

Firm Brochure
(Part 2A of Form ADV)



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This brochure provides information about the qualifications and business practices of Spinnaker Financial Group, LLC. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 888-615-4101 or by email at bglancy@spinnakerfinancialgroup.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Spinnaker Financial Group, LLC (CRD #165279) is available on the SEC's website at www.adviserinfo.sec.gov

February 23, 2022

Item 2: Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

Since the last update on 06/24/2021 the total amount for assets under management has been updated.

Full Brochure Available

This Firm Brochure being delivered is the complete brochure for the Firm.

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Item 4: Advisory Business

Firm Description

Spinnaker Financial Group, LLC (“Spinnaker”) was founded in 2012. Bryan D. Glancy is 100% owner.

Spinnaker provides personalized confidential financial planning and investment management primarily to individuals and business entities. The individuals may include executives, retirees, and individual participants of pension and profit sharing plans. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

Spinnaker is a fee based financial planning and investment management firm. The firm does not sell securities products or insurance products for a commission. Thus the firm is fee-only.

Spinnaker does not act as a custodian of client assets.

An evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement, risk analysis or similar document. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, tax preparers, insurance agents, etc.) are engaged directly by the client on an as-needed basis and may charge fees of their own. For example, tax preparation and to the extent your estate plan needs to be updated, the tax preparer and/or attorney will bill the client separately. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

Types of Advisory Services

Spinnaker provides investment supervisory services, also known as asset management services and furnishes financial planning and investment advice through consultations.

ASSET MANAGEMENT

Spinnaker offers discretionary direct asset management services to advisory clients. Spinnaker may offer clients the Morningstar® Managed Portfoliossm program (“Program”). This Program is a discretionary investment advisory program offered by Morningstar Investment Services, Inc. (“MIS”), a federally registered investment advisor. The Program is available to clients through arrangement MIS has with Spinnaker. MIS will receive compensation for their investment advisory services provided under the Program as a percentage of assets. In addition, MIS will delegate certain services to Spinnaker such as assisting each client in completing a questionnaire and other applicable account opening forms, determining suitability, meeting with the client at least annually to obtain any changes in their financial situation and acting as liaison between MIS and Spinnaker’s client. For these services,

Spinnaker will receive a portion of the fee paid by each client participating in this Program.

ERISA PLAN SERVICES

Spinnaker offers the following services to the Plan and the Plan participants:

1. Fiduciary Services are:

- a. Provide non-discretionary investment advice to the Client about asset classes and investment alternatives available for the Plan in accordance with the Plan's investment policies and objectives. Client will make the final decision regarding the initial selection, retention, removal and addition of investment options.
- b. Assist the Client with the selection of a broad range of investment options consistent with ERISA Section 404(c) and the regulations thereunder.
- c. Assist the Client in the development of an investment policy statement ("IPS"). The IPS establishes the investment policies and objectives for the Plan. Client shall have the ultimate responsibility and authority to establish such policies and objectives and to adopt and amend the IPS.
- d. Assist in monitoring investment options by preparing periodic investment reports that document investment performance, consistency of fund management and conformance to the guidelines set forth in the IPS and make recommendations to maintain, remove or replace investment options.
- e. Meet with Client on a periodic basis to discuss the reports and the investment recommendations.
- f. Provide non-discretionary investment advice to the Plan Sponsor with respect to the selection of a qualified default investment alternative for participants who are automatically enrolled in the Plan or who have otherwise failed to make investment elections. The Client retains the sole responsibility to provide all notices to the Plan participants required under ERISA Section 404(c)(5).

2. Non-fiduciary Services are:

- a. Assist in the education of Plan participants about general investment information and the investment alternatives available to them under the Plan. Client understands the Adviser's assistance in education of the Plan participants shall be consistent with and within the scope of the Department of Labor's definition of investment education (Department of Labor Interpretive Bulletin 96-1). As such, the Adviser is not providing fiduciary advice as defined by ERISA to the Plan participants. Adviser will not provide investment advice concerning the prudence of any investment option or combination of investment options for a particular participant or beneficiary under the Plan.
- b. Assist in the group enrollment meetings designed to increase retirement plan participation among the employees and investment and financial understanding by the employees.

Adviser may provide these services or, alternatively, may arrange for the Plan's other providers to offer these services, as agreed upon between Adviser and Client.

3. The Adviser has no responsibility to provide services related to the following types of assets (“Excluded Assets”):
 - a. Employer securities;
 - b. Real estate (except for real estate funds or publicly traded REITs);
 - c. Stock brokerage accounts or mutual fund windows;
 - d. Participant loans;
 - e. Non-publicly traded partnership interests;
 - f. Other non-publicly traded securities or property (other than collective trusts and similar vehicles); or
 - g. Other hard-to-value or illiquid securities or property.

Excluded Assets will **not** be included in calculation of Fees paid to the Adviser under this Agreement.

Spinnaker will not have discretion or custody, at any time, of client funds and/or securities.

FINANCIAL PLANNING AND CONSULTING

If financial planning services are applicable, the client will compensate Spinnaker on an hourly fee basis or fixed fee basis described in detail under “Fees and Compensation” section of this brochure. Services include but are not limited to a thorough review of all applicable topics including Wills, Estate Plan/Trusts, Investments, Taxes, and Insurance. If a conflict of interest exists between the interests of the investment advisor and the interests of the client, the client is under no obligation to act upon the investment advisor’s recommendation. If the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through Spinnaker. Financial plans will be completed and delivered inside of six (6) months.

SEMINARS AND WORKSHOPS

Spinnaker may hold seminars and workshops to educate the public on different types of investments and the different services they offer. The seminars are educational in nature and no specific investment or tax advice is given. Spinnaker does not charge a fee for attendance to these seminars.

INSURANCE PRODUCTS AND SERVICES

Spinnaker offers consulting and advisory services pertaining to insurance and risk management as part of a comprehensive financial planning process. In an effort to remain objective and to reduce conflicts of interest, Spinnaker will not accept any commissions of any kind for their role in assisting clients with insurance and risk management concerns. Spinnaker is a fee-only firm and commissions would be in violation of this compensation model.

Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without written client consent.

Wrap Fee Programs

Spinnaker does not sponsor a wrap fee program.

Client Assets under Management

As of February 23, 2022 Spinnaker has approximately \$34,693,475.44 assets under management on a discretionary basis.

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

Spinnaker bases its fees on a percentage of assets under management, hourly charges and fixed fees.

ASSET MANAGEMENT

Spinnaker offers discretionary asset management services to advisory clients. The fees for these services will be based on a percentage of Assets Under Management not to exceed 1.10% annually. The annual fee includes the fee charged by Spinnaker and the fee charged by MIS. The annual Fee may be negotiable. Accounts within the same household may be combined for a reduced fee. Fees are billed either quarterly in arrears or in advance depending on the portfolio strategy chosen. Quarterly advisory fees deducted from the clients' account by the custodian will be reflected in the custodial statement. Lower fees for comparable services may be available from other sources.

Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement for a full refund. Clients may terminate advisory services with thirty (30) days written notice. When fees are paid in arrears, Spinnaker will be entitled to a pro rata fee for the days service was provided in the final quarter. For accounts billed in advance, the client is entitled to a pro rata refund based on the days service was not provided in the final quarter. Client shall be given thirty (30) days prior written notice of any increase in fees, and client will acknowledge, in writing, any agreement of increase in said fees.

ERISA PLAN SERVICES

The annual fees are based on the market value of the Included Assets. The initial fee will be based on the market value of the Plan assets as calculated by the custodian or record keeper of the Included Assets on the first business day of the initial fee period and will be due on the first business day of the fee period. If the services to be provided start any time other than the first day of a quarter, the fee will be prorated based on the number of days remaining in the initial fee period. Thereafter, the fee will be based on the market value of the Plan assets on the last business day of the previous fee period (without adjustments for anticipated withdrawals by Plan participants or other anticipated or scheduled transfers or distribution of assets) and will be due the following business day. If this Agreement is terminated prior to the end of the fee period, the Adviser shall be entitled to a prorated fee based on the number of days during the fee period services were provided. Any unearned fees shall be refunded to the Plan or Plan Sponsor.

The compensation of Spinnaker for the services is described in detail in Schedule A of the Erisa Plan Agreement. The Plan is obligated to pay the fees, however the Plan Sponsor may elect to pay the fees. The Adviser does not reasonably expect to receive

any additional compensation, directly or indirectly, for its services under this Agreement. If additional compensation is received, the Adviser will disclose this compensation, the services rendered, and the payer of compensation. The Adviser will offset the compensation against the fees agreed upon under this Agreement.

FINANCIAL PLANNING and CONSULTING

Spinnaker charges either a negotiable hourly fee basis or fixed fee basis for financial planning. Prior to the planning process the client will be provided an estimated plan fee. The services include, but are not limited to, a thorough review of all applicable topics including Wills, Estate Plan/Trusts, Investments, Taxes, and Insurance. Client will have the following options for paying the estimated fee:

1. 100% at the signing of the agreement;
2. 50% at the time of signing the agreement with final payment due upon delivery of the completed plan; or
3. In 25% increments with final payment due upon delivery of the completed plan.

Services are completed and delivered inside of six (6) months. Client may cancel within five (5) business days of signing Agreement for a full refund. If the client cancels after five (5) business days, any unearned fees will be refunded to the client, or any unpaid earned fees will be due to Spinnaker.

HOURLY FEES

Financial Planning Services are offered based on a negotiable hourly fee of \$200 per hour.

FIXED FEES

Financial Planning Services are offered based on flat fee basis with a maximum fee of \$10,000.

COMMISSIONS

Spinnaker does not accept any commission for any insurance or investment product or any other product, as such they are a fee-only firm.

Client Payment of Fees

Investment management fees are either billed quarterly, in arrears or advance, meaning that the fees will be charged for three (3) month billing periods. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Fees for financial plans are to be paid with the client having the following options to pay the estimated fee:

1. 100% at the signing of the agreement;
2. 50% at the time of signing the agreement with final payment due upon delivery of the completed plan; or
3. In 25% increments with final payment due upon delivery of the completed plan.

Client may cancel within five (5) business days of signing Agreement for a full refund. If the client cancels after five (5) business days, any unearned fees will be refunded to the client, or any unpaid earned fees will be due to Spinnaker.

Additional Client Fees Charged

Custodians may charge transaction fees on purchases or sales of certain mutual funds, equities, and exchange-traded funds. These charges may include mutual fund transactions fees, postage and handling, and miscellaneous fees (fee levied to recover costs associated with fees assessed by self regulatory organizations). These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

Spinnaker, in its sole discretion, may charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

For more details on the brokerage practices, see Item 12 of this brochure.

Prepayment of Client Fees

Client may choose an option to pay the financial planning fees 100% in advance, upon signing the agreement. Depending on the investment strategy chosen, some managed accounts are billed quarterly in advance.

External Compensation for the Sale of Securities to Clients

Spinnaker does not receive any external compensation for the sale of securities to clients, nor do any of the investment advisor representatives of Spinnaker.

Item 6: Performance-Based Fees

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Spinnaker does not use a performance-based fee structure because of the conflict of interest. Performance-based compensation may create an incentive for the advisor to recommend an investment that may carry a higher degree of risk to the client.

Item 7: Types of Clients

Description

Spinnaker generally provides investment advice to individuals, pension and profit sharing plans and business entities.

Client relationships vary in scope and length of service.

Account Minimums

Spinnaker does not require a minimum to open an account, except when utilizing MIS strategies. MIS has an initial minimum investment of \$50,000.

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

Methods of Analysis

Security analysis methods may include fundamental analysis. Investing in securities involves risk of loss that clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis involves evaluating a stock using real data such as company revenues, earnings, return on equity, and profits margins to determine underlying value and potential growth. When creating a financial plan, Spinnaker utilizes fundamental analysis to provide review of insurance policies for economic value and income replacement.

In developing a financial plan for a client, Spinnaker's analysis may include cash flow analysis, investment planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the client's specific situation.

The main sources of information include Morningstar, client documents such as tax returns, financial newspapers, and magazines, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

Investment Strategy

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement, Risk Tolerance or similar form that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

Security Specific Material Risks

All investment programs have certain risks that are borne by the investor. Fundamental analysis may involve interest rate risk, market risk, business risk, and financial risk. Risks involved in technical analysis are inflation risk, reinvestment risk, and market risk. Cyclical analysis involves inflation risk, market risk, and currency risk.

- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Market Risk:* The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Business Risk:* These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Financial Risk:* Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Item 9: Disciplinary Information

Criminal or Civil Actions

The firm and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

The firm and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

The firm and its management have not been involved in legal or disciplinary events that are material to a client's or prospective client's evaluation of Spinnaker or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

Neither Spinnaker nor any of its employees are registered representatives of a broker-dealer.

Futures or Commodity Registration

Neither Spinnaker nor its employees are registered or has an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Spinnaker does not have material relationships or conflicts of interest to disclose.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

Spinnaker does not solicit the services of Third Party Money Managers to manage client accounts.

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

Code of Ethics Description

The employees of Spinnaker have committed to a Code of Ethics (“Code”). The purpose of our Code is to set forth standards of conduct expected of Spinnaker employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of Spinnaker. The Code reflects Spinnaker and its supervised persons’ responsibility to act in the best interest of their client.

One area which the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our clients. We do not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our clients.

Spinnaker’s policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of Spinnaker may recommend any transaction in a security or its derivative to advisory clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Spinnaker’s Code is based on the guiding principle that the interests of the client are our top priority. Spinnaker’s officers, directors, advisors, and other employees have a fiduciary duty to our clients and must diligently perform that duty to maintain the complete trust and confidence of our clients. When a conflict arises, it is our obligation to put the client’s interests over the interests of either employees or the company.

The Code applies to “access” persons. “Access” persons are employees who have access to non-public information regarding any clients’ purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to clients, or who have access to such recommendations that are non-public.

The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

Spinnaker and its employees do not recommend to clients securities in which we have a material financial interest.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Spinnaker and its employees may buy or sell securities that are also held by clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide Spinnaker with copies of their brokerage statements.

The Chief Compliance Officer of Spinnaker is Bryan Glancy. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment over employee transactions.

Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

Spinnaker does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist. However, employees may buy or sell securities at the same time they buy or sell securities for clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide Spinnaker with copies of their brokerage statements.

The Chief Compliance Officer of Spinnaker is Bryan Glancy. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment over employee transactions.

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

Spinnaker may recommend the use of a particular broker-dealer or may utilize a broker-dealer of the client's choosing. Spinnaker will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. Spinnaker relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by Spinnaker.

- *Directed Brokerage*

In circumstances where a client directs Spinnaker to use a certain broker-dealer, Spinnaker still has a fiduciary duty to its clients. The following may apply with Directed Brokerage: Spinnaker's inability to negotiate commissions, to obtain

volume discounts, there may be a disparity in commission charges among clients and conflicts of interest arising from brokerage firm referrals.

- *Best Execution*

Investment advisors who manage or supervise client portfolios on a discretionary basis have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is effected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. The firm does not receive any portion of the trading fees.

- *Soft Dollar Arrangements*

Spinnaker utilizes the services of custodial broker dealers. Economic benefits are received by Spinnaker which would not be received if Spinnaker did not give investment advice to clients. These benefits include: A dedicated trading desk, a dedicated service group and an account services manager dedicated to Spinnaker's accounts, ability to conduct "block" client trades, electronic download of trades, balances and positions, duplicate and batched client statements, and the ability to have advisory fees directly deducted from client accounts.

A conflict of interest exists when Spinnaker receives soft dollars. This conflict is mitigated by the fact that Mr. Glancy has a fiduciary responsibility to act in the best interest of his clients and the services received are beneficial to all clients.

Aggregating Securities Transactions for Client Accounts

Spinnaker is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of Spinnaker. All clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis.

Item 13: Review of Accounts

Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

Account reviews are performed quarterly by Bryan Glancy, Chief Compliance Officer. Account reviews are performed more frequently when market conditions dictate.

Review of Client Accounts on Non-Periodic Basis

Other conditions that may trigger a review of clients accounts are changes in the tax laws, new investment information, and changes in a client's own situation.

Content of Client Provided Reports and Frequency

Clients receive account statements no less than quarterly for managed accounts. Account statements are issued by the Advisor's custodian. Client receives

confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs.

Item 14: Client Referrals and Other Compensation

Economic benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest

Spinnaker does not receive any economic benefits from external sources.

Advisory Firm Payments for Client Referrals

Spinnaker compensates some Certified Public Accountants when referring clients for financial planning services. The referral fee is a one-time fee paid to the referring party, based on financial planning fee not to exceed 50% of the fee received from the client.

Item 15: Custody

Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly. Clients are urged to review the account statements received directly from their custodians for accuracy.

Spinnaker is deemed to have indirect custody solely because advisory fees are directly deducted from client's account by the custodian on behalf of Spinnaker.

Item 16: Investment Discretion

Discretionary Authority for Trading

Spinnaker accepts discretionary authority to manage securities accounts on behalf of clients. Spinnaker has the authority to determine, with obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. The client will authorize Spinnaker discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

Item 17: Voting Client Securities

Proxy Votes

Spinnaker does not vote proxies on securities. Clients are expected to vote their own proxies. The client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, Spinnaker will provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client.

Item 18: Financial Information

Balance Sheet

A balance sheet is not required to be provided because Spinnaker does not serve as a custodian for client funds or securities and Spinnaker does not require prepayment of fees of more than \$500 per client and six (6) months or more in advance.

Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

Spinnaker has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

Bankruptcy Petitions during the Past Ten Years

Neither Spinnaker nor its management has had any bankruptcy petitions in the last ten years.

Item 19: Requirements for State Registered Advisors

Principal Executive Officers and Management Persons

Managing Member and Chief Compliance Officer, Bryan Glancy's education and business background can be found in the Part 2B of this Brochure.

Outside Business Activities

The outside business activities for all management and supervised persons can be found in the Part 2B of this Brochure.

Performance Based Fee Description

Mr. Glancy does not receive any performance based fees.

Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons

Mr. Glancy does not have any disclosures to report.

Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities

There are no material relationships with issuers of securities to disclose.

Supervised Person Brochure

Part 2B of Form ADV

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P.O. BOX 33220

NORTH ROYALTON, OH 44133

This brochure supplement provides information about Bryan Glancy and supplements the Spinnaker Financial Group, LLC's brochure. You should have received a copy of that brochure. Please contact Bryan Glancy if you did not receive Spinnaker Financial Group, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Bryan Glancy (IARD #4425814) is available on the SEC's website at www.adviserinfo.sec.gov.

February 23, 2022

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Principal Executive Officer

Bryan D. Glancy, CFP®

- Year of birth: 1974
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Educational Background and Business Experience

Educational Background:

- Indiana Wesleyan University; Bachelor of Arts, Accounting; 2011

Business Experience:

- Spinnaker Financial Group, LLC; Managing Member/Investment Advisor Representative; 10/2012 – Present
 - Securities America Advisors, Inc.; Investment Advisor Representative; 01/2006 – 10/2012
 - Securities America; Registered Representative; 10/2005 – 10/2012
 - Cedar Brook Financial Partners, LLC; Investment Advisor Representative; 10/2005 - 07/2008
 - Lincoln National Life Insurance Co.; Registered Representative; 10/2001 – 10/2005
 - Lincoln Financial Advisors Corp.; Registered Representative/Investment Advisor Representative; 07/2001 – 10/2005
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Professional Certifications

Employees have earned certifications and credentials that are required to be explained in further detail.

Certified Financial Planner (CFP®): Certified Financial Planner is a designation granted by the CFP® Board. CFP® requirements:

- Bachelor's degree from an accredited college or university.
 - Completion of the financial planning education requirements set by the CFP® Board (www.cfp.net).
 - Successful completion of the 10-hour CFP® Certification Exam.
 - Three-year qualifying full-time work experience.
 - Successfully pass the Candidate Fitness Standards and background check.
 - When you achieve your CFP® designation, you must renew your certification every year, pay \$360 certification fee and complete 30 hours of continuing education.
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Disciplinary Information

None to report

Other Business Activities

Mr. Glancy does not have other business activities.

Additional Compensation

Mr. Glancy does not have additional compensation.

Supervision

Since Mr. Glancy is the sole owner of Spinnaker Financial Group, LLC, he is solely responsible for all supervision and formulation and monitoring of investment advice offered to clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual.

Requirements for State-Registered Advisors

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None