

# Jennifer L. Szaro, CRCP®

XML Financial Group  
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**This document provides information about Jennifer Szaro that supplements the XML Financial Group (XML) ADV 2A Brochure and Wrap Fee Program Brochure (“Brochures”). If you were not provided with a Brochure or if you have questions about the content of this supplement please contact Compliance at [info@xmlfg.com](mailto:info@xmlfg.com) or 703.827.2300. The Brochures and additional information about XML and Jennifer Szaro are available on the SEC’s website at [adviserinfo.sec.gov](http://adviserinfo.sec.gov).**

## ITEM 2 EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Jennifer attended the University of Rhode Island earning a Bachelor of Science. Jennifer joined XML Financial Group in 2019 as the Chief Compliance Officer when the affiliated broker-dealer, XML Securities, LLC, member FINRA/SIPC (“XML BD”), then dually registered, merged its investment advisory activity with XML. Since 2010, Jennifer has been a registered representative with XML BD.

FINRA’s Compliance Professional (CRCP)® program provides compliance, legal and regulatory professionals with an in-depth understanding of the foundation, theory and practical application of securities laws and regulation. Jennifer completed the CRCP® program in 2012, then delivered at the FINRA Institute at Wharton. The program comprises two non-consecutive weeklong residential courses, in addition to extensive pre-course readings and casework. The CRCP certificate is awarded to those who successfully complete the program within a two-year period. R Perquisites: None  
Designation Training Requirements: Two non-consecutive weeklong residential courses  
Designation Exam Type: Open-book, proctored exam at the end of each weeklong course  
Continuing Education Requirements: 12 hours every three years  
Online at FINRA’s Investor Complaint Center if designee is a registered broker or investment adviser, or email [CRCP@finra.org](mailto:CRCP@finra.org)  
Published List of Disciplined Designees: None.

## ITEM 3 DISCIPLINARY INFORMATION - None

## ITEM 4 OTHER BUSINESS ACTIVITIES

**BROKER AGENT:** Jennifer is a registered representative with XML BD. This enables her to effect securities transactions for a commission in his capacity as a broker agent. She is able to offer brokerage services to both clients and non-clients of XML. When acting in the capacity as a broker agent, she is eligible to receive compensation based on the sale of securities and brokerage products including, but not limited to, mutual fund share classes that pay sale charges and distribution or service (“trail”) fees, transaction commissions, markup and markdowns on principal trades in bonds and other compensation as detailed in the Reg BI Disclosure document. This creates a conflict of interest as there is an inherent incentive to recommend brokerage products and effect transactions based on the broker agent’s compensation. Please discuss any questions regarding brokerage compensation and the related conflicts of interest with this professional. Visit <https://www.xmlfg.com/brokerage-services> to view the Reg BI Disclosure and additional disclosures and policies.

Pursuant to a management agreement between Focus and BR Financial Associates Management Company (“Management Company”), the Management Company has agreed to provide persons to serve as officers of XML who, in such capacity, will be responsible for the management, supervision and oversight of XML. Jennifer is a member of the Management Company.

Refer this individual’s Other Business Activities listed in the IAPD Detailed Report available on <https://adviserinfo.sec.gov>.

**ITEM 5 ADDITIONAL COMPENSATION**

In lieu of receiving a advisory fees or commission payouts, Jennifer receives a base amount and a percentage of the Management Company fee payout, which is based on the combined XML and XML BD company financials.

**ITEM 6 SUPERVISION**

XML's investment advisor supervisory system includes, but is not limited to, principal approval of advisory agreements and amendments, email sample review, outside account review and trade monitoring. This individual's designated supervisor is Brett Bernstein, CFP®, CEO at 301.770.5234.