

**Brochure**  
**Form ADV Part 2A**  
**Item 1 - Cover Page**



**CONVERGENT**  
FINANCIAL GROUP

**Convergent Financial Group,  
LLC**  
**CRD# 290052**

3850 Bessemer Road, Suite 210  
Mount Pleasant, South Carolina 29466

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**March 3rd, 2023**

This brochure provides information about the qualifications and business practices of Convergent Financial Group, LLC. If you have any questions about the contents of this brochure, please contact us at (843) 972-4402 or [jellisor@ConvergentFG.com](mailto:jellisor@ConvergentFG.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state authority.

Convergent Financial Group, LLC is an investment advisory firm registered with the appropriate regulatory authority. Registration does not imply a certain level of skill or training.

Additional information about Convergent Financial Group, LLC also is available on the SEC's website at [www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov).

**Item 2 - Summary of Material Changes**

Form ADV Part 2 requires registered investment advisors to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since the filing of our last annual updating amendment, dated February 23, 2022, we have no material changes to report.

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## ***Item 4 - Advisory Business***

### General Information

Convergent Financial Group, LLC (“CFG”) was formed in 2017, and provides comprehensive financial planning services and investment management services to individuals, trusts, estates, charitable organizations and business entities. We work with clients in comprehensive and ongoing collaborative relationships, and most commonly charge a fee based on a percentage of assets under management for our services.

Jeremy A. Ellisor is the principal owner of CFG. Please see ***Brochure Supplements***, Exhibit A, for more information on the principal owner and other individuals who formulate investment advice and have direct contact with clients.

As of December 31, 2022, CFG managed \$26,165,523 of assets on a discretionary basis, and \$0 of assets on a non-discretionary basis.

### **SERVICES PROVIDED**

CFG provides personal financial planning and investment management services for a fee to a variety of Clients including individuals, families, business owners, professionals, and retirees.

At the outset of each client relationship, CFG spends time with the client, asking questions, discussing the client’s investment experience and financial circumstances, and broadly identifying major goals of the client.

Clients may elect to retain CFG to prepare provide financial planning advice and/or receive investment services for a percentage of assets managed. Please see ***Item 5 – Fees and Compensation*** for additional information

### Financial Planning Services - Comprehensive Planning

One of the services offered by CFG is comprehensive financial planning, described below. This service may be provided as a stand-alone service, or may be coupled with ongoing Investment Management Services.

Planning services are generally provided over a period of time after the Client begins working with the firm, depending on the Client’s needs, and usually follows a process including the following:

- Gathering information concerning the client's personal and financial situation;
- Assisting the client in establishing financial goals and objectives;
- Analyzing the client's present situation and anticipated future activities considering the client's financial goals and objectives;
- Identifying problems foreseen in the accomplishment of these financial goals and objectives and offering alternative solutions to the problems;
- Making recommendations to help achieve retirement plan goals and objectives;
- Designing an investment portfolio allocations to help meet the goals and objectives of the client;
- Providing guidance on estate planning;
- Assessing risk and reviewing basic health, life and disability insurance needs; or
- Reviewing goals and objectives and measuring progress toward these goals.

The client is under no obligation to act upon any of the recommendations made by CFG. Presentation of comprehensive planning does not include preparation of legal documents or tax returns. CFG is not licensed to provide legal or tax advice.

## Investment Services

Our investment management services include:

- Understanding of client's broad financial situation, to put in place an appropriate set of investments incorporating time horizon, high-level long-term goals for the investments, and risk tolerance;
- Design of an asset allocation appropriate to the Client's specific circumstances, and in most cases informed by ongoing financial planning considerations including the need for liquidity and appropriate time horizon;
- Determination of specific investment changes to be made to implement the recommended plan;
- Trading;
- Monitoring of investments as needed on an ongoing basis; or
- Provision of trading related data for tax, estate, or other purposes.

CFG will manage the client's investment portfolio on a discretionary basis. As a discretionary investment adviser, CFG will have the authority to supervise and direct the portfolio without prior consultation with the client.

CFG follows an established investment management process with a long-term orientation. For most clients, we believe that a long-term diversified approach is the most appropriate investment strategy. CFG manages a select group of model asset allocation portfolios that are used in client accounts, when appropriate. These model portfolios are groups of investments designed to deliver certain risk/return characteristics. CFG has created and manages model portfolios ranging from conservative to aggressive.

CFG will recommend a model portfolio or portfolios to match the client's financial goals and situation. CFG closely oversees the model portfolios and individual ETFs and will adjust as necessary.

For some clients, CFG will manage a portfolio allocation of individual stocks and bonds. Clients in this strategy may have less diversification and have the potential for the loss of dividend income compared to that of a model portfolio. For non-qualified accounts, clients may experience additional tax implications.

## IRA Rollover Recommendations

Effective December 20, 2021 (or such later date as the US Department of Labor ("DOL") Field Assistance Bulletin 2018-02 ceases to be in effect), for purposes of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02") where applicable, we are providing the following acknowledgement to you. When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice)
- Never put our financial interests ahead of yours when making recommendations (give loyal advice)
- Avoid misleading statements and conflicts of interest, fees, and investments
- Follow policies and procedures designed to ensure that we give advice that is in your best interest
- Charge no more than what is considered reasonable for our services
- Give you basic information about conflicts of interest

We benefit financially from the rollover of your assets from a retirement account to an account that we manage or provide investment advice, because the assets increase our assets under management and, in turn, our advisory fees. As a fiduciary, we only recommend a rollover when we believe it is in your best interest.

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

### General Fee Information

Fees paid to CFG are exclusive of all custodial and transaction costs paid to the client's custodian, brokers or other third party consultants. Please see ***Item 12 – Brokerage Practices*** for additional information. Fees paid to CFG are also separate and distinct from the fees and expenses charged by the mutual funds, ETFs (exchange traded funds) or other investment pools to their shareholders (generally including a management fee and fund expenses, as described in each fund's prospectus or offering materials). The client should review all fees charged by funds, brokers, CFG and others to fully understand the total amount of fees paid by the client for investment and financial-related services.

### Financial Planning Services

Comprehensive Financial Planning consists an ongoing fee that is paid monthly, in advance, at the rate of \$50 to \$300 per month. The fee may be negotiated in certain cases. Clients will be invoiced for fees due, and can pay fees via credit card or direct debit. This service may be terminated with 30 days's notice. Upon termination, any unearned fee will be refunded to the client in full.

CFG will waive monthly fees for Financial Planning Services for clients with \$250,000 or more in Assets Under Management with CFG.

### Investment Management Services

The Client executes an Investment Advisory Agreement ("Agreement") at the time they become a Client, and the Agreement specifies the compensation structure. There may be Clients at the firm with differing compensation scheduled depending on when they contracted services with the firm, or other specific variations as noted in their Agreement.

### Fee Structure

Investment management fees are paid monthly, in advance. If management begins after the start of a month, fees will be prorated accordingly. Fees will also be prorated for additional deposits of funds and/or securities. TD Ameritrade is the recommended custodian to hold client accounts under CFG's direct management. TD Ameritrade, Inc., member FINRA/SIPC, is a subsidiary of The Charles Schwab Corporation. TD Ameritrade deducts advisory fees through the authority granted by the client in the account opening agreement and forwards such fees to CFG.

The fee schedule for this service is:

<u>Assets Under Management</u>	<u>Annual Fee</u>
\$0 - \$1,000,000	1.25%
The next: \$1,000,001 - \$2,000,000	0.75%
Following greater than \$2,000,000	0.25%

CFG may, at its discretion, make exceptions to the foregoing or negotiate special fee arrangements where CFG deems it appropriate under the circumstances.

### Termination

Either CFG or the client may terminate their Investment Management Agreement at any time, subject to any written notice requirements in the agreement. In the event of termination, any paid but unearned fees

will be promptly refunded to the client based on the number of days that the account was managed, and any fees due to CFG from the client will be invoiced or deducted from the client's account prior to termination.

#### Other Compensation

CFG does not receive any other forms of compensation.

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

CFG does not have any performance-based fee arrangements. "Side by Side Management" refers to a situation in which the same firm manages accounts that are billed based on a percentage of assets under management and at the same time manages other accounts for which fees are assessed on a performance fee basis. Because CFG has no performance-based fee accounts, it has no side-by-side management.

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

CFG serves individuals, trusts, estates, charitable organizations and business entities.

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

#### Methods of Analysis

ETFs are generally evaluated and selected based on a variety of factors, including, as applicable and without limitation, past performance, fee structure, portfolio manager, fund sponsor, overall ratings for safety and returns, and other factors.

#### Investment Strategies

CFG's strategic approach is to invest each portfolio in accordance with a client's financial goals and situation. CFG is generally a long-term investor, meaning that securities are purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

#### Risk of Loss

While CFG seeks to diversify clients' investment portfolios across various asset classes consistent with their tolerance for risk of loss, all investment portfolios are subject to risks. Accordingly, there can be no assurance that client investment portfolios will be able to fully meet their investment objectives and goals, or that investments will not lose money.

Below is a description of several of the principal risks that client investment portfolios face.

*Management Risks.* While CFG manages client investment portfolios based on CFG's experience, research and proprietary methods, the value of client investment portfolios will change daily based on the performance of the underlying securities in which they are invested. Accordingly, client investment portfolios are subject to the risk that CFG allocates to asset classes that are adversely affected by unanticipated market movements, and the risk that CFG's specific investment choices could underperform their relevant indexes.

*Risks of Investments in Mutual Funds, ETFs and Other Investment Pools.* CFG may invest client portfolios in mutual funds, ETFs and other investment pools ("pooled investment funds"). Investments in pooled investment funds are generally less risky than investing in individual securities because of their diversified portfolios; however, these investments are still subject to risks associated with the markets in which they invest. In addition, pooled investment funds' success will be related to the skills of their particular managers and their performance in managing their funds. Pooled investment funds are also subject to risks due to regulatory restrictions applicable to registered investment companies under the Investment Company Act of 1940.

*Equity Market Risks.* CFG will generally invest portions of client assets directly into equity investments, primarily pooled investment funds that invest in the stock market. As noted above, while pooled

investments have diversified portfolios that may make them less risky than investments in individual securities, funds that invest in stocks and other equity securities are nevertheless subject to the risks of the stock market. These risks include, without limitation, the risks that stock values will decline due to daily fluctuations in the markets, and that stock values will decline over longer periods (e.g., bear markets) due to general market declines in the stock prices for all companies, regardless of any individual security's prospects.

*Fixed Income Risks.* CFG may invest portions of client assets directly into fixed income instruments, such as bonds and notes, or may invest in pooled investment funds that invest in bonds and notes. While investing in fixed income instruments, either directly or through pooled investment funds, is generally less volatile than investing in stock (equity) markets, fixed income investments nevertheless are subject to risks. These risks include, without limitation, interest rate risks (risks that changes in interest rates will devalue the investments), credit risks (risks of default by borrowers), or maturity risk (risks that bonds or notes will change value from the time of issuance to maturity).

*Foreign Securities Risks.* CFG may invest portions of client assets into pooled investment funds that invest internationally. While foreign investments are important to the diversification of client investment portfolios, they carry risks that may be different from U.S. investments. For example, foreign investments may not be subject to uniform audit, financial reporting or disclosure standards, practices or requirements comparable to those found in the U.S. Foreign investments are also subject to foreign withholding taxes and the risk of adverse changes in investment or exchange control regulations. Finally, foreign investments may involve currency risk, which is the risk that the value of the foreign security will decrease due to changes in the relative value of the U.S. dollar and the security's underlying foreign currency.

#### ***Item 9 - Disciplinary Information***

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of CFG or the integrity of CFG's management. CFG has no disciplinary events to report.

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

CFG has no other financial industry activities or affiliations to report.

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

##### Code of Ethics and Personal Trading

CFG has adopted a Code of Ethics ("the Code"), the full text of which is available to you upon request. CFG's Code has several goals. First, the Code is designed to assist CFG in complying with applicable laws and regulations governing its investment advisory business. Under the Investment Advisers Act of 1940, CFG owes fiduciary duties to its clients. Pursuant to these fiduciary duties, the Code requires persons associated with CFG (managers, officers and employees) to act with honesty, good faith and fair dealing in working with clients. In addition, the Code prohibits such associated persons from trading or otherwise acting on insider information.

Next, the Code sets forth guidelines for professional standards for CFG's associated persons. Under the Code's Professional Standards, CFG expects its associated persons to put the interests of its clients first, ahead of personal interests. In this regard, CFG associated persons are not to take inappropriate advantage of their positions in relation to CFG clients.

Third, the Code sets forth policies and procedures to monitor and review the personal trading activities of associated persons. From time to time CFG's associated persons may invest in the same securities recommended to clients. Under its Code, CFG has adopted procedures designed to reduce or eliminate conflicts of interest that this could potentially cause. The Code's personal trading policies include procedures for limitations on personal securities transactions of associated persons, reporting and review

of such trading and pre-clearance of certain types of personal trading activities. These policies are designed to discourage and prohibit personal trading that would disadvantage clients. The Code also provides for disciplinary action as appropriate for violations.

#### Participation or Interest in Client Transactions

Because client accounts are invested almost exclusively in ETFs and open-end mutual funds, there is little opportunity for a conflict of interest between personal trades by CFG associated persons and trades in client accounts, even when such accounts invest in the same securities. However, in the event of other identified potential trading conflicts of interest, CFG's goal is to place client interests first.

Consistent with the foregoing, CFG maintains policies regarding participation in initial public offerings ("IPOs") and private placements to comply with applicable laws and avoid conflicts with client transactions. If an CFG associated person wishes to participate in an IPO or invest in a private placement, he or she must submit a pre-clearance request and obtain the approval of the Chief Compliance Officer.

#### ***Item 12 - Brokerage Practices***

For CFG's investment management services, CFG recommends all clients establish brokerage accounts with TD Ameritrade, Member's FINRA/SIPC to execute securities transactions and to serve as the qualified custodian of clients' accounts. TD Ameritrade, Inc., member FINRA/SIPC, is a subsidiary of The Charles Schwab Corporation. CFG is independently owned and operated and not affiliated with TD Ameritrade. CFG does not allow clients to direct brokerage.

TD Ameritrade provides CFG access to their institutional trading and custody services, which are not typically available to TD Ameritrade retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them.

Some of the services provided by TD Ameritrade are beneficial to both the client and CFG in managing and administering a client's account. Examples of these services include:

- Trade executions;
- Trade confirmations and account statements;
- Research, pricing and other market data;
- Access to certain mutual funds and other investments normally only available to institutional investors; or
- Facilitation of the payment of CFG fees from a client's accounts.

TD Ameritrade generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction related fees for security trades that are executed through TD Ameritrade.

TD Ameritrade makes available to CFG other products and services intended to assist the firm in managing and developing its business enterprise. These products and services may not directly benefit any specific client accounts, but generally may be used to service all or a substantial number of client accounts, including accounts not maintained by TD Ameritrade. These services may include:

- Compliance, legal and business consulting;
- Publications and conferences on practice management and business succession; or
- Educational events.

In evaluating whether to recommend that a client custody their assets at TD Ameritrade, CFG may consider the availability of some previously listed products and services and other arrangements as a part of the total mix of factors considered. This could create a conflict of interest. CFG believes the receipt of additional services does not diminish its duty to act in the best interest of its clients, including seeking best execution of trades for client accounts.



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

Managed portfolios are reviewed at least annually, but may be reviewed more often if requested by the client, upon receipt of information material to the management of the portfolio, or at any time such review is deemed necessary or advisable by CFG. These factors may include but are not limited to, the following: change in general client circumstances (marriage, divorce, retirement); or economic, political or market conditions. Jeremy Ellisor, CFG's Managing Member, reviews accounts.

For those clients to whom CFG provides separate financial planning and/or consulting services, reviews are conducted on an as needed or agreed upon basis. Such reviews are conducted by one of CFG's investment adviser representatives or principals.

Account custodians are responsible for providing monthly or quarterly account statements which reflect the positions (and current pricing) in each account as well as transactions in each account, including fees paid from an account. Account custodians also provide prompt confirmation of all trading activity, and year-end tax statements, such as 1099 forms.

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

As noted above, CFG may receive an economic benefit from TD Ameritrade in the form of support products and services it makes available to CFG and other independent investment advisors that encourage their clients to maintain accounts at TD Ameritrade. These products and services, how they benefit our firm, and the related conflicts of interest are described in ***(Item 12 - Brokerage Practices)***. The availability of TD Ameritrade products and services to CFG is based solely on the firm's participation in the program, and not on the provision of any particular investment advice. TD Ameritrade nor any other party is paid to refer clients to CFG.

### ***Item 15 - Custody***

It is the custodian's responsibility to provide clients with confirmations of trading activity, tax forms and at least quarterly account statements. Clients are advised to review this information carefully, and to notify CFG of any questions or concerns. Clients are also asked to promptly notify CFG if the custodian fails to provide statements on each account held.

From time to time and in accordance with CFG's agreement with clients, CFG will provide additional reports. The account balances reflected on these reports should be compared to the balances shown on the brokerage statements to ensure accuracy. At times, there may be small differences due to the timing of dividend reporting, pending trades or other similar issues.

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

As described in ***Item 4 - Advisory Business***, CFG will accept clients on a discretionary basis. For *discretionary accounts*, a Limited Power of Attorney ("LPOA") is executed by the client, giving CFG the authority to carry out various activities in the account, generally including the following: trade execution and the withdrawal of advisory fees directly from the account. CFG then directs investment of the client's portfolio using its discretionary authority. The client may limit the terms of the LPOA to the extent consistent with the client's investment advisory agreement with CFG and the requirements of the client's custodian.

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

As a policy and in accordance with CFG's client agreement, CFG does not vote proxies related to securities held in client accounts. The custodian of the account will normally provide proxy materials directly to the client. Clients may contact CFG with questions relating to proxy procedures and proposals; however, CFG generally does not research particular proxy proposals.

***Item 18 - Financial Information***

CFG does not require nor solicit prepayment of more than \$500 in fees per client, six months or more in advance, and therefore has no disclosure required for this item.

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

As the principal executive officer and management persons of CFG, the background information for Jeremy Ellisor is provided elsewhere in this Form ADV. Other than this, no disclosure is required under this item.

# **Exhibit A**

**Brochure Supplement**

**Form ADV Part 2B**

**Item 1 - Cover Page**

**Jeremy A. Ellisor, Sr.**

**CRD# 5722917**

**of**

**Convergent Financial Group, LLC**

3850 Bessemer Road, Suite 210  
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29466

(843) 972-4402

March 3rd, 2023

This brochure supplement provides information about Jeremy Ellisor, and supplements the Convergent Financial Group, LLC (“CFG”) brochure. You should have received a copy of that brochure. Please contact us at (843) 972-4402 if you did not receive CFG’s brochure, or if you have any questions about the contents of this supplement.

Additional information about Jeremy is available on the SEC’s website at  
**[www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov)**.

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***Item 2 - Educational Background and Business Experience***

Jeremy A. Ellisor, Sr. (year of birth 1978) is the Founder and Lead Advisor of CFG and serves as the firm’s Chief Compliance Officer. Jeremy earned a Bachelor of Science in Civil Engineering from Clemson University in 2001, and subsequently built a career as an engineer and construction manager. Before forming Convergent Financial Group in 2017, he has worked with clients since 2009 as a Financial Advisor for Mass Mutual Financial Group (2009-2011) and Commonwealth Financial Group (2011-2014) and as a Co-Founder and lead Advisor of E&R Wealth Management (2014-2017).

Jeremy is a native of South Carolina, and is married to Kristy Ellisor. They live in Mount Pleasant, South Carolina with their son, Alexander, and daughter, Caroline. During his free time, Jeremy enjoys spending time with his family and his church, The Church at LifePark in Mount Pleasant, where he and his family are active members.

***Item 3 - Disciplinary Information***

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would-be material to your evaluation of an adviser; however, Jeremy has no such disciplinary information to report.

***Item 4 - Other Business Activities***

Advisers are required to disclose any material facts regarding other investment related business activities. Jeremy has no such activities to report.

***Item 5 - Additional Compensation***

Other than stated above, Jeremy has no other income or compensation to disclose.

***Item 6 - Supervision***

Jeremy Ellisor is the founder of Convergent Financial Group and serves as the firm's Chief Compliance Officer. He is the sole advisor and has no one supervising his work. He may be contacted at (843) 972-4402.

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

In addition to Item 3 above, state-registered advisers are required to disclose all material facts regarding any event in which a supervised person of the firm was found liable in certain legal proceedings, or was the subject of a bankruptcy petition. Jeremy has no event to disclose with respect to this item.