

ITEM 1. INTRODUCTION

994 Group is an SEC Registered Investment Adviser. We are not a broker-dealer. Brokerage and investment management services and fees differ, it is important for investors to understand the differences. You should carefully consider which accounts and services are right for you. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which provides educational materials about broker-dealers, investment advisers, and investing.

ITEM 2. WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

We offer investment management, financial planning, and consulting services. We work collaboratively with you and your family to determine financial goals, investment objectives, and appropriate levels of risk.

As part of our standard services, 994 Group monitors client portfolios on a continuous and ongoing basis, while regular account reviews are conducted at least annually to consider changes to your family's financial situation. We will meet with you in person, via phone, or via video call.

The vast majority of our clients choose to open discretionary accounts, which means you grant us the authority to determine the investments to buy and sell without asking in advance. A small portion of our clients choose to open non-discretionary accounts, which means we provide advice, but you ultimately decide to buy and sell. Our firm does not make available, or offer advice, on proprietary products or a limited menu of investment products or types. Our minimum account opening balance is \$5,000.00, which may be negotiable based upon certain circumstances.

Please see our [Form ADV, Part 2A brochure](#) (Items 4, 7, 8, and 13) for more information.

CONVERSATION STARTERS:

- *Given my financial situation, should I choose an investment advisory service? Why or why not?*
- *How will you choose investments to recommend to me?*
- *What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?"*

ITEM 3A. WHAT FEES WILL I PAY?

The vast majority of our clients pay us a tiered fee based upon their assets under management. This ongoing asset-based fee will be billed quarterly in advance, and will be calculated on the previous quarter-ending balance of the account(s) under management. Asset-based fees will be debited directly from your account upon notification to the custodian, Schwab. Our fee schedule is the same regardless of the type of investment selected. Our fee schedule is not dependent upon the number of transactions. Fees deducted from your account will affect the value over time. If you hire us for consulting or planning, we will charge an agreed-upon fixed fee.

Your tiered fee will vary as the account value changes. We are incentivized by increasing the assets we manage for you. As your portfolio grows, our fees grow; conversely, our fees decline as your portfolio decreases. There may be costs and fees related to your account from the investment products (i.e., mutual funds or exchange-traded funds), as well as from the custodian, Schwab (trading fees, wire expenses, or other account maintenance fees). Whether you make or lose money on your investments, you will pay fees and costs.

Please make sure you understand the fees and costs you are paying, and see our [Form ADV, Part 2A brochure](#) (Item 5) for more information.

CONVERSATION STARTERS:

- Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to

ITEM 3B. WHAT ARE YOUR LEGAL OBLIGATIONS TO ME WHEN ACTING AS MY INVESTMENT ADVISER? HOW DOES YOUR FIRM MAKE MONEY, AND WHAT CONFLICTS OF INTEREST DO YOU HAVE?

We are held to a fiduciary standard that covers our entire investment advisory relationship with you. *When we act as your investment adviser, we must act in your best interest, regardless of our own interests.* 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.

- *IRA Rollovers:* our advisory fees may be higher than what you are paying with your current provider.
- *Soft Dollars:* though we do not contract directly with firms to receive soft dollar benefits, we benefit from research and technology tools by using Schwab as a custodian for your account. These benefits replace the need for us to pay out-of-pocket expenses in some cases.
- *Insurance Commissions:* We have a license to sell certain insurance products, which pay a sales commission.

CONVERSATION STARTERS:

- How might your conflicts of interest affect me, and how will you address them?

ITEM 3C. HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?

Our investment advisor representatives receive a base salary and a quarterly distribution based upon overall firm financials. The firm’s financials are largely dependent upon your and other clients’ assets that we manage. This compensation creates a conflict of interest, because we have an incentive to encourage you to open an account with more assets. Our investment advisor representatives may sell certain insurance products for a sales commission, though this represents a minimal amount of revenue and does not affect base salary or quarterly distribution. We do not have solicitation or referral agreements, so no referral fees are ever earned.

Please see our [Form ADV, Part 2A brochure](#) (Item 4, 5, and 10) for more information

ITEM 4. DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

No. Visit [Investor.gov](#) for a free and simple search tool to research our firm and financial professionals.

CONVERSATION STARTERS:

- As a financial professional, do you have any disciplinary history? For what type of conduct?

ITEM 5. HOW DO I GET ADDITIONAL INFORMATION ABOUT YOUR FIRM AND SERVICES?

For additional information about our services, please see our Form ADV brochure on our website, [994group.com](#), or [adviserinfo.sec.gov](#). You may also request additional information or a copy of our disclosure brochures by calling (512) 853-9597 or emailing the CCO at Pete.Markovich@994group.com.

CONVERSATION STARTERS:

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