

DISCLOSURE BROCHURE

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This brochure provides information about the qualifications and business practices of Sentry Pacific Financial Group, LLC. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 858-384-5700. 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 Sentry Pacific Financial Group, LLC (IARD#168614) is available on the SEC's website at www.adviserinfo.sec.gov

APRIL 2021

Item 2: Material Changes

Annual Update

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

Material Changes since the Last Update

Since filing the last Annual Amendment to this brochure in March 2020, we have made the following material changes.

- Item 4 was amended to reflect the Firm's relationship with Sofos Investments, Inc. and the billing structure associated with that relationship.
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Full Brochure Available

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

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Item 4: Advisory Business

Firm Description

Sentry Pacific Financial Group, LLC (hereinafter “SPFG”, “Firm” or the “Advisor”) was founded in 2013 and is a state-registered investment advisor located in San Diego, California.

SPFG is a fee-based financial planning and investment advisory firm providing comprehensive wealth management and retirement plan consulting services to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations, and institutions.

Advice is provided through consultation with the client and can include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate conservation.

The firm does not sell annuities or insurance. Moreover, we do not sell for commissions stocks, bonds, mutual funds, limited partnerships, or other commissioned products. However, the firm’s Managing Member is an independent insurance agent who sells insurance products through Sentry Pacific Insurance Services, LLC.

An evaluation of each client’s initial situation is provided to the client, often in the form of a net worth statement or risk analysis. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Under CCR Section 260.238(k), Advisor, its representatives, or any of its employees will disclose to the clients all material conflicts of interest.

Types of Advisory Services

On many occasions, SPFG furnishes advice to clients on matters not involving securities. The Firm offers an initial consultation in which pertinent information about the client’s personal and financial circumstances and objectives is collected, and the scope of the engagement is determined.

FINANCIAL PLANNING AND CONSULTING

Advisor offers financial planning services. The client will compensate Advisor on an hourly or fixed fee basis described in detail under “Fees and Compensation” section of this brochure. Services include but are not limited to a thorough review of all applicable topics including Wills, Estate Plan/Trusts, Investments, Taxes, and Insurance.

California Code of Regulations, 10 CCR Section 260.235.2 requires that the conflict of interest, which exists between the interests of the investment advisor and the interests of the client when offering financial planning services, be disclosed. We will disclose, through this brochure and other written disclosures, all conflicts of interest existing between the interests of our firm and the interests of our clients. Clients are under no obligation to act upon our recommendations.

INVESTMENT ADVISORY SERVICES

SPFG offers investment advice through consultations where the advice provided is tailored to meet the needs and investment objectives of the client. For advisory clients, all aspects of the client’s financial affairs are reviewed, and realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis. The Adviser periodically reviews a client’s financial

situation and portfolio through regular contact with the client and will provide recommendations as to the client's asset allocation. The client is always free to accept or reject any investment recommendation from SPFG.

DUNHAM ASSET MANAGEMENT SERVICES

Advisor offers direct asset management services to advisory clients utilizing the asset allocation program ("The Program") through Dunham & Associates Investment Counsel, Inc. ("DAIC"). DAIC is an investment advisor and broker-dealer registered with the Securities and Exchange Commission ("SEC"). Advisor shall use the Program to provide asset allocation services to its Clients on an individualized basis pursuant to a DAIC client asset allocation agreement.

Advisor will use the Funds and Allocation Strategies available under the Program for the purposes of helping to develop individualized asset allocation recommendations for each Client.

Advisor's recommendation to use the Program is done on a non-discretionary basis. Once selected by the client, Advisor will maintain limited discretionary authority on the account to make changes to the account. Advisor shall provide on-going monitoring and evaluation of the performance of the Funds, Allocation Strategies, and the allocations among them, for each Client on an individualized basis, and can change investment allocations as it deems appropriate. Advisor will have limited discretionary authority on the client's account for the purposes of selecting or changing investment allocation strategies.

REFERRALS TO THIRD-PARTY MONEY MANAGERS - SPFG offers advisory services by referring clients to independent, third-party money manager firms registered as investment advisers, including without limitation Sofos Investments Inc. ("Sofos"), offering asset management and other advisory services. Third-party money manager firms are responsible for continuously monitoring client accounts and making trades in client accounts when necessary. As a result of the referral, the firm is paid a portion of the fee charged and collected by the third-party money manager firm in the form of solicitor and consultation fees. Each solicitation arrangement is performed pursuant to a written solicitation agreement and is in compliance with SEC Rule 206(4)-3 and applicable state securities rules and regulations.

Under this program, Advisor will assist you with identifying your risk tolerance and investment objectives. Third-party money managers are recommended in relation to your stated investment objectives and risk tolerance. You must enter into an agreement directly with the third-party investment advisory firms who provide your designated account with asset management services.

We are available to answer questions that you have regarding your account and act as the communication conduit between you and the third-party investment advisory firm. The third-party investment advisory firm will typically take discretionary authority to determine the securities to be purchased and sold for your account. We do not have any trading authority with respect to your designated account(s) managed by a third-party investment advisory firm.

You are never required or obligated to work with a third-party investment advisory firm we recommend and can work with the financial professional of your choice.

No guarantees can be made that a client's financial goals or objectives will be achieved by a third-party investment advisory firm recommended by our firm. Further, no guarantees of performance can ever be offered by our firm.

Please refer to *Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss* for more details.

Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objectives. Clients can impose restrictions on investing in certain securities or types of securities. Agreements cannot be assigned without written client consent.

Wrap Fee Programs

Advisor does not sponsor any wrap fee programs.

Client Assets under Management

As of the date of January 4, 2021, Advisor had \$11,388,458.00 in client assets under management on a discretionary basis.

Item 5: Fees and Compensation

FINANCIAL PLANNING and CONSULTING

Financial Planning Services are offered based on an hourly rate of \$350 and fixed fee ranging between \$500 and \$2,500 based on complexity and unique client needs. The fees are negotiable. Prior to the planning process the client will be provided an estimated plan fee. Lower fees for comparable services can be available from other sources. The payment is due upon delivery of the plan. Advisor reserves the right to waive the planning fees should the client decide to implement the plan with Advisor.

If the client cancels within five (5) business days, no fees will be due. If a client cancels after five (5) business days, Advisor is entitled to any earned fees and will bill the client.

FEES FOR DUNHAM SERVICES AND THIRD-PARTY MONEY MANAGERS

Third-party investment advisory firms recommended by Advisor, including Dunham, generally have different fee schedules that will vary among the different firms. Advisor will not charge or assess an advisory fee directly to you. However, Advisor receives a solicitor or referral fee from third-party investment advisory firms. Specifically, the firm will receive a portion of the overall fee charged by third-party investment advisory firms. Most investment advisory firms charge a fee based on the percentage of assets under management and pay 50% - 60% of the overall fee charged to your account to our firm. Other firms can charge the same set fee on all accounts and all assets allowing us to retain a higher percentage of the fee for smaller account. In some cases, we can retain up to 75% or more of the total fee charged to the client. The following is Dunham's standard fee schedule provided for illustrative purposes.

Fee Schedule for:			
DAIC Asset Allocation Program			
Assets Under Management	Total Fee	DAIC Retention	Advisor Retention
Up to \$99,000	1.50%	.25%	1.25%
\$100,000 to \$499,000	1.15%	.25%	.90%
\$500,000 to \$999,999	1.00%	.25%	.75%

Over \$1,000,000	.85%	.25%	.60%
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FEE Schedule for: SOFOS Program Fees						
\$3.50 per account plus an annual percentage of the Account value using the daily average. closing market value of the Account equal to:						
	4 Alpha			4 Beta		
Assets	Total Fee	Sofos	Advisor	Total Fee	Sofos	Advisor
Up to \$249,999	1.65000%	.55000%	1.10%	1.4500%	.35000%	1.10%
> \$250,000	1.44500%	.49500%	.95%	1.2650%	.31500%	0.95%
> \$500,000	1.29550%	.44550%	.85%	1.1335%	.28350%	0.85%
> \$1,000,000	1.15095%	.40095%	.75%	1.0052%	.25515%	0.75%
> \$3,000,000	1.00095%	.40095%	.60%	0.8552%	.25515%	0.60%

All fees are calculated and collected by third-party investment advisory firms who will be responsible for delivering my portion of the fee paid by you to Advisor. A complete description of third-party investment advisory firms' services, fee schedules and account minimums will be disclosed in the firm's disclosure brochure (i.e., Form ADV Part 2A: Firm Brochure) which will be provided to you prior to or at the time an agreement for services is executed and the account is established. You will also receive a Solicitor Disclosure Statement from my firm which details the exact fee arrangement between Advisor and the third-party investment advisory firm.

Advisor has a conflict of interest in that it will only recommend third-party investment advisory firms that have agreed to compensate the firm for referrals of my clients. Clients are advised that there can be other third-party managed programs not recommended by my firm, that are suitable for the client and that can be costly than arrangements recommended by my firm. Additionally, we have a conflict of interest to recommend third-party investment adviser firms that agree to pay Advisor a higher portion of the overall management fee than do other third-party investment adviser firms. To control for this conflict of interest, we attempt to negotiate the same solicitor fee received from all third-party investment adviser firms. Moreover, our decision to recommend a third-party investment adviser is based on objective criteria such as prior investment performance, investment strategies offered and the totality of investment advisory services available.

You can incur additional charges including but not limited to, mutual fund sales loads, 12b-1 fees and surrender charges and IRA and qualified retirement plan fees. We do not receive any portion of such commissions or fees. We are only compensated by the solicitor/referral fees described above, and do not receive any other compensation in connection with your account. When we negotiate lower fees and expenses charged by third parties, all negotiated improvements are for your benefit.

Third-party investment advisory firms are registered or exempt from registration in the state where you reside.

Client Payment of Financial Planning Fees

Fees for financial plans are due upon delivery of the completed plan. All plans are delivered inside of forty-five (45) days.

Additional Client Fees Charged

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

Prepayment of Client Fees

Advisor does not require prepayment of fees of more than \$500 per client and six months or more in advance.

External Compensation for the Sale of Securities to Clients

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

Item 6: Performance-Based Fees and Side-by-Side Management

Sharing of Capital Gains

The Dunham Program has been designed to assess fees based on the capital gains or capital appreciated of managed securities and Dunham can share the receipt of such compensation with Advisor. This is known as performance-based fees and is in addition to the standard Dunham fee detailed in Item 5. The following is a description of Dunham's performance-based fee arrangements.

The initial account value shall constitute the first "highwater" mark. Subsequent "net" daily activity adjusts the highwater mark up or down. Investments increase the highwater mark by the amount of the net investment. Redemptions reduce the highwater mark on a pro-rata basis (calculated as the ratio of the market value of the net redemption to the total market value of the account times the highwater mark prior to redemption) and can trigger a fee if the market value of the net redemption is greater than the pro-rata highwater mark redeemed. The adjusted highwater mark at the end of the month is compared to the market value of the Account at the end of the month.

If the Account value is greater than the highwater mark, a fee equal to 10% of the increase will be calculated and a new highwater mark is established. No performance fee is assessed for any month in which a new highwater mark is not established (except for a performance fee related to a redemption as noted previously). As fees are calculated monthly and charged quarterly, in arrears, an Account can incur a fee for a given month during a quarter even though the Account due at quarter-end can be below the Account highwater mark at the beginning of the quarter.

For qualified clients who elect to pay a performance-based fee, DAIC and Advisor shall each receive one-half of any performance fee attributable to a Client Account. Fees will be automatically deducted from the Account ten (10) days after the billing notice unless alternate instruction have been provided.

For purposes of rule 205-3(d)(1)(ii)(A) under the Investment Advisers Act of 1940 [17 CFR 275.205-3(d)(1)(ii)(A)], a qualified client means a natural person who, or a company that, the investment adviser entering into the contract (and any person acting on his behalf) reasonably believes, immediately prior to entering into the contract, has a net worth (together, in the case of a natural person, with assets held jointly with a spouse) of more than \$2,100,000.

The simultaneous management of these different types of client accounts, with different fee structures, creates certain conflicts of interest, as the fees for the management of some client types are higher than for others. Nevertheless, when managing the assets of these accounts, we have a duty to treat all accounts fairly and equitably over time.

Additionally, since performance-based fees reward us for strong performance in accounts which are subject to such fees, we can have an incentive to favor these accounts over those that have only asset-based fees (i.e., fees based simply on the amount of assets under management in an account) with respect to areas such as trading opportunities, trade allocation, and allocation of new investment opportunities.

To mitigate the conflict, the Advisor represents that it is not its intent to trade a client's account in an irresponsible, unethical, or baseless manner, or to assume unnecessary risk given perceived reward. Advisor will never knowingly or intentionally breach the fiduciary duty it owes to a client and believes the incentive or performance fee portion of its compensation aligns, rather than divides, the interests of clients and the Advisor in addition, the client can choose to place their account in the advisory fee only program.

Item 7: Types of Clients

Description

Advisor generally provides investment advice to individuals, trusts, estates, charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

Account Minimums

Advisor does not require a minimum to open an account, however the third party money managers utilized by Advisor can have minimum asset requirements as set forward in their Form ADV Part 2A.

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

Methods of Analysis

Because Advisor does not formulate investment advice (other than the recommendation of third-party investment advisory firms) or manage assets, we do not utilize specific methods of analysis or strategies to select individual investments or securities. Although we do not utilize specific methods of analysis or strategies, we are available to consult with you about the strategies utilized by third-party investment advisory firms responsible for managing your accounts. We are available to provide recommendations and consult with you about specific securities held in accounts managed by third-party investment advisory firms.

When determining which third-party investment advisory firms to recommend, Advisor focuses on investment advisory firms offering long term investment strategies which can be defined as strategies whereby investments are held for at least one year or longer.

When researching third-party investment advisory firms to use, Advisor relies on fundamental method of analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for any type of security or investment. The risk associated with fundamental analysis is that it is somewhat subjective. While a quantitative approach is possible, fundamental analysis usually entails a qualitative assessment of how market forces interact with one another in their impact on the investment in question. It is possible for those market forces to point in different directions, thus necessitating an interpretation of which forces will be dominant. This interpretation can be wrong and could therefore lead to an unfavorable investment decision.

Past performance is not indicative of future results. Therefore, you should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds, etc.) involves risk of loss. Further, depending on the different types of investments there can be varying degrees of risk. You should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, my firm is unable to represent, guarantee, or even imply that services and methods of analysis used by third-party investment advisory firms we recommend can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines.

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

Fundamental analysis involves evaluating a stock using real data such as company revenues, earnings, return on equity, and profits margins to determine underlying value and potential growth. Technical analysis involves evaluating securities based on past prices and volume. Cyclical analysis involves analyzing the cycles of the market.

When creating a financial plan, Advisor utilizes fundamental analysis to provide review of insurance policies for economic value and income replacement. Technical analysis is used to review mutual funds and individual stocks. The main sources of information include Morningstar, client documents such as tax returns and insurance policies.

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

Fundamental analysis can involve interest rate risk, market risk, business risk, and financial risk. Risks involved in technical analysis are inflation risk, reinvestment risk, and market risk. Cyclical analysis involves inflation risk, market risk, and currency risk.

The main sources of information include financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

Investment Strategy

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

Other strategies utilized by the third party money managers can include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

Security Specific Material Risks

All investment programs have certain risks that are borne by the investor.

Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with Advisor:

- *Interest-rate Risk:* Fluctuations in interest rates can cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Market Risk:* The price of a security, bond, or mutual fund can drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions can trigger market events.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments can be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Business Risk:* These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Financial Risk:* Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations can result in bankruptcy and/or a declining market value.

Item 9: Disciplinary Information

Criminal or Civil Actions

In 2010, a lawsuit was filed against an investment adviser, whom Managing Member Daniel Guillen had referred a client to two years prior. Mr. Guillen was brought into the suit as a defendant because he had referred the client to the investment adviser. The suit was brought because of how the investment adviser managed the investment. Mr. Guillen did not manage the

investment but had only referred the client to the adviser. The lawsuit was resolved and Mr. Guillen was not adjudicated liable on any of the causes of action. The lawsuit was later dismissed as to Guillen.

Administrative Enforcement Proceedings

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

Self-Regulatory Organization Enforcement Proceedings

The firm and its management have not been involved in legal or disciplinary events related to past or present investment clients.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

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

Futures or Commodity Registration

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

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Managing Member Daniel Guillen has a financial industry affiliated business as an independent insurance agent with Sentry Pacific Insurance Services, LLC. Approximately 50% of his time is spent in this business, he will offer clients advice or products from those activities. As an insurance agent, he can receive separate yet typical compensation in the form of commissions for the sale of insurance products.

These practices represent conflicts of interest because it gives Mr. Guillen an incentive to recommend products based on the commission amount received. This conflict is mitigated by the fact that Mr. Guillen has a fiduciary responsibility to place the best interest of the clients first and clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

Managing Member Daniel Guillen is also an investment advisor representative with Axxcess Wealth Management, LLC, an unaffiliated registered investment advisor. This does not represent a conflict of interest since clients of Sentry Pacific Financial Group, LLC will not also be clients of Axxcess Wealth Management, LLC.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

Advisor solicits the services of Third-Party Money Managers to manage client accounts. In such circumstances, Advisor receives solicitor fees from the Third Party Money Manager. This situation creates a conflict of interest. This conflict is mitigated by the fact that Advisor has a fiduciary duty to place the client's best interest first and will act accordingly. When referring clients to a third-party money manager, the client's best interest will be the main determining factor of Advisor. These fees do not include brokerage fees that can be assessed by the custodial broker dealer. Fees for these services are based on a percentage of assets under management not to exceed any limit imposed by any regulatory agency. The final fee schedule is attached to Exhibit C in Advisor's Investment Advisory Agreement.

Prior to referring any clients to third party advisors, Advisor will make sure they are properly licensed, or notice filed with the Department of Business Oversight.

This solicitor relationship is disclosed to the client in each contract between Advisor and Third Party Money Manager. Advisor does not charge additional management fees for Third Party managed account services. Client's signature is required to confirm consent for services within Third Party Investment Agreement. Client initials Advisor 's Investment Advisory Agreement to acknowledge receipt of Third Party fee Schedule and required documents including Form ADV Part 2 disclosures.

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

Code of Ethics Description

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

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

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

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

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

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

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

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

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

Advisor and its employees can buy or sell securities that are also recommended to clients. To mitigate conflicts of interest, employees are required to disclose all reportable securities transactions as well as provide Advisor with copies of their brokerage statements.

The Chief Compliance Officer of Advisor is Daniel Guillen. He reviews all employee trades each quarter.

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

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

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

Item 12: Brokerage Practices

Advisor's services do not include the selection or recommendation of broker-dealers to be used for implementation of client securities transactions. All recommendations and other broker-dealer decisions are made by third-party advisory firms.

Item 13: Review of Accounts

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

Accounts established and maintained with third-party money management firms are reviewed quarterly by Daniel Guillen, Chief Compliance Officer. Account reviews are performed more frequently when market conditions dictate. Financial Plans are considered complete when recommendations are delivered to the client and a review is done only upon request of client.

Review of Client Accounts on Non-Periodic Basis

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

Content of Client Provided Reports and Frequency

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by the Third Party Money Manager's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs. Client should carefully compare any reports and/or invoices received from Third Party Money Managers to the statements sent by the custodian. Client should report any discrepancies to Advisor immediately.

Item 14: Client Referrals and Other Compensation

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

Advisor receives a portion of the annual management fees collected by the Third-Party Money Managers to whom Advisor refers clients.

This situation creates a conflict of interest because Advisor and/or its Investment Advisor Representative have an incentive to decide what Third Party Money Managers to use because of the higher solicitor fees to be received by Advisor. However, when referring clients to a third party money manager, the client's best interest will be the main determining factor of Advisor.

Advisory Firm Payments for Client Referrals

Advisor can enter into "Solicitor/Finder" relationships. These individual solicitors offer our services to the public. Advisor pays a referral fee to the solicitor or finder based on its advisory fee and written agreement. Solicitors/finders will also be appropriately registered under federal and state securities laws where applicable. Client receives all related agreements and disclosures prior to or at the time of entering into an Investment Advisory Agreement.

Item 15: Custody

Account Statements

Advisor does not have custody of client funds or securities. All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to the performance report statements prepared by the Third Party Money Managers.

Item 16: Investment Discretion

Discretionary Authority for Trading

Advisor does not have discretionary authority for any client accounts managed by third-party money managers.

Advisor's recommendation to use the Dunham Program, SOFOS, or another third-party manager is done on a non-discretionary basis. Once selected by the client, Advisor will maintain limited discretionary authority on the account to make changes to the account. Advisor shall provide on-going monitoring and evaluation of the performance of the Funds, Allocation Strategies, and the allocations among them, for each Client on an individualized basis, and can change investment allocations as it deems appropriate. Advisor will have limited discretionary authority on the client's account for the purposes of selecting or changing investment allocation strategies. However, Dunham is solely responsible for selecting the investments held in each allocation strategy and solely responsible for implementing all trades in the client's account.

Item 17: Voting Client Securities

Proxy Votes

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

Item 18: Financial Information

Balance Sheet

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

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

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

Bankruptcy Petitions during the Past Ten Years

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

Item 19: Requirements for State Registered Advisors

Principal Executive Officers and Management Persons

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

Outside Business Activities

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

Performance Based Fee Description

As previously disclosed in *Item 6*, Advisor charges or accept performance-based fees through Dunham & Associates. Performance-based compensation can create an incentive for Advisor to recommend an investment that can carry a higher degree of risk to the client.

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

No management persons of Advisor have any disclosures to report.

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

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

Material Conflicts of Interest Assurance

All material conflicts of interest regarding the Advisor, its representatives or any of its employees which could be reasonably expected to impair the rendering of unbiased and objective advice are disclosed as required under CCR Section 260.238(k).

ITEM 1 COVER
SUPERVISED PERSON BROCHURE
FORM ADV PART 2B

Daniel Guillen

Sentry Pacific Financial Group, LLC

Office Address:
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San Diego, CA 92108

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

Additional information about Daniel Guillen (CRD#6243750) is available on the SEC's website at www.adviserinfo.sec.gov.

APRIL 2021

Brochure Supplement (Part 2B of Form ADV) Supervised Person Brochure

Principal Executive Officer

Daniel Guillen

- Year of Birth: 1976
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Item 2 Educational Background and Business Experience

Educational Background:

- University of California – San Diego; Coursework and studies in Computer Science; 1994 - 1996

Business Experience:

- Sentry Pacific Financial Group, LLC; Managing Member/Investment Advisor Representative; 08/2013 – Present.
 - Sentry Pacific Insurance Services, LLC; Managing Member/Insurance Agent; 11/2013 - Present.
 - Axxcess Wealth Management, LLC; Investment Advisor Representative; 05/2015 - Present
 - North Wealth Insurance Agency, Inc.; President/Insurance Agent; 02/2008 – 03/2014
 - Self-employed; Mortgage and Insurance Broker; 01/2002 – 02/2008
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Item 3 Disciplinary Information

None to report

Item 4 Other Business Activities

Managing Member Daniel Guillen has a financial industry affiliated business as an independent insurance agent with Sentry Pacific Insurance Services, LLC. Approximately 50% of his time is spent in this business, he will offer clients advice or products from those activities. As an insurance agent, he can receive separate yet typical compensation in the form of commissions for the sale of insurance products.

These practices represent conflicts of interest because it gives Mr. Guillen an incentive to recommend products based on the commission amount received. This conflict is mitigated by the fact that Mr. Guillen has a fiduciary responsibility to place the best interest of the clients first and clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

Managing Member Daniel Guillen is also an investment advisor representative with Axxcess Wealth Management, LLC, an unaffiliated registered investment advisor. This does not represent a conflict of interest since clients of Sentry Pacific Financial Group, LLC will not also be clients of Axxcess Wealth Management, LLC.

Item 5 Additional Compensation

Daniel Guillen receives commission from the sale of insurance products but does not receive any performance-based fees.

Item 6 Supervision

Since Daniel Guillen is the sole owner of the firm, he is solely responsible for all supervision and formulation and monitoring of investment advice offered to clients.

Item 7 Requirements for State-Registered Advisors

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None