

Item 1 Cover Page



**Part 2A of Form ADV: Firm Brochure**

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**Mailing Address: PO Box 3, Columbus MS 39703**

**Telephone: 662-327-1480**

**Email: [info@fincon.net](mailto:info@fincon.net)**

**Web Address: [www.fincon.net](http://www.fincon.net)**

**February 2, 2026**

This brochure provides information about the qualifications and business practices of Giraffes, Inc. DBA Financial Concepts. If you have any questions about the contents of this brochure, please contact us at 662-327-1480 or email, [info@fincon.net](mailto:info@fincon.net)

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 Financial Concepts is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 157616.

## Item 2 Material Changes

### Material Changes Since Our Last Annual Update

Since our last annual amendment, we have made the following material changes to this brochure:

1. **Address Update.** Our physical address changed from 1121 Second Ave N Columbus MS 39701 to 2980 North Frontage Road, Columbus, MS 39701 and our mailing address changed to PO Box 3, Columbus, MS 39703.
2. **Chief Compliance Officer Update.** Felice Olmos was appointed Chief Compliance Officer. Scott T. Ferguson continues to serve as principal owner, CEO, and primary adviser.

These changes do not materially alter the advisory services, fees, or conflicts of interest previously disclosed, unless otherwise noted.

We will provide you with an updated brochure or a summary of material changes when material updates occur.

The most current version is available upon request.

Prior annual update, date for reference: February 19, 2025.

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## Item 4 Advisory Business

Financial Concepts is an SEC registered investment adviser located in Columbus, Mississippi.

Financial Concepts began conducting advisory business in 2011.

Financial Concepts is principally owned by its primary adviser:

**Scott T. Ferguson, CEO**

Senior Management:

**Felice Olmos, Chief Compliance Officer**

**Casey Whitley, Chief of Staff**

Financial Concepts offers the following advisory services to our clients:

### Investment Supervisory Services ("ISS") Individual Portfolio Management

Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's strategy and create and manage a portfolio based on that strategy. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background.

We design portfolios based on a client's objectives and needs determined in the financial planning process. It is our firm's philosophy and belief that an investment portfolio should be changed based on changing financial goals and objectives, with an emphasis on disciplined, long-term investing rather than reacting to short-term market movements. While we generally employ a long-term, buy-and-hold philosophy, we may recommend changes when appropriate based on client circumstances, portfolio alignment, or risk considerations. We believe that purchasing power, erosion and inflation are the biggest risks our clients face. We believe the protection against that risk is ownership in equities. Therefore, we recommend portfolios that are primarily growth, growth, income, and balanced mutual fund portfolios.

Market risk is a part of owning equities. Therefore, our most significant value comes from behavior coaching, reminding clients of their long-term plans, goals, and objectives, and the history of owning the types of portfolios designed inside their financial plans. Often our biggest value comes from helping clients avoid the mistakes of timing or reacting to market emotion.

We communicate with clients on an ongoing basis to see if their objectives, goals, and financial needs have changed. If there have been significant changes, we discuss updating their plans and their portfolios. We manage these advisory accounts on a discretionary basis. Account supervision is guided by the client's stated objectives (i.e., maximum capital appreciation, growth, income, growth, and

income, or capital preservation). Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company and will generally include advice regarding the following securities:

- Mutual fund shares
- Money Market Funds
- Savings Bonds
- Certificate of Deposits
- Treasury Bills
- Exchange Traded Funds
- Variable Annuities

Many of our portfolio recommendations utilize funds from a single primary fund family. We select these funds because they align with our investment philosophy and offer diversification, competitive costs, and operational efficiency for clients. We conduct ongoing due diligence and consider reasonable alternatives. Clients are not obligated to use any specific fund family, and we will consider other families when appropriate to the client's objectives or restrictions. This approach creates a potential conflict of interest as our preference for a primary family could create an incentive to favor those funds. To address this conflict, we (i) evaluate cost and performance relative to available alternatives, (ii) supervise accounts for suitability and client best interest, and (iii) document the basis for our selections. Clients may impose reasonable investment restrictions at any time. Financial Concepts does not receive revenue-sharing, sales incentives, or other compensation from any fund family in connection with these recommendations, unless otherwise disclosed in this brochure.

## Financial Planning

As part of our services, we provide financial planning to our clients. Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values, and withdrawal plans. Through the financial planning process, all questions, information, and analysis are considered as they impact and are impacted by the entire financial and life situation of the client. Clients purchasing this service receive a written report that provides the client with a detailed financial plan designed to assist the client in achieving his or her financial goals and objectives.

In general, the financial plan can address any or all the following areas:

- **PERSONAL:** We review family records, budgeting, personal liability, estate information and financial goals.
- **INVESTMENTS:** We analyze investment alternatives and their effect on the client's portfolio.
- **INSURANCE:** We review existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile.
- **RETIREMENT:** We analyze current strategies and investment plans to help the client achieve his or her retirement goals.

- DEATH & DISABILITY: We review the client's cash needs at death, income needs of surviving dependents, estate planning and disability income.

We gather required information through in-depth personal interviews. Information gathered includes the client's current financial status, tax status, future goals, returns objectives and attitudes towards risk. Should the client choose to implement our recommendations, we suggest the client work closely with his/her attorney, accountant, insurance agent, and/or stockbroker. Implementation of financial plan recommendations is entirely at the client's discretion.

We also provide general non-securities advice on topics that may include tax and budgetary planning, estate planning and business planning.

Financial Planning recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. All recommendations are of a generic nature.

## Pension Consulting Services

We also provide several advisory services separately or in combination. While the primary clients for these services will be pension, profit sharing, and 401(k) plans, we offer these services, where appropriate, to individuals and trusts, estates, and charitable organizations. Pension Consulting Services is comprised of four distinct services. Clients may choose to use any or all of these services.

### **Investment Policy Statement Preparation (hereinafter referred to as "IPS"):**

We will meet with the client (in person or over the telephone) to determine an appropriate investment strategy that reflects the plan sponsor's stated investment objectives for the management of the plan. Our firm then assists with a written IPS detailing those needs and goals, including an encompassing policy under which these goals are to be achieved. The IPS also lists the criteria for the selection of investment vehicles as well as the procedures and timing interval for monitoring of investment performance.

### **Selection of Investment Vehicles:**

We assist plan sponsors in constructing appropriate asset allocation models. We will then review various mutual funds (both index and managed) to determine which investments are appropriate to implement the client's IPS. The number of investments to be recommended will be determined by the client, based on the IPS.

### **Monitoring of Investment Performance:**

We monitor client investments continually, based on the procedures and timing intervals delineated in the Investment Policy Statement. Although our firm is not involved in any way in the purchase or sale of these investments, we supervise the client's portfolio and will make recommendations to the client as market factors and the client's needs dictate.

## Employee Communications:

For pension, profit sharing and 401(k) plan clients with individual plan participants exercising control over assets in their own account ("self-directed plans"), we also provide quarterly educational support and investment workshops designed for the plan participants when the plan sponsor engages our firm to provide these services. The nature of the topics to be covered will be determined by us and the client under the guidelines established in ERISA Section

404(c). The educational support and investment workshops will NOT provide plan participants with individualized, tailored investment advice or individualized tailored asset allocation recommendations.

## SEI Asset Management Programs

Financial Concepts (the "Adviser") participates in SEI asset management and asset-allocation programs made available through SEI Investments Management Corporation ("SIMC") and its affiliates. These programs may utilize mutual funds and/or exchange-traded funds ("ETFs"), depending on the strategy selected.

For clients who select these programs, Financial Concepts analyzes the client's financial goals, risk tolerance, time horizon, liquidity needs, and preferences, and assists the client in selecting an appropriate investment strategy and asset-allocation model. Financial Concepts provides ongoing monitoring and advisory services consistent with the selected strategy.

SIMC serves as investment adviser to certain SEI mutual funds and ETFs and may manage or provide model portfolios used in these programs. SIMC may periodically make changes to the models and/or underlying fund allocations based on market conditions or investment considerations. While SIMC manages the model portfolios, the Adviser retains responsibility for monitoring suitability and may recommend changes or termination if no longer appropriate.

Clients may impose reasonable investment restrictions, select alternative strategies when available, or terminate participation in the program at any time, subject to applicable agreements.

SEI and its affiliates receive compensation as described in the applicable prospectuses and program documents. Clients should review those documents carefully before investing. Financial Concepts does not receive compensation from SEI other than the advisory fees disclosed in this brochure, unless otherwise stated.

**As of December 31, 2025, Financial Concepts is managing \$1,088,251,596 in assets under management, substantially all of which is managed on a discretionary basis.**

## Item 5 Fees and Compensation

### Investment Supervisory Services ("ISS") Individual Portfolio Management And Pension Consulting Fees

**Our annual fees for Investment Supervisory Services are assessed within a ranged rate of .5% - 1% of assets under management on an annualized basis.**

A minimum of \$25,000 of assets under management is required for this service. This account size may be negotiable under certain circumstances. Financial Concepts may group certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee the client will pay Financial Concepts for its investment advisory services.

**How We Calculate and Deduct Our Advisory Fee:** Your advisory fee is an annual percentage of assets we manage for you, billed quarterly in arrears. Each quarter, the transfer agent/custodian calculates your fee based on the value of your account over the period and your agreed-upon annual rate. The fee is deducted directly from your account, and your custodial statement will show the deduction.

**Negotiability, Household Grouping, and Employee/Spouse Discounts:** Our standard annual advisory fee schedule for ISS generally ranges from 0.50% to 1.00% of assets under management, depending on services and assets. We do negotiate fees based on factors such as account size, overall household relationship, and service complexity, and we group related household accounts for minimums and pricing where appropriate. Employees of Financial Concepts and their spouses receive discounted advisory fees under our employee benefits policy. We review fee levels on a periodic basis to help ensure similarly situated clients are treated fairly, reflect legitimate factors and are consistent with our fiduciary duty.

### Financial Planning Fees

Financial Concepts' Financial Planning fee is determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering into a contract with any client.

Our Financial Planning fees are calculated and charged on a fixed fee basis, typically ranging from \$1,000.00 to \$5,000.00, depending on the specific arrangement reached with the client.

We may request a retainer upon completion of our initial fact-finding session with the client; however, the advance payment will never exceed \$500 for work that will not be completed within six months. The balance is due upon completion of the plan.

The client is responsible for the payment of financial planning fees at the time of completion.

### General Information

#### Termination of the Advisory Relationship:

A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days written notice. Termination of this Agreement will not affect (a) the validity of any action previously taken by Financial Concepts under this Agreement; (b) liabilities or obligations of the parties from transactions initiated before termination of this Agreement. On the termination of this Agreement, Financial Concepts will have no obligation to recommend or take any action regarding the securities, cash, or other investments in the Account.

**Additional Fees and Expenses:** Our advisory fee is separate from mutual fund/ETF expenses (see fund prospectuses) and any custodian/transfer-agent fees (e.g., account or transaction-related charges). Review both sets of fees to understand your total cost.

**Grandfathering of Minimum Account Requirements:** Pre-existing advisory clients are subject to Financial Concept's minimum account requirements and advisory fees in effect at the time the client enters the advisory relationship. Therefore, our firm's minimum account requirements will differ among clients.

**Employee/Spouse Discounts:** As noted above, employees and their spouses receive discounted advisory fees under our employee benefits policy. (See "Negotiability, Household Grouping, and Employee/Spouse Discounts.")

**Advisory Fees in General:** Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment firms for similar or lower fees.

**Limited Prepayment of Fees:** Under no circumstances do we require or solicit payment of fees in excess of \$1200 more than six months in advance of services rendered.

**SEI Accounts:** Compensation is derived through a combination of asset-based fees and service fees. The interest rates that banks are willing to pay for deposits can affect the net returns, which are subject to change and can vary over time. In certain economic conditions, banks might not pay interest on deposits or may even charge negative interest, impacting the deposit balance

**ERISA Accounts:** Financial Concepts is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include, among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, Financial Concepts may only charge fees for investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b-1 fees.

**Your Transfer Agent/custodian sends statements at least quarterly showing all transactions, holdings, and fee deductions; please review them carefully and contact us with any questions.**

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

Financial Concepts does not charge performance-based fees.

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## Item 7 Types of Clients

Financial Concepts provides advisory services to the following types of clients:

- Individuals (other than high net-worth individuals)
- High Net Worth Individuals
- Charitable Organizations
- Small Businesses or Institutions

We do not require clients to meet a 'qualified client' standard.

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

### METHODS OF ANALYSIS

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

**Fundamental Analysis:** We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

**Risks for all forms of analysis:** Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

### INVESTMENT STRATEGIES

We use the following strategies in managing client accounts, provided that such strategies are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

**Long-term purchases:** We purchase securities with the idea of holding them in the client's account for a year or longer. Typically, we employ this strategy when:

- We believe the securities to be currently undervalued, and/or
- We want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, security may decline sharply in value before we make the decision to sell.

**Material Risk:** Investing involves risk, including loss of principal. Key risks that may affect your portfolio include:

- Market and Equity Risk, equity markets can be volatile and may decline sharply due to economic, geopolitical, or company-specific events;

- Inflation/Purchasing-Power Risk, inflation can erode the real value of assets and income; equity exposure is used, in part, to address this risk over time;
- Asset Allocation and Model Risk, diversification and model portfolios may underperform other allocations or benchmarks, and rebalancing or adjustments may lag changing conditions;
- Manager/Fund Risk, mutual fund and ETF performance depends on underlying managers and strategies; fees and expenses reduce returns; and
- Behavioral Risk, emotional reactions to market movements can lead to poor timing decisions; our role includes behavioral coaching to keep your plan on track.

**Risk of Loss:** Securities investments are not guaranteed, and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk.

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## Item 9 Disciplinary Information

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no reportable disciplinary events to disclose.

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## Item 10 Other Financial Industry Activities and Affiliations

**Insurance Affiliations and Conflicts:** Certain personnel are licensed insurance agents and may recommend insurance products for which they receive separate, customary compensation. This creates a conflict of interest because they have a financial incentive to recommend those products.

**How We Address This Conflict:** Clients are not obligated to purchase any recommended insurance through our personnel. Our supervisory program (i) requires recommendations to be suitable and aligned with client objectives, (ii) includes transactional and periodic reviews, and (iii) requires pre-approval and monitoring of outside business activities. We disclose conflicts, evaluate alternatives, and remind clients they may obtain products through any provider they choose.

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

**Code of Ethics & Personal Trading:** Our Code of Ethics requires all personnel to act with loyalty, fairness, and good faith, comply with applicable securities laws, and place client interests ahead of their own.

We: (i) prohibit use of material non-public information and personal trading ahead of clients; (ii) require initial/annual holdings and quarterly transaction reports for access persons; (iii) require pre-clearance for limited offerings and prohibit IPO purchases; and (iv) maintain oversight, recordkeeping, and enforcement procedures. We may invest in the same or different securities we recommend to clients, but our policies are designed to identify and mitigate conflicts and prevent misuse of information.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by emailing [info@fincon.net](mailto:info@fincon.net), or by calling us at 662-327-1480.

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## Item 12 Brokerage Practices

Financial Concepts does not have any direct soft-dollar arrangements and does not receive any soft-dollar benefits.

As a matter of policy and practice, Financial Concepts does not generally block client trades and, therefore, we implement client transactions separately for each account. Consequently, certain client trades may be executed before others.

Financial Concepts may require that clients establish brokerage accounts with American Funds Service Company ("AFSC") and Capital Bank and Trust Company ("CB&T") as Transfer Agent, to maintain custody of client's assets and to effect trades for their accounts. Financial Concepts is independently owned and operated and not affiliated with AFSC or CB&T.

AFSC & CB&T provides Financial Concepts with access to its investment advisory trading and custody services, which are typically not available to AFSC & CB&T retail investors. These services are not contingent upon our firm committing to AFSC & CB&T any specific amount of business (assets in custody or trading commissions). AFSC & CB&T services include the execution of securities transactions, custody, research, and access to the American Funds Family. For our client accounts maintained in its custody, AFSC & CB&T does not charge separately for custody.

AFSC & CB&T's products and services that assist us in managing and administering our clients' accounts include software and other technology that:

- provide access to client account data (such as trade confirmations and account statements).
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts.
- facilitate payment of our fees from clients' accounts; and
- assist with back-office functions, recordkeeping, and client reporting.

AFSC & CB&T also offers other services intended to help us manage and further develop our business enterprise. These services may include compliance, legal and business consulting.

AFSC & CB&T may also provide other benefits such as educational events or occasional business entertainment of our personnel. In evaluating whether to recommend or require that clients custody their assets at AFSC & CB&T, we may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors we consider and not solely on the nature, cost or quality of custody and brokerage services provided by AFSC & CB&T, which may create a potential conflict of interest.

Financial Concepts does not maintain custody of your assets which we advise although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15 - Custody, below).

Your assets must be maintained in an account at a "qualified custodian," or Transfer Agent, generally a broker-dealer or bank. A qualified custodian is a financial institution that meets specific regulatory

standards to hold client funds and securities, ensuring they are kept in separate accounts under the client's name or in accounts that contain only the adviser's clients' funds and securities. We seek to select a Transfer Agent who will hold your assets and execute transactions on terms that are overall most advantageous when compared with other available providers and their services. Clients must include any limitations on this discretionary authority in this written authority statement. Clients may change/amend these limitations as required. Such amendments must be provided to us in writing.

For clients in need of custodial services, and depending on client circumstances and needs, we may recommend the use of one of several custodians (including, but not limited to Lincoln Financial Group, SEI, Empower), provided that such recommendation is consistent with our firm's fiduciary duty to the client. Our clients must evaluate these custodians before opening an account. The factors considered by Financial Concepts when making these recommendations are the custodian's ability to provide professional services, our experience with the custodian, the custodian's reputation, the custodian's quality of execution services and costs of such services, among other factors. Clients are under any obligation to effect trades through any recommended custodian.

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## Item 13 Review of Accounts

### Investment Supervisory Services ("ISS") Individual Portfolio Management

**REVIEWS:** While the underlying securities within Individual Portfolio Management Services accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

Accounts are reviewed by Scott Ferguson and other advisory personnel, as appropriate.

**REPORTS:** In addition to the quarterly statements and confirmations of transactions that clients receive from the Transfer Agent, annually we provide reports summarizing account performance, balances, and holdings.

### Financial Planning Services

**REVIEWS:** While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for Financial Planning clients unless otherwise contracted for.

Accounts are reviewed by Scott Ferguson and other advisory personnel, as appropriate.

**REPORTS:** Financial Planning clients will receive a completed financial plan. Additional reports will not typically be provided unless otherwise contracted for.

### SEI Accounts

**REVIEWS:** With the SEI Asset Allocation Program, the Adviser serves as the investment adviser to the investor and is responsible for analyzing the investor's current financial situation, return expectations, risk tolerance, time horizon, and asset class preference, pursuant to the Adviser's investment advisory agreement. Based upon the investor's information, the Adviser and the investor select an investment strategy and choose from one of many mutual fund asset allocation models, which may be provided by SEI Investments Management Corporation ("SIMC") or purchase the individual mutual funds.

Accounts are reviewed by Scott Ferguson and other advisory personnel, as appropriate.

### Pension Consulting Services

**REVIEWS:** Financial Concepts will review the client's Investment Policy Statement (IPS) whenever the client advises us of a change in circumstances regarding the needs of the plan. Financial Concepts will also review the investment options of the plan according to the agreed upon time intervals established in the IPS. Such reviews will generally occur quarterly.

Accounts are reviewed by Scott Ferguson and other advisory personnel, as appropriate.

## Item 14 Client Referrals and Other Compensation

It is Financial Concepts' policy not to engage promoters or to pay related or non-related persons to refer potential clients to our firm directly. We may provide small non-monetary gifts that do not exceed the de minimis threshold for referring clients to our firm, in accordance with SEC regulations.

Additionally, it is Financial Concepts' policy not to accept or allow our related persons to accept any form of compensation, including cash, or gifts, from a client in conjunction with the advisory services we provide that exceed the de minimis threshold.

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## Item 15 Custody

We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that fees are directly debited from client accounts.

Because the Transfer Agent calculates the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact Financial Concepts directly if they believe that there may be an error in their statement. On at least a quarterly basis, the Transfer Agent is required to send to the client a statement showing all transactions within the account during the reporting period.

Financial Concepts is deemed to have limited custody of client assets solely due to its authority to deduct advisory fees from client accounts. We do not otherwise have access to client funds or securities.

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## Item 16 Investment Discretion

Clients may hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission.

Our discretionary authority includes the ability to do the following without contacting the client:

- Determine the security to buy or sell; and/or
- Determine the amount of the security to buy or sell

Clients give us discretionary authority when they sign a discretionary agreement with our firm and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

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## Item 17 Voting Client Securities

As a matter of firm policy, we do not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.

We do not offer any consulting assistance regarding proxy issues to clients.

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## Item 18 Financial Information

Under no circumstances do we require or solicit payment of fees in excess of \$1200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

Financial Concepts has not been the subject of a bankruptcy petition at any time during the past ten years.

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## **Part 2B of Form ADV: *Brochure Supplement***

### **Scott T. Ferguson**

Financial Concepts  
2980 North Frontage Road  
Columbus, MS 39701  
Telephone: 662-327- 1480  
Email: [stf@fincon.net](mailto:stf@fincon.net)  
Web Address: [www.fincon.net](http://www.fincon.net)

February 2, 2026

This brochure supplement provides information about Scott T. Ferguson that supplements the Financial Concepts brochure. You should have received a copy of that brochure. Please contact Financial Concepts if you did not receive the Firm Brochure or if you have any questions about the contents of this supplement.

Additional information about Scott T. Ferguson is available on the SEC's website at <https://adviserinfo.sec.gov>.

## **Item 2 Educational, Background and Business Experience**

**Full Legal Name:** Scott Todd Ferguson

**Born:** 1986

### **Education:**

University of Alabama; Tuscaloosa, AL; General Studies, No Degree; 2004- 2005  
Heritage Academy; Columbus, MS; Diploma; 2004

### **Business Experience:**

Financial Concepts; Columbus, MS; President/CEO; from September 2020 to present  
Financial Concepts; Columbus, MS; Chief Compliance Officer; October 2015 to 2025  
Financial Concepts; Columbus, MS; Vice President; from March 2007 to September 2020  
Financial Concepts; Columbus, MS; Database Operations; from January 2006 to March 2007  
National Planning Corporation; Registered Representative; April 2015 -November 2017  
Girard Securities, Inc.; Registered Representative; from March 2007 to April 2015

### **Previous Securities Examinations:**

FINRA Series 6, Investment Company and Variable Contracts Products Representative Examination (2007)  
NASM Series 63 Uniform Securities Agent State Law Examination (2008) SIE –  
Securities Industry Essentials Examination (2017)  
FINRA Series 65 Uniform Investment Adviser Law Examination (2014)

## **Item 3 Disciplinary Information**

Scott T. Ferguson does not have any history of disciplinary events.

## **Item 4 Other Business Activities**

- Investment-Related Activities
  - Scott T. Ferguson is not actively engaged in any investment-related business or occupation.
  - Scott T. Ferguson does not receive any other commissions, bonuses or other compensation on the sale of securities or other investment products.
- Non-Investment-Related Activities
  - Scott Ferguson is involved in a non-investment-related business venture that includes an individual who is also an advisory client of the Firm. This activity is separate from the Firm's advisory services and presents a potential conflict of interest due to Scott Ferguson's financial interest in the venture.
    - Clients are not required to participate in this activity, and advisory services are provided independently and in the client's best interest.

## **Item 5 Additional Compensation**

Scott T. Ferguson does not receive additional compensation from third parties for providing investment advice to its clients and does not compensate anyone directly for client referrals.

## **Item 6 Supervision**

The supervision of advisory activities under the leadership of Scott Ferguson, as owner and primary adviser, ensures that the firm acts in the best interests of its clients and maintains compliance with regulatory obligations. Supervision of Scott Ferguson's advisory activities is conducted by Felice Olmos, Chief Compliance Officer, who oversees compliance with regulatory requirements and firm policies.

## **Part 2B of Form ADV: *Brochure Supplement***

### **Sawyer Brown**

Financial Concepts  
2980 North Frontage Road  
Columbus, MS 39701  
Telephone: 662-327- 1480  
Email: sbrown@fincon.net  
Web Address: www.fincon.net

February 2, 2026

This brochure supplement provides information about Sawyer Brown that supplements the Financial Concepts brochure. You should have received a copy of that brochure. Please contact Financial Concepts if you did not receive the Firm Brochure or if you have any questions about the contents of this supplement.

Additional information about Sawyer Brown is available on the SEC's website at <https://adviserinfo.sec.gov>.

## **Item 2 Educational, Background and Business Experience**

**Full Legal Name:** Sawyer Rias Brown

**Born:** 1999

### **Education:**

Mississippi State University; Starkville, MS; General Finance, 2022

East Mississippi Community College; Starkville, MS; General Studies, 2021

Caledonia High School; Caledonia, MS; Diploma; 2018

### **Business Experience:**

Financial Concepts; Columbus, MS; Registered Representative; October 2023 to present

Financial Concepts; Columbus, MS; Client Care Specialist; from December 2022 to present

Caring Transitions of GTR; Staff Member; May 2021 -October 2021

Sleepmade, Inc.; Staff Member; from January 2018 to July 2020

### **Previous Securities Examinations:**

FINRA Series 65 Uniform Investment Adviser Law Examination (2023)

## **Item 3 Disciplinary Information**

Sawyer R. Brown does not have any history of disciplinary events.

## **Item 4 Other Business Activities**

- Investment-Related Activities
  - Sawyer R. Brown is not actively engaged in any investment-related business or occupation.
  - Sawyer R. Brown does not receive any other commissions, bonuses or other compensation on the sale of securities or other investment products.
- Non-Investment-Related Activities
  - Sawyer R. Brown owns a personal residential rental property. From time to time, this property may be rented to individuals, which could include advisory clients. This activity is non-investment-related; however, the rental of property to a client may present a potential conflict of interest, as Mr. Brown could receive rental income from a client relationship.
    - Clients are under no obligation to rent any property owned by Mr. Brown, and any such arrangement would be conducted on terms consistent with those offered to the public. Mr. Brown is required to disclose this conflict to affected clients and is expected to always act in the client's best interest.

## **Item 5 Additional Compensation**

Sawyer R. Brown does not receive additional compensation from third parties for providing investment advice to its clients and does not compensate anyone directly for client referrals.

## **Item 6 Supervision**

The supervised person's investment advisory activities are subject to oversight by the Firm's Chief Compliance Officer and senior management. Supervision includes review of client accounts, advice provided, and adherence to Firm policies and regulatory requirements.

## **Part 2B of Form ADV: *Brochure Supplement***

### **Felice Olmos**

Financial Concepts  
2980 North Frontage Road  
Columbus, MS 39701  
Telephone: 662-327-1480  
Email: folmos@fincon.net  
Web Address: www.fincon.net

February 2, 2026

This brochure supplement provides information about Felice Olmos that supplements the Financial Concepts brochure. You should have received a copy of that brochure. Please contact Financial Concepts if you did not receive the Firm Brochure or if you have any questions about the contents of this supplement.

Additional information about Felice Olmos is available on the SEC's website at <https://adviserinfo.sec.gov>.

## **Item 2 Educational, Background and Business Experience**

**Full Legal Name:** Felice Rosanne Olmos

**Born:** 1983

### **Education:**

College For Financial Planning; Online; Financial Paraplanner Qualified Professional; Designation 2021

Santa Barbara College; Santa Barbara, CA; General Studies, No Degree; 2003-2004

Mira Costa High School; Manhattan Beach, CA; Diploma; 2002

### **Licenses & Certifications:**

Investment Adviser Certified Compliance Professional, (IACCP) (2025)

FINRA Series 65 Uniform Investment Adviser Law Examination (2023)

Financial Paraplanner Qualified Professional (FPQP) (2021)

### **Business Experience:**

Financial Concepts; Columbus, MS; Chief Compliance Officer; from May 2025 to present

Financial Concepts; Columbus, MS; Compliance Manager; from December 2021 to 2025

Financial Concepts; Columbus, MS; Client Care Specialist; from January 2020 to December 2021

Nicholas Air; Accounting Assistant; July 2018 - May 2019

United Exchange Corp; Accounts Payable Specialist; from May 2017- October 2017

Monster Energy Corp; Accounts Payable International Supervisor; from November 2006 – August 2014

## **Item 3 Disciplinary Information**

Felice R Olmos does not have any history of disciplinary events.

## **Item 4 Other Business Activities**

- Investment-Related Activities
  - Felice Olmos is not actively engaged in any investment-related business or occupation.
  - Felice Olmos does not receive any other commissions, bonuses or other compensation on the sale of securities or other investment products.
- Non-Investment-Related Activities
  - Felice Olmos is not engaged in an occupation that provides substantial compensation or involves a substantial amount of her time.

## **Item 5 Additional Compensation**

Felice Olmos does not receive additional compensation from third parties for providing investment advice to its clients and does not compensate anyone directly for client referrals.

## **Item 6 Supervision**

Felice Olmos, as Chief Compliance Officer, has the autonomy to oversee compliance with regulatory requirements and firm policies. While Mrs. Olmos manages the Firm's compliance program, oversight by Scott Ferguson is limited to administrative and organizational matters and does not interfere with her independent compliance judgment.

## **Part 2B of Form ADV: *Brochure Supplement***

### **Kristen Elsmore**

Financial Concepts  
2980 North Frontage Road  
Columbus, MS 39701  
Telephone: 662-327- 1480  
Email: [kelsmore@fincon.net](mailto:kelsmore@fincon.net)  
Web Address: [www.fincon.net](http://www.fincon.net)

February 2, 2026

This brochure supplement provides information about Kristen Elsmore that supplements the Financial Concepts brochure. You should have received a copy of that brochure. Please contact Financial Concepts if you did not receive the Firm Brochure or if you have any questions about the contents of this supplement.

Additional information about Kristen Elsmore is available on the SEC's website at <https://adviserinfo.sec.gov>.

## **Item 2 Educational, Background and Business Experience**

**Full Legal Name:** Kristen Nicole Elsmore Born: 1997

### **Education:**

Mississippi University for Women; Columbus, MS; MBA, 2021

Mississippi University for Women; Columbus, MS; Bachelor's degree in general business, 2018

East Mississippi Community College; Mayhew, MS; Associate's degree, 2016

New Hope High School; Columbus, MS; Diploma; 2015

### **Business Experience:**

Financial Concepts; Columbus, MS; Registered Representative; May 2024 to present

Financial Concepts; Columbus, MS; Client Care Specialist; from January 2020 to May 2023

### **Previous Securities Examinations:**

FINRA Series 65 Uniform Investment Adviser Law Examination (2024)

## **Item 3 Disciplinary Information**

Kristen N. Elsmore does not have any history of disciplinary events.

## **Item 4 Other Business Activities**

- Investment-Related Activities
  - Kristen N. Elsmore is licensed as an insurance agent and can offer insurance products through unaffiliated insurance companies. In this capacity, she may receive standard commissions if clients choose to purchase insurance products through her. This presents a potential conflict of interest, as there may be an incentive to recommend insurance products based on compensation rather than solely on a client's needs.
  - Clients are under no obligation to act on any insurance-related recommendations or to purchase insurance products through her. All recommendations are made with the client's best interest in mind, and clients are free to obtain insurance through other providers.
  - Kristen N. Elsmore is not otherwise actively engaged in any additional investment-related business or occupation. She does not receive any other commissions, bonuses, or compensation on the sale of securities or other investment products.
- Non-Investment-Related Activities
  - Kristen N. Elsmore is not engaged in any occupation that provides substantial compensation or involves a substantial amount of her time outside of her investment-related activities.

## **Item 5 Additional Compensation**

Kristen N. Elsmore does not receive additional compensation from third parties for providing investment advice to its clients and does not compensate anyone directly for client referrals.

## **Item 6 Supervision**

The supervised person's investment advisory activities are subject to oversight by the Firm's Chief Compliance Officer and senior management. Supervision includes review of client accounts, advice provided, and adherence to Firm policies and regulatory requirements.