



Ethos Financial Group, LLC

ADV Part 2A

06/06/2024

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King of Prussia, PA 19406

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This brochure provides information about the qualifications and business practices of Ethos Financial Group, LLC. If you have any questions about the contents of this brochure, please contact Ethos's CCO at 410-294-2737. 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 Ethos Financial Group, LLC is also available on the SEC's website at www.advisorinfo.sec.gov. Registration as an investment adviser does not imply any certain level of skill or training.

Item 2 - Material Changes

This page will discuss the material changes made to the Ethos Financial Group, LLC Form ADV Part 2A (“Brochure”). The summary provided is for all material changes that have occurred since the last update of this Brochure filed with the SEC in March 2024:

- None

Ethos will ensure that clients receive a summary of any material changes to this and future brochures within 120 days of the close of our business' fiscal year at no charge.

Our Brochure may be requested at any time, without charge, by contacting us at 410-294-2737 or emailing us at info@ethosfg.com

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Item 4 - Advisory Business

GENERAL DESCRIPTION

Ethos Financial Group, LLC ("Ethos" or "Advisor") is a Delaware limited liability company formed on May 5th, 2022. James Judge is the principal owner of Ethos.

The Advisor's core business is to offer wealth management services to individual and institutional clients using model asset allocation portfolios. Each model portfolio is designed to meet a particular investment goal (the "Core Allocation"). Ethos offers its services through several independently owned offices located across the United States.

As discussed below, Ethos offers to its clients (individuals, high net worth individuals, state or municipal entities, trusts, estates, and charitable organizations, etc.) investment advisory services, and, to the extent specifically requested by a client, financial planning, and related consulting services. In addition, Ethos also provides services to other investment advisers in the form of sub-advisory and consulting.

Ethos manages advisory accounts on a discretionary or non-discretionary basis through relationships with Charles Schwab & Company, Inc. ("*Schwab*") and US Bancorp Wealth Management ("*US Bank*"). Some non-discretionary accounts are managed through a relationship with Citigroup, Inc. ("*Citigroup*"). Ethos's annual investment advisory fee may be either fixed or based upon a percentage (%) of the market value of the assets placed under Ethos's management.

Through personal discussions with the client in which the client's goals and objectives are established, Ethos Investment Adviser Representatives determine which model portfolio is best suited to the client's individual needs and objectives. The Advisor's Core Allocation starts by forming a fundamental understanding of the primary drivers of potential portfolio exposures and emphasizes the development of methods for combining these exposures (often index based) into a diversified risk conscious portfolio.

Once Ethos determines the suitability of the portfolio, the portfolio is managed based on the portfolio's intended objective. Clients are permitted to place reasonable restrictions on the types of investments to be held in their account if such restrictions do not materially interfere with Ethos's ability to effectively manage client assets. Clients retain individual ownership of all securities.

Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity needs and overall suitability.

To ensure that Ethos's initial determination of an appropriate portfolio remains suitable and that the account continues to be managed in a manner consistent with the client's financial circumstances, Ethos will:

1. At least annually, contact each participating client to determine whether there have been any changes in the client's financial situation or investment objectives, and whether the client wishes to impose investment restrictions or modify existing restrictions;
2. Be reasonably available to consult with the client; and
3. Maintain client suitability information in each client's file.

B. INVESTMENT MANAGEMENT SERVICES

Ethos may be engaged to provide discretionary or non-discretionary investment advisory services. Ethos's investment advisory fee is based upon a percentage (%) of the market value of the assets placed under Ethos's management and generally ranges from .25% to 2.0% annually.

Ethos's annual investment advisory fee shall include investment advisory services, and, to the extent specifically requested by the client, financial planning and consulting services.

Ethos supports its own investment management platform (the "Platform") that is available to the IARs of Ethos. Before engaging Ethos to provide investment advisory services, clients are required to enter into an Investment Management Agreement ("IMA") with Ethos setting forth the terms and conditions of the engagement (including termination, describing the scope of the services to be provided, and the fee that is due from the client).

To commence the investment advisory process, an IAR will first ascertain each client's investment objectives and then allocate and/or recommend that the client allocate investment assets consistent with their designated investment objectives. Once client assets are allocated, Ethos provides ongoing monitoring and review of account performance and asset allocation.

Ethos shall have discretionary authority to engage unaffiliated investment managers and serve as an overlay portfolio manager to construct, allocate and reallocate investment portfolios for clients of Ethos IARs. Ethos also provides the following services, either directly or through contractual relationships with third parties, with respect to the Platform:

- Investment model administration and Manager facilitation services
- Advisor as Portfolio Manager ("APM") functionality, account administration, billing and reconciliation, account aggregation, reconciliation and reporting, and client account reporting
- Business management reporting technology services

Investment Services

Ethos offers compliance, operational and back-office support to its IARs through third party service providers. These services are typically funded through the fees charged by the IAR to its clients. As part of these services to the investment advisor, Ethos provides the IARs with access to a range of discretionary investment advisory services for use by advisors with their clients, including Separately Managed Accounts ("SMA"), Mutual Funds and Exchange Traded Funds ("ETF") Asset Allocation Strategies and Unified Managed Accounts ("UMA") (each an "Investment Program" and collectively, the "Investment Programs"). The Investment Programs are generally made available by Ethos to their IARs, who may recommend one or more Investment Programs to their clients. A client's investment adviser determines which services and Investment Programs of Ethos to use with its clients and may use the services of other third-party service providers in conjunction with the Investment Programs.

The Investment Programs generally consist of model portfolios comprised of mutual funds, individual stocks/equities and/or exchange-traded funds ("ETFs") to represent different possible investment strategies for managing your account. Each of these investment strategies is intended to meet a specific goal. At all times we will continue to be your financial advisor, with the fiduciary responsibility to you. You will not have a direct contractual relationship or be in contact with the Investment Program, or any other Third-Party Service Provider – these are all service providers to us which we employ on your behalf.

Prior to investing in the Investment Program, you will execute a discretionary investment management agreement with us setting forth the terms and conditions of our management of your investments within the Investment Program. Depending on the management services you select, you will grant us discretionary authority to manage your account through selection of an overlay manager ("Overlay Manager") and, optionally, a third-party strategist ("Strategist") and/or third-party managers ("Managers"; collectively, "Third-Party Service Providers"). If utilized for your account(s), we will separately provide you with the firm brochure (Part 2 of Form ADV) for the applicable Third-Party

Service Provider(s) which includes information about their services, model portfolios, and investment strategies. It is our responsibility to monitor the performance of these Third-Party Service Providers. Ethos will maintain the authority to replace any Strategist and/or Manager associated with your account(s) when we deem doing so is in your best interest.

In addition, you will authorize the custodian to follow our instructions as well as instructions given by Overlay Manager to effect transactions, deliver securities, deduct fees, and take other actions with respect to your account(s).

The timing of trades in your account(s) will primarily depend upon the model portfolio or changes in the model portfolio and, generally, will not take into consideration how long you may have held the position indicated by the model portfolio – unless the optional tax overlay management services are elected. Tax Overlay Management is available only to U.S. account holders. By default, accounts are managed without Tax Overlay Management services unless specifically elected by you.



Overlay Management Services

Tax overlay management services are available as an option for accounts utilizing the Investment Program through the Overlay Manager. If you elect tax overlay management services, the portion of your fee paid as the management fee on your account will increase. The Overlay Manager will develop a tax strategy for your account based on the information and instructions provided by us on your behalf. Tax overlay management services in an investment account offer benefits and limitations, as described below. The tax strategy developed for you by the Overlay Manager is provided solely in connection with your account and the Overlay Manager does not provide general tax planning services. If you do elect the tax overlay management services option, please consider the following:

- The Overlay Manager will implement tax overlay management services based on the information and instructions provided by us for your account(s).
- The Overlay Manager does not provide general tax advice, tax return preparation or tax planning services.
- The Overlay Manager will seek to reduce the overall tax burden of the account while seeking to maintain the risk and return characteristics of the model portfolios received from Strategists and/or Managers.
- When providing tax overlay management services to the account, short-term gains are avoided where possible, but long-term gains are not limited unless you have requested a mandate to limit realized long-term gains.

The Overlay Manager will provide tax overlay management services with the assumption that the Overlay Manager will continue to provide services to the account for an entire tax year. The termination or removal of the tax overlay management services before the completion of an entire tax year may result in adverse tax consequences, including without limitation realization of short-term capital gains. Regardless of your account size or any other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)

Consulting Services

Ethos offers a range of consulting services including allocation research, risk analysis, benchmarking, and manager assessment. These services are provided pursuant to specialized engagements individually negotiated with Ethos's clients based upon their specific needs and objectives.

In performing its services, Ethos is not required to verify any information received from the client or from the client's other professionals (e.g., attorney, accountant, etc.) and is authorized to rely on such information. Ethos may recommend the services of itself, and/or other professionals to implement its recommendations. Clients are advised that a conflict of interest exists if Ethos recommends its own services or the services of any of its Advisory Affiliates (as set forth in Item 10). The client is under no obligation to act upon any of the recommendations made by Ethos under a consulting engagement or to engage the services of any such recommended professional, including Ethos itself. The client retains discretion over all such implementation decisions and is free to accept or reject any of Ethos's recommendations. Clients are advised that it remains their responsibility to promptly notify Ethos if

there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating, or revising Ethos's previous recommendations and/or services.

Financial Planning

To the extent specifically requested by a client, Ethos may provide financial planning and/or consulting services (including investment and non-investment related matters, including estate planning, insurance planning, etc.) on a stand-alone separate fee basis. Ethos's planning and consulting fees are charged either at an hourly rate or annual fee, subject to a minimum of \$1,000; however, discounted rates can and may be offered. The fees charged are dependent upon the level and scope of the service(s) required and the professional(s) rendering the service(s). Prior to engaging Ethos to provide planning or consulting services, clients are generally required to enter into a Financial Planning and Consulting Agreement with Ethos setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the portion of the fee that is due from the client prior to Ethos commencing services.

If requested by the client, Ethos will recommend the services of other professionals for implementation purposes, including Ethos's representatives in their individual capacities as registered representatives of a broker-dealer, or licensed insurance agents. (*See* disclosure at Item 10.C.). The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from Ethos. It remains the client's responsibility to promptly notify Ethos if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating, or revising Ethos's previous recommendations and/or services.

Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. Through the financial planning process, all questions, information, and analysis are considered as they impact, and are impacted by, the entire financial and life situation of the client. Clients purchasing this service either receive a written report or access to software which provides the client with a detailed financial plan designed to assist the client in achieving his or her financial goals and objectives. In general, the financial plan can address any or all the following areas:

- **PERSONAL:** Ethos reviews family records, budgeting, personal liability, estate information and financial goals.
- **TAX & CASH FLOW:** Ethos analyzes the client's income tax and spending and planning for past, current, and future years; then illustrates the impact of various investments on the client's current income tax and future tax liability.
- **INVESTMENTS:** Ethos analyzes investment alternatives and their effect on the client's portfolio.
- **INSURANCE:** Ethos reviews existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile.
- **RETIREMENT:** Ethos analyzes current strategies and investment plans to help the client achieve his or her retirement goals.
- **DEATH & DISABILITY:** Ethos reviews the client's cash needs at death, income needs of surviving dependents, estate planning and disability income.
- **ESTATE:** Ethos assists the client in assessing and developing long-term strategies, including as appropriate, living trusts, wills, review estate tax, powers of attorney, asset protection plans, nursing homes, Medicaid, and elder law. Ethos gathers required information through in-depth personal interviews. Information gathered includes the client's current financial status, tax status, future goals, returns objectives and attitudes towards risk. Ethos carefully reviews documents supplied by the client, including a questionnaire completed by the client, and prepares a written report. Should the client choose to implement the recommendations contained in the plan, Ethos suggests the client work closely with their attorney, accountant, insurance agent, and/or investment adviser. Implementation of financial plan recommendations is entirely at the client's discretion.

Ethos also provides general non-securities advice on topics that may include tax and budgetary planning, estate planning and business planning. Investment recommendations in financial plans may include any or all the following:

- Exchange-listed securities
- Securities traded over-the-counter
- Corporate debt securities (other than commercial paper)
- Commercial paper
- Certificates of deposit
- Municipal securities
- Variable life insurance
- Variable annuities
- Mutual fund share
- United States governmental securities
- Options contracts on securities
- Interests in partnerships investing in real estate
- Interests in partnerships investing in oil and gas interests
- Any investments held by the client at the inception of the advisory relationship

Typically, the financial plan is presented to the client within six months of the contract date, provided that all information needed to prepare the financial plan has been promptly provided. Financial Planning recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. All recommendations are of a generic nature and should be reviewed with your attorney, accountant or other professional as appropriate prior to implementation.

MISCELLANEOUS

Limitations of Financial Planning and Non-Investment Consulting/Implementation Services: As indicated above, to the extent requested by the client, Ethos may provide financial planning and related consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance, etc. Ethos is not a law firm or accounting firm, and no portion of its services should be construed as legal, tax or accounting advice. Accordingly, Ethos does not prepare estate planning documents or tax returns. To the extent requested by a client, Ethos may recommend the services of other professionals for certain non-investment implementation purposes (i.e., attorneys, accountants, insurance agents, etc.), including representatives of Ethos in their separate individual capacities as registered representatives of Innovation Partners, LLC (“Innovation Partners”) (individually and/or collectively, “Third Party BD”), each a FINRA member broker-dealer and/or as insurance agents. The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from Ethos and/or its representatives (See Item 10 below). The recommendation by Ethos’s representative that a client purchase a security or insurance commission product in his/her separate and individual capacity as a registered representative of a Third-Party broker dealer, and/or as an insurance agent, presents a conflict of interest, as the receipt of commissions provides an incentive to recommend investment or insurance products based on commissions to be received, rather than on a particular client’s need. No client is under any obligation to purchase any securities or insurance commission products through such a representative. Clients are reminded that they may purchase securities or insurance products recommended by Ethos through other, non-affiliated broker-dealers or insurance agencies.

Retirement Rollovers-Potential for Conflict of Interest: A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in one or a combination of these options): (i) leave the money in the former employer’s plan, if permitted, (ii) roll over the assets to the new employer’s plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account (“IRA”), or (iv) cash out the account value (which would, depending upon the client’s age, result in adverse tax consequences). If Ethos recommends that a client roll over their retirement plan assets into an account to be managed by Ethos, such a recommendation creates a conflict of interest as Ethos will earn new (or increase its current) compensation because of

the rollover. No client is under any obligation to roll over retirement plan assets to an account managed by Ethos.

When Ethos provides investment advice to you regarding your retirement plan account, individual retirement account, or other qualified asset under ERISA, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security 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 Ethos operates under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Clients can engage Ethos to provide either education or recommendations with respect to qualified ERISA assets including:

- ☐ from a qualified plan to an IRA;
- ☐ from an existing third-party IRA to an IRA;
- ☐ changing the account type of an existing IRA;
- ☐ from a qualified plan to another qualified plan; and
- ☐ from an IRA to qualified plan rollover.

Such provisions also extend to other qualified assets such as Education Savings Accounts and retirement annuities. Clients should fully understand all the conflicts, risks, costs & expenses, as well as potential benefits associated with moving qualified retirement assets. Clients are under no obligation to accept or follow Ethos's recommendations.

Unaffiliated Private Funds

Ethos may also provide investment advice regarding unaffiliated private investment funds. Ethos, on a non-discretionary basis, may recommend that certain qualified clients consider an investment in unaffiliated private investment funds. Ethos's role relative to the private investment funds shall be limited to its initial and ongoing due diligence and investment monitoring services. If a client determines to become a private fund investor, the amount of assets invested in the fund(s) shall be included as part of "assets under management" for purposes of Ethos calculating its investment advisory fee. Ethos's clients are under absolutely no obligation to consider or make an investment in a private investment fund(s).

Private investment funds generally involve various risk factors, including, but not limited to, potential for complete loss of principal, liquidity constraints and lack of transparency, a complete discussion of which is set forth in the Fund's offering documents, which will be provided to each client for review and consideration. Unlike other liquid investments that a client may maintain, private investment funds do not provide daily liquidity or pricing. Each prospective client that elects to invest in the Fund will be required to complete a Subscription Agreement, pursuant to which the client shall establish that the client is qualified to invest in the Fund and acknowledges and accepts the various risk factors that are associated with such an investment.

If Ethos references private investment funds owned by the client on any supplemental account reports prepared by Ethos, the value(s) for all private investment funds owned by the client shall reflect the most recent valuation provided by the fund sponsor. If the fund sponsor does not provide a post-purchase valuation, then the valuation shall reflect the initial purchase price (and/or a value as of a previous date) or the current value(s) (either the initial purchase price and/or the most recent valuation provided by the fund sponsor). If the valuation reflects the initial purchase price (and/or a value as of a previous date), then the current value(s) (to the extent ascertainable) could be significantly more or less than the original purchase price. The client's advisory fee shall be based upon such reflected fund value(s). Some private investment funds offered to clients on a non-discretionary basis are funds in which Ethos personnel are general partners. This creates a conflict of interest, as it is an incentive to recommend those funds to our clients. Clients are under no obligation to consider or make an investment in any private investment fund.

Use of Mutual and Exchange Traded Funds: Most mutual funds and exchange traded funds are available directly to the public. Thus, a prospective client may obtain many, if not all, of the funds(securities) utilized by Ethos in managing client assets independent of engaging Ethos as an investment advisor. However, if a prospective client determines to do so, he/she will not receive Ethos's initial and ongoing

investment advisory services. In addition to Ethos's investment advisory fee described below, and transaction and/or custodial fees discussed below, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g., management fees and other fund expenses).

Cash Positions: At any specific point in time, depending upon perceived or anticipated market conditions/events (there being no guarantee that such anticipated market conditions/events will occur), Ethos may increase or maintain higher cash positions. Absent a specific written agreement to the contrary, cash positions (i.e., cash, money markets, etc.) are generally included as part of assets under management for the purposes of calculating Ethos's advisory fee.

Portfolio Activity: Ethos has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, Ethos will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including, but not limited to, investment performance, fund manager tenure, style drift, account additions/withdrawals, and/or a change in the client's investment objective. Based upon these factors, there may be extended periods of time when Ethos determines that changes to a client's portfolio are neither necessary nor prudent. There can be no assurance that investment decisions made by Ethos will be profitable or result in any specific performance level(s). Clients pay Ethos advisory fees regardless of whether their account increases or decreases in value.

Fee Differentials: As discussed above and indicated below at Item 5, Ethos shall generally price our advisory services based upon various objective and subjective factors. As a result, our clients could pay diverse fees based upon the market value of their assets, the complexity of the engagement, and the level and scope of the overall investment advisory services to be rendered, and client negotiations. As a result of these factors, similarly situated clients could pay different fees, and the services provided by Ethos to any client could be available from other advisers at lower, or greater, cost. Before engaging Ethos to provide investment advisory services, clients are required to enter into a discretionary or non-discretionary IMA, setting forth the terms and conditions of the engagement (including termination), which includes the fees and services to be provided.

Non-Discretionary Accounts Service Limitations: Clients that engage Ethos on a non-discretionary basis acknowledge that Ethos cannot affect any account transactions without first obtaining consent to such transaction(s) from the client directly. In the event Ethos would like to make a transaction for a client's account (including in the event of an individual holding or general market correction), and the client is unavailable, Ethos would be unable to affect the account transaction(s) (as it would for its discretionary clients) without first obtaining the client's consent. As a result, recommended trades for non-discretionary accounts will be delayed and, in some cases, may not be executed at all.

Independent Managers: Ethos may allocate (and/or recommend that the client allocate) a portion of a client's investment assets among unaffiliated independent investment managers ("Independent Manager(s)") in accordance with the client's designated investment objective(s). In such situations, the Independent Manager(s) will have day-to-day responsibility for the active discretionary management of the allocated assets. Ethos will continue to render investment supervisory services to the client relative to the ongoing monitoring and review of account performance, asset allocation and client investment objectives. The factors Ethos considers in recommending Independent Manager(s) include the client's designated investment objective(s), management style, performance, reputation, financial strength, reporting, pricing, and research.

The investment management fee charged by the Independent Manager(s) is separate from, and in addition to, Ethos's advisory fee as set forth in the fee schedule at Item 5 below and which will be disclosed to the client before entering into the Independent Manager engagement and/or subject to the terms and conditions of a separate agreement between the client and the Independent Manager(s).

Sub-Advisory Engagements.

Ethos may also serve as a sub-adviser to unaffiliated registered investment advisers per the terms and conditions of a written Sub-Advisory Agreement. With respect to its sub-advisory services, the

unaffiliated investment advisers that engage Ethos's sub-advisory services maintain both the initial and ongoing day-to-day relationship with the underlying client, including initial and ongoing determination of client suitability for Ethos's designated investment strategies and or programs. If the custodian/broker-dealer is determined by the unaffiliated investment adviser, Ethos will be unable to negotiate commissions and/or transaction costs, and/or seek better execution. As a result, client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case through alternative clearing arrangements recommended by Ethos. Higher transaction costs adversely impact account performance.

Inverse/Enhanced Market Strategies: Ethos may utilize long and short mutual funds and/or exchange traded funds that are designed to perform in either an: (1) inverse relationship to certain market indices (at a rate of 1 or more times the inverse [opposite] result of the corresponding index) as an investment strategy and/or for the purpose of hedging against downside market risk; and (2) enhanced relationship to certain market indices (at a rate of 1 or more times the actual result of the corresponding index) as an investment strategy and/or for the purpose of increasing gains in an advancing market. There can be no assurance that any such strategy will prove profitable or successful. Furthermore, Ethos may hold these positions for longer than the one day that many fund prospectuses suggest, which may lead to additional risks. For periods longer than a single day, these funds will lose money when the level of the underlying indices are flat, and it is possible that the funds will lose money even if the level of the indices either increase or decrease (if inverse). Longer holding periods, higher index volatility, inverse exposure, and levered exposure each exacerbate the impact of compounding on an investor's returns. During periods of high index volatility, the volatility of the indices may affect the returns of the funds as much as, or more, than the return of the indices. In light of these enhanced risks/rewards, a client may direct Ethos, in writing, not to employ any or all such strategies for his/her/their/its accounts.

Client Obligations: In performing its services, Ethos shall not be required to verify any information received from the client or from the client's other professionals and is expressly authorized to rely thereon. Moreover, each client is advised that it remains their responsibility to promptly notify Ethos if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating, or revising Ethos's previous recommendations and/or services.

Disclosure Statement: A copy of Ethos's written disclosure statement as set forth on Part 2 of Form ADV and Form CRS shall be provided to each client prior to, or contemporaneously with, the execution of the *Investment Management Agreement and/or Financial Planning and Consulting Agreement*.

C. Ethos shall provide investment advisory services specific to the needs of each client. Prior to providing investment advisory services, an investment adviser representative will ascertain each client's investment objective(s). Thereafter, Ethos shall allocate and/or recommend that the client allocate investment assets consistent with the designated investment objective(s). The client may, at any time, impose reasonable restrictions, in writing, on Ethos's services.

D. Ethos does not participate in any wrap fee programs.

E. As of 12/31/2023, Ethos manages 2,481 discretionary accounts with regulatory assets under management of \$750,899,445. Ethos also manages 1 non-discretionary account with regulatory assets under management of \$163,035,360. This totals 2,482 accounts at \$913,934,805 regulatory assets under management.

Item 5 - Fees and Compensation

A. INVESTMENT ADVISORY SERVICES

Our annual fees for Investment Advisory Services are based upon a percentage of assets under management and generally range from 0.25% to 2.0%. Please see each individual advisor for their specific fee schedule.

A minimum of \$100,000 of assets under management is typically required for this service. Minimum account size may be waived by Ethos at its discretion. Ethos does not have a minimum asset management fee.

Fee Differentials/Conflict of Interest: Ethos shall receive an investment advisory fee based upon a percentage (%) of the market value of the assets placed under management (between 0.25% and 2.00%). Fees vary depending upon the complexity of the client relationship. Services provided by Ethos to any client may be available from other advisers at a lower fee. All clients and prospective clients should be guided accordingly. Since an Ethos investment adviser representative receives a portion of the advisory fee charged to the client, a material conflict of interest exists because an increase in the management fee paid by the client will result directly in increased compensation received by Ethos's representative.

Limited Negotiability of Advisory Fees: Although Ethos has established the fee ranges(s), Ethos retains the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs are considered in determining the appropriate fee schedule. Factors include the complexity of the client, volume, and type of assets to be placed under management, anticipated future additional assets; related accounts; portfolio style, account composition and reporting requirements, among other factors. Each client's specific annual fee schedule is outlined in the IMA between the adviser and the client.

CONSULTING

Ethos provides investment consulting services for a fixed fee. These fees are negotiable, but generally range from \$10,000 to \$250,000 and can be one time, quarterly or annually, depending on the level and scope of the services provided and the resources engaged. Fees vary based on the services provided and are outlined pursuant to a Consulting Agreement executed by the client.


FINANCIAL PLANNING

To the extent specifically requested by a client, Ethos may provide financial planning and/or consulting services (including investment and non-investment related matters, including estate planning, insurance planning, etc.) on a stand-alone separate fee basis. Ethos's planning and consulting fees are outlined in a separate financial planning agreement between the client and Ethos's advisors directly. Financial planning fees are separate from, and in addition to, any investment management fees charged by Ethos.

GENERAL

Mutual Fund and ETF Fees: All fees paid to Ethos for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the value of the advisory services being provided.

In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transactions for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

B. Clients generally elect to have Ethos's advisory fees deducted from their custodial account  directly. Both Ethos's IMA and the custodial/clearing agreement authorize the custodian to debit the account for Ethos's investment advisory fee and to directly remit that management fee to Ethos in compliance with regulatory procedures. In the limited event that Ethos bills the client directly, payment is due promptly upon receipt of Ethos's invoice.

C. As discussed below, unless the client directs otherwise or an individual client's circumstances require, Ethos shall generally recommend that *Schwab* or *US Bank* serve as the broker-dealer/custodian for client investment management assets. Broker-dealers such as *Schwab* or *US Bank* charge transaction fees for effecting certain securities transactions).

In addition to Ethos's investment management fee and transaction fees, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g., management fees and other fund expenses).

Tradeaway/Prime Broker Fees. Relative to its discretionary investment management services, when beneficial to the client, individual equity and/or fixed income transactions may be effected through broker-dealers other than the account custodian, in which event, the client generally will incur either or both of two possible charges; (1) the fee (commission, mark-up/mark-down) charged by the executing broker-dealer, and (2) a separate trade-away and/or prime broker fee charged by the account custodian

Margin Accounts: Ethos may trade client accounts on margin if granted authorization. A margin account may incur margin interest which will be charged in addition to Ethos's advisory fee. Ethos's advisory fee will be based on total assets under management, inclusive of any margin balance held in a client's account. This creates a potential conflict of interest because the use of margin generally increases the total assets under management. Clients are under no obligation to authorize Ethos's use of margin.

D. Ethos's annual investment advisory fee is generally billed monthly in arrears based on the daily weighted average balance of the assets under management during the previous month. The billing method is specifically indicated in the client's IMA.

The IMA between Ethos and the client will continue in effect until terminated by either party by written notice in accordance with the terms of the IMA.

Brokerage Practices

Securities Commission Transactions. If the client desires, the client can engage certain of Ethos's representatives, in their individual capacities, as registered representatives of Third-Party FINRA member broker-dealers ("Third-Party BD"), to implement investment recommendations on a commission basis. In the event the client chooses to purchase investment products through a Third-Party BD, the Third-Party BD will charge brokerage commissions to effect securities transactions, a portion of which commissions these firms shall pay to Ethos's representatives, as applicable. The brokerage commissions charged by the Third-Party BD may be higher or lower than those charged by other broker-dealers. In addition, representatives of a Third-Party BD, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment.

1. **Conflict of Interest:** The recommendation that a client purchase a commission product from through a Third-Party BD presents a conflict of interest, as the receipt of commissions may provide an incentive for dually registered employees to recommend investment products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from Ethos's representatives through a Third-Party BD.
2. Clients may purchase investment products recommended by Ethos through other, non-affiliated broker dealers or agents.
3. When Ethos's representatives sell an investment product on a commission basis, Ethos does not charge an advisory fee in addition to the commissions paid by the client for such product. When providing services on an advisory fee basis, Ethos's representatives do not also receive commission compensation for such advisory services. However, a client may engage Ethos to provide investment management services on an advisory fee basis and separate from

such advisory services purchase an investment product from Ethos's representatives on a separate commission basis.

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

Under certain circumstances, Ethos may enter performance-based fee arrangements in accordance with Rule 205-3 of the Investment Advisers Act of 1940. The management of accounts with different advisory fee rates and/or fee structures, including accounts that pay advisory fees based on account performance, may raise potential conflicts of interest by creating an incentive to favor higher-fee accounts. These potential conflicts include, among others:

- The most attractive investments could be allocated to higher-fee accounts or performance fee accounts.
- The trading of higher-fee accounts or performance fee accounts could be favored as to timing and/or execution price. For example, higher-fee accounts or performance fee accounts could be permitted to sell securities earlier than other accounts when a prompt sale is desirable or to buy securities at an earlier and more opportune time.
- The trading of other accounts could be used to benefit higher-fee accounts ("front-running").
- The investment management team could focus their time and efforts primarily on higher-fee accounts or performance fee accounts due to a personal stake in compensation.

Ethos attempts to address these potential conflicts of interest relating to higher-fee accounts or performance fee accounts through various compliance policies that are generally intended to place all accounts, regardless of fee structure, on the same footing for investment management purposes. For example, under Ethos' policies:

- Performance fee accounts are included in all standard trading and allocation procedures with all other accounts.
- All accounts managed in the same style trade in parallel with allocations of similar accounts based on the procedures generally applicable to those accounts.
- All trading by an adviser who has clients with performance-based fees must be affected through the same trading desks and normal queues and procedures must be followed (i.e., no special treatment is permitted for performance fee accounts or higher-fee accounts based on account fee structure).

Ethos seeks to ensure that all clients are treated fairly and equitably over time regardless of the type of client, level of services provided, or the nature of its fee compensation.

Item 7 - Types of Clients

Clients shall generally include individuals, trusts, family offices, and business entities related to those clients. Ethos generally requires a minimum investment asset level of \$100,000 for investment advisory services. Ethos, in its sole discretion, may reduce or waive its minimum asset requirement based upon certain criteria (i.e., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.).

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

A. The Advisor employs a combination of methods to analyze potential investments strategies and risk of loss. These include both quantitative and qualitative research techniques. Examples of quantitative techniques include, but are not limited to, risk factor analysis, historical simulation, and risk contribution analysis. The Advisor also employs fundamental analysis techniques based on primary, academic and third-party research spanning global macroeconomic and security specific analysis.

Investment Risk. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by Ethos) will be profitable or equal any specific performance level(s). Investing in securities involves risk of loss that clients should be prepared to bear.

B. Ethos's method of analysis does not present any significant or unusual risks.

However, every method of analysis has its own inherent risks. To perform an accurate market analysis Ethos must have access to current/new market information. Ethos has no control over the dissemination rate of market information; therefore, unbeknownst to Ethos, certain analyses may be compiled with outdated market information, severely limiting the value of its analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

Ethos's primary investment strategies – Long-

Term Purchases and Short-Term Purchases - are fundamental investment strategies. However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment period to allow for the strategy to potentially develop. Shorter term investment strategies require a shorter investment period to potentially develop but, because of more frequent trading, may incur higher transactional costs when compared to a longer-term investment strategy.

POTENTIAL RISKS OF INVESTING WITH FUNDS, EQUITIES, BONDS, AND OPTIONS

Leveraged ETFs Risk

An investment in Leveraged ETFs involves significant risk. Leveraged ETFs attempt to deliver a multiple on their stated index. This is typically done using strategies employing swap agreements and futures contract by the ETF. These ETFs can have multiples up to 3x which means they are attempting to increase return by three times. It also means that, should the value of the portfolio decrease, the Leveraged ETF will have a more significant loss than had it not been leveraged. If held for more than a single day, these ETFs have greater risks than the use of leverage in investing, due to the compounding of daily leveraged returns for each trading day during the relevant trading period. Furthermore, Ethos may hold these ETFs for longer than the one day that many fund prospectuses suggest, leading to additional risks. Consequently, especially in periods of market volatility, the volatility of the underlying index may affect an ETF's return as much as, or more than, the return of the underlying index. During periods of high volatility, these ETFs may not perform as expected and the ETFs may have losses when an investor may have expected gains if the ETFs are held for a period that is different than one trading day. In addition, the Advisor may invest in Inverse Leveraged ETFs, which combine the risks mentioned with both the Inverse ETFs and Leveraged ETFs. Therefore, while there can be a benefit in using Leveraged ETFs, these products present additional risk versus non-leveraged ETFs and will exacerbate any investment losses.

Redemption Fee Risk

A mutual fund redemption fee, also referred to as a "redemption fee," "market timing fee," or "short-term trading fee," is a charge by a mutual fund company to discourage investors from making a short-

term purchases and sales of mutual fund shares. Clients may incur redemption fees if a model update is implemented, as Ethos and the Overlay Manager generally would not consider individual Client holding periods for existing Client portfolios. Redemption fees vary by mutual fund and are described in each mutual fund's prospectus. Imposition of redemption fees can have a material impact on the performance of Program accounts.

Stock Market Risk

Mutual funds that invest in equity securities are subject to stock market risk. Stock market risk is the possibility that stock prices overall will decline over short or extended periods. Markets tend to move in cycles, with periods of rising prices and periods of falling prices. Investing in small or medium-sized companies involves greater risk than is customarily associated with more established companies. Stocks of such companies may be subject to more volatility in price than larger company securities.

Foreign Securities Risk

Foreign securities are subject to the same market risks as U.S. securities, such as general economic conditions and company and industry prospects. However, foreign securities involve the additional risk of loss due to political, economic, legal, regulatory, and operational uncertainties; differing accounting and financial reporting standards; limited availability of information; currency conversion; and pricing factors affecting investment in the securities of foreign businesses or governments.

Interest Rate Risk

Bonds also experience market risk because of changes in interest rates. The general rule is that if interest rates rise, bond prices will fall and so will the mutual fund's share price. The reverse is also true: if interest rates fall, bond prices will generally rise.

A bond with a longer maturity (or a bond fund with a longer average maturity) will typically fluctuate more in price than a shorter-term bond. Because of their very short-term nature, money market instruments carry less interest rate risk.

Credit Risk

Bonds and bond mutual funds are also exposed to credit risk, which is the possibility that the issuer of a bond will default on its obligation to pay interest and/or principal. U.S. Treasury securities, which are backed by the full faith and credit of the U.S. Government, have limited credit risk, while securities issued or guaranteed by U.S. Government agencies or government-sponsored enterprises that are not backed by the full faith and credit of the U.S. Government may be subject to varying degrees of credit risk. Corporate bonds rated BBB or above by Standard & Poor's are generally considered to carry moderate credit risk. Corporate bonds rated lower than BBB are considered to have significant credit risk. Of course, bonds with lower credit ratings generally pay a higher level of income to investors.

Liquidity Risk

Liquidity risk exists when a particular security is difficult to trade. A mutual fund's investment in illiquid securities may reduce the returns of the mutual fund because the mutual fund may not be able to sell the assets at the time desired for an acceptable price or might not be able to sell the assets at all.

Call Risk

Many fixed income securities have a provision allowing the issuer to repay the debt early, otherwise known as a "call feature." Issuers often exercise this right when interest rates are low. Accordingly, holders of such callable securities may not benefit fully from the increase in value that other fixed income securities experience when rates decline. Furthermore, after a callable security is repaid early, a mutual fund would reinvest the proceeds of the payoff at current interest rates, which would likely be lower than those paid on the security that was called.

Objective/Style Risk

All mutual funds are subject, in varying degrees, to objective/style risk, which is the possibility that returns from a specific type of security in which a mutual fund invests will trail the returns of the overall market.

U.S. Government Agency Securities Risk

Securities issued by U.S. Government agencies or government-sponsored entities may not be guaranteed by the U.S. Treasury. If a government sponsored entity is unable to meet its obligations, the securities of the entity will be adversely impacted.

Options Strategies

The use of options transactions as an investment strategy involves a high level of inherent risk. Option transactions establish a contract between two parties concerning the buying or selling of an asset at a predetermined price during a specific period. During the term of the option contract, the buyer of the option gains the right to demand fulfillment by the seller. Fulfillment may take the form of either selling or purchasing a security depending upon the nature of the option contract. Generally, the purchase or the recommendation to purchase an option contract by Ethos shall be with the intent of offsetting/"hedging" a potential market risk in a client's portfolio. Although the intent of the options-related transactions that may be implemented by Ethos is to hedge against principal risk, certain of the options-related strategies (i.e. straddles, short positions, etc.), may, in and of themselves, produce principal volatility and/or risk. Thus, a client must be willing to accept these enhanced volatility and principal risks associated with such strategies. Considering these enhanced risks, client may direct Ethos, in writing, not to employ any or all such strategies for his/her/their/its accounts. Ethos performs the same quantitative and qualitative methods of analysis listed previously when determining if affiliated funds should be included within a respective Ethos investment model. Affiliated funds are generally included within certain models because they provide the advisor with access to a larger investment universe, the ability to adjust internal model risk quickly and efficiently, reduce overall underlying model expenses by reducing layers of fund fees improving tax efficiency because of the tax advantages associated with ETFs in general.

C. Currently, Ethos primarily allocates client investment assets among various mutual funds (including closed end funds) and exchange traded funds ("ETFs") (including inverse ETFs and/or mutual funds that are designed to perform in an inverse relationship to certain market indices), individual equities (stocks), and debt instruments (bonds) on a discretionary or non-discretionary basis in accordance with the client's designated investment objective(s). The Advisor allocates investment management assets of its client accounts on a discretionary and non-discretionary basis, using its proprietary asset allocation program. Advisor's asset allocation strategy has been designed to comply with the requirements of Rule 3a-4 of the Investment Company Act of 1940. Rule 3a-4 provides similarly managed investment programs, such as Advisor's asset allocation program, with a non-exclusive safe harbor from the definition of an investment company.

In accordance with Rule 3a-4, the following disclosure is applicable to Ethos's management of client assets:

1. Initial Interview – at the opening of the account, Ethos through its designated representatives, shall obtain from the client information sufficient to determine the client's financial situation and investment objectives;
2. Individual Treatment - the account is managed based on the client's financial situation and investment objectives;
3. Quarterly Notice – at least quarterly Ethos shall notify the client to advise Ethos whether the client's financial situation or investment objectives have changed, or if the client wants to impose and/or modify any reasonable restrictions on the management of the account;
4. Annual Contact – at least annually, Ethos shall contact the client to determine whether the client's financial situation or investment objectives have changed, or if the client wants to impose and/or modify any reasonable restrictions on the management of the account;
5. Consultation Available – Ethos shall be reasonably available to consult with the client relative to the status of the account;

6. Quarterly Report – the client shall be provided with a quarterly report for the account for the preceding period;
7. Ability to Impose Restrictions – the client shall have the ability to impose reasonable restrictions on the management of the account, including the ability to instruct Ethos not to purchase certain securities;
8. No Pooling – the client’s beneficial interest in a security does not represent an undivided interest in all the securities held by the custodian, but rather represents a direct and beneficial interest in the securities which comprise the account;
9. Separate Account - a separate account is maintained for the client with the Custodian;
10. Ownership – each client retains indicia of ownership of the account (e.g., right to withdraw securities or cash, exercise, or delegate proxy voting, and receive transaction confirmations).

Ethos believes that its investment management fee is reasonable in relation to: (1) the advisory services provided under its client agreement; and (2) the fees charged by other investment advisers offering similar services/programs. However, Ethos's annual investment management fee may be higher than that charged by other investment advisers offering similar services/programs. In addition to Ethos's annual investment management fee, the client will also incur charges imposed directly at the mutual and exchange traded fund level, if applicable (e.g., management fees and other fund expenses).

Please Note: Ethos’s investment program may involve above- average portfolio turnover which could negatively impact upon the net after-tax gain experienced by an individual client in a taxable account.

Item 9 - Disciplinary Information

The Advisor and its Principals have not been involved in disciplinary events related to past or present investment clients. Ethos has no other information responsive to this section.

Item 10 - Other Financial Industry Activities and Affiliations

A. REGISTERED REPRESENTATIVES OF A BROKER DEALER

B. In order for Ethos to provide asset management services, we request you utilize the brokerage and custodial services of Charles Schwab & Co., Inc. (“Schwab”), for which we have an existing relationship. Ethos and Schwab are not affiliated companies. In considering which independent qualified custodian will be the best fit for Ethos’s business model, we are evaluating the following factors, which is not an all-inclusive list:

- Financial strength
- Reputation
- Reporting capabilities
- Execution capabilities
- Pricing, and
- Types and quality of research

A detailed description, list of services, and additional disclosures will be made during the revision of this brochure once an arrangement is finalized.

While you are free to choose any broker-dealer or other service provider, we recommend that you establish an account with a brokerage firm with which we have an existing relationship. Such relationships may include benefits provided to our firm, including, but not limited to research, market

information, and administrative services that help our firm manage your account(s). We believe that recommended broker-dealers provide quality execution services for our clients at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by the recommended broker-dealers, including the value of research provided, the firm's reputation, execution capabilities, commission rates, and responsiveness to our clients and our firm.

You may direct us in writing to use a particular broker-dealer to execute some or all of the transactions for your account. If you do so, you are responsible for negotiating the terms and arrangements for the account with that broker-dealer. We may not be able to negotiate commissions, obtain volume discounts, or best execution. In addition, under these circumstances a difference in commission charges may exist between the commissions charged to clients who direct us to use a particular broker or dealer and other clients who do not direct us to use a particular broker or dealer.

Ethos does not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

Ethos does not have any formal soft dollar arrangements.

When Ethos buys or sells the same security for two or more clients (including our personal accounts), we may place concurrent orders to be executed together as a single "block" in order to facilitate orderly and efficient execution. Each client account will be charged or credited with the average price per unit. We receive no additional compensation or remuneration of any kind because we aggregate client transactions. No client is favored over any other client. If an order is not completely filled, it is allocated pro-rata based on an allocation statement prepared by Ethos prior to placing the order. Because of an order's aggregation, some clients may pay higher transaction costs, or greater spreads, or receive less favorable net prices on transactions than would otherwise be the case if the order had not been aggregated.

C. Neither Ethos, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.

D. Broker Dealer. As disclosed above in Item 5.E, certain of Ethos's representatives are registered representatives of FINRA member broker-dealers. Clients can choose to engage Ethos's representatives, in their individual capacities, to affect securities brokerage transactions on a commission basis.

LICENSED INSURANCE AGENTS

Certain Associated Persons of Ethos, in their individual capacities, are licensed insurance agents, and may recommend the purchase of certain insurance-related products on a commission basis. As referenced in Item 4 B above, clients can engage certain of Ethos's representatives to effect insurance transactions on a commission basis.

Conflict of Interest: The recommendation by certain representatives of Ethos, that a client purchase a securities or insurance commission product presents a material conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from any representatives of Ethos. Clients are reminded that they may purchase securities and insurance products recommended by Ethos through other, non-affiliated licensed insurance agents or registered representatives.

OTHER PRIVATE FUND

Certain employees of the Adviser may sponsor or otherwise receive financial benefits from unaffiliated private fund(s) in which the Adviser's clients can invest. This presents a conflict of interest in that a financial advisor of the Adviser may receive compensation beyond the Adviser's customary management fee. Such investments are limited to Qualified Investors and Clients are advised of this potential conflict prior to investing and Clients are under no obligation to follow any particular investment recommendation.

Certain employees of Ethos may be affiliated with other investment advisers and/or other private funds.

BRANCH OFFICES

Our firm offers services through our network of investment advisor representatives ("Advisor Representatives" or "IARs"). IARs may have their own legal business entities whose trade names and logos are used for marketing purposes and may appear on marketing materials or client statements. The Client should understand that the businesses are legal entities of the IAR and not of Ethos. The IARs are under the supervision of Ethos, and the advisory services of the IARs are provided through Ethos.

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

A. Ethos maintains an investment policy relative to personal securities transactions. This investment policy is part of Ethos's overall Code of Ethics, which serves to establish a standard of business conduct for all of Ethos's Representatives that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

In accordance with Section 204A of the Investment Advisers Act of 1940, Ethos also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by Ethos or any person associated with Ethos.

B. Neither Ethos nor any related person of Ethos recommends, buys, or sells for client accounts, securities in which Ethos or any related person of Ethos has a material financial interest other than those disclosed herein.

C. Ethos and/or representatives of Ethos may buy or sell securities that are also recommended to clients. This practice may create a situation where Ethos and/or representatives of Ethos are able to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a conflict of interest. Practices such as "scalping" (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if Ethos did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, "front-running" (i.e., personal trades executed prior to those of Ethos's clients) and other potentially abusive practices.

Ethos has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of Ethos's "Access Persons." Ethos's securities transaction policy requires that Access Person of Ethos must report through the automated compliance system their current securities holdings within ten (10) days after becoming an Access Person. Thereafter, the Access Person shall report through the automated compliance system each quarter detailing the Access Person's personal account transactions. Each Access Person must attest to their current securities holdings at least once each twelve (12) month period.

D. Ethos and/or representatives of Ethos may buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where Ethos and/or representatives of Ethos are able to materially benefit from the sale or purchase of those securities.

Therefore, this situation creates a conflict of interest. As indicated above in Item 11C, Ethos has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of Ethos's Access Persons.

Item 12 - Brokerage Practices

Ethos operates its business through multiple custodians across a series of branch offices, and a network of individual advisers. Advisers within the various offices manage client assets independently to the best interest of each individual client or household. As a result, advisers may routinely take similar or contrary positions to other Ethos Advisers. While Ethos attempts to efficiently manage trading across the firm, its decentralized structure and client centric approach to trading may limit its ability to do so.

The Advisor does not select brokers based upon whether Ethos will receive client referrals from a broker dealer or third party. Ethos may recommend a broker to its clients, but the ultimate selection of any broker remains with the client. When recommending a broker Ethos considers several factors including cost, execution capabilities, price, reputation, access to various markets, reporting, and security of client funds.

If the client requests that Ethos recommend a broker-dealer/custodian for execution and/or custodial services, Ethos generally recommends that investment management accounts be maintained at *Schwab and/or US Bank*. Prior to engaging Ethos to provide investment management services, the client will be required to enter into a formal *Investment Management Agreement* with Ethos setting forth the terms and conditions under which Ethos shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker dealer/custodian.

Factors that Ethos considers in recommending *Schwab, US Bank, or Citigroup* (or any other broker-dealer/custodian to clients) include historical relationship with Ethos, financial strength, reputation, execution capabilities, pricing, research, and service. Although the transaction fees paid by Ethos's clients shall comply with Ethos's duty to obtain best execution, a client may pay a transaction fee that is higher than another qualified broker-dealer might charge to affect the same transaction where Ethos determines, in good faith, that the transaction fee is reasonable. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best overall execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, transaction rates, and responsiveness. Accordingly, although Ethos will seek competitive rates, it may not necessarily obtain the lowest possible rates for client account transactions. Unless services are provided in conjunction with a wrap program, transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, Ethos's investment advisory fee. Ethos's best execution responsibility is qualified if securities that it purchases for client accounts are mutual funds that trade at net asset value as determined at the daily market close.

1. Other Economic Benefits

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, Ethos receives from *Schwab, US Bank, and Citigroup* support services and/or products, which assist Ethos to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by Ethos may be investment-related research, pricing information and market data, software and other technology that simplify 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 Ethos in furtherance of its investment advisory business operations.

As indicated above, certain of the support services and/or products that *can* be received may assist Ethos in managing and administering client accounts. Others do not directly provide such assistance, but rather assist Ethos to manage and further develop its business enterprise.

Ethos's clients do not pay more for investment transactions effected and/or assets maintained at *Schwab, US Bank, or Citigroup* because of this arrangement. There is no corresponding commitment made by Ethos to *Schwab, US Bank, or Citigroup* or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities, or other investment products because of the above arrangement.

Schwab's services described in this paragraph generally benefit the client and the client's account but may extend beyond a specific client to other client accounts as well.

Schwab Custodial Program

Schwab also makes available to us other products and services that benefit us but may not directly benefit the client or their account. These products and services assist us in managing and administering all our clients' accounts. They include investment research, both *Schwab's* own and that of third parties. We may use this research to service all or some subset of our clients' accounts, including accounts not maintained at *Schwab*. In addition to investment research, *Schwab* also makes available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide pricing and other market data;
- facilitate payment of our fees from our clients' accounts; and
- assist with back-office functions, recordkeeping, and client reporting.

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- educational conferences and events;
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants, and insurance providers.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. *Schwab* may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. *Schwab* may also provide us with other benefits such as occasional business entertainment of our personnel.

Considering our arrangements with *Schwab*, Ethos has an incentive to recommend that clients maintain their accounts with *Schwab*, based on its interest in receiving *Schwab's* services that benefit its business rather than based on the client's interest in receiving the best value in custody services and the most favorable execution of transactions. This is a conflict of interest. Ethos believes, however, that its selection of *Schwab* as custodian and broker is in the best interests of its clients. This belief is primarily supported by the scope, quality, and price of *Schwab's* services and not *Schwab's* services that benefit only Ethos.

2. Ethos does not receive referrals from broker-dealers.

3. Ethos recommends that its clients utilize the brokerage and custodial services provided by *Schwab* and *US Bank*. Ethos does not generally accept directed brokerage arrangements (when a client requires that account transactions be affected through a specific broker-dealer). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and Ethos will not seek better execution services or prices from other broker-dealers or be able to “batch” the client’s transactions for execution through other broker-dealers with orders for other accounts managed by Ethos. As a result, a client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

If the client directs Ethos to effect securities transactions for the client’s accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through Ethos. Higher transaction costs adversely impact account performance. In addition, transactions for directed accounts will generally be executed following the execution of portfolio transactions for non- directed accounts.

To the extent that Ethos provides investment management services to its clients, the transactions for each client account generally will be affected independently, unless Ethos decides to purchase or sell the same securities for several clients at approximately the same time. Ethos may (but is not obligated to) combine or “aggregate” such orders to obtain best execution, to negotiate more favorable commission rates, or to allocate equitably among Ethos’ clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. Ethos shall not receive any additional compensation or remuneration because of such aggregation.

Item 13 - Review of Accounts

A. For those clients to whom Ethos provides investment supervisory services, account reviews are conducted on at least an annual basis by Ethos's Principals. All investment advisory clients should be aware that it remains their responsibility to advise Ethos of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with Ethos on at least an annual basis.

B. Account performance is reviewed periodically by Ethos. Ethos may conduct account reviews on an other-than-periodic basis upon the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and client request.

C. Clients are provided trade confirmation notices and, no less than quarterly, summary account statements, directly from the broker-dealer/custodian and/or program sponsor for the client accounts. Ethos may also provide a written periodic report summarizing account activity and performance.

Item 14 - Client Referrals and Other Compensation

As referenced above at Item 12, Ethos receives economic benefits from *Schwab, US Bank, and/or Citigroup*. Ethos, without cost (and/or at a discount), may receive support services and/or products from these custodians.

A. Ethos's clients do not pay more for investment transactions effected and/or assets maintained at Schwab, US Bank, or Citigroup because of this arrangement. There is no corresponding commitment made by Ethos to Schwab, US Bank, or Citigroup or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities, or other investment products as a result of the above arrangement.

B. If a client is introduced to Ethos by either an unaffiliated or an affiliated promoter, Ethos may pay that promoter a referral fee in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, and any corresponding state securities law requirements. Any such referral fee shall be paid solely from Ethos's investment management fee and shall not result in any additional charge to the client. If the client is introduced to Ethos by an unaffiliated promoter, the promoter, at the time of the referral, shall disclose the nature of his/her/its solicitor relationship.

Item 15 - Custody

Ethos clients' assets are held in custody by unaffiliated broker/dealers or custodians and Ethos can have its advisory fee for each client debited by the custodian monthly. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker dealer/custodian and/or program sponsor for the client accounts. Ethos may also provide a written periodic report summarizing account activity and performance.

To the extent that Ethos provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by Ethos with the account statements received from the account custodian. The account custodian does not verify the accuracy of Ethos's advisory fee calculation.

Ethos urges you to carefully review such statements and compare the official custodial records to the account statements provided to you by your financial intermediary. The financial intermediary performance reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Some clients may execute limited powers of attorney or other standing letters of authorization that permit the firm to transfer money from their account with the client's independent qualified Custodian to third-parties. This authorization to direct the Custodian may be deemed to cause our firm to exercise custody over your funds or securities and for regulatory reporting purposes, we are required to keep track of the number of clients and accounts for which we may have this ability. With respect to matters involving standing letters of authorization we are committed to following the guidance from the SEC No-Action Letter dated February 21, 2017. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian. The account statements from your custodian(s) will indicate any transfers that may have taken place within your account(s) each billing period. You should carefully review account statements for accuracy.

While we do not physically possess client funds or securities, certain representatives of our firm act as general partners in limited partnerships (“funds”). As such, custody is imputed to Ethos Financial Group, LLC. In accordance with the SEC Custody Rule, audited financials of these funds from an independent accountant will be produced until such time as the Ethos representatives no longer serve in that capacity.

Item 16- Investment Discretion

The client can determine to engage Ethos to provide investment advisory services on a discretionary basis. Prior to the Advisor assuming discretionary authority over a client's account, the client shall be required to execute an *Investment Management Agreement*, naming the Advisor as the client's attorney and agent in fact, granting the Advisor full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

Clients who engage Ethos on a discretionary basis may, at any time, impose restrictions, **in writing**, on the Advisor's discretionary authority (i.e., limit the types/amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe the Advisor's use of margin, etc.).

Item 17 - Voting Client Securities

A. Ethos does not vote client proxies. Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client’s investment assets.

B. Clients will receive their proxies or other solicitations directly from the custodian. Clients may contact Ethos to discuss any questions they may have with a particular solicitation.

Item 18 - Financial Information

The Advisor is not required to include a balance sheet for our most recent fiscal year end because Ethos does not require or solicit more than \$1,200 in fees per client, six months or more in advance. Ethos has not been the subject of a bankruptcy petition during the past ten years and is not aware of any financial commitment that might impair its ability to meet contractual and fiduciary obligations to clients.

Item 1 Cover Page

A.

Alan G Baca

Ethos Financial Group, LLC

ADV Part 2B, Brochure Supplement Dated: November 6, 2023

Contact: Dan Guy, Chief Compliance Officer (410-294-2737)

B.

This Brochure Supplement provides information about Alan G Baca that supplements the Ethos Financial Group, LLC Brochure; you should have received a copy of that Brochure. Please contact Dan Guy, Chief Compliance Officer, if you did not receive Ethos Financial Group, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Alan G. Baca, III is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Alan G. Baca was born in 1977. Mr. Baca graduated from the US Naval Academy in 1999, with a Bachelor of Science degree in Economics. He also graduated from University of California, Los Angeles with an MBA with a specialization in Entrepreneurship and Finance. Mr. Baca has been an investment adviser representative of Ethos Financial Group since September 2023. Previously, Mr. Baca has been a Managing Director, Principal and investment adviser representative of Alliance Bernstein (2012 - 2023) a Vice President and licensed real estate broker at Jones Lang LaSalle and The Staubach Company (2007-2012) and an officer in the US Navy in both Active and Reserve components (1999-Present) and is currently serving at the rank of Captain.

Item 3 Disciplinary Information

None

Item 4 Other Business Activities

Private Equity Partner: Mr. Baca, in his individual capacity, is a Managing Partner and/or General Partner of certain Private Equity investment partnerships (the “Partnership”). **Conflict of Interest:** Mr. Baca, in his individual capacity, may recommend these Partnership interests to clients of Ethos. This creates a conflict of interest, as Mr. Baca is incentivized by his compensation as Managing/General Partner of the Fund to recommend this fund. Clients are under no obligation to consider or to make an investment in this Fund. Mr. Baca spends less than 20% of working hours in this capacity. This conflict of interest is mitigated by the fact that Mr. Baca operates under the fiduciary standard of care and as such places the interests of advisory clients first.

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant’s policies and procedures manual. The primary purpose of the Registrant’s Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act (“*Act*”). The Registrant’s Chief Compliance Officer, Dan Guy, is primarily responsible for the implementation of the Registrant’s policies and procedures and overseeing the activities of the Registrant’s supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant’s supervision or compliance practices, please contact Mr. Guy at 410-294-2737.

Item 1 Cover Page

A.

Robert J. Bagonis Jr.

Ethos Financial Group, LLC

ADV Part 2B, Brochure Supplement

Dated: April 18, 2024

Contact: Dan Guy, Chief Compliance Officer (410-294-2737)

B.

This Brochure Supplement provides information about Robert J. Bagonis Jr. that supplements the Ethos Financial Group, LLC Brochure; you should have received a copy of that Brochure. Please contact Dan Guy, Chief Compliance Officer, if you did not receive Ethos Financial Group, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Robert J. Bagonis Jr. is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Robert J. Bagonis Jr. was born in 1985. Mr. Bagonis graduated from Penn State University in 2010, with a Bachelor of Science degree in Business Administration, Financial Services. Mr. Bagonis has been an investment adviser representative of Ethos Financial Group, LLC since June 2022. Concurrently, Mr. Bagonis has been a Principal/Owner at Tritium Private Wealth Strategies since January 2015. Prior to Ethos, Mr. Bagonis was an investment Adviser Representative of Almanack Investment Partners. Prior to establishing Tritium, Mr. Bagonis was a Manager and Financial Planning Specialist at Creative Financial Group from August 2010 to November 2014.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

Licensed Insurance Agent. Mr. Bagonis, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Bagonis to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mr. Bagonis that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Bagonis. Clients are reminded that they may purchase insurance products recommended by Mr. Bagonis through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Dan Guy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act ("*Act*"). The Registrant's Chief Compliance Officer, Jared Calvert, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Calvert at 859-287-1657.

Item 1 Cover Page

A.

James Behr

Ethos Financial Group, LLC

ADV Part 2B, Brochure Supplement Dated: March 18, 2024

Contact: Daniel Guy, Chief Compliance Officer (410-294-2737)

This Brochure Supplement provides information about James Behr that supplements the Ethos Financial Group, LLC Brochure; you should have received a copy of that Brochure. Please contact Daniel Guy, Chief Compliance Officer, if you did not receive Ethos Financial Group, LLC's Brochure or if you have any questions about the contents of this supplement.

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

Item 2 Education Background and Business Experience

James Behr was born in 1990. Mr. Behr graduated from Syracuse University with a Bachelor of Science degree in Supply Chain and Entrepreneurship. Prior to becoming an investment advisor representative with Ethos Financial Group, LLC in 2024, Mr. Behr served as an associate at Blue Bell Private Wealth Management (2015-2024).

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

None

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act ("*Act*"). The Registrant's Chief Compliance Officer, Daniel Guy, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Guy at 410-294-2737.

Item 1 Cover Page

A.

Antonio Betancourt

Ethos Financial Group, LLC

ADV Part 2B, Brochure Supplement

Dated: April 18, 2024

Contact: Dan Guy, Chief Compliance Officer (410-294-2737)

B.

This Brochure Supplement provides information about Antonio Betancourt that supplements the Ethos Financial Group, LLC Brochure; you should have received a copy of that Brochure. Please contact Dan Guy, Chief Compliance Officer, if you did not receive Ethos Financial Group, LLC's Brochure or if you have any questions about the contents of this supplement.

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

Item 2 Education Background and Business Experience

Antonio Betancourt was born in 1956. Mr. Betancourt graduated from Bernard M. Baruch College in 1980 with a Bachelor degree in Finance. Mr. Betancourt has been an investment adviser representative of Ethos Financial Group, LLC since March 2023. From May 2022 to March 2023, Mr. Betancourt served as an investment advisor at Ascendant 360, LLC and as an investment advisor from November 2017 to May 2022 for SagePoint Financial. Previously, he was an investment advisor representative and registered representative of SII Investments from June 2007 to November 2017. He is also a licensed insurance agent.

Mr. Betancourt is a CERTIFIED FINANCIAL PLANNER™.

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

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 88,000 individuals have obtained CFP® certification in the United States.

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

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

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

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

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. **Registered Representative of Innovation Partners, LLC.** Mr. Betancourt is a registered representative of Innovation Partners, LLC (“IPL”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Betancourt in his individual capacity as a registered representative of IPL, to implement investment recommendations on a commission basis.

Conflict of Interest. The recommendation by Mr. Betancourt that a client purchase a securities commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from Mr. Betancourt. Clients are reminded that they may purchase investment products recommended by Mr. Betancourt through other, non-affiliated broker dealers. **The Registrant’s Chief Compliance Officer, Dan Guy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Commissions. In the event the client chooses to purchase investment products through IPL, brokerage commissions will be charged by IPL to effect securities transactions, a portion of which commissions shall be paid by IPL to Mr. Betancourt. The brokerage commissions charged by IPL may be higher or lower than those charged by other broker- dealers. In addition, IPL, as well as Mr. Betancourt, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The securities commission business conducted by Mr. Betancourt is separate and apart from Registrant’s investment management services discussed in the Registrant’s *Brochure*.

- B. **Licensed Insurance Agent.** Mr. Betancourt, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Betancourt to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation

by Mr. Betancourt that a client purchase an insurance commission product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than based on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Betancourt. Clients are reminded that they may purchase insurance products recommended by Mr. Betancourt through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Dan Guy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act ("*Act*"). The Registrant's Chief Compliance Officer, Dan Guy, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Guy at 410-294-2737.

Item 1 Cover Page

A.

Seth E. Bittner
2200 Renaissance Boulevard
Suite 340
King of Prussia, PA 19406

Ethos Financial Group, LLC

ADV Part 2B, Brochure Supplement
Dated: April 18, 2024

Contact: Dan Guy, Chief Compliance Officer (410-294-2737)

This Brochure Supplement provides information about Seth Bittner that supplements the Ethos Financial Group, LLC Brochure; you should have received a copy of that Brochure. Please contact Dan Guy, Chief Compliance Officer, if you did not receive Ethos Financial Group, LLC's Brochure or if you have any questions about the contents of this supplement.

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

Item 2 Education Background and Business Experience

Seth E. Bittner was born in 1982. Mr. Bittner graduated from Philadelphia University in 2005, with a Bachelor of Science degree in Finance. Mr. Bittner has been an investment adviser representative of Ethos Financial Group, LLC since September 2023 and, also, a registered representative of Innovation Partners, LLC since November 2020. Previously, Mr. Bittner has been an agent of Almanack Investment Partners, LLC (2017-2023), Penn Mutual Life Insurance Co. (2007-2017), a registered representative of MerCap Securities, LLC (2017-2020) and an investment adviser of Hornor, Townsend & Kent, LLC (2007-2017). In addition, Mr. Bittner was a financial representative for Northwestern Mutual (2004-2007).

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. **Registered Representative of Innovation Partners, LLC.** Mr. Bittner is a registered representative of Innovation Partners, LLC (“IPL”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Bittner in his individual capacity as a registered representative of IPL, to implement investment recommendations on a commission basis.

Conflict of Interest. The recommendation by Mr. Bittner that a client purchase a securities commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from Mr. Bittner. Clients are reminded that they may purchase investment products recommended by Mr. Bittner through other, non-affiliated broker dealers. **The Registrant’s Chief Compliance Officer, Dan Guy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Commissions. In the event the client chooses to purchase investment products through IPL, brokerage commissions will be charged by IPL to effect securities transactions, a portion of which commissions shall be paid by IPL to Mr. Bittner. The brokerage commissions charged by IPL may be higher or lower than those charged by other broker- dealers. In addition, IPL, as well as Mr. Bittner, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The securities commission business conducted by Mr. Bittner is separate and apart from Registrant’s investment management services discussed in the Registrant’s *Brochure*.

- B. **Licensed Insurance Agent.** Mr. Bittner, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Bittner to purchase insurance products on a commission basis.

Conflict of Interest: The recommendation by Mr. Bittner that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client’s need. No client is under any obligation to purchase any insurance commission products from Mr. Bittner. Clients are reminded that they may purchase insurance products recommended by Mr. Bittner through

other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Dan Guy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act ("*Act*"). The Registrant's Chief Compliance Officer, Jared Calvert, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Calvert at 859-287-1657.

Item 1 Cover Page

A.

Peter Cazamias

Ethos Financial Group, LLC

ADV Part 2B, Brochure Supplement Dated: February 20, 2024

Contact: Daniel Guy, Chief Compliance Officer (410-294-2737)

This Brochure Supplement provides information about Peter Cazamias that supplements the Ethos Financial Group, LLC Brochure; you should have received a copy of that Brochure. Please contact Daniel Guy, Chief Compliance Officer, if you did not receive Ethos Financial Group, LLC's Brochure or if you have any questions about the contents of this supplement.

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

Item 2 Education Background and Business Experience

Peter Cazamias was born in 1970. Mr. Cazamias graduated from Yale University (BA), University of Texas (JD), and the Wharton School of Pennsylvania (MBA). Prior to becoming an investment advisor representative with Ethos Financial Group, LLC, Mr. Cazamias served as a planning consultant at Pine Valley Private Wealth (2019-2024).

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

Licensed Insurance Agent. Mr. Cazamias, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Cazamias to purchase insurance products on a commission basis. Conflict of Interest: The recommendation by Mr. Cazamias that a client purchase an insurance commission product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than based on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Cazamias. Clients are reminded that they may purchase insurance products recommended by Mr. Cazamias through other, non-affiliated insurance agents. The Registrant's Chief Compliance Officer, Daniel Guy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act ("Act"). The Registrant's Chief Compliance Officer, Daniel Guy, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Guy at 410-294-2737.

Item 1 Cover Page

A.

Dustin Scott Dowling
5800 One Perkins Place, Suite 8A
Baton Rouge, LA 70808

Ethos Financial Group, LLC

ADV Part 2B, Brochure Supplement
Dated: April 18, 2024

Contact: Dan Guy, Chief Compliance Officer (410-294-2737)

This Brochure Supplement provides information about Dustin Scott Dowling that supplements the Ethos Financial Group, LLC Brochure; you should have received a copy of that Brochure. Please contact Dan Guy, Chief Compliance Officer, if you did not receive Ethos Financial Group, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Dustin Scott Dowling is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Dustin Scott Dowling was born in 1974. Mr. Dowling graduated from Louisiana Tech in 1998, with an Associates degree in Nursing. Mr. Dowling has been an investment adviser representative of Ethos Financial Group, LLC since August 2022. From June 2018 to August 2022, Mr. Dowling was an investment adviser representative for Almanack Investment Partners, LLC. From July 2008 to June 2018, Mr. Dowling was a sales representative for Peters Wealth Advisors, LLC and from April 2010 to October 2017, he was also a registered representative with Dominion Investor Services, Inc.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

Licensed Insurance Agent. Mr. Dowling, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Dowling to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mr. Dowling that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Dowling. Clients are reminded that they may purchase insurance products recommended by Mr. Dowling through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Dan Guy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act ("Act"). The Registrant's Chief Compliance Officer, Dan Guy, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Guy at 410-294-2737.

Item 1 Cover Page

A.

James Gonnason
2200 Renaissance Boulevard
Suite 340
King of Prussia, PA 19406

Ethos Financial Group, LLC

ADV Part 2B, Brochure Supplement
Dated: March 8, 2024

Contact: Dan Guy, Chief Compliance Officer (410-294-2737)

B.

This Brochure Supplement provides information about James Gonnason that supplements the Ethos Financial Group, LLC Brochure; you should have received a copy of that Brochure. Please contact Dan Guy, Chief Compliance Officer, if you did not receive Ethos Financial Group, LLC's Brochure or if you have any questions about the contents of this supplement.

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

Item 2 Education Background and Business Experience

James A. Gonnason was born in 1980. Mr. Gonnason graduated from the University of Arizona with a Bachelor of Science degree in Engineering Management / Optical Engineering in 2008. Prior to becoming an investment advisor representative with Ethos Financial Group, LLC, Mr. Gonnason most served as an investment advisor at Almanack Investment Partners, LLC and Auerbach Investment Services, LLC. Additionally, Mr. Gonnason was previously a registered representative at Hornor, Townsend & Kent, Inc. from 2013 – 2021. Mr. Gonnason is currently a licensed insurance agent.

Item 3 Disciplinary Information

None

Item 4 Other Business Activities

Licensed Insurance Agent. Mr. Gonnason, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Gonnason to purchase insurance products on a commission basis.

Conflict of Interest: The recommendation by Mr. Gonnason that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Gonnason. Clients are reminded that they may purchase insurance products recommended by Mr. Gonnason through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Dan Guy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act ("*Act*"). The Registrant's Chief Compliance Officer, Dan Guy, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Guy at 410-294-2737.

Item 1 Cover Page

A.

Daniel Cook Guy
2200 Renaissance Boulevard
Suite 340
King of Prussia, PA 19406

Ethos Financial Group, LLC

ADV Part 2B, Brochure Supplement
Dated: April 18, 2024

Contact: Dan Guy, Chief Compliance Officer (410-294-2737)

B.

This Brochure Supplement provides information about Daniel Cook Guy that supplements the Ethos Financial Group, LLC Brochure; you should have received a copy of that Brochure. Please contact Dan Guy, Chief Compliance Officer, if you did not receive Ethos Financial Group, LLC's Brochure or if you have any questions about the contents of this supplement.

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

Item 2 Education Background and Business Experience

Daniel Cook Guy was born in 1990. Mr. Guy graduated from the University of Delaware in 2012, with a Bachelor of Science degree in Finance and Economics. Mr. Guy has been an investment adviser representative and executive of Ethos Financial Group, LLC since May 2022. From March 2016 to May 2022, Mr. Guy was an analyst of Almanack Investment Partners. From April 2015 to March 2016, Mr. Guy was an analyst of Spire Investment Partners. From May 2014 to April 2015, Mr. Guy was an analyst at Forefront Analytics, LLC and from July 2013 to April 2014, he was an analyst at SEI Investments. From June 2012 to June 2013, Mr. Guy was a Member of Financial, LLC

Mr. Guy has been a CFA® Charter Holder since 2017. CFA® designates an international professional certificate that is offered by the CFA Institute.

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 170,000 CFA charter holders working in 159 countries. To earn the CFA charter, candidates must: (1) pass three sequential, six-hour examinations; (2) have at least four years of qualified professional investment experience; (3) join CFA Institute as members; and (4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charter holders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charter holders—often making the charter a prerequisite for employment. Additionally, regulatory bodies in 38 countries/territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 466 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

Mr. Guy has held the designation of Chartered Alternative Investment Analyst (CAIA) since 2016.

The CAIA designation, recognized globally, is administered by the Chartered Alternative Investment Analyst Association and requires a comprehensive understanding of core and advanced concepts regarding alternative investments, structures, and ethical obligations. To qualify for the CAIA designation, finance professionals must complete a self-directed, comprehensive course of study on risk-return attributes of institutional quality alternative assets; pass both the Level I and Level II CAIA examinations at global, proctored testing centers; attest annually to the terms of the Member Agreement; and hold a US bachelor's degree (or equivalent) plus have at least one year of professional experience or have four years of professional experience. Professional experience includes full-time employment in a professional capacity within the regulatory, banking, financial, or related fields. Once a qualified candidate completes the CAIA program, he or she may apply for CAIA membership and the right to use the CAIA designation, providing an opportunity to access ongoing educational opportunities.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

The supervised person is not actively engaged in any other investment-related businesses or occupations.

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act ("*Act*"). The Registrant's Chief Compliance Officer, Dan Guy, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Guy at 410-294-2737.

Item 1 Cover Page

A.

William L. Lane, III

Ethos Financial Group, LLC

ADV Part 2B, Brochure Supplement

Dated: April 18, 2024

Contact: Dan Guy, Chief Compliance Officer (410-294-2737)

B.

This Brochure Supplement provides information about William L. Lane that supplements the Ethos Financial Group, LLC Brochure; you should have received a copy of that Brochure. Please contact Dan Guy, Chief Compliance Officer, if you did not receive Ethos Financial Group, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about William L. Lane, III is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

William L. Lane, III was born in 1979. Mr. Lane graduated from Lafayette College in 2001, with a Bachelor of Arts degree in Economics. Mr. Lane has been an investment adviser representative of Ethos Financial Group, LLC since August 2022. From February 2019 to June 2022, Mr. Lane was a investment adviser representative of Almanack Investment Partners, LLC. From January 2016 to February 2019, Mr. Lane was a registered representative of Wells Fargo Clearing Services, LLC. From April 2009 to January 2016, Mr. Lane was the Vice President of Credit Suisse Securities, LLC.

Mr. Lane has held the designation of Certified Investment Management Analyst (CIMA®) since 2016.

The CIMA® certification signifies that an individual has met initial and on-going experience,

ethical, education, and examination requirements for investment management consulting, including advanced investment management theory and application. Prerequisites for the CIMA® certification are three years of financial services experience and an acceptable regulatory history. To obtain the CIMA® certification, candidates must pass an online Qualification Examination, successfully complete a one-week classroom education program provided by a Registered Education Provider at an AACSB accredited university business school, and pass an online Certification Examination. CIMA® designees are required to adhere to IMCA's Code of Professional Responsibility, Standards of Practice, and Rules and Guidelines for Use of the Marks. CIMA® designees must report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the certification. The designation is administered through Investment Management Consultants Association (IMCA®).

Item 3 Disciplinary Information

None

Item 4 Other Business Activities

Private Real Estate Partner: Mr. Lane, in his individual capacity, is a Managing Partner and/or General Partner of certain Private Real Estate investment partnerships. **Conflict of Interest:** Mr. Lane, in his individual capacity, may recommend these Partnership interests to clients of Ethos. This creates a conflict of interest, as Mr. Lane is incentivized by his compensation as Managing/General Partner of the Fund to recommend this fund. Clients are under no obligation to consider or to make an investment in this Fund. **The Registrant's Chief Compliance Officer, Dan Guy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Private Venture Partner: Mr. Lane, in his individual capacity, is a Director of a private venture interest. **Conflict of Interest:** Mr. Lane, in his individual capacity, may recommend these Partnership interests to clients of Ethos. This creates a conflict of interest, as Mr. Lane is incentivized by the success of the venture. Clients are under no obligation to consider or to make an investment in this venture. **The Registrant's Chief Compliance Officer, Dan Guy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act ("*Act*"). The Registrant's Chief Compliance Officer, Dan Guy, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Guy at 410-294-2737.

Item 1 Cover Page

A.

Michael D. Malone
2200 Renaissance Boulevard
Suite 340
King of Prussia, PA 19406

Ethos Financial Group, LLC

ADV Part 2B, Brochure Supplement
Dated: April 18, 2024

Contact: Dan Guy, Chief Compliance Officer (410-294-2737)

B.

This Brochure Supplement provides information about James Gonnason that supplements the Ethos Financial Group, LLC Brochure; you should have received a copy of that Brochure. Please contact Dan Guy, Chief Compliance Officer, if you did not receive Ethos Financial Group, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Michael D. Malone is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Michael D. Malone was born in 1950. Mr. Malone graduated from University of Delaware with a Bachelor of Arts degree in Political Science in 1973. Prior to becoming an investment advisor representative with Ethos Financial group, , LLC, Mr. Malone most recently served as an investment advisor at Almanack Investment Partners (2020-2023), MerCap Advisors, Inc., (2015 – 2020), Merion Wealth Partners, LLC (2011 – 2015), and LPL Financial, LLC (2004 – 2011). Additionally, Mr. Malone was previously a registered representative at LPL Financial, LLC (2004 – 2011).

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

None.

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act ("*Act*"). The Registrant's Chief Compliance Officer, Dan Guy, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Guy at 410-294-2737.

Item 1 Cover Page

A.

John Francis Marsini

Ethos Financial Group, LLC

ADV Part 2B, Brochure Supplement

Dated: April 18, 2024

Contact: Dan Guy, Chief Compliance Officer (410-294-2737)

B.

This Brochure Supplement provides information about John Francis Marsini that supplements the Ethos Financial Group, LLC Brochure; you should have received a copy of that Brochure. Please contact Dan Guy, Chief Compliance Officer, if you did not receive Ethos Financial Group, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about John Francis Marsini is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

John Francis Marsini was born in 1960. Mr. Marsini graduated from the University of Delaware in 1985, with a Bachelor of Arts degree in Political Science. Mr. Marsini has been an investment adviser representative of Ethos Financial Group, LLC since January 2023 and, also, a registered representative of Innovation Partners, LLC since January 2023. Previously, Mr. Marsini has been an agent of MML Investor Services LLC (2016-2022), and Metlife Securities, Inc (2015-2016).

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. **Registered Representative of Innovation Partners, LLC.** Mr. Marsini is a registered representative of Innovation Partners, LLC (“IPL”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Marsini in his individual capacity as a registered representative of IPL, to implement investment recommendations on a commission basis.

Conflict of Interest. The recommendation by Mr. Marsini that a client purchase a securities commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from Mr. Marsini. Clients are reminded that they may purchase investment products recommended by Mr. Marsini through other, non-affiliated broker dealers. **The Registrant’s Chief Compliance Officer, Dan Guy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Commissions. In the event the client chooses to purchase investment products through IPL, brokerage commissions will be charged by IPL to effect securities transactions, a portion of which commissions shall be paid by IPL to Mr. Marsini. The brokerage commissions charged by IPL may be higher or lower than those charged by other broker-dealers. In addition, IPL, as well as Mr. Marsini, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The securities commission business conducted by Mr. Marsini is separate and apart from Registrant’s investment management services discussed in the Registrant’s *Brochure*.

- B. **Licensed Insurance Agent.** Mr. Marsini, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Marsini to purchase insurance products on a commission basis.

Conflict of Interest: The recommendation by Mr. Marsini that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client’s need. No client is under any obligation to purchase any insurance commission products from Mr. Marsini. Clients are reminded that they may purchase insurance products recommended by Mr. Marsini through other, non-affiliated insurance agents. **The**

Registrant's Chief Compliance Officer, Dan Guy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.

- C. **Legal Professional:** Mr. Marsini, in his individual capacity, is a practicing legal professional, and may recommend his own services or the services of third party legal counsel. These outside business activities engaged in by IA Representative are separate and apart from the services provided by Ethos Financial Group, LLC. Ethos Financial Group, LLC has no involvement with the other business activities. These services may provide a substantial source of income and may require a substantial amount of IA Representative's time. If you would like additional information on these other business activities, please contact IA Representative. **The Registrant's Chief Compliance Officer, Dan Guy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act ("*Act*"). The Registrant's Chief Compliance Officer, Dan Guy, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Guy at 410-294-2737.

Item 1 Cover Page

A.

Michael Charles McConahy
Front Street Financial
4400 Deer Path Road, Suite 108
Harrisburg, Pennsylvania 17110

Ethos Financial Group, LLC

ADV Part 2B, Brochure Supplement
Dated: April 18, 2024

Contact: Dan Guy, Chief Compliance Officer (410-294-2737)

B.

This Brochure Supplement provides information about Michael Charles McConahy that supplements the Ethos Financial Group, LLC Brochure; you should have received a copy of that Brochure. Please contact Dan Guy, Chief Compliance Officer, if you did not receive Ethos Financial Group, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Michael Charles McConahy is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Michael Charles McConahy was born in 1972. Mr. McConahy graduated from Frostburg State University in 1997, with a Bachelor of Science degree in Mathematics. Mr. McConahy has been a financial advisor of Ethos Financial Group, LLC since August 2022. Mr. McConahy was a investment adviser representative of Almanack Investment Partners, LLC from May 2016 through June 2022. Mr. McConahy was a registered representative of MerCap Securities from July 2016 through December 2019. From September 2015 through May 2016, Mr. McConahy was a registered representative of Purshe Kaplan Sterling Investments. From August 2015 to May 2016, Mr. McConahy was an investment adviser representative of the Sevenbridge Financial Group, LLC. From May 2009 to May 2016, Mr. McConahy was a registered representative of Wells Fargo Advisors, LLC.

Mr. McConahy has held the designation of Chartered Retirement Planning Counselor (CRPC®) since 2008. The College of Financial Planning® awards the CRPC® designation to applicants who complete the CRPC® professional education program, pass a final examination, commit to a code of ethics and agree to pursue continuing education. Continued use of the CRPC® designation is subject to ongoing renewal requirements. Every two (2) years the designee must renew their right to continue using the CRPC® designation by completing 16 hours of continuing education and reaffirming to abide by the Standards of Professional Conduct.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

Licensed Insurance Agent. Mr. McConahy, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. McConahy to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mr. McConahy that a client purchase an insurance commission product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. McConahy. Clients are reminded that they may purchase insurance products recommended by Mr. McConahy through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Dan Guy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act ("Act"). The Registrant's Chief Compliance Officer, Dan Guy, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Guy at 410-294-2737.

Item 1 Cover Page

A.

Alexander “Lex” H. Nikpour

2200 Renaissance Boulevard
Suite 340
King of Prussia, PA 19406

Ethos Financial Group, LLC

ADV Part 2B, Brochure Supplement
Dated: April 18, 2024

Contact: Dan Guy, Chief Compliance Officer (410-294-2737)

B.

This Brochure Supplement provides information about Alexander “Lex” H. Nikpour that supplements the Ethos Financial Group, LLC Brochure; you should have received a copy of that Brochure. Please contact Dan Guy, Chief Compliance Officer, if you did not receive Ethos Financial Group, LLC’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Alexander “Lex” H. Nikpour is available on the SEC’s website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Alexander “Lex” H. Nikpour was born in 1988. Mr. Nikpour graduated from High Point University in 2011 with a Bachelor of Arts degree in Political Science. Mr. Nikpour has been an investment adviser representative of Ethos Financial Group, LLC since August 2022. From April 2020 to August 2022, Mr. Nikpour served as an investment advisor at Almanack Investment Partners, LLC, as an investment advisor from March 2016 to April 2020 for Wells Fargo, and as a financial representative from April 2014 to February 2016 for Northwestern Mutual Financial Network. He is a licensed insurance agent.

Mr. Nikpour has been a CERTIFIED FINANCIAL PLANNER™ since 2020.

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

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 88,000 individuals have obtained CFP® certification in the United States.

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

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

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

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

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

Licensed Insurance Agent. Mr. Nikpour, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Nikpour to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mr. Nikpour that a client purchase an insurance commission product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than based on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Nikpour. Clients are reminded that they may purchase insurance product The Registrant's Chief Compliance Officer, Dan Guy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.s recommended by Mr. Nikpour through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Jared Calvert, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act ("Act"). The Registrant's Chief Compliance Officer, Dan Guy, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions

regarding the Registrant's supervision or compliance practices, please contact Mr. Guy at 410-294-2737.

Item 1 Cover Page

A.

Matthew B. Ohrenich

Ethos Financial Group, LLC

ADV Part 2B, Brochure Supplement Dated: February 19, 2024

Contact: Daniel Guy, Chief Compliance Officer (410-294-2737)

This Brochure Supplement provides information about Matthew B Ohrenich that supplements the Ethos Financial Group, LLC Brochure; you should have received a copy of that Brochure. Please contact Daniel Guy, Chief Compliance Officer, if you did not receive Ethos Financial Group, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Matthew B. Ohrenich is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Matthew B. Ohrenich was born in 1995. Mr. Ohrenich graduated from the University of South Carolina with a Bachelor of Science degree in Finance. Prior to becoming an investment advisor representative with Ethos Financial Group, LLC, Mr. Ohrenich most served as a paraplanner at Fairman Group (2020-2024) and a sales associate with Kitu Life (2018-2019).

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

None

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act ("Act"). The Registrant's Chief Compliance Officer, Daniel Guy, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Guy at 410-294-2737.

Item 1 Cover Page

A.

John Dominic Santini

Ethos Financial Group, LLC

ADV Part 2B, Brochure Supplement

Dated: April 18, 2024

Contact: Dan Guy, Chief Compliance Officer (410-294-2737)

B.

This Brochure Supplement provides information about John Dominic Santini that supplements the Ethos Financial Group, LLC Brochure; you should have received a copy of that Brochure. Please contact Dan Guy, Chief Compliance Officer, if you did not receive Ethos Financial Group, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about John Dominic Santini is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

John Dominic Santini was born in 1984. Mr. Santini graduated from Johnson & Wales University in 2008, with a Bachelor of Science degree in Finance. Mr. Santini has been an investment adviser representative of Ethos Financial Group, LLC since September 2022 and, also, a registered representative of Innovation Partners, LLC since October 2022. Previously, Mr. Santini has been an agent of Merrill Lynch, Pierce, Fenner & Smith Inc (2019-2022), Massachusetts Mutual Life Insurance Co. (2016-2017), and Metlife Securities, Inc (2012-2016).

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. **Registered Representative of Innovation Partners, LLC.** Mr. Santini is a registered representative of Innovation Partners, LLC (“IPL”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Santini in his individual capacity as a registered representative of IPL, to implement investment recommendations on a commission basis.

Conflict of Interest. The recommendation by Mr. Santini that a client purchase a securities commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from Mr. Santini. Clients are reminded that they may purchase investment products recommended by Mr. Santini through other, non-affiliated broker dealers. **The Registrant’s Chief Compliance Officer, Dan Guy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Commissions. In the event the client chooses to purchase investment products through IPL, brokerage commissions will be charged by IPL to effect securities transactions, a portion of which commissions shall be paid by IPL to Mr. Santini. The brokerage commissions charged by IPL may be higher or lower than those charged by other broker- dealers. In addition, IPL, as well as Mr. Santini, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The securities commission business conducted by Mr. Santini is separate and apart from Registrant’s investment management services discussed in the Registrant’s *Brochure*.

- B. **Licensed Insurance Agent.** Mr. Santini, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Santini to purchase insurance products on a commission basis.

Conflict of Interest: The recommendation by Mr. Santini that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client’s need. No client is under any obligation to purchase any insurance commission products from Mr. Santini. Clients are reminded that they may purchase insurance products recommended by Mr. Santini through other, non-affiliated insurance agents. **The Registrant’s Chief Compliance Officer, Dan Guy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act ("*Act*"). The Registrant's Chief Compliance Officer, Dan Guy, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Guy at 410-294-2737.

Item 1 Cover Page

A.

Meagan Campbell Shields
5800 One Perkins Place, Suite 8A
Baton Rouge, LA 70808

Ethos Financial Group, LLC

ADV Part 2B, Brochure Supplement
Dated: April 18, 2024

Contact: Dan Guy, Chief Compliance Officer (410-294-2737)

B.

This Brochure Supplement provides information about Meagan Campbell Shields that supplements the Ethos Financial Group, LLC Brochure; you should have received a copy of that Brochure. Please contact Dan Guy, Chief Compliance Officer, if you did not receive Ethos Financial Group, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Meagan Campbell Shields is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Meagan Campbell Shields was born in 1986. Ms. Shields graduated from the Louisiana State University, with Bachelors and Masters of Science degrees in Finance. Ms. Shields has been an investment adviser representative of Ethos Financial Group, LLC since October 2022. From August 2004 to 2019, Ms. Shields was a client associate for Merrill Lynch.

Item 3 Disciplinary Information

None

Item 4 Other Business Activities

None.

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act ("*Act*"). The Registrant's Chief Compliance Officer, Dan Guy, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Guy at 410-294-2737.

Item 1 Cover Page

A.

Jamie Michelle Stapf

Ethos Financial Group, LLC

ADV Part 2B, Brochure Supplement

Dated: April 18, 2024

Contact: Dan Guy, Chief Compliance Officer (410-294-2737)

B.

This Brochure Supplement provides information about Jamie Michelle Stapf that supplements the Ethos Financial Group, LLC Brochure; you should have received a copy of that Brochure. Please contact Dan Guy, Chief Compliance Officer, if you did not receive Ethos Financial Group, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Jamie Michelle Stapf is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Jamie Stapf was born in 1971. Mrs. Stapf graduated from Syracuse University in 1993. Mrs. Stapf has been an investment adviser representative of Ethos Financial Group, LLC since August 2022. From February 2019 to June 2022, Mrs. Stapf was a investment adviser representative of Almanack Investment Partners, LLC. From January 2016 to February 2019, Mrs. Stapf was a registered representative of Wells Fargo Clearing Services, LLC. From April 2009 to January 2016, Mrs. Stapf was a registered representative of Credit Suisse Securities, LLC. From October 2001 to April 2009, Mrs. Stapf was a registered representative of Deutsche Bank Securities, Inc. From July 1999 to October 2001, Mrs. Stapf was a registered representative of Goldman Sachs & Co.

Item 3 Disciplinary Information

None

Item 4 Other Business Activities

Private Real Estate Partner: Mrs. Stapf, in her individual capacity, is a Managing Partner and/or General Partner of certain Private Real Estate investment partnerships. **Conflict of Interest:** Mrs. Stapf, in her individual capacity, may recommend these Partnership interests to clients of Ethos. This creates a conflict of interest, as Mrs. Stapf is incentivized by her compensation as Managing/General Partner of the Fund to recommend this fund. Clients are under no obligation to consider or to make an investment in this Fund. **The Registrant's Chief Compliance Officer, Dan Guy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Private Venture Partner: Mrs. Stapf, in her individual capacity, is a Director of a private venture interest. **Conflict of Interest:** Mrs. Stapf, in her individual capacity, may recommend these Partnership interests to clients of Ethos. This creates a conflict of interest, as Mrs. Stapf is incentivized by the success of the venture. Clients are under no obligation to consider or to make an investment in this venture. **The Registrant's Chief Compliance Officer, Dan Guy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act ("*Act*"). The Registrant's Chief Compliance Officer, Dan Guy, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Guy at 410-294-2737.

Item 1 Cover Page

A.

Jacob W. Stull

Ethos Financial Group, LLC

ADV Part 2B, Brochure Supplement

Dated: April 18, 2024

Contact: Dan Guy, Chief Compliance Officer (410-294-2737)

B.

This Brochure Supplement provides information about Jacob W. Stull that supplements the Ethos Financial Group, LLC Brochure; you should have received a copy of that Brochure. Please contact Dan Guy, Chief Compliance Officer, if you did not receive Ethos Financial Group, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Jacob W. Stull is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Jacob W. Stull was born in 1991. Mr. Stull graduated from Frostburg State University in 2012, with a Bachelor of Science degree in Business Administration, Management with a Minor in Marketing. Additionally, Mr. Stull completed his Master of Business Administration (M.B.A.) degree from Frostburg State University in 2014. Mr. Stull has been an investment adviser representative of Ethos Financial Group, LLC since June 2022. Previously, Mr. Stull was an Investment Adviser Representative at Almanack Investment Partners, LLC from February 2021 to June 2022, an Origination Coordinator at Corridor Mortgage Group from 2013 – 2015 and a Mortgage Consultant in 2013.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

The supervised person is not actively engaged in any other investment-related businesses or occupations.

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act ("*Act*"). The Registrant's Chief Compliance Officer, Dan Guy, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Guy at 410-294-2737.

Item 1 Cover Page

A.

Dania Fitzgerald Tanguis
5800 One Perkins Place, Suite 8A
Baton Rouge, LA 70808

Ethos Financial Group, LLC

ADV Part 2B, Brochure Supplement
Dated: April 18, 2024

Contact: Dan Guy, Chief Compliance Officer (410-294-2737)

B.

This Brochure Supplement provides information about Dania Fitzgerald Tanguis that supplements the Ethos Financial Group, LLC Brochure; you should have received a copy of that Brochure. Please contact Dan Guy, Chief Compliance Officer, if you did not receive Ethos Financial Group, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Dania Fitzgerald Tanguis is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Dania Fitzgerald Tanguis was born in 1963. Ms. Tanguis graduated from the University of New Orleans in 1999, with a Bachelor of Science degree in Business/Finance. Ms. Tanguis has been an investment adviser representative of Ethos Financial Group, LLC since August 2022. From June 2018 to August 2022, Ms. Tanguis was an investment adviser representative/wealth manager for Almanack Investment Partners, LLC. From September 2014 to June 2018, Ms. Tanguis was an investment adviser representative/wealth manager for Peters Wealth Advisors, LLC and from September 2014 to October 2017, she was also a registered representative with Dominion Investor Services, Inc. From March 2009 to March 2014, Ms. Tanguis was a financial advisor with Sterne Agee & Leach, Inc.

Item 3 Disciplinary Information

None

Item 4 Other Business Activities

Licensed Insurance Agent. Ms. Tanguis, in her individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Ms. Tanguis to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Ms. Tanguis that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Ms. Tanguis. Clients are reminded that they may purchase insurance products recommended by Ms. Tanguis through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Dan Guy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act ("*Act*"). The Registrant's Chief Compliance Officer, Dan Guy, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Guy at 410-294-2737.

Item 1 Cover Page

A.

Jeffrey Paul Wrabel
Front Street Financial
4400 Deer Path Road, Suite 108
Harrisburg, Pennsylvania 17110

Ethos Financial Group, LLC

ADV Part 2B, Brochure Supplement
Dated: April 18, 2024

Contact: Dan Guy, Chief Compliance Officer (410-294-2737)

B.

This Brochure Supplement provides information about Jeffrey Paul Wrabel that supplements the Ethos Financial Group, LLC Brochure; you should have received a copy of that Brochure. Please contact Dan Guy, Chief Compliance Officer, if you did not receive Ethos Financial Group, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Jeffrey Paul Wrabel is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Jeffrey Paul Wrabel was born in 1969. Mr. Wrabel graduated from McDaniel College in 1991, with a Bachelor of the Arts degree in Business Administration. Mr. Wrabel has been a financial advisor of Ethos Financial Group, LLC since August 2022. Prior to Ethos, Mr. Wrabel was an investment Adviser Representative of Almanack Investment Partners. Mr. Wrabel has also been an introducing broker at the insurance agency of Tegler McHenry Associates since January 2008. From October 2014 to July 2016, Mr. Wrabel was a financial professional at The Prudential Insurance Company of America and a registered representative at Pruco Securities. From January 2011 to October 2014, Mr. Wrabel was a registered representative at AXA Advisors.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

Licensed Insurance Agent. Mr. Wrabel, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Wrabel to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mr. Wrabel that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Wrabel. Clients are reminded that they may purchase insurance products recommended by Mr. Wrabel through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Dan Guy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act ("*Act*"). The Registrant's Chief Compliance Officer, Dan Guy, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Guy at 410-294-2737.