by 4Thought management/operations, and clients consent to this process at the time of account opening on signature of the Investment Advisory Agreement. This review is initiated by an emailed request to complete an online questionnaire, and is dependent on the responsiveness of the client to the request for effective completion. Responses to the questionnaire are automatically compared to existing known client objectives, and 4Thought is automatically notified of any changes to objectives. This prompts 4Thought to take action to contact the client to make any necessary adjustments. A similar process is offered to participants in the Retirement Plan Services program, in which plan participants may affirmatively elect a new plan investment option based on the results of a digital questionnaire. In addition, in the case of clients not introduced through a web-based interface, the client's investment adviser representative (either a 4Thought IAR or third party RIA's IAR) may offer the annual (or more frequent) review of the client's account(s) with the client at an in-person, web-based or telephone meeting. The custodian selected by the client provides clients with statements on at least a quarterly basis and confirmation notices as transactions are executed in electronic format. If paper printed documents are required by the client, an additional custodial charge may apply.

Client Referrals and Other Compensation

4Thought Financial Group may receive discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support and/or other products used by the firm in furtherance of its investment advisory business from certain distributors and/or wholesalers. These arrangements present a conflict of interest for 4Thought Financial Group since it has an economic incentive to do business with these distributors or wholesalers. However, 4Thought Financial Group does not favor these distributors or wholesalers over other distributors, wholesalers or product sponsors.

4Thought uses proprietarily developed Separately Managed Account (SMA) strategies when managing client accounts. These SMA strategies are also marketed to third party advisory firms as a named and packaged program to be used with their clients, and therefore could be seen as the use of a proprietary product/service when utilized for the individual private clients of 4Thought. This poses a possible conflict of interest when 4Thought's representatives recommend or offer the use of its directly managed accounts in the implementation of fee financial plans for its private individual clients, as 4Thought will receive an investment advisory/ portfolio management fee for management of the accounts if clients choose to implement through 4Thought. This fee and the quality/character of the investment advisory services may differ from services available elsewhere if the client were to implement their investment portfolio through a third party (with or without the introduction of 4Thought). Recognizing this conflict of interests for financial planning fee clients, 4Thought discloses it and offers the additional options to either use third party asset management firms with whom 4Thought has contracted (and will receive a solicitation or advisory fee), or to direct the client in implementing their investment portfolio on their own through third parties of their choice (for which 4Thought will receive no investment advisory or solicitation fee compensation).

From time to time 4Thought Financial Group may enter into agreements providing cash compensation to accounting firms and other persons who refer clients to the firm ("solicitors"). These agreements require that the solicitor meet certain disclosure and other requirements, as well as comply with other applicable laws and regulations including state securities laws. The terms of the agreements differ somewhat depending upon the circumstances, but generally provide either for compensation equal to a specified percentage of the fees received by 4Thought Financial Group from clients referred, or for fixed compensation.

In addition to normal investment advisory fee and financial planning fee compensation provided to Investment Adviser Representatives of 4Thought for their work with individual clients previously referenced in this document, 4Thought may offer additional compensation arrangements to its IARs by signed addendum to the IAR Agreement. In one such addendum, an IAR may receive compensation via an "Override" arrangement, in which the IAR is paid on an ongoing basis for the referral/introduction of a new IAR hire/recruit, a Non-RIA Solicitor, or an RIA Solicitor of 4Thought's services. The amount of such compensation to the introducing IAR is based on a percentage of the income from end-user client investment advisory fees to the firm derived from the formalized relationship developed between the introduced IAR/Non-RIA Solicitor/RIA Solicitor and 4Thought. The above "Override" arrangements may also be offered to Non-RIA Solicitors (as opposed to IARs) by signed addendum to the Solicitor Agreement, provided the Solicitor maintains appropriate licensing to receive this compensation. In another optional addendum to the IAR Agreement, the "Practice Succession" arrangement allows an IAR to be compensated on his/her client book of investment advisory fee business in the events of the IAR's semi-retirement/outsourcing, full retirement, disability, or death, provided that he/she maintains the appropriate licensing with regulatory authorities and affiliations with 4Thought to receive such compensation, and also meets certain minimum requirements. This is intended to attract/retain talented IARs for employment and to permit the continuity of the client experience in working with 4Thought as a firm, as new servicing IARs are assigned to client cases in any of the aforementioned IAR retirement/disability/death scenarios.

As part of the implementation of a financial plan designed by 4Thought Financial Group, the firm may recommend the purchase of an insurance policy(ies) through its own insurance brokerage or from an insurance brokerage firm with whom the firm has an agreement. Although the insurance brokerages may not be compensated as solicitors unless they are or their employees are registered as investment advisers or investment adviser representatives, respectively, they may receive insurance commissions that result from the implementation of a financial plan, provided they are appropriately insurance licensed.

Financial Information

4Thought Financial Group does not believe there is any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients.