## Form ADV Part II A

**Brochure Cover Page** 

# **BLACKMORE GROUP, LLC** d.b.a Blackmore Financial Solutions

389 S. Ferguson Ave Ste. 204 Bozeman, MT 59718

Telephone: 406-577-2277 Email: brock@blackmoregroupllc.com Website: blackmorefinancialsolutions.com

Blackmore Group, LLC (referred to as "Advisor" or "Blackmore Group") is a state registered Investment Advisor firm.

#### Dated 2/29/2024

This brochure provides information about the qualifications and business practices of Blackmore Group, LLC.

If you have any questions about the contents of this brochure, please contact customerservice@blackmoregroupllc.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.

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		Page 2 of 21	
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## **ITEM 3: TABLE OF CONTENTS**

## **ADV Part 2A Brochure**

Item 1 Brochure Cover Page    Page 1
Item 2 Material Changes for Part 2APage 2
Item 3 Table of Content    Page 3
Item 4 Advisory BusinessPage 4
Item 5 Fees and Compensation
Item 6 Performance-Based Fees and Side by         Side Management
Item 7 Types of ClientsPage 6
Item 8 Methods of Analysis, Investment Strategies and Risk of Loss
Item 9 Disciplinary InformationPage 7-8
Item 10 Other Financial Industry Activities         and Affiliations       Page 8
Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading
Item 12 Brokerage Practices
Item 13 Review of Accounts

CompensationPage 10
Item 15 CustodyPage 11
Item 16 Investment Discretion     Page 11
Item 17 Voting Client SecuritiesPage 11
Item 18 Financial Information
Item 19 Requirements for State-Registered      Advisors
ADV Part 2B Supplemental
Brock SchimbenoPage 13-17
Jenifer Schimbeno

## ITEM 4: ADVISORY BUSINESS

Blackmore Group, LLC (referred to as "Advisor" or "Blackmore Group") is a state registered Investment Advisor firm.

- A. Blackmore Group is a privately owned, independent financial services and management company that provides personal and professional financial management services to individuals, families, and small businesses. The firm was established in 2015 and is owned and operated in its entirety by Brock Schimbeno.
- B. Blackmore Group provides wholistic wealth management for individuals and families. This includes individual retirement accounts (IRAs), brokerage accounts, life and health insurance policies, and managed commodities accounts. Blackmore Group specializes in feebased financial planning for individuals, couples, and small businesses. Additionally, for qualified clients, Blackmore Group has niche focus in active management of short-term investment portfolios consisting of stock options and managed commodities futures and options accounts.

Stock options accounts and commodities accounts are for well-qualified investors who meet certain risk tolerances. The portion of investable assets dedicated to these strategies will remain under 20% of total investable assets.

In addition to asset management for individuals and families, Blackmore Group brokers life, health, and disability insurance policies through Ash Insurance Brokerage. This is used to augment a wealth management strategy and is not a stand-alone revenue source.

Lastly, Blackmore Group provides financial advisory services billed hourly. The focus is financial planning for collaborative divorce, mediation, individuals, couples, and small businesses.

Blackmore Group uses one d.b.a. which is Blackmore Financial Solutions.

C. The advisory services are tailored to the individual needs of the clients through thorough portfolio analysis. Each portfolio will be unique to each client given the resources available, market conditions, and risk tolerances of the client. An initial client assessment will be performed during the account opening process to determine the suitability of Blackmore Group's services with the goals of the prospective client.

Clients may impose restrictions on investing in certain securities or types of securities that are deemed too risky for their risk tolerance levels.

- D. Blackmore Group does not participate in wrap-fee programs.
- E. As of 12/31/2023, Blackmore Group is managing \$16,641,064.93 worth of clients' assets.

## ITEM 5: FEES AND COMPENSATION

## A. <u>Portfolio Management Fees</u>

Portfolio management fees are based upon the amount of assets under management for a client's account. These fees are established at the time of signing the Advisory Services Agreement. These fees are non-negotiable. In no case will Blackmore Group collect fees in advance. The fees charged are not for transactions executed for the account but are solely for the active management of the account. Commissions for brokerage execution will be in addition to the portfolio management fees and are discussed below.

Fees will be calculated after the close of trade on the last trading day of the month. The net liquidating value of the account at the close of trading on the last trading day of the month will be charged the tiered fees outlined in the table below.

Net Liquidating Value	Monthly Fee
\$0-1,000,000	0.10%
\$1,000,000 plus	0.075%

If an account is opened or closed mid-month, the fees will be prorated using a 30-day month. When closed, the fee will be charged prior to funds being released.

## Hourly or Flat Fees for Planning

For clients that choose to engage with Blackmore Group on an hourly basis or for flat fee planning the fees are as follows:

\$175 to \$225 per hour

\$799 per individual's plan

\$1,199 per couple's plan

Clients can engage in ongoing monthly planning as follows:

\$49 per month up to \$50,000

\$79 per month up to \$150,000

B. Portfolio management fees will be deducted from the clients' account prior to the 5<sup>th</sup> business day following the month end. These will be automatically deducted from the clients' assets. These fees are deducted by the custodian and credited to the Advisor's account with the custodian. Clients will receive notification of the deductions.

Hourly or flat fees for planning will be invoiced at months' end and can be paid via check, ACH transfer, credit card, or debit card.

C. Commission, clearing, and exchange fees may be charged for brokerage execution in addition to the portfolio management fees. These fees are discussed in Item 12 below.

D. Portfolio management fees are not to be paid in advance of services rendered.

## ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE COMPENSATION

Blackmore Group does not accept performance-based fees, that is, fees based on a share of capital gains on or capital appreciation of the assets of a client.

### ITEM 7: TYPES OF CLIENTS

Blackmore Group's primary portfolio management accounts will be individual or families. These clients will have an approximate net worth of over \$150,000. Blackmore Group works with clients with net worth's under \$150,000 on a flat fee or hourly fee basis.

Prior to account opening, several tasks must be completed which include a risk tolerance assessment, a portfolio summary, new account forms, and an Advisory Services Agreement or Financial Planning Services Agreement. Additional risk disclosure forms may be necessary dependent upon the investment experience of the prospective client. All the aforementioned documents will need completion and signatures prior to any transaction.

## ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

The Adviser evaluates clients' investments to ascertain that the fundamental features are synchronized with the clients' financial objectives. A proposed portfolio is designed to help the client attain future financial security, and the investments in the portfolio are stated in generic terms (for example, "stock options", "stocks").

Methods of analysis and investment strategies used by Blackmore Group in formulating our investment advice or managing of the assets are as follows. The material risks involved with each investment strategy are also explained herewith.

1. Fundamental Method: Valuation ratios such as Price to Earnings (P/E), Price to Book (P/B), Shiller P/E (10 year-smoothed earnings), profit margins, and growth forecasts for each nation (GDP). These measures allow us to evaluate whether the market is expensive or cheap relative to historical valuations. Also gives a good idea of the risk-reward available for each security/asset class. Other valuation components are ROE, ROA, projected growth, Free Cash Flow, and Debt to Equity Ratio. However, there are still risks in this strategy and investing in securities involves risk of loss that you should be prepared to bear.

Material Risk: This strategy still has risk as the market can be irrational from time to time, so even though fundamentals are sound, outside, or unforeseen events can cause a loss of principal.

The main types of risk that are present are market risk (entire stock market falls out of favor a decline as a whole), interest rate risk (sudden increases in interest rates may cause the value of principal to decrease), however; through proper diversification some specific business risk can be mitigated (holding an individual stock exposes you to the risks specifically of that one company).

2. Technical: 200-day, 50-day simple and exponential moving averages help display overbought or oversold conditions relative to the current price. We use this for specific asset classes to make tactical recommendations for our annual portfolio construction. However, there are still risks in this strategy and investing in securities involves risk of loss that you should be prepared to bear.

Material Risk: This strategy is useful for getting an overall idea as to where the market/security came from (its past pathway to the current price). One main risk with this strategy is that alone, it can be very dangerous to use as a primary tool because trend following can often lead to sharp losses of principal.

3. Other: The Adviser evaluates clients' investments to ascertain that the fundamental features are synchronized with the clients' financial objectives. A proposed portfolio is designed to help the client attain future financial security, and the investments in the portfolio are stated in generic terms (for example, "stock options", "stocks"). Even though the adviser obtains information that is deemed to be accurate by the client, there are still risks in this strategy and investing in securities involves risk of loss that you should be prepared to bear.

Material Risk: The risk of this strategy is mainly miscommunication. The adviser communicates with the client to get the best idea as to what risk tolerance they are and what type of securities they should be in. If the client fails to disclose any outside assets or information that may hinder the adviser's ability to make a sound decision this could be risky.

The main securities recommended are ETFs, stock options, and stocks

- a. ETFs: market risk
- b. Stock options: margin risk, leverage, time decay
- e. Stocks: company risk (specific), market risk

#### ITEM 9: DISCIPLINARY INFORMATION

Blackmore Group as an advisory firm, or any registered representative of the firm has not been involved in any legal or disciplinary event that would be material nor immaterial to a client's or prospective client's evaluation of the firm or integrity of Blackmore Group or advisors.

- A. Blackmore Group as an advisory firm, or any registered representative of the firm has not had any civil or criminal actions brought against them.
- B. Blackmore Group as an advisory firm, or any registered representative of the firm has not had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.

- C. Blackmore Group as an advisory firm, or any registered representative of the firm has not had any proceedings before a self-regulatory organization.
- D. Blackmore Group as an advisory firm, or any registered representative of the firm has not had proceedings in which a professional attainment, designation, or license was revoked or suspended.

## ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

- A. Blackmore Group's persons are not registered and do not have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.
- B. Blackmore Group's CEO and Founder is an associated person of the National Futures Association (NFA).
- C. Blackmore Group is a guaranteed introducing broker that is guaranteed by the futures commission merchant R.J. O'Brien and Associates, LLC (RJO). All commodity futures and options accounts are introduced to RJO.

Blackmore Group is a life and health insurance broker for Ash Insurance Brokerage. These policies are used to augment and protect assets for Blackmore Financial Solutions clients.

Blackmore Group provides hourly and flat fee financial advisory services for collaborative divorce proceedings, mediations, individuals, couples and small businesses for budgeting and wealth management.

A conflict of time management could arise from being a guaranteed introducing broker. This conflict will be limited due to the nature of the accounts being introduced. These accounts will be primarily self-directed or broker-assisted, meaning very little time will be spent in service of these accounts. It is estimated that approximately 20% of the time available to management personnel will be used for the guaranteed introducing brokerage. A second advisor has been hired to manage the insurance and wealth management portions of the business.

- D. Blackmore Group does not select or recommend other investment advisors for compensation.
- E. Blackmore Group is a 50% general partner in Blackmore Holdings, LLP. As of 12/31/2023, Blackmore Holdings has not conducted business activity.

## ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

All personnel and associated persons of Blackmore Group strive to meet the highest ethical standards of behavior. Blackmore Group has adopted a formal Code of Ethics Policy, a copy of

which is available to Clients upon request. The objective of Blackmore Group's policy is to assure that all personnel and associated persons clearly understand the level of commitment that is required on behalf of the Clients of Blackmore Group; to assure that Client interest always take priority over the interests of Blackmore Group and its personnel; that personal securities transactions must avoid even the appearance of conflict with the interests of the Clients; and that all applicable federal and state securities laws are complied with.

A full copy of the Blackmore Group Code of Ethics will be provided on request.

No supervised person may trade, either personally or on behalf of others (such as investment funds and private accounts managed by Blackmore Group), while in the possession of material, nonpublic information, nor may any personnel of Blackmore Group communicate material, nonpublic information to others in violation of the law.

Blackmore Group has adopted the following principles governing personal investment activities by Blackmore Group supervised persons:

- •The interests of client accounts will at all times be placed first;
- •All personal securities transactions will be conducted in such manner as to avoid any actual or potential conflict of interest or any abuse of an individual's position of trust and responsibility; and
- •Supervised persons must not take inappropriate advantage of their positions.

Advisor's principals and registered representatives may buy or sell the same securities that are recommended to clients. Client accounts receive priority over any personal purchases and sales made by the principals and any such transactions will be fully disclosed to the Client. Blackmore Group will abide by the rules and regulations of the Insider Trading and Securities Fraud Enforcement Act of 1988.

The Advisor's Principals and registered representatives must report to the Chief Compliance Officer (CCO) all initial security holdings and transactions, as well as ongoing transactions. These transactions are reported and reviewed quarterly by the CCO.

All Advisor's Principals, registered representatives and their immediate family members security's transactions are reported on separate trading reports and principally reviewed by the CCO on an ongoing basis, as required.

## **ITEM 12: BROKERAGE PRACTICES**

A. The first custodian used is Interactive Brokers LLC. IB is a FINRA-registered broker-dealer, member SIPC, used to maintain custody of Clients' assets and to effect trades for their accounts. Blackmore Group uses IB's order entry and trading platform for the execution of ETF, stock options, and individual security transactions.

The second custodian used is Altruist Financial LLC. Altruist is a FINRA-registered broker-dealer, member SIPC, used to maintain custody of Clients' assets and to affect trades for their accounts. Blackmore Group uses Altruist's order entry and trading platform for the execution of ETF, stock options, and individual security transactions.

Blackmore Group considered several factors when selecting broker-dealers for client transactions. Commission rates was the most important factor that was considered. A second factor was the technology available for clients and advisors to use. Efficiency when managing client account was a necessity of the platforms.

Soft dollar benefits are received by Blackmore Group for using Altruist to execute client transactions. The 'Advisor Tech Collection Program' consists of subscription reimbursement for the use of Wealthbox when adding \$5,000,000 or more of net new Client assets to the brokerage platform. Total benefits received were \$2,164.36 in 2023.

Blackmore Group does not receive client referrals in return for selecting or recommending a broker-dealer.

B. Blackmore Group does not aggregate purchases or sales of securities for client accounts. Transaction costs may be higher because of non-aggregated purchases.

## ITEM 13: REVIEW OF ACCOUNTS

Reviews will be made on a periodic basis or upon request by the Client, or in the event of a substantial change in the Client's financial situation, i.e., sale or purchase of assets, death, etc. Changes in financial or family status during the previous year will be reviewed to determine changes in objectives of the Client. The Client is under no obligation to implement any recommendations by the Adviser nor is the Client under obligation to engage the services of the applicant for reviews.

Financial plans and account reviews may be done by any registered Adviser of the Firm and listed in the ADV Brochure Part 2B Supplement.

Clients receive quarterly reports, which will generally include a list of transactions for the month, current investment allocations, and their account balances.

## ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

Blackmore Group may enter into solicitation agreements pursuant to which it compensates thirdparty intermediaries for client referrals that result in the provision of investment advisory services by Blackmore Group. Blackmore Group will disclose these solicitation arrangements to affected investors, and any cash solicitation agreements will comply with Rule 206(4)-3 under the Advisers Act. Solicitors introducing clients to Blackmore Group may receive compensation from Blackmore Group, such as a retainer, a flat fee per referral and/or a percentage of introduced capital. Such Compensation will be paid pursuant to a written agreement with the solicitor and generally may be terminated by either party from time to time. The cost of any such fees will be borne entirely by Blackmore Group and not by any affected client.

## ITEM 15: CUSTODY

As a matter of policy and practice, Blackmore Group does not permit employees or the firm to accept or maintain custody of client assets. It is our policy that we will not accept, hold, directly or indirectly, client funds or securities, or have any authority to obtain possession of them. Blackmore Group will not intentionally take custody of client cash or securities.

The custody rule under the Investment Advisors Act of 1940 defines custody as "holding, directly or indirectly, client funds or securities, or having any authority to obtain possession of them."

Blackmore Group does not accept or maintain custody of client assets.

Brock Schimbeno, as Chief Compliance Officer has the responsibility for the implementation and monitoring of our policies, practices, disclosures, and record keeping ensuring we are not deemed a custodian. Mr. Schimbeno may be contacted at 406-577-2277 or brock@blackmoregroupLLC.com

## ITEM 16: INVESTMENT DISCRETION

Blackmore Group manages client securities portfolios on a discretionary basis. Blackmore Group is granted limited discretionary authority in writing by the client at the outset of the advisory relationship. This limited discretionary authorization gives Blackmore Group the authority to manage the client's investment assets at our firm's sole discretion and without consulting with the client in advance, subject to the investment objectives, guidelines and restrictions set by the client. This authorization will remain in full force and effect until we receive a written termination notice of the Engagement Agreement from the client.

Blackmore Group does not have discretionary authority to determine what broker-dealer to use or the number of commissions that are charged by the broker-dealer or custodian.

## **ITEM 17: VOTING CLIENT SECURITIES**

Blackmore Group has adopted the following policies and the procedures regarding proxy voting for its clients' accounts:

Currently, Advisor has chosen not to retain voting authority over its clients' proxy voting and has left the voting authority to the Clients. All proxy ballots will be sent directly to the Client and not to the Advisor. Should the Client wish to speak with the Advisor about advice on how to vote their proxies, they may do so by contacting Blackmore Group at 406-577-2277.

At all times, Adviser has a "duty of care" to its Clients, and Blackmore Group recognizes and accepts this responsibility. Should the Advisor exercise voting authority over its Clients' proxies, it must ensure that all proxies are handled in the best interests of its Clients.

## **ITEM 18: FINANCIAL INFORMATION**

Blackmore Group does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, therefore balance sheet financial information is not required in this brochure.

Blackmore Group has no financial condition that would likely impair our ability to meet contractual commitments to its clients.

## ITEM 19: REQUIREMENTS FOR STATE-REGISTERED ADVISERS

- A. The CEO of Blackmore Group is Brock Schimbeno who has a bachelor's degree in Finance, a secondary minor degree in Economics, and a Master of Business Administration (MBA). Schimbeno has worked for over ten years as a commodities broker and has passed the series 3, 7, 30, and 66 securities exams.
- B. Brock Schimbeno is an associated person of the National Futures Association (NFA). Blackmore Group is a guaranteed introducing broker that is guaranteed by the futures commission merchant R.J. O'Brien and Associates, LLC (RJO). All commodity futures and options accounts are introduced to RJO. These accounts will be primarily self-directed or broker-assisted, meaning very little time will be spent in service of these accounts. It is estimated that approximately 30% of the time available to management personnel will be used for the guaranteed introducing brokerage.
- C. Advisors and supervised persons of Blackmore Group do not receive performance-based fees.
- D. Advisors and supervised persons of Blackmore Group have not been involved in or have been found liable in an arbitration claim or by a civil, self-regulatory organization, or administrative proceeding of damages more than \$2,500 that involve any of the following:
  - An investment or an investment-related business or activity;
  - Fraud, false statement(s), or omissions;
  - Theft, embezzlement, or other wrongful taking of property;
  - Bribery, forgery, counterfeiting, or extortion; or
  - Dishonest, unfair, or unethical practices.

## Form ADV Part II B

**Brochure Supplement** 

## **Brock Schimbeno**

74 Morgan Creek Ln Bozeman, MT 59718

Telephone: 406-577-2277 Email: brock@blackmoregroupllc.com Website: blackmorefinancialsolutions.com

Dated 2/29/2024

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

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

### EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Brock Schimbeno, 40, is the CEO of Blackmore Group and has a bachelor's degree in Finance, a secondary minor degree in Economics, and a Master of Business Administration (MBA). Schimbeno has worked for over nine years as a commodities broker and has passed the series 3, 7, 30, and 66 securities exams.

Before founding Blackmore Group, LLC, Schimbeno attended Montana State University-Bozeman and earned a bachelors' degree in Finance with a minor degree in Economics. Schimbeno always had a passion for financial markets, which led him to pursue employment with Go Grain LLC. Initial success at Go Grain was steady and following an ownership shakeup, Schimbeno began working for Lone Peak Trading LLC (LPT). Schimbeno continued to gain valuable experience and expand his book of clients in the following years. Eventually, Schimbeno was promoted to Principal and Chief Anti-Money Laundering and Compliance Officer. Feeling the need for more education, Schimbeno resigned from LPT in May 2014 to pursue his Master of Business Administration from the University of Montana in Missoula, MT. During his final semester, Schimbeno formed Blackmore Group, LLC and began working full-time following his graduation in May 2015.

The experience Schimbeno gained while working for two startup companies has been invaluable and integral for his success in starting Blackmore Group, LLC. Schimbeno was exposed to a wide array of projects and tasks not normal to a relatively young professional. These projects included: a transition from a guaranteed introducing broker to an independent introducing broker, being a point-person during audits and with futures clearing members, writing numerous newsletters and articles for publications, delivering weekly national radio commentary, made numerous guest speaking appearances, and creating a daily video blog.

#### **Education:**

- Bachelor of Science in Finance option, Montana State University
- Bachelor of Science in Economics minor, Montana State University
- Master of Business Administration (MBA), University of Montana
- Certified Valuation Analyst (CVA), National Association of Certified Valuation Analysts

## **Business Experience:**

- Principal and CCO, Blackmore Commodities, Oct. 2015-present
- CEO, Blackmore Group, LLC, Jan. 2015-present
- Principal and CCO, Lone Peak Trading LLC, July 2013-May 2014
- Senior Broker, Lone Peak Trading LLC, May 2011-May 2014
- Commodities Broker, Go Grain LLC, April 2009-May 2011

## **DISCIPLINARY INFORMATION**

- A. Brock Schimbeno has not had any civil or criminal actions brought against him.
- B. Brock Schimbeno has not had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.
- C. Brock Schimbeno has not had any proceedings before a self-regulatory organization.
- D. Brock Schimbeno has not had proceedings in which a professional attainment, designation, or license was revoked or suspended.

## OTHER BUSINESS ACTIVITIES

Blackmore Group's CEO and Founder is an associated person of the National Futures Association (NFA).

Blackmore Group is a guaranteed introducing broker that is guaranteed by the futures commission merchant R.J. O'Brien and Associates, LLC (RJO). All commodity futures and options accounts are introduced to RJO.

Brock Schimbeno is a registered Certified Valuation Analyst (CVA) and provides consulting services and business valuations.

A conflict of time management could arise from being a guaranteed introducing broker. This conflict will be limited due to the nature of the accounts being introduced. These accounts will be primarily self-directed or broker-assisted, meaning very little time will be spent in service of these accounts. It is estimated that approximately 30% of the time available to management personnel will be used for the guaranteed introducing brokerage.

Blackmore Group is a 50% general partner in Blackmore Holdings, LLP. As of 12/31/23, Blackmore Holdings has not conducted business activity.

### ADDITIONAL COMPENSATION

Brock Schimbeno does not receive any additional compensation.

### **SUPERVISION**

Blackmore Group has adopted written policies and procedures which are designed to set standards and internal controls for the firm, its employees, and its businesses and are also reasonably designed to detect and prevent any violations of regulatory requirements and the firm's policies and procedures. Every employee and manager are required to be responsible for and monitor those individuals and departments he or she supervises to detect, prevent, and report any activities inconsistent with the firm's procedures, policies, high professional standards, or legal/regulatory requirements.

Brock Schimbeno as the Chief Compliance Officer has the overall responsibility for monitoring and testing compliance with Blackmore Group's policies and procedures. Mr. Schimbeno may be contacted at 406-577-2277 or brock@blackmoregroupLLC.com.

Definition: "Supervised person" means directors, officers, and partners of Blackmore Group (or other persons occupying a similar status or performing similar functions); employees of Blackmore Group; and any other person who provides advice on behalf of Blackmore Group and is subject to Blackmore Group supervision and control.

The following is a brief outline of the major areas of responsibility of the Chief Compliance Officer in Blackmore Group's supervisory structure. Please note that these items are not, nor are they intended to be, a complete representation of the Chief's responsibilities. This list is provided only as a general reference tool.

- 1) Approval of Customer Accounts -The Chief Compliance Officer must review all account documentation to insure completion as well as the suitability of the proposed transaction relative to client needs, income, assets, risk tolerance and objectives.
- 2) Maintenance of Registered Representative Office Documentation The Chief Compliance Officer shall maintain relevant files pertaining to all business conducted by any registered person under the supervision of the Chief Compliance Officer. Such files include customer files, transaction blotters, correspondence, advertising, sales memoranda, representative employment files, complaint files and cross-reference logs.
- 3) Processing of Sales/Transactions -The Chief Compliance Officer shall insure that all transactions and supporting documentation are reviewed promptly. Additionally, the Chief Compliance Officer shall insure that all checks and transactions are posted to appropriate internal records and copies maintained in the appropriate files.
- 4) Review of Client Accounts -The Chief Compliance Officer shall insure that all customer accounts receive a periodic review to ensure that all activity is consistent with client suitability standards. The Chief Compliance Officer shall further maintain a record of said review.
- 5) Review of Representative Status -The Chief Compliance Officer shall periodically review the status of all registered personnel assigned to their supervision to ensure that the representatives maintain the proper level of registration, state licensure and continuing education eligibility.
- 6) Annual Compliance Review -The Chief Compliance Officer shall insure that all offices assigned to the Chief Compliance Officer are audited on at least an annual basis to assure compliance with applicable state, federal, and FINRA regulations.

## REQUIREMENTS FOR STATE-REGISTERED ADVISORS

- A. Brock Schimbeno of Blackmore Group has not been involved in or has not been found liable in an arbitration claim or by a civil, self-regulatory organization, or administrative proceeding of damages more than \$2,500 that involve any of the following:
  - An investment or an investment-related business or activity;
  - Fraud, false statement(s), or omissions;
  - Theft, embezzlement, or other wrongful taking of property;
  - Bribery, forgery, counterfeiting, or extortion; or
  - Dishonest, unfair, or unethical practices.
- B. Brock Schimbeno of Blackmore Group has not been subject of a bankruptcy petition.

## Form ADV Part II B

**Brochure Supplement** 

## Jenifer Schimbeno

74 Morgan Creek Ln Bozeman, MT 59718

Telephone: 406-577-2277 Email: jen@blackmoregroupllc.com Website: blackmorefinancialsolutions.com

Dated 2/29/2024

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

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

### EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Jenifer Schimbeno, 38, is the Vice President of Client Relations of Blackmore Group and has a bachelor's degree in Global Studies with a concentration in Spanish. Schimbeno has worked for over 15 years in the financial industry and has passed the series 6, 63, and 65 securities exams.

Before joining Blackmore Group, LLC, Schimbeno attended Montana State University-Bozeman and earned a bachelors' degree in Global Studies with a concentration in Spanish. Soon after graduation, Schimbeno went to work for Northwestern Mutual in Wheaton, IL as a Recruiter. After a couple of years in the Chicago area, she then was moved to Dallas/Fort Worth to aid in growing a new branch office. Shortly after the move, Schimbeno began a new position as a financial advisor with the company. Initial success at Northwestern Mutual grew quickly and led to several milestones to be achieved over the coming years. Later, Schimbeno moved to Missoula, MT and then Bozeman, MT. After nearly 10 years with Northwestern Mutual, Schimbeno left the company to join a private wealth team at Wells Fargo in Bozeman as a Fiduciary Advisor. Extensive knowledge of trusts and foundation endowments was obtained. In early 2018, she joined Blackmore Group LLC as the Vice President of Client Relations.

The experience Schimbeno gained while working for two large financial companies has been invaluable and integral for success in growing Blackmore Group, LLC. Schimbeno has since expanded her knowledge base to include the Certified Divorce Financial Analyst (CDFA) and is a certified financial mediator. These skills are added to her extensive estate planning and insurance experience. Schimbeno has started two separate companies over the last couple of years and are Bozeman Cleaning Services and Parent Team. The latter focusing on collaborative divorce processes.

#### **Education:**

- Bachelor of Arts in Global Studies, Montana State University
- Certified Divorce Financial Analyst (CDFA), Institute for Divorce Financial Analysts

## **Business Experience:**

- Financial Representative, Northwestern Mutual October 2007-November 2016
- Fiduciary Advisory Specialist, Wells Fargo, The Private Bank November 2016- January 2018
- Vice President of Client Relations, Blackmore Financial Solutions January 2018-Present

## **DISCIPLINARY INFORMATION**

- A. Jenifer Schimbeno has not had any civil or criminal actions brought against him.
- B. Jenifer Schimbeno has not had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.
- C. Jenifer Schimbeno has not had any proceedings before a self-regulatory organization.
- D. Jenifer Schimbeno has not had proceedings in which a professional attainment, designation, or license was revoked or suspended.

## OTHER BUSINESS ACTIVITIES

- Co-founder of Parent Team LLP as of 1/1/2021.
- Co-founder of Bozeman Cleaning Services LLP as of 8/1/2020.
- Trained mediator and serves as a Financial Neutral for Collaborative Law as of 11/1/2018.

### ADDITIONAL COMPENSATION

Jenifer Schimbeno does not receive any additional compensation.

#### **SUPERVISION**

Blackmore Group has adopted written policies and procedures which are designed to set standards and internal controls for the firm, its employees, and its businesses and are also reasonably designed to detect and prevent any violations of regulatory requirements and the firm's policies and procedures. Every employee and manager are required to be responsible for and monitor those individuals and departments he or she supervises to detect, prevent, and report any activities inconsistent with the firm's procedures, policies, high professional standards, or legal/regulatory requirements.

Brock Schimbeno as the Chief Compliance Officer has the overall responsibility for monitoring and testing compliance with Blackmore Group's policies and procedures. Mr. Schimbeno may be contacted at 406-577-2277 or brock@blackmoregroupLLC.com.

Definition: "Supervised person" means directors, officers, and partners of Blackmore Group (or other persons occupying a similar status or performing similar functions); employees of Blackmore Group; and any other person who provides advice on behalf of Blackmore Group and is subject to Blackmore Group supervision and control.

The following is a brief outline of the major areas of responsibility of the Chief Compliance Officer in Blackmore Group's supervisory structure. Please note that these items are not, nor are

they intended to be, a complete representation of the Chief's responsibilities. This list is provided only as a general reference tool.

- 1) Approval of Customer Accounts -The Chief Compliance Officer must review all account documentation to insure completion as well as the suitability of the proposed transaction relative to client needs, income, assets, risk tolerance and objectives.
- 2) Maintenance of Registered Representative Office Documentation The Chief Compliance Officer shall maintain relevant files pertaining to all business conducted by any registered person under the supervision of the Chief Compliance Officer. Such files include customer files, transaction blotters, correspondence, advertising, sales memoranda, representative employment files, complaint files and cross-reference logs.
- 3) Processing of Sales/Transactions -The Chief Compliance Officer shall insure that all transactions and supporting documentation are reviewed promptly. Additionally, the Chief Compliance Officer shall insure that all checks and transactions are posted to appropriate internal records and copies maintained in the appropriate files.
- 4) Review of Client Accounts -The Chief Compliance Officer shall insure that all customer accounts receive a periodic review to ensure that all activity is consistent with client suitability standards. The Chief Compliance Officer shall further maintain a record of said review.
- 5) Review of Representative Status -The Chief Compliance Officer shall periodically review the status of all registered personnel assigned to their supervision to ensure that the representatives maintain the proper level of registration, state licensure and continuing education eligibility.
- 6) Annual Compliance Review The Chief Compliance Officer shall insure that all offices assigned to the Chief Compliance Officer are audited on at least an annual basis to assure compliance with applicable state, federal, and FINRA regulations.

## REQUIREMENTS FOR STATE-REGISTERED ADVISORS

- A. Jenifer Schimbeno of Blackmore Group has not been involved in or has not been found liable in an arbitration claim or by a civil, self-regulatory organization, or administrative proceeding of damages more than \$2,500 that involve any of the following:
  - An investment or an investment-related business or activity;
  - Fraud, false statement(s), or omissions;
  - Theft, embezzlement, or other wrongful taking of property;
  - Bribery, forgery, counterfeiting, or extortion; or
  - Dishonest, unfair, or unethical practices.
- B. Jenifer Schimbeno of Blackmore Group has not been subject of a bankruptcy petition.