

Shaffer Capital

FORM ADV PART 2A - FIRM BROCHURE
FORM ADV PART 2B – BROCHURE SUPPLEMENT

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This brochure provides information about the qualifications and business practices of Shaffer Capital. If you have any questions about the contents of this brochure, please contact us at 614-891-1200 or info@shaffercapital.net. 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 Shaffer Capital is available on the SEC's website at www.adviserinfo.sec.gov.

Material Changes

Since our last amendment from March 13, 2026, Andrew and Alexander Shaffer have joined the firm as licensed IARs.

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Item 4 - Advisory Business

Founded in May 2009 by Matthew E. Shaffer and Patricia L. Shaffer, Shaffer Capital Advisers, LLC is a wholly owned subsidiary of Shaffer Capital Wealth Management, LLC headquartered in Westerville, OH. We will refer to both entities as Shaffer Capital (SC) throughout this brochure.

SC advises both individual and business clients in defining and pursuing their financial objectives and fiduciary responsibilities.

A. Services for Individuals & Families

SC provides **Financial Planning & Consulting, Investment Management & Investment Consulting** to our individual clients.

1. Financial Planning & Consulting

SC's financial planning process can be broken into six steps:

1. Define the Advisor/Client Relationship
2. Gather Information & Set Goals
3. Analyze & Strategize
4. Develop Recommendations
5. Present Recommendations & Put Plan into Motion
6. Monitor Progress

We provide the following financial planning & consulting services:

- Financial Statements Creation & Review
- Cash Flow/Budget Analysis
- Debt Management
- Planning for a Major Purchase
- Education Needs Planning
- Investment Consulting – Asset Allocation and risk/return analysis only
 - Non-discretionary security selection and investment recommendations are provided through our separate Investment Consulting Agreement.
 - Discretionary investment management services are provided through our separate Investment Management Agreement.
- Private Real Estate cash-flow modeling
- Private Investment & Business cash-flow modeling
- Retirement Planning – Pre-Retirement
- Retirement Planning – Post-Retirement
- Estate Analysis – Current Snapshot of Your Estate

- Estate Planning – Comprehensive
- Tax Efficiency & Reduction Planning
 - Not tax preparation
- Family/Personal Gift Planning
- Charitable Gift Planning
- Life Insurance Policy Review & Needs Analysis
- Disability Insurance Policy Review & Needs Analysis
- Long-Term Care Insurance Policy Review & Needs Analysis
- Healthcare Savings/Expense Planning
- Employer & Government Benefits Planning
- Executive Compensation Planning
 - Non-qualified deferred compensation, employer stock options & restricted stock

2. Investment Management

SC offers the following discretionary investment portfolios:

- **Shaffer Capital Global Asset Allocation Portfolios** (\$25,000 minimum per account) – Our asset allocation strategies seek an attractive total return while managing downside risk. No-load mutual funds, exchange-traded funds, and cash alternatives can be utilized in these strategies. Adjustments are made for taxable versus non-taxable accounts.
 - Aggressive
 - Moderate Aggressive
 - Moderate
 - Moderate Conservative
 - Conservative
 - Ultra Conservative
- **Shaffer Capital Equity-Income Portfolio** (\$50,000 minimum per account) – Our Equity-Income strategy is comprised of approximately 15-20 individual stocks. While dividend income is a priority, growth, valuation, and risk are important components of the stock selection process.
- **Shaffer Capital Core-Equity Portfolio** (\$50,000 minimum per account) – Our Core-Equity strategy is comprised of approximately 15-20 individual stocks. Growth through total return is the primary objective, but valuation and risk are important components of the stock selection process.
- **Shaffer Capital Growth-Equity Portfolio** (\$50,000 minimum per account) – Our Growth-Equity strategy is comprised of approximately 15-20 individual stocks, exchange-traded funds and/or other securities deemed appropriate by Shaffer Capital. We focus on finding quality

companies that have demonstrated skilled management and financial discipline. While price momentum can carry stocks to lofty heights in the short-term, we believe that long-term price appreciation generally follows, or is supported by, earnings growth.

- **Shaffer Capital Fixed-Income Portfolio** (\$75,000 minimum per account) – Our Fixed-Income strategies are tailored utilizing individual bond issues to solve for the client’s specific needs. Fixed-Income portfolios are managed based on the client’s need for income, the timing/duration of the income stream, and default risk. Adjustments are made for taxable versus non-taxable accounts.
- **Shaffer Capital Balanced Portfolios** (\$100,000 minimum per account) – Our Balanced Portfolios contain stocks from either the Equity-Income or Core-Equity Portfolios and the Fixed-Income Portfolio. Clients can also choose from three different Equity/Fixed-Income targets depending on their objectives. Adjustments are made for taxable versus non-taxable accounts.
 - 70% Equity / 30% Fixed-Income
 - 50% Equity / 50% Fixed-Income
 - 30% Equity / 70% Fixed-Income
- **Accounts below \$25,000** – For those accounts that do not meet the minimum investment requirement of our strategies listed above; Shaffer Capital can still serve as an investment adviser. On a discretionary basis, we will select either no-load mutual funds or exchange-traded funds for our clients. Adjustments are made for taxable versus non-taxable accounts.
- **Custom Allocation** (\$250,000 minimum per account)

3. Investment Consulting

Shaffer Capital strives to ensure that our clients have the correct asset allocation structure to coincide with the current economic environment and their individual financial strategy. Our firm continuously monitors economic changes and clients receive updated recommendations upon request. Trading responsibility/authority will remain with the client, or the non-affiliated investment manager recommended by SC and selected by the client.

SC provides the follow investment consulting services:

- Asset Allocation Analysis and Recommendations
- Investment Manager Search and Recommendations
- Security Analysis and Recommendations
- Performance Reporting

B. Services for Businesses

SC's business clients are concerned with addressing their fiduciary responsibilities as retirement plan sponsors and helping their employees save for retirement. As defined by the Department of Labor and the Employee Retirement Income Security Act (ERISA) laws, there are three choices for a financial adviser when it comes to the fiduciary responsibilities for managing your company's retirement plan. It is crucial that plan sponsors and trustees have a good understanding of the different types of financial advisers who can service their retirement plans so that they can protect themselves, as well as their employees.

1. Fiduciary Investment Services

- **Plan Investment Services**
 - **Discretionary 3(38) Investment Management Services.** SCA will have discretionary authority to determine the core investment options and qualified default investment alternative(s) under the Plan and shall support the Sponsor in complying with ERISA Section 404(c), although such compliance shall remain the Sponsor's responsibility.
 - **Non-Discretionary 3(21) Investment Advisory Services.** SCA will advise and assist the Sponsor in selecting the core investment options and qualified default investment alternative(s) under the Plan and shall support the Sponsor in complying with ERISA Section 404(c), although such compliance shall remain the Sponsor's responsibility.
- **Participant Investment Advisory Services**
 - SCA will provide **on-request 3(21)** fiduciary investment advice to Plan participants and beneficiaries regarding the allocation of their individual Plan account(s) among the Plan's investment options. Such advice will not relate to (i) securities issued by the Sponsor or any affiliate or (ii) any amounts held in a self-directed brokerage account. If a participant or beneficiary elects to invest his or her Plan account in a SCA model portfolio, additional investment management fees may apply through the model portfolio.

2. Non-Fiduciary Services

- Financial & Plan Education Services – Group and/or one-on-one meetings, on-site and/or online.
- Investment Policy Statement (IPS) creation, review, and updates.
- Assistance to Plan Sponsor in the review and evaluation of the Plan, Plan provisions and service providers.

3. Model Portfolios

- SCA provides model portfolios reflecting a range of risk and potential return characteristics appropriate as investment alternatives under an ERISA-covered retirement plan. These portfolios will be updated by SCA on a discretionary basis. Investment management fees may apply through the model portfolios and will be charged only to those participants who choose a model portfolio.

C. Current Shaffer Capital Advisers, LLC Ownership Structure

100% - Shaffer Capital Wealth Management, LLC

D. Current Shaffer Capital Wealth Management, LLC Ownership Structure

100% - Shaffer Capital, LLC

80% owned by the Matthew E. Shaffer Revocable Living Trust
20% owned by the Patricia L. Shaffer Revocable Living Trust

E. WRAP Accounts

Shaffer Capital does not participate in WRAP account programs.

F. Current Assets Under Management

Individual and Business Accounts

Discretionary = \$146,480,729 – 447 accounts

Non-Discretionary = \$0

Employer-Sponsored Retirement Plans

Discretionary Fiduciary Investment Management = \$64,578,445 – 10 plans

Total Discretionary = \$211,059,174 as of 03/12/2026

Total Non-Discretionary = \$0 as of 03/12/2026

Total Assets = \$211,059,174 as of 03/12/2026

Item 5 - Fees and Compensation

A. Financial Planning & Consulting

Fees for financial planning services listed on Schedule A of the Financial Planning Agreement will be based on the good faith representations of both parties. Changes in Client circumstances, omission of relevant facts or other information may require financial planning services to be modified or updated at an additional expense to Client. Financial planning fees start at **\$500** and will increase based on the complexity of the Financial Plan “Plan”. Client will have thirty (30) days from delivery of the Plan to consult with SCA and make any adjustments the Client deems necessary prior to the Financial Planning Agreement terminating.

If Client would like SCA to monitor and maintain their Plan on an ongoing basis, SCA will do so according to the Financial Plan Monitoring & Maintenance Agreement. The Monitoring and Maintenance monthly fee equals **5%** of the total Plan fee as indicated in Client’s most recent, fully executed, Financial Planning Agreement.

If it is determined that a new Plan is needed due to changes in Client’s goals, objectives and/or priorities, a new Financial Planning Agreement would need to be executed by Client and SCA. Furthermore, if a new Plan is created and delivered by SCA to Client, a new Financial Plan Monitoring & Maintenance Agreement will be required to receive ongoing monitoring and maintenance services pursuant to the new Plan. Fees for financial planning services may be higher or lower than comparable services offered elsewhere.

SC reserves the right to offset or waive fees or a portion thereof.

Travel expenses will be charged to Client for meeting locations greater than 75 miles of Shaffer Capital’s office in Westerville, Ohio. Travel expenses include airfare, lodging, rental car, gasoline, parking, tolls, train/bus/cab fares and all meals paid by SC representatives.

B. Investment Management

Client fees for SC’s investment management services will be based on a percentage of Account assets, with each quarterly fee based on the value of Account assets as of the last day of the preceding quarter, and such expenses shall be billed quarterly, in advance, pursuant to the applicable fee schedule set forth in the Investment Management Agreement. The fees for any partial quarter shall be determined based on the days during the quarter in which the Agreement is in effect. SC does not participate in management fees or Custodian fees charged by the Custodian, mutual funds, retirement plan Custodians, and non-affiliated investment managers, and such fees are separate from the fees described under the Agreement. SC’s fees for investment management services may be higher or lower than comparable services offered elsewhere. SC reserves the right to offset or waive fees or a portion thereof. Annualized fees range from **0.05%** to **1.00%** of Account assets.

C. Investment Consulting

Client fees for SC's investment consulting services will be based on a percentage of Account assets, with each quarterly fee based on the value of Account assets as of the last day of the preceding quarter, and such expenses shall be billed quarterly, in advance, pursuant to the applicable fee schedule set forth in the Investment Consulting Agreement. The fees for any partial quarter shall be determined based on the days during the quarter in which the Agreement is in effect. SC does not participate in management fees or custodian fees charged by brokerage firms, mutual funds, retirement plan custodians, and non-affiliated investment managers, and such fees are separate from the fees described under the Agreement. SC's fees for investment consulting services may be higher or lower than comparable services offered elsewhere. SC reserves the right to offset or waive fees or a portion thereof. Annualized fees range from **0.10%** to **0.70%** of Account assets.

D. Employer-Sponsored Retirement Plans

1. Fiduciary Investment Services

- **Plan Investment Services**

- Fees for Plan Investment Services will be based on a percentage of Plan assets, with each quarterly fee based on the value of Plan assets as of the last day of the preceding quarter, and such expenses shall be billed quarterly, in advance, pursuant to the applicable fee schedule in the Retirement Plan Services Agreement. The fees for any partial quarter shall be determined based on the days during the quarter in which the Agreement is in effect. SC does not participate in management fees or custodian fees charged by brokerage firms, mutual funds, retirement plan custodians, and non-affiliated investment managers, and such fees are separate from those described in the Agreement. Annualized fees range from **0.025%** to **0.25%** of Plan assets.

- **Participant Investment Advisory Services**

- Fees for Participant Investment Advisory Services will be calculated and billed quarterly using a flat dollar amount per Plan participant or beneficiary with a balance. Annualized per participant/beneficiary fees range from **\$0 to \$125**.

2. Non-Fiduciary Services

- **Financial & Plan Education Services**

- Fees for Financial & Plan Education Services will be calculated and billed quarterly using a flat dollar amount per Plan participant or beneficiary with a balance. Annualized per participant/beneficiary fees range from **\$0 to \$30**.

- **All Other Non-Fiduciary Services**

- Fees for Investment Policy Statement (IPS) creation, review, and updates; and Assistance to the Plan Sponsor in the review and evaluation of the Plan, Plan provisions, and service providers will be billed and hourly rate of **\$300** per hour.

3. Model Portfolios

- Fees for Model Portfolios will be charged only to those Plan participants or beneficiaries who select a Model Portfolio. The annual fee is a percentage of the Plan participant's or beneficiary's account balance allocated to a Model Portfolio. The annualized fee is **0.35%**.

4. Travel Expense Reimbursement

- Travel expenses include airfare, lodging, rental car, gasoline, parking, tolls, train/bus/cab fares and all meals paid by SCA representatives when traveling for on-site Plan meetings. Travel expenses will not be charged for Plan meeting locations within 50 miles of Shaffer Capital's office in Westerville, OH.

E. Payment Options

Clients have the following payment options:

- Check from Client (made payable to Shaffer Capital Advisers).
- Wire Transfer (instructions can be provided upon request).
- Automatic Billing performed by a qualified custodian, third party administrator (TPA), or record keeper. SC will send the applicable entity an invoice that details the calculation of fees.

F. Termination of Services and Refund of Prepaid Fees

1. For Individuals:

Client may terminate the Agreement without penalty within five (5) business days from the date set forth below. Otherwise, either party may terminate the Agreement upon written notification to the other party. If the Agreement is terminated before the completion of services, any unearned fees will be refunded back to Client. If Client is seeking only financial planning services from SC, and Client has received a written financial analysis and recommendation, no portion of the advisory fee will be refunded if Client terminates the Agreement subsequent to receiving the written financial plan. Unless ongoing financial planning or investment consulting services are selected on Schedule A, Section II, or Section III, the Agreement shall terminate once the financial planning services described on Schedule A, Section I, have been rendered by SCA and payment for such services is received from Client. Upon termination of the Agreement, SC will not be obligated to provide any further financial planning and/or investment advisory services to Client under the Agreement.

2. For Businesses:

The Plan Sponsor may terminate the Agreement without penalty within five (5) business days from the date of execution. Except as provided in the preceding sentence, either party may terminate the Agreement upon at least 30-days prior written notice to the other party, which notice may be waived in writing by the party to whom such notice is required. If the Agreement is terminated, any unearned fees will be refunded back to the Plan and/or Plan Sponsor. Upon termination of the Agreement, SC shall not be obligated to provide further services pursuant to the Agreement.

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

SC does not participate in Performance-Based Fees or Side-by-Side Management.

Item 7 - Types of Clients, Account Minimums

A. Types of Clients:

Shaffer Capital advises both individual and businesses clients in defining and pursuing their financial objectives and fiduciary responsibilities.

B. Account Minimums:

Minimums for SC portfolios:

- Shaffer Capital Global Asset Allocation Portfolios (\$25,000 minimum per account)
- Shaffer Capital Equity-Income (\$50,000 minimum per account)
- Shaffer Capital Growth-Equity Portfolio (\$50,000 minimum per account)
- Shaffer Capital Core-Equity Portfolio (\$50,000 minimum per account)
- Shaffer Capital Fixed-Income Portfolios (\$75,000 minimum per account)
- Shaffer Capital Balanced Portfolios (\$100,000 minimum per account)
- Custom Allocation (\$250,000 minimum per account)

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

A. Methods of Analysis & Investment Strategies:

1. Methods of Analysis:

SC's methods of analysis include fundamental analysis, technical analysis, and cyclical analysis, and charting analysis.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Technical analysis involves the analysis of past market data, primarily price and volume.

Cyclical analysis involved the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Modern portfolio theory is a theory of investment which attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully choosing the proportions of various assets.

Charting analysis involves the use of patterns in performance charts. SC uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

2. Investment Strategies:

SC uses long term trading, short term trading, and margin transactions. SC does not utilize ESG or sustainability criteria as a primary factor in investment selection unless specifically requested by a client.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved:

1. Methods of Analysis:

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns and 2) if too many investors begin to implement this strategy, it changes the very cycles these investors are trying to exploit.

Modern Portfolio Theory assumes that investors are risk adverse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Charting analysis strategy involves using and comparing various charts to predict long and short-term performance or market trends. The risk involved in solely using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Model Risk: SC utilizes quantitative and model-based analysis in portfolio construction and asset allocation. Models are based on historical data and assumptions which may prove incorrect. Market conditions may cause models to perform differently than expected.

2. Investment Strategies:

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Short term trading risks include liquidity, economic stability and inflation, in addition to the long-term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Short sales entail the possibility of infinite loss. An increase in the applicable securities' prices will result in a loss and, over time, the market has historically trended upward.

Margin transactions use leverage that is borrowed from a brokerage SC as collateral. When losses occur, the value of the margin account may fall below the brokerage SC's threshold thereby triggering a margin call. This may force the account holder to either allocate more funds to the account or sell assets on a shorter time frame than desired.

Options writing or trading involves a contract to purchase a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value and the possibility of leveraged loss of trading capital due to the leveraged nature of stock options.

Selection of Other Advisers: Although SC will seek to select only money managers who will invest clients' assets with the highest level of integrity, SC's selection process cannot ensure that money managers will perform as desired, and SC will have no control over the day-to-day operations of any of its selected money managers. SC would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulator breach or fraud.

3. Cybersecurity Risk:

SC's business relies on technology systems and third-party service providers. Cybersecurity incidents such as unauthorized access, ransomware, or operational disruptions could affect client accounts or confidential information. While the Firm maintains cybersecurity policies and safeguards, there is no guarantee that such systems will fully prevent cyber incidents.

C. Risks of Specific Securities Utilized:

SC generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic, international, and/or emerging equity and debt markets. However, it will utilize margin transactions. Margin transactions generally hold greater risk of capital loss and clients should be aware that there is a material risk of loss using any of those strategies. The investment types listed below (leaving aside

Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds (open end and closed end): Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond “fixed income” nature (lower risk) or stock “equity” nature (mentioned below).

Equity investment generally refers to buying shares of stocks by an individual or SCs in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

Treasury Inflation Protected/Inflation Linked Bonds: The Risk of default on these bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary and include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile, and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

High Yield Bonds are an investment that guarantees fixed periodic payments in the future that may involve economic risks such as inflationary risk, interest rate risk. High Yield Bonds are at greater risk of default and repayment of principal due to the lower credit quality of the issuer.

Debt securities carry risks such as the possibility of default on the principal, fluctuation in interest rates, and counterparties being unable to meet obligations.

Hedge Funds often engage in leveraging and other speculative investment practices that may increase the risk of investment loss; can be highly illiquid; are not required to provide periodic pricing or valuation information to investors; May involve complex tax structures and delays in distributing important tax information; are not subject to the same regulatory requirements as mutual funds; and often charge high fees. In addition, hedge funds may invest in risky securities and engage in risky strategies.

Stocks & Exchange Traded Funds (ETF): Investing in stocks & ETF's carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy).

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing

complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

REITs have specific risks including valuation due to cash flows, dividends paid in stock rather than cash, and the payment of debt resulting in dilution of shares.

Real Estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal): Investing in precious metal ETFs carries the risk of capital loss.

Private equity funds carry certain risks. Capital calls will be made on short notice, and the failure to meet capital calls can result in significant adverse consequences, including but not limited to a total loss of investment.

Private placements carry a substantial risk as they are subject to less regulation than publicly offered securities, the market to resell these assets under applicable securities laws may be illiquid, due to restrictions, and liquidation may be taken at a substantial discount to the underlying value or result in the entire loss of the value of such assets.

Venture capital funds invest in start-up companies at an early stage of development in the interest of generating a return through an eventual realization event; the risk is high as a result of the uncertainty involved at that stage of development.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks; just as mutual funds do.

Commodities are tangible assets used to manufacture and produce goods or services. Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints

and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain.

Over-the-counter Currency: The low correlation to equity markets makes currency investments an invaluable source of *diversification* to the overall portfolio. However, it is important to note that there may be periods of higher volatility and liquidity maybe restrictive at certain periods in the 24-hour period. Further, the utilization of leverage in various instruments may amplify losses and profits. These over-the-counter instruments also carry the credit risk of the SC issuing the instruments.

International and Emerging Markets: investments in international and emerging market economies stocks and bonds may expose portfolio to greater volatility due to additional risks of currency and exchange rate fluctuations, political instability and governance issues, and liquidity concerns.

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various other types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Short term trading risks include liquidity, economic stability and inflation.

Margin transactions use leverage that is borrowed from a brokerage SC as collateral.

Options are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

Options writing involves a contract to purchase a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value and the possibility of leveraged loss of trading capital due to the leveraged nature of stock options. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option writing also involves risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

Equity Derivatives gain their value from another instrument and therefore can result in large losses because of the use of leverage, or borrowing. Derivatives allow investors to earn large returns from small movements

in the underlying asset's price. However, investors could lose large amounts if the price of the underlying moves against them significantly.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9 - Disciplinary Information

Neither SC nor its representatives are, or have been, subject to any disciplinary action or judgments.

Item 10 - Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative:

Neither SC nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor:

Neither SC nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests:

Neither SC nor its representatives have material registration relationships that would cause possible conflicts of interest.

D. Selection of Other Advisors or Managers and How This Advisor is Compensated for Those Selections:

SC may direct clients to third party investment managers. SC will be compensated via an investment consulting fee directly from those clients. This relationship will be disclosed in each contract between SC and each third-party advisor. SC will always act in the best interests of the client, including when determining which third-party manager to recommend to clients. SC will ensure that all recommended advisors or managers are licensed, or notice filed in the states in which SC is recommending them to clients.

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

On occasion SC or individuals associated with SC may buy or sell securities that SC recommends to Clients. Any conflict of interest is small as the securities are widely held and publicly traded. SC or individuals associated with SC may buy or sell securities identical to those recommended to Clients for their personal accounts. It is the expressed policy of SC that no person employed by SC may purchase or sell any security prior to a transaction(s) being implemented for any advisory account, and therefore, preventing such employees from benefiting from transactions placed on behalf of advisory accounts. SC or any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a Client. As these situations may represent a conflict of interest, SC has established the following restrictions in order to ensure its fiduciary responsibilities:

- (1) SC or individuals associated with SC shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No person associated with SC shall prefer his or her own interest to that of the advisory Client.
- (2) SC maintains a list of all securities holdings for itself and for anyone associated with its advisory practice. These holdings are reviewed on a regular basis by Mr. Shaffer.
- (3) SC requires that all individuals must act in accordance with all applicable federal and state regulations governing registered investment advisory practices.
- (4) Any individual not in compliance with any of the above may be subject to termination.

SC has adopted a written Code of Ethics in compliance with SEC Rule 204A-1. The code sets forth Standards of conduct and requires compliance with all federal and state securities law. SC's Code of Ethics also addresses personal trading and requires employees and related person to report their personal securities holdings and transactions to the Chief Compliance Officer. SC will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

Item 12 - Brokerage Practices

A. Brokerage Relationships and Soft Dollar Arrangements:

Client is free to choose any broker or agent to implement any recommendation or investment advice. SC may recommend Clients establish brokerage accounts with Charles Schwab & Co., Inc., a registered broker-dealer, member SIPC (Referred to as B/Ds below). B/Ds provides SC with access to their institutional trading and operations services, which typically are not available to retail customers. These services are generally available, without cost, to financial advisory firms who maintain a minimum threshold of client assets with B/Ds.

SC utilizes B/Ds for custody of customer assets and execution of customer transactions SC, subject to its best execution obligations, may trade outside of B/Ds. In the selection of broker-dealers, SC may consider all relevant factors, including the commission rate, the value of research provided, execution capability, speed, efficiency, confidentiality, familiarity with potential purchasers and sellers, financial responsibility, responsiveness, and other relevant factors. SC has retained and may compensate B/Ds to provide various administrative services which include determining the fair market value of assets held in the account at least quarterly and producing a brokerage statement and performance reporting for client detailing account assets, account transactions, receipt and disbursement of funds, interest and dividends received, and account gain or loss by security as well as for the total account.

Fees for B/Ds accounts include all execution charges except (1) certain dealer mark-ups and odd-lot differentials, transfer taxes, exchange fees mandated by the Securities and Exchange Act of 1934 and any other charges imposed by law regarding transactions in the account, (2) offering concessions and related fees for purchases of money market mutual funds and other public offerings of securities as more fully disclosed in the prospectus; and (3) certain legal transfer fees. Client may also incur charges for other account services provided by B/Ds, not directly related to the execution and clearing of transactions including, but not limited to, IRA custodial fees, safekeeping fees, interest charges on margin loans, and fees for transfers of securities. In no event, will B/Ds be obligated to execute any transaction that would violate state or federal law or regulation of any self-regulatory organization of which B/Ds is a member. Further, B/Ds may designate certain investments that cannot be held in a client's account.

In addition to those items named above, services provided by B/Ds to financial advisory firms like SC include research (including mutual fund research and third-party research), brokerage, custody, and access to mutual funds and other investments that are available only to institutional investors or would require a significantly higher minimum initial investment. In addition, B/Ds makes available software and other technologies that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution, provide research, pricing information, and other market data, facilitate payment of fees to SC from client accounts, assist with performance reporting, facilitate trade allocation, and assist with back-office support, record-keeping, and client reporting. B/Ds also provides access to practice management consulting support, best execution assistance, consolidated statements assistance, educational and industry conferences, marketing and educational materials, technological and information technology support, and B/Ds corporate discounts. Many of these services may be used to service all or a substantial number of SC's accounts, including accounts not maintained at B/Ds.

B/Ds may also provide SC with other services intended to help SC manage and further develop its business enterprise, including assistance in the following areas: consulting, publications and presentations, information technology, business succession, and marketing. In addition, B/Ds may make available or arrange and/or pay for these types of services provided by independent third parties, including regulatory compliance.

The services described above are usually provided without direct cost to SC and may create an incentive for the Firm to recommend a B/D as custodian.

B. Aggregating (Block) Trading for Multiple Client Accounts:

If SC buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, SC would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. SC would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13 - Review of Accounts

Matthew Shaffer is responsible for reviewing all Client accounts and preparing reports for the Clients. Investment analysis and recommendations are summarized in written reports. The reports are customized for each Client. Part of the analysis for each Client includes a review using data from Client's investment statements received from third-party sources, i.e., brokerage firms, mutual funds, and employer retirement plans.

For those Clients engaging in on-going relationships, investment reviews include a comparison of annual and long-term investment results with the Client's targeted allocation. Income tax projections and other financial planning scenarios may be updated as needed, as mutually agreed upon and described in the Agreement. Similarly, frequency of investment account reviews and related reports is based on previously mutually agreed upon terms as set forth in each Agreement. Clients typically choose quarterly, semi-annual, or annual account reviews, depending on their goals and objectives. Interim verbal or written reviews may also take place if unanticipated events arise. Clients are encouraged to promptly inform SC of changes to their financial situation. Clients are responsible for providing SC with all account statements to be reviewed.

Item 14 - Client Referrals and Other Compensation

In compliance with SEC Rule 206(4)-1 of the Investment Advisors Act of 1940, SC may use Solicitor(s) for Client referrals. Solicitors are required to enter into a written Solicitor Agreement with SC, wherein, among other things, the Solicitor represents and warrants to SC that it qualifies under the Investment Advisors Act of 1940 to serve as a Solicitor and that it will provide a written disclosure statement and this Form ADV Part 2 to prospective Client referrals. In consideration of Client referrals from a Solicitor, SC agrees to pay compensation to the Solicitor equal to an agreed percentage of the advisory fees collected by SC from a referred Client.

SC complies with SEC Rule 206(4)-1 governing investment adviser marketing. The Firm may utilize testimonials, endorsements, third-party ratings, or hypothetical performance in marketing materials where permitted. When used, such materials will include required disclosures, including whether compensation was provided and material conflicts of interest.

SC does not accept referral fees.

SC's representatives may receive benefits from other investment/insurance companies in the form of travel (airfare) and lodging to attend various educational conferences. Mutual funds, insurance companies, and/or other money management firms may invite and pay for travel/lodging expenses for due diligence meetings.

From time-to-time SC may receive compensation in the form of sponsorship fees for seminars, meetings or conferences from product sponsors such as limited partnerships, mutual funds, insurance companies and annuity sponsors. Such sponsorship fees generally entitle the sponsor to an allotted presentation to representatives of SC.

SC endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits by SC, or SC's representatives, in and of itself creates a potential conflict of interest.

More information regarding benefits received from B/Ds may be found in item 12.

Item 15 - Custody

SC has custody to the extent it deducts advisory fees directly from Client accounts via a qualified custodian. Clients will receive statements at least quarterly directly from the qualified custodian. Clients should carefully review those statements. Otherwise, SC does not take custody of Client securities, cash or other assets.

Item 16 - Investment Discretion

SC can and does take discretion for accounts held at one of its preferred custodians (i.e., Charles Schwab). Clients need to execute the Shaffer Capital Investment Management Agreement or Retirement Plan Services Agreement prior to discretionary investment management services being provided. Discretionary services are limited to trading in an investment account. Withdrawals from accounts cannot be made without prior Client consent.

Item 17 - Voting Client Securities

Proxy voting is Client's responsibility. SC is expressly precluded from voting proxies. Client understands and agrees that Client retains the right to vote all proxies that are solicited for securities held in any of Client's investment accounts. Any proxy solicitations that apply to any of Client's accounts and that are received by SC will be immediately forwarded to Client for Client's evaluation and decision.

Prospectuses for newly purchased investment securities recommended by SC will be provided directly by the associated brokerage firm, custodian, or by the provider or distributor of the recommended investment

security. SC will request the timely delivery of current Prospectus to Client's address of record when new investment securities are recommended. Such delivery will normally be made by regular US mail, and Client should receive these Prospectuses on or before the settlement date for the investment security purchase transaction(s). Client agrees to notify SC if Prospectuses for all newly purchased investment securities are not received in a timely manner.

Item 18 - Financial Information

SC is not required to disclose financial information.

FORM ADV PART 2B – BROCHURE SUPPLEMENT #1

May 26, 2026

Item 1 - Cover Page

Matthew E. Shaffer, MBA, CFP®
Co-Founder & Chief Executive Officer
Chief Investment Officer & Chief Compliance Officer

Shaffer Capital
550 Polaris Parkway
Suite 130
Westerville, OH 43082

614-891-1200 Main
877-891-1213 Toll Free
614-891-7360 Fax
www.shaffercapital.net

This brochure supplement provides information about Matthew E. Shaffer that supplements the Shaffer Capital brochure. Please contact us at 614-891-1200 if you have any questions about the contents of this supplement.

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

Item 2 - Educational Background & Business Experience

Date of Birth: 06/24/1974

A. Formal Education

1996 – Miami University – BS: Finance major, Economics minor

2005 – The Ohio State University – Fisher College of Business – MBA: Executive program class valedictorian

B. Business Experience

May 1996 – Nov 2001 – Financial Advisor, Associate Vice President-Investments: Morgan Stanley, Columbus, OH

Nov 2001 – May 2009 – Financial Advisor, Vice President-Wealth Management: Smith Barney, Columbus, OH

May 2009 – Dec 2012 – Registered Representative & Branch Manager: Raymond James Financial Services, Inc., Westerville, OH

May 2009 – Current – Co-Founder & Chief Executive Officer; Chief Investment Officer & Chief Compliance Officer: Shaffer Capital, Westerville, OH

C. Securities Licenses

Active: Series 65

Inactive: Series 7, 24, 63, 31

D. Professional Designations

2000 - Certified Financial Planner™ - See description immediately below**

**A CERTIFIED FINANCIAL PLANNER™ professional or a CFP® practitioner is a financial professional who meets the requirements established by the Certified Financial Planner Board of Standards, Inc. While others may call themselves financial planners, only those who demonstrate the requisite experience, education, and ethical standards are awarded the CFP® mark.

What are the requirements?

In order to obtain the CFP® mark, an applicant must:

- Hold a bachelor's degree from an accredited college or university
- Complete a CFP® Board-registered education program
- Pass the 10-hour CFP® certification exam
- Have at least three years of qualifying full-time work experience in financial planning
- Pass a professional fitness standards and background check

Once appointed, a CFP® professional must meet continuing education requirements every other year in order to maintain the certification.

E. Associations

Financial Planning Association

Honor Society of Phi Kappa Phi

Item 3 - Disciplinary Information

Mr. Shaffer is not, nor has ever been subject to any disciplinary action or judgments.

Item 4 – Other Business Activities

Mr. Shaffer has no other business activities to report.

Item 5 – Additional Compensation

Mr. Shaffer may receive benefits from other investment companies in the form of travel (airfare) and lodging to attend various educational conferences. Mutual funds and/or other money management firms may invite and pay for travel/lodging expenses for due diligence meetings.

From time-to-time Mr. Shaffer or SC may receive compensation in the form of sponsorship fees for seminars, meetings or conferences from product sponsors such as limited partnerships, mutual funds. Such sponsorship fees generally entitle the sponsor to an allotted presentation to representatives of SC.

As noted above, Mr. Shaffer endeavors at all times to put the interests of SC's clients first. Clients should be aware, however, that the receipt of economic benefits by Mr. Shaffer, in and of itself creates a potential conflict of interest.

Item 6 – Supervision

Mr. Shaffer is responsible for supervising all activities of SC.

FORM ADV PART 2B – BROCHURE SUPPLEMENT #2

May 26, 2026

Item 1 - Cover Page

William E. Shaffer
Wealth Management Advisor & Executive Trainee

Shaffer Capital
550 Polaris Parkway
Suite 130
Westerville, OH 43082

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877-891-1213 Toll Free
614-891-7360 Fax
www.shaffercapital.net

This brochure supplement provides information about William E. Shaffer that supplements the Shaffer Capital brochure. Please contact us at 614-891-1200 if you have any questions about the contents of this supplement.

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

Item 2 - Educational Background & Business Experience

Date of Birth: 07/05/2001

A. Formal Education

2025 – Ohio Northern University – BS: Finance & Marketing double major
Summa Cum Laude, Medal winner in Finance, Ranked #1 in the Dicke College of Business.

B. Business Experience

June 2017 – Dec 2024 – Wealth Management Associate, Shaffer Capital, LLC, Columbus, OH
Jan 2025 – Current – Wealth Management Advisor & Executive Trainee, Shaffer Capital, LLC, Columbus, OH

C. Securities Licenses

Active: Series 65

D. Professional Designations

None at this time.

E. Associations

Financial Planning Association
Honor Society of Phi Kappa Phi
Honor Society of Beta Alpha Psi

Item 3 - Disciplinary Information

Mr. Shaffer is not, nor has ever been subject to any disciplinary action or judgments.

Item 4 – Other Business Activities

Mr. Shaffer has no other business activities to report.

Item 5 – Additional Compensation

Mr. Shaffer may receive benefits from other investment companies in the form of travel (airfare) and lodging to attend various educational conferences. Mutual funds and/or other money management firms may invite and pay for travel/lodging expenses for due diligence meetings.

From time-to-time Mr. Shaffer or SC may receive compensation in the form of sponsorship fees for seminars, meetings or conferences from product sponsors such as limited partnerships and mutual funds. Such sponsorship fees generally entitle the sponsor to an allotted presentation to representatives of SC.

As noted above, Mr. Shaffer endeavors at all times to put the interests of SC's clients first. Clients should be aware, however, that the receipt of economic benefits by Mr. Shaffer, in and of itself creates a potential conflict of interest.

Item 6 – Supervision

Matthew Shaffer is responsible for supervising all activities of SC.

FORM ADV PART 2B – BROCHURE SUPPLEMENT #3

May 26, 2026

Item 1 - Cover Page

Andrew B. Shaffer
Wealth Management Advisor & Executive Trainee

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Westerville, OH 43082

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www.shaffercapital.net

This brochure supplement provides information about Andrew B. Shaffer that supplements the Shaffer Capital brochure. Please contact us at 614-891-1200 if you have any questions about the contents of this supplement.

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

Item 2 - Educational Background & Business Experience

Date of Birth: 03/09/2004

A. Formal Education

2025 – Bowling Green State University – BS: Finance major
Magna Cum Laude

B. Business Experience

June 2020 – Dec 2025 – Wealth Management Associate, Shaffer Capital, LLC, Columbus, OH
Jan 2026 – Current – Wealth Management Advisor & Executive Trainee, Shaffer Capital, LLC, Columbus, OH

C. Securities Licenses

Active: Series 65

D. Professional Designations

None at this time.

E. Associations

Financial Planning Association

Item 3 - Disciplinary Information

Mr. Shaffer is not, nor has ever been subject to any disciplinary action or judgments.

Item 4 – Other Business Activities

Mr. Shaffer has no other business activities to report.

Item 5 – Additional Compensation

Mr. Shaffer may receive benefits from other investment companies in the form of travel (airfare) and lodging to attend various educational conferences. Mutual funds and/or other money management firms may invite and pay for travel/lodging expenses for due diligence meetings.

From time-to-time Mr. Shaffer or SC may receive compensation in the form of sponsorship fees for seminars, meetings or conferences from product sponsors such as limited partnerships and mutual funds. Such sponsorship fees generally entitle the sponsor to an allotted presentation to representatives of SC.

As noted above, Mr. Shaffer endeavors at all times to put the interests of SC's clients first. Clients should be aware, however, that the receipt of economic benefits by Mr. Shaffer, in and of itself creates a potential conflict of interest.

Item 6 – Supervision

Matthew Shaffer is responsible for supervising all activities of SC.

FORM ADV PART 2B – BROCHURE SUPPLEMENT #4

May 26, 2026

Item 1 - Cover Page

Alexander M. Shaffer
Wealth Management Advisor & Executive Trainee

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This brochure supplement provides information about Alexander M. Shaffer that supplements the Shaffer Capital brochure. Please contact us at 614-891-1200 if you have any questions about the contents of this supplement.

Additional information about Alexander M. Shaffer is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background & Business Experience

Date of Birth: 03/09/2004

A. Formal Education

Current (graduates summer 2026) – Ohio Northern University – BS: Finance & Marketing double major

B. Business Experience

June 2020 – April 2026 – Wealth Management Associate, Shaffer Capital, LLC, Columbus, OH

May 2026 – Current – Wealth Management Advisor & Executive Trainee, Shaffer Capital, LLC, Columbus, OH

C. Securities Licenses

Active: Series 65

D. Professional Designations

None at this time.

E. Associations

Financial Planning Association

Honor Society of Beta Alpha Psi

Honor Society of Beta Gamma Sigma

Honor Society of Omicron Delta Epsilon

Honor Society of Omicron Delta Kappa

Item 3 - Disciplinary Information

Mr. Shaffer is not, nor has ever been subject to any disciplinary action or judgments.

Item 4 – Other Business Activities

Mr. Shaffer has no other business activities to report.

Item 5 – Additional Compensation

Mr. Shaffer may receive benefits from other investment companies in the form of travel (airfare) and lodging to attend various educational conferences. Mutual funds and/or other money management firms may invite and pay for travel/lodging expenses for due diligence meetings.

From time-to-time Mr. Shaffer or SC may receive compensation in the form of sponsorship fees for seminars, meetings or conferences from product sponsors such as limited partnerships and mutual funds. Such sponsorship fees generally entitle the sponsor to an allotted presentation to representatives of SC.

As noted above, Mr. Shaffer endeavors at all times to put the interests of SC's clients first. Clients should be aware, however, that the receipt of economic benefits by Mr. Shaffer, in and of itself creates a potential conflict of interest.

Item 6 – Supervision

Matthew Shaffer is responsible for supervising all activities of SC.

Notice of Privacy Practices

SC views protecting private information about its Clients as a top priority. Pursuant to the requirements of the Gramm-Leach-Bliley Act (the “GLBA”) and the guidelines established by the Securities Exchange Commission regarding the Privacy of Consumer Financial Information (Regulation S-P), SC has instituted policies and procedures to ensure that such nonpublic private information is kept private and secure. This Notice describes the information SC may gather and the circumstances under which SC may share it.

As part of its business practices, SC obtains certain “nonpublic personal financial information” about its Clients, which for ease of reading will be referred to as “Information” in this notice. This Information includes data SC receives from you on applications or other forms (i.e., your name, address, social security or tax identification number, assets, income, account balances, investment activity and accounts at other institutions), information about your transactions with SC, its affiliates or others, and information SC may receive from third-party sources.

SC restricts access to the Information to authorized parties who need to know this information to provide services and products to its Clients. SC maintains physical, electronic and procedural safeguards to protect Client information.

SC does not disclose and does not wish to reserve the right to disclose, Information to affiliates or nonaffiliated third parties except under the limited exceptions for processing and servicing transactions and legal requirements. Except in those limited situations, without Client consent, SC will not make any disclosures of Information to other companies who may want to sell their products or services to you. For example, SC does not sell customer lists, and will not sell your name to a catalog company or telemarketer. SC also does not disclose and does not wish to reserve the right to disclose, Information about former Clients to affiliates or nonaffiliated third parties except under the limited exceptions for processing and servicing transactions and legal requirements.

SC only makes disclosures of Information of its Clients to nonaffiliated third parties as permitted or required by law or consented to by its Clients.