

**Item 1 - Introduction**

SBK Financial, Inc. (“SBK”, “we”, “our” or “us”) is registered with the Securities Exchange Commission (“SEC”) as an investment adviser. Our services and compensation structure differ from a registered broker-dealer, and it is important for you to understand the differences between those structures. Free and simple tools are available to research firms and financial professionals at [www.investor.gov/CRS](http://www.investor.gov/CRS). The site also provides educational materials about broker-dealers, investment advisers and investing. The italicized sentences appearing in text boxes below are intended to be “conversation starters” for you to have with us, as required by the instructions to Form CRS.

**Item 2 - Relationships and Services**

**What investment services and advice can you provide me?**

- As fiduciaries, we provide customized investment management services to high net worth individuals and their trusts and estates (“you,” “clients”, or our “retail investors”). Investment management services may be combined with financial planning and tax strategies as part of our integrated approach.
- We provide these services based on each client’s unique circumstances, including their investment objectives, risk tolerance, investment time horizon, withdrawal requirements and tax considerations.
- When you engage us to provide investment management services, we monitor portfolios on an ongoing basis and make changes to them as we deem necessary. You sign an agreement that gives us discretionary authority to determine the investments to buy and sell in your account without speaking with you before doing so. You may impose reasonable restrictions on the management of your account, which must be provided in writing.
- We do not have to limit the type of securities we trade for retail investors to proprietary products or a limited group or type of investment, but we generally construct and manage portfolios consisting primarily of mutual funds, exchange traded funds (“ETFs”), cash and cash equivalents. To a lesser extent, we may evaluate, select and oversee unaffiliated investment managers to manage a portion of your portfolio, or recommend certain private investment funds to qualifying clients.
- We generally limit our investment management services to clients who designate at least \$1M for our management, and we impose a corresponding \$10,000 minimum annual fee.
- For more detailed information about our Advisory Business, Fees and Compensation, and the Types of Clients we generally service, please see Items 4, 5 and 7, respectively in our [Form ADV Part 2A](#).

<b>Ask Us:</b>	<p><i>Given my financial situation, should I choose an investment advisory service? Why or why not?</i></p> <p><i>How will you choose investments to recommend to me?</i></p> <p><i>What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?</i></p>
----------------	---

**Item 3 - Fees, Costs, Conflicts, and Standard of Conduct**

**What fees will I pay?**

- We provide investment management services on a fee-only basis. Our tiered annual fee ranges from 1% to 0.25% and is based on assets under management. We typically deduct our fees from one or more of your investment accounts, quarterly in advance. Because our fee is based on the amount of your assets under our management, the more assets you designate to us for management, the more you will pay us for our services. Therefore, we have an incentive to encourage you to increase the amount of assets that you designate for our management. However, under the tiered fee schedule, as the value of assets under our management increases, the applicable fee percentage decreases incrementally at each tier. For more detailed information about our investment advisory and other fees and expenses, please see Item 5 in our [Form ADV Part 2A](#).
- Your account will be held with a qualified custodian. You will be responsible for the fees and expenses charged by qualified custodians and imposed by broker dealers according to their fee schedules. Those fees and expenses may include but are not limited to, certain transaction charges and costs related to maintaining an account. If your assets are invested in mutual funds, ETFs, or other registered and unregistered investment companies, you will bear your pro rata share of the investment management fees and other fees of the funds, which are in addition to the fees you pay us. If your assets are allocated to unaffiliated independent investment managers, you will incur a separate and additional charge for their services subject to the terms of a separate agreement

you sign with them.

- You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For more detailed information about our fees and costs related to our management of your account, please see Item 5 in our [Form ADV Part 2A](#).

**Ask Us:** *Help me understand how these fees and costs might affect my investments. If I give you \$1,000,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

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

- When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means:
  - We may recommend a particular custodian from whom we receive support services, certain of which assist us to better monitor and service your account, but may nonetheless incentivize us to continue recommending them.
  - We may recommend rollovers out of employer-sponsored retirement plans and into Individual Retirement Accounts that we manage for an asset-based fee. If we do not currently manage your account held with your employer’s plan, this will increase our compensation.

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

For more detailed information about our conflicts of interest, please review Items 4, 10, 11, 12, and 14 of our [Form ADV Part 2A](#).

**How do your financial professionals make money?**

- Our financial professionals are generally paid a salary and may receive a discretionary bonus. Bonuses are based on the firm’s overall success and the professional’s individual performance. This may present conflicts of interest, as it could incentivize our financial professionals to recommend that you place additional assets under our management. We mitigate that conflict by adhering to our fiduciary duty when making investment recommendations in conformity with each client’s investment objectives and savings strategy. You should discuss your financial professional’s compensation directly with your financial professional.

**Item 4 - Disciplinary History**

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

- No. We encourage you to visit [www.investor.gov/CRS](http://www.investor.gov/CRS) to research our firm and our financial professionals.

**Ask Us:** *As a financial professional, do you have any disciplinary history? If so, for what type of conduct?*

**Item 5 - Additional Information**

Additional information about our firm is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You may contact our Chief Compliance Officer at 804-237-1700 to request a current copy of our [Form ADV Part 2A](#) or our relationship summary.

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

Full link to Form ADV Part 2A:  
[https://files.adviserinfo.sec.gov/IAPD/Content/Common/crd\\_iapd\\_Brochure.aspx?BRCHR\\_VRSN\\_ID=684058](https://files.adviserinfo.sec.gov/IAPD/Content/Common/crd_iapd_Brochure.aspx?BRCHR_VRSN_ID=684058)