

Part 2A of Form ADV: Firm Brochure



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Englewood, CO 80113
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<https://slingshotfin.com/>

February 2023

This brochure provides information about the qualifications and business practices of Slingshot Financial. If you have any questions about the contents of this brochure, please contact us at 303.993.7839. 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 Slingshot Financial is also available on the SEC's website at: www.adviserinfo.sec.gov. The firm's CRD/IARD Number is **#312796**

Slingshot Financial is a registered investment adviser. Registration does not imply a certain level of skill or training.

Item 2. Material Changes

Since the first published version of this document, dated May 2021, the following are material changes:

- Item 11: Code of Ethics has been amended to add information about when we render advice on retirement accounts, including IRAs.
- Item 5: Fees and Compensation has been changed regarding investment management services fees to be paid in arrears.

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Item 4. Advisory Business

Slingshot Financial was incorporated in Colorado in July 2020, became licensed as an investment adviser in 2021, and is wholly owned by Garrett Brookes, Founder and Chief Compliance Officer.

Slingshot Financial provides consulting services, business development and sales services for institutional asset managers, and investment management services for individual investors. Prior to engaging with Slingshot Financial, clients will have written agreement(s) with Slingshot Financial setting forth the terms and conditions under which Slingshot Financial renders its services.

Consulting services

Slingshot Financial offers a variety of professional services to businesses primarily in or related to the financial services industry. Consulting services include financial analysis, investment related research for product development and intellectual property, marketing and sales strategy, production of educational marketing collateral, and “white label” technical writing and corporate communications.

Institutional Sales Services (third party solicitor)

Slingshot Financial offers institutional sales services to asset management companies and financial technology companies, introducing their products and services to financial professionals.

Investment Management Services

Clients may engage Slingshot Financial Management (SFM) to manage investments on a discretionary basis. SFM provides continuous and regular account supervision and may provide advice about investments held within a client’s external portfolio but not managed by the firm.

Clients’ portfolio asset allocation will be set to reflect the client’s objectives (goals), risk tolerance, and in consideration with their individual situation including special needs, and circumstances.

The principles of Modern Portfolio Theory will largely guide asset allocation.

SFM may invest client portfolio using ETF’s, Mutual Funds, Stocks, REITs (public). Investment selection will be determined by client’s objectives and risk tolerance, as well as any special needs or considerations. Cost of ownership will be carefully considered when choosing investments.

Mutual Funds and ETFs are evaluated based on the Manager’s ability to consistently achieve the stated objectives of the fund. The qualifications and tenure of people managing the fund, the process for managing the fund, the composition of the fund, and the portfolio’s risk and return statistics are analyzed.

In some cases, Slingshot Financial Management may recommend that clients utilize the active discretionary management of a portion of the portfolio by and/or among independent non-affiliated

investment managers (“SUBADVISOR”) based upon their investment objectives. In these cases SFM will retain the full authority to fire, hire, and review subadvisors.

Prior to making any recommendations or commencing discretionary asset management, SFM will conduct a client interview and standardized risk assessment questionnaire to determine the client’s current financial position, investment objectives, and risk tolerance. SFM will create a Client Profile to guide investment advisory activities in accordance with the client’s investment objectives and constraints. When possible, SFM will accommodate client requests to restrict certain securities or types of securities. If SFM is not able to accommodate a client’s request to impose restrictions, the client will be informed in writing or email and the client will be given the opportunity to terminate their agreement with SFM.

SFM does not participate in any Wrap Fee programs.

As of the date of this filing, SFM manages approximately \$100,000 of client assets.

Item 5. Fees and Compensation

Consulting Services are provided for an hourly rate of \$100.00. These are typically short-term projects or specific business services outside of advisory services. Consulting service fee hourly rate is negotiable at the sole discretion of Slingshot Financial.

Third party solicitor (Institutional Sales) Services are provided for a flat monthly fee \$3400.00 plus 50% of Manager’s advisory fee on relationships managed or introduced between the retail advisor and institutional asset manager. Solicitor fees are billed monthly and include the flat monthly fee for the current month and 50% of the applicable manager’s fees in arrears as of the last day of the month. The first month’s flat fee is due upon signing of the engagement document. The flat monthly fee and percentage of manager’s fee are negotiable at the sole discretion of Slingshot Financial.

Investment Management Services: For the initial quarter, a pro-rated fee based on an annual rate of .90% of assets to be managed, will be due upon execution of the advisory agreement based on the remaining days in the calendar quarter.

After the initial calendar quarter, ongoing services are provided for a fee at an annual rate of .90% of assets under management. The investment management fee is paid quarterly in arrears and based on assets under management as of the last business day of the quarter. This fee is negotiable for accounts over \$2,000,000.

If the services of a subadvisor are recommended, Slingshot will pay the subadvisor’s fee from its Investment Management Services fee.

SFM requires clients to have their asset management fees deducted from client assets at the custodian.

Please refer to Item 15 for details about direct fee deduction.

Investment Management clients will also incur other fees and expenses outside of SFM. Custodians who hold client accounts may charge transaction fees and account-related or administrative fees. Please

review your account agreement from your custodian to determine whether any such custodian fees apply. SFM does not receive any portion of fees or expenses charged by mutual funds or custodians.

Termination: Any client may terminate their agreement with Slingshot Financial through written notice including email. Fees paid in advance will be refunded on a pro rata basis for days remaining in the period from the second business day following termination through the final day of billing period. Clients have five (5) business days from the date of execution of the agreement to terminate our services without penalty or fee.

Item 6. Performance-Based Fees and Side-By-Side Management

SFM does not charge performance-based fees, and therefore does not engage in side-by-side management.

Item 7. Types of Clients

SFM provides third party solicitor services to institutional asset managers.

SFM provides consulting services to individuals and businesses.

SFM provides investment management services to individuals and high net worth individuals.

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

SFM employs a combination of fundamental analysis, technical analysis, and macroeconomic indicators to develop its investment strategies. All investment management recommendations are made with consideration given to the client's objectives and goals, ability and willingness to take risk – risk tolerance, time horizon, liquidity needs, financial position, and any unique circumstances.

Investing involves the risk of loss including the loss of principal. Additionally, investment portfolios managed by Slingshot Financial Management may underperform other types of investments. You should expect the value of your portfolio to fluctuate within a wide range.

SFM may invest client portfolio using ETF's, Mutual Funds, Stocks, and publicly traded REITs. Investment selection will be determined by client's objectives and risk tolerance, as well as any special needs or considerations. Cost of ownership will be carefully considered when choosing investments.

Fundamental analysis typically involves analysis of the financial statements to gain understanding of the company's financial strength, growth prospective, quality of management and corporate governance practices.

Primary risks associated with Fundamental analysis are that the information obtained may not be accurate, may be misinterpreted by the analyst resulting in an incorrect estimate of a company's value. Additionally, if the security's price reacts more quickly or differently to new information about the company than anticipated, the results produced by fundamental analysis may not be favorable

Technical analysis is also used to evaluate broader price trends, momentum, and volatility using past market movements and attempt to identify patterns and predict future movements.

The primary risks associated with technical analysis are that past performance is no guarantee of future results. Security prices may be random and erratic, causing the assumptions made through technical analysis to be incorrect or differ from expected results.

Macroeconomic indicators may be studied to follow the business cycle in an attempt to identify favorable conditions to buy and sell securities/asset classes.

The primary risks associated with macroeconomic cyclical research are that economic indicators may take long periods of time to adjust or cause changes within the economy and business cycle. Additionally, historical patterns are not guaranteed to repeat as each business cycle may differ from previous ones. If long term patterns are slow to develop or remain undetectable in the chosen indicators, the results produced from cyclical research may be unfavorable.

Strategies:

Slingshot's Investment Philosophy begins with establishing an appropriate asset allocation based on client objectives. We may gradually shift the proportions of asset classes in the portfolio depending on the business cycle or economic conditions in addition to changes in client objectives. Portfolios are rebalanced to the desired weightings if they drift outside of permissible limits as the value of investments change. In addition to traditional stock, bond, cash allocations, we may include alternative asset classes in portfolios for diversification benefits and risk management.

We construct asset allocation portfolios through a mix of passive and active strategies employing both fundamental and quantitative management styles. We carefully consider the costs of investing and will opt for relatively low cost passively managed investments in efficient asset classes with deep, liquid markets. In more esoteric asset classes with less liquid markets, we will carefully select actively managed investments if we believe a premium can be earned through security selection and/or active risk management techniques. All actively managed investments including subadvisors are evaluated based on their experience in their respective market and their ability to consistently achieve their stated objectives. Alternative asset classes are accessed through daily liquid fund structures.

General Investing Risks: All investing involves risk, including loss of the investment itself that the investor should be prepared to bear.

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 an investment 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 specific circumstances. For example, political, economic and social conditions may trigger market events.

Inflation Risk: A dollar today will not buy as much as 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 an 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.

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.

Investment-Specific Risks:

Stocks may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring, could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

Companies may change their dividend policy, reducing, suspending, or even cancelling dividend payments to shareholders of common stock. If a company alters its dividend policy the shareholders may not realize their expected level of dividend income and the market price per share may fall as a result of negative dividend-related news. It is also important to understand that upon dividend payment, the market price per share of dividend paying stock will decrease by the amount of the dividend paid per share. Additionally, receipt of a dividend is a taxable event for the shareholder.

Mutual Funds and ETFs are investment pools which accept money from investors for shares in a portfolio of many securities. Mutual fund investors buy and sell their shares directly from/to the fund typically at a price calculated at the close of market, whereas ETF shares are continuously traded on an exchange like a stock. Both types of funds are managed according to a stated objective. The advantage of Mutual Funds and ETFs is usually diversification, as they offer exposure to many securities in a single share. However, depending on the object of the fund and its holdings, investors may be subject to concentration risk if the fund holds many of the same type of security or asset class. Certain types of funds may be subject to increased risks if they hold speculative securities, derivative securities, or use leverage. Mutual Funds and ETFs charge internal administrative and management fees which reduce returns. Shareholders of both Mutual Funds and ETFs are subject to risk that the manager is not able to achieve the stated objective of the fund.

ETFs carry tracking error risk, meaning that the fund could fail to closely track its underlying index. The performance of Inverse and leveraged ETFs may significantly deviate from the

performance of their underlying index due to mathematical compounding over time. Since ETF shares trade continuously throughout the day, their intraday price may fluctuate significantly which could impact performance depending on the timing of trade execution. Additionally, the liquidity of ETF shares are primarily determined by the liquidity of the Fund's holdings; ETFs holding less liquid assets may carry wide spreads and trade below the fund's Net Asset Value which could impact performance. An ETF's shares may trade at a market price that is above (premium) or below (discount) their net asset value, and ETFs purchased at a premium may not sell at a premium but at a discount, so a premium paid to purchase the ETF may not be realized at the time of sale, resulting in a loss of the premium.

Item 9. Disciplinary Information

SFM has no disciplinary or regulatory events to disclose regarding the firm or our management persons.

Item 10. Other Financial Industry Activities and Affiliations

Neither SFM nor any management persons are registered, or have an application pending to register as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

SFM may engage the services of a sub-advisor with whom Slingshot also has separate solicitation arrangements. This is a conflict of interest in that SFM would have an incentive to recommend third-party managers from whom SFM also receives solicitation fees on the same assets. To mitigate this conflict of interest:

- Slingshot Financial will always abide by its fiduciary duty to serve clients' best interest and will select sub-advisors in client's best interest independent of any other relationship with the sub-advisor.
- Clients always have the right to choose whether to accept SFM's recommendations, and
- Slingshot Financial will not receive any additional compensation in such instances so that there is no financial incentive to recommend one asset manager over another.

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

The Firm and its associates are fiduciaries, and as such, held to the highest standard of care. SFM has adopted the CFA Code of Ethics and Standards of Professional Conduct published by the CFA Institute. A copy of this Code of Ethics is available upon request.

Under the CFA Code and applicable securities regulations, the Firm and its associates shall observe the following standards of conduct:

- The Firm and its associates shall always place the interests of clients first;

- All investment activities carried out by the Firm on behalf of clients shall be in the client's interest, and suitable for each client considering the client's investment objectives, financial situation and needs;
- All personal securities transactions shall be conducted in such a manner as to avoid receiving a more favorable execution price than any client on that same day or trading to the disadvantage of a client in any way.
- Neither the firm nor any associate shall misuse material, non-public information (including further disclosure, insider trading, tipping, or other use for any personal gain);
- The Firm and its associates shall hold the identities, securities holdings, and financial circumstances of clients confidential; and
- The Firm and its associates shall make full, timely, and meaningful written disclosure of any conflicts of interest.

Our associates can invest in the same securities ourselves as we recommend for our clients and may do so at or about the same time as trades for clients. This represents a conflict of interest in that it creates an opportunity to obtain more advantageous trade execution than a client, or to attempt to influence the prices of securities by engaging in certain patterns of trading. The Firm does not permit associates to engage in trading to the disadvantage of a client, such as front-running, cherry-picking, or trading opposite client positions (e.g. shorting positions that a client owns long).

When we provide investment advice to you regarding your retirement plan account or individual retirement account (IRA), we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

* It should be noted that the fiduciary duties enumerated above do not differ from those we observe in all our advisory activities.

Item 12. Brokerage Practices

SFM requires that clients use Interactive Brokers for custody of their investment portfolios and trade execution.

Factors that SFM considers in selecting a custodian include minimizing commissions, quality of executions for clients, the platform of services offered to SFM, services offered to clients such as online access, banking features, reporting, and account insurance. The determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration, the full range of custodian services, including historical relationship, reputation, financial strength, the value of research provided, execution capability, commission rates, and responsiveness.

Interactive Brokers is an independent, unaffiliated broker-dealer and member, FINRA/SIPC. This custodian offers services to investment advisors which include custody of securities, trade execution, clearance and settlement of transactions. SFM receives some benefits (aka “soft dollars”) from Interactive Brokers in addition to the above. These benefits include the following products and services (provided without cost or at a discount):

- receipt of duplicate Client statements and confirmations;
- research related products and tools;
- consulting services; access to a trading desk serving Advisor participants;
- access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts);
- the ability to have advisory fees deducted directly from Client accounts;
- access to an electronic communications network for Client order entry and account information;
- access to mutual funds with no transaction fees and to certain institutional money managers;
and
- discounts on compliance.

The availability of these benefits is a conflict of interest in that it creates an incentive to recommend or require custodians that provide services for which the firm might otherwise have to pay. This conflict is mitigated first and foremost by our fiduciary duty to act in clients’ best interest. The recommendation of custodian is not made based on these benefits, but on the factors discussed above. Additionally, these benefits are generally available to all advisers, and most custodians provide similar services to advisers.

SFM does not receive client referrals from a broker-dealer or third party.

SFM does not permit clients to direct trade execution to a specified broker-dealer other than the custodian. If clients were permitted to direct trade execution, the firm might be unable to achieve most

favorable execution of client transactions, and this could cost clients more money. Some advisers do permit clients to direct trade execution.

When feasible the Firm will aggregate client trades, and shares shall be allocated among participating client accounts at an average price.

Item 13. Review of Accounts

SFM will review client accounts on a quarterly basis at a minimum, with consultation with clients no less than annually. All reviews will be conducted by Garrett Brookes, CFA.

Outside of regular review cycles, substantial market moves, other economic factors, or changes in a client's situation will trigger account reviews to ensure coherence to client objectives and risk tolerance.

The firm will not provide written reports clients. Clients are urged to review statements from the custodian, compare them with invoices received from SFM and contact SFM promptly with any discrepancies, questions, or concerns.

Item 14. Client Referrals and Other Compensation

Other than "soft dollar" benefits from custodian(s) discussed in Item 12, SFM does not receive economic benefits from any third party for providing investment advice to clients.

SFM does not pay or receive solicitation fees other than Institutional Sales discussed in Items 4 and 5 for referral of clients.

Item 15. Custody

We do not accept or maintain physical custody of any client funds or securities. Client assets are maintained at Interactive Brokers, who will send statements directly to clients no less than quarterly. Clients are urged to carefully review their statements.

When clients pay fees by direct deduction from their account(s), and we are deemed to have "constructive custody." In order for us to collect fees by direct deduction, we must: 1) have the client's written authorization to do so, 2) send the qualified custodian an invoice of the fee amount to be deducted from the client's account each time a fee is deducted, 3) send the client an itemized notice or invoice showing fee amount, the time period, amount of assets, and formula for the fee each time a fee is deducted, and 4) notify the Commissioner in writing that we intend to use the above safeguards.

Clients will receive custodian statements at least quarterly that show the fee deductions. Clients are urged to review statements from the custodian, compare them with invoices received from SFM and contact SFM promptly with any discrepancies, questions, or concerns.

Item 16. Investment Discretion

SFM requires discretionary authority to manage investment portfolios on behalf of clients, and clients will grant discretionary authority in their advisory agreement. Discretionary authority includes authority to determine which securities to purchase or sell and the amounts of securities to be bought or sold.

Clients wishing to impose reasonable limits or restrictions on discretionary authority may do so in the Client Profile that is part of the advisory agreement, subject to SFM's determination of whether such limits will permit the expeditious management of client assets.

Item 17. Voting Client Securities

SFM will not ask for nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients may direct proxy questions to SFM or to the issuer of the security.

Item 18. Financial Information

SFM does not have any financial condition that is likely to impair our ability to meet contractual commitments to clients.

We will not bill or collect fees of more than \$500, six months or more in advance.

Neither the firm nor any management person has been the subject of a bankruptcy petition.

Item 19. Requirements for State-Registered Advisers

Garrett Brookes, CFA® is the firm's principal executive officer. Please see the Brochure Supplement below for his education and business background.

Neither the firm nor any supervised person is compensated for advisory services with performance-based fees.

Neither the firm nor any management person has been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Neither the Firm nor any management person has any relationship or arrangement with issuers of securities.

Part 2B of Form ADV

Brochure Supplement for Garrett H Brookes, CFA®



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February 2023

This brochure supplement provides information about Garrett Brookes that supplements the Slingshot Financial brochure. You should have received a copy of that brochure. Please contact Garrett Brookes if you did not receive Slingshot Financial's brochure or if you have any questions about the contents of this supplement.

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

Garrett Brookes' Central Registration Depository (CRD) number is **#4806723**.

Item 2: Educational Background and Business Experience

Garrett H Brookes, CFA®

Year of Birth: 1980

Formal Education:

- University of Vermont, Burlington, VT, BSBA, 2002

Business Background:

- March 2021 – Present, Slingshot Financial, Consultant/Investment Adviser Representative
- August 2020 – March 2021, Slingshot Financial, Consultant
- February 2017 – June 2019, Oppenheimer Funds, AVP/RIA Consultant
- December 2014 – February 2017, Globalt Investments, VP of Sales and Distribution
- April 2014 – June 2014, 361 Capital, VP National Accounts/Institutional Sales
- April 2014 – June 2014, IMST Distributors, Registered Representative
- May 2008 – February 2014, Guggenheim Investments, Regional Vice President

Chartered Financial Analyst (CFA)

The Chartered Financial Analyst (CFA) charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Item 3: Disciplinary Information

There are no disciplinary events to disclose.

Item 4: Other Business Activities

SFM may engage the services of a sub-advisor with whom Slingshot also has separate solicitation arrangements. This is a conflict of interest in that SFM would have an incentive to recommend third-party managers from whom SFM also receives solicitation fees on the same assets. To mitigate this conflict of interest:

- Slingshot Financial will always abide by its fiduciary duty to serve clients' best interest and will select sub-advisors in client's best interest independent of any other relationship with the sub-advisor.
- Clients always have the right to choose whether to accept SFM's recommendations, and
- Slingshot Financial will not receive any additional compensation in such instances so that there is no financial incentive to recommend one asset manager over another.

Item 5: Additional Compensation

Garrett Brookes does not receive any economic benefit, other than planning fees, for providing advisory, consulting, or solicitation services to through SFM as described in Item 5: Fees (above).

Item 6: Supervision

Garrett Brookes is the Chief Compliance Officer for SFM, and supervises the firm's compliance with all applicable securities regulations, including his own, and will adhere to the firm's policies and procedures.

Item 7: Requirements for State-Registered Advisers

Garrett Brookes has no legal, disciplinary, or regulatory events to disclose.

Garrett Brookes has never been the subject of a bankruptcy petition.