



## Item 1 – Cover Page

# Escarpment Financial Group, LLC

Registered Investment Adviser

## FORM ADV PART 2A FIRM BROCHURE

Date: October 7, 2026

This Form ADV Part 2A (“Disclosure brochure”) provides information about the qualifications and business practices of Escarpment Financial Group, LLC (“Firm,” “Advisor,” “we,” “our,” or “us”). If you have any questions about the contents of this Disclosure Brochure, please contact the Firm at 512-917-3937 or by email at [compliance@escarpmentfg.com](mailto:compliance@escarpmentfg.com). The Firm’s website is [www.escarpmentfg.com](http://www.escarpmentfg.com).

Escarpment Financial Group is a registered investment adviser located in the State of Texas. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration as an investment adviser does not imply any specific level of skill or training. This Disclosure Brochure provides information about Escarpment Financial Group to assist you in determining whether to retain the Advisor.

Additional information about Escarpment Financial Group and its Advisor is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor’s firm name or CRD#343281.



## Item 2 – Material Changes

This brochure is the initial Form ADV Part 2A filing for Escarpment Financial Group, LLC.

In the future, this section will discuss material changes made since the previous annual updating amendment.

Clients may request a copy of the current brochure at any time.



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## Item 4 – Advisory Business

### Firm Overview

Escarpment Financial Group, LLC is a Texas limited liability company formed in 2026. Brian Scott Crow (“Principal”) is the sole member, manager, and Chief Compliance Officer of the Firm.

The Firm operates as a fiduciary investment adviser and provides fee-only financial planning and investment management services.

The Firm does not receive commissions for securities transactions and does not sell proprietary investment products.

### Services Offered

#### Comprehensive Financial Planning

Financial planning engagements may include:

- Retirement planning
- Cash flow and budgeting analysis
- Tax planning coordination
- Investment planning
- Insurance review
- Education planning
- Estate planning coordination
- Executive compensation analysis
- Business owner planning
- Charitable giving strategies

Clients may engage the Firm for standalone financial planning services or receive ongoing financial planning as part of an investment management relationship.

The financial planning process will include:

- Discovery – intake of client documents including tax returns, bank statements, brokerage statements, insurance documents, and any other relevant account statements that make up the entirety of the client’s financial facts and circumstances. The quality and effectiveness of the financial plan depends on the accuracy and completeness of information provided by the client.



- Client meetings to assess client risk tolerance, suitability, goals, circumstances and any other factors which may drive boundaries in the financial plan.
- Plan Development and Delivery – the Advisor will develop a comprehensive financial plan based on the inputs, which will map out paths to solve identified problem areas and achieve goals where possible. Gaps may be identified, which require iteration to achieve goals. The plan will be delivered to the Client in writing and in a client meeting, with opportunity for discussion and follow-up.
- Implementation responsibility rests primarily with the client. The Firm will assist the client in establishing accounts, transferring accounts, or otherwise implementing those portions of the plan which can be implemented with the Firm. Implementation of tax strategies, estate planning recommendations, and actions involving held-away accounts remains the responsibility of the client.
- The Firm will provide ongoing monitoring of plan progress, with regular review of accounts held with the Firm and those held-away, as possible.

Escarpment Financial Group may from time to time refer clients to an accountant, attorney, or other specialists as appropriate for their unique situation. Escarpment Financial Group is not compensated for any referrals.

The Firm does not provide legal or accounting services and recommends clients consult qualified professionals regarding legal, tax, and accounting matters. The Firm may sit in meetings with the client and appropriate tax or legal professionals in order to serve the client's interests in developing and implementing the financial plan.

Comprehensive Financial planning will follow the model outlined below:

- The Firm will provide an initial report as part of comprehensive financial planning.
- The Firm expects to deliver initial reports within 90 days of client engagement of services. Timeliness of the initial report will have dependence on client schedule for information gathering meetings and client's timely delivery of supporting documents.
- The Firm provides regular client meetings to assess changes in facts and circumstances which would drive updates to the financial plan. The meetings will also provide reporting and monitoring of effectiveness of the financial plan, which could in turn drive changes to the financial plan.
- If the client has significant assets in held-away accounts or in illiquid business interests, then the client may be better suited to only financial planning services rather than the traditional investment management services. This occurrence is expected to be rare and unusual. The primary model of the Firm is Investment



Management services, which include financial planning services without additional fee.

- The Firm will complete the financial plan based on client provided data. If client fails to submit the necessary information, the plan quality will suffer. A plan will be provided with best effort based on client documents and facts known to the Firm through interviews and account documents available to the Firm. Continued lack of transparency or information disclosure may indicate the client is not a fit for long-term relationship with the Firm.
- The Client and the Firm will evaluate the beneficial relationship provided by the Firm at periodic intervals. With fiduciary interests in mind, and if the financial planning process is no longer in best interest of the client, the Firm will recommend pause or exit of the relationship, and thus, would not collect ongoing fees from the Client.
- The Firm will provide monitoring progress reports for Clients at periodic intervals. This would not constitute a new financial plan, when none is required due to no substantive changes to the prior plan.

## Investment Management

The Firm provides discretionary portfolio management services tailored to each client's:

- Financial objectives
- Risk tolerance
- Time horizon
- Liquidity needs
- Tax circumstances

Investment recommendations generally utilize:

- Low-cost ETFs
- Mutual funds
- Individual equities
- Fixed-income securities
- Cash equivalents
- Real Estate Investment Trusts (REITs)
- Options

The Firm generally emphasizes long-term investing, diversification, tax efficiency, and evidence-based portfolio construction.



## Held-Away Account Management

We provide asset management services in which we manage your custodial accounts and provide you with continuous and ongoing supervision of your custodial accounts. For certain clients, we provide asset management services for client held-away accounts that are maintained at independent third-party custodians where Escarpment Financial Group uses an order management system to implement asset allocation and rebalancing strategies on behalf of the client for these held-away accounts. These are primarily 401(k) or 403(b) accounts, HSAs, 529 plans, IRA accounts, and other assets which are held by custodians other than our investment management account custodian.

The Firm may also advise on held-away accounts on a non-discretionary basis. These will typically be held-away accounts where Escarpment Financial Group does not use an order management system to exercise discretion.

Where held-away account management is offered, clients grant discretionary authority through the applicable technology platform. The Firm does not take custody of client assets or maintain possession of client credentials. The Firm's ability to manage held-away accounts may be limited by restrictions imposed by the third-party custodian or retirement plan provider.

The Firm relies on information provided by clients and third-party custodians for held-away accounts and cannot guarantee the accuracy or completeness of such information.

## Wrap Fee Programs

Escarpment Financial Group does not manage or place client assets into a wrap fee program. Investment management services are provided directly by Escarpment Financial Group.

## Assets Under Management

As a newly formed investment adviser, the Firm currently has no regulatory assets under management as of the date of this brochure.

## Item 5 – Fees and Compensation

Unless a client has received the firm's disclosure brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees.



## Investment Management Fees

The Firm charges an annual asset-based advisory fee ranging from 0.50% to 1.00% based on assets under management, per schedule below.

| <b>Assets Under Management</b> | <b>Annual Fee</b> |
|--------------------------------|-------------------|
| First \$1,000,000              | 1.00%             |
| Next \$2,000,000               | 0.75%             |
| Above \$3,000,000              | 0.50%             |

The Firm may negotiate fees based on factors including anticipated assets under management, complexity of services, anticipated future relationship size, and other relevant considerations.

Fees are generally billed quarterly in arrears based on the quarter-end value of managed accounts. Fees on initial account startup and on client agreement termination are pro-rated for the applicable quarter. As fees are billed in arrears, no rebate will be needed upon termination of the agreement.

Clients receiving ongoing investment management services generally receive financial planning services as part of the advisory relationship. In limited circumstances involving unusually complex or extensive planning engagements, the Firm may charge a separate planning fee, which will be disclosed and agreed to in writing before services are provided.

Client agreements may be terminated upon written or emailed notice, at least 30 calendar days in advance.

## Financial Planning Fees

Standalone financial planning services are offered on either:

- Fixed-fee basis
- Hourly basis

Typical fees range from:

- Initial comprehensive plan: \$3,600 to \$7,500. Fee for initial comprehensive plan may be waived for Investment Management clients under the AUM fee schedule at the Firm's discretion.
- Hourly planning: \$250-\$500 per hour, billed in 15-minute increments. Hourly fees will be billed monthly as the work is performed (in arrears).

Specific fees will be disclosed in each client agreement.



## Additional Costs

Clients may incur separate costs including:

- Brokerage commissions (if applicable)
- Custodial fees
- ETF expenses
- Mutual fund expenses
- Wire fees
- Transfer fees
- Other third-party charges

These expenses are in addition to advisory fees. The firm does not share in any portion of the brokerage fees or transaction charges imposed by the broker/dealer or custodian.

## Advance Fees

The Firm does not require payment of more than \$500 six months or more in advance.

## Item 6 – Performance-Based Fees and Side-by-Side Management

The Firm does not charge performance-based fees.

## Item 7 – Types of Clients

The Firm generally serves:

- Individuals
- Families
- Retirees
- High-net-worth individuals
- Business owners
- Trusts
- Estates
- Small retirement plans

The Firm reserves the right to decline any prospective client engagement.



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

### Methods of Analysis

The Firm may utilize:

- Fundamental analysis
- Asset allocation analysis
- Modern portfolio theory
- Tax-aware portfolio analysis
- Retirement income analysis

Sources of information include:

- Public company filings
- Research providers
- Financial publications
- Economic reports
- Custodial platform resources

### Investment Strategies

The Firm generally employs:

- Strategic asset allocation
- Diversified portfolio construction
- Long-term investing
- Periodic rebalancing
- Tax-efficient investing

### Risks of Methods of Analysis and Investment Strategies

Each method of analysis and investment strategy used by the Firm involves risk and may not achieve its intended result. Fundamental analysis relies on financial, economic, and other information that may be incomplete, inaccurate, or incorrectly interpreted, and an investment's market value may not reflect the Firm's assessment of its underlying value. Asset allocation analysis and modern portfolio theory rely in part on historical relationships, assumptions regarding risk and return, and diversification among asset classes; actual market behavior may differ from these assumptions, and diversification does not assure against loss.



Strategic asset allocation and long-term investment strategies may result in portfolios remaining invested during periods of market decline and may underperform other strategies over shorter periods. Periodic rebalancing may result in the sale of appreciating investments or the purchase of declining investments and may generate transaction costs or taxable gains. Tax-aware and tax-efficient investment strategies involve tradeoffs between tax considerations and investment considerations, and actions intended to reduce taxes may adversely affect investment performance or may not produce the anticipated tax result. Retirement income analysis depends upon assumptions regarding investment returns, inflation, longevity, spending, and other factors that may differ materially from actual experience.

## Risks

Investing involves risk of loss.

Material risks include:

### Low-cost ETF Risk

Exchange Traded Funds (ETFs) are subject to the risks associated with the securities or other assets held by the fund. ETF shares may trade above or below their net asset value, and market prices may be affected by supply and demand, market volatility, liquidity, and trading conditions. An ETF may not achieve its investment objective or accurately track its underlying index or benchmark. ETFs also incur management fees and other expenses that may reduce investment returns.

### Mutual Fund Risk

Mutual funds are subject to the risks associated with the securities or other assets held by the fund. Fund performance may be affected by market conditions, investment decisions made by the fund's manager, and the fund's investment strategy. Mutual funds also incur management fees and other expenses that reduce investment returns and may distribute taxable capital gains to shareholders regardless of whether the shareholder has sold shares.

### Individual Equity Risk

Investments in individual equities are subject to the business, financial, competitive, regulatory, and other risks affecting the issuing company, as well as general market conditions. The value of an individual security may decline substantially or become worthless. Investments concentrated in a particular company, industry, or sector may experience greater volatility and risk of loss than a more diversified portfolio.



## Fixed-income Securities Risk

Fixed-income securities are subject to interest rate risk, credit risk, and inflation risk. Bond prices generally decline when interest rates rise, and an issuer may be unable or unwilling to make required interest or principal payments. Fixed-income securities may also be subject to liquidity and call or prepayment risk, and inflation may reduce the purchasing power of interest and principal payments.

## Cash Equivalents Risk

Cash equivalents generally involve lower investment risk than many other securities but are subject to inflation risk, interest rate and reinvestment risk, and, depending on the instrument, credit risk. Returns may not keep pace with inflation, resulting in a loss of purchasing power over time.

## Real Estate Investment Trust (REIT) Risk

REITs are subject to risks associated with real estate ownership, including changes in property values, occupancy rates, interest rates, and economic conditions. REITs may also be affected by the use of leverage, changes in financing costs, and reductions or interruptions in distributions to investors.

## Options Risk

Options involve additional risks including leverage, time decay, liquidity limitations, valuation complexity, and the possibility of substantial losses. The value of an option may be highly sensitive to changes in the price and volatility of the underlying security, and an option purchaser may lose the entire premium paid if the option expires worthless.

## Market Risk

Securities markets may decline in response to economic, political, regulatory, geopolitical, or other events and market conditions. Such declines may affect individual securities, particular market segments, or financial markets broadly and may result in loss of principal.

## Interest Rate Risk

Changes in interest rates may affect the value of investments, particularly fixed-income securities. Bond values generally decline when interest rates rise, and securities with longer maturities or durations may be more sensitive to changes in interest rates.



## Inflation Risk

Inflation may reduce the purchasing power of investment returns and assets over time. Investments whose returns do not keep pace with inflation may lose purchasing power even if their nominal value does not decline.

## Liquidity Risk

Liquidity risk is the risk that an investment cannot be sold or converted to cash within a reasonable period of time, or cannot be sold without materially affecting its value.

Liquidity risk may arise from investments including private equity, private credit, private real estate, restricted securities, and other non-traded or thinly traded investments. Such investments may have extended holding periods, limitations or penalties on early withdrawal, limited redemption opportunities, or no readily available secondary market.

When evaluating liquidity risk, EFG will consider, as applicable, the client's anticipated cash needs, investment time horizon, other liquid assets, the amount of the client's assets committed to illiquid investments, and the terms and expected holding period of the investment.

EFG will seek to maintain sufficient liquidity in client portfolios to meet reasonably anticipated needs based upon information provided by the client. Where EFG becomes aware of significant illiquid assets held outside accounts managed by EFG, those assets may also be considered when evaluating the client's overall liquidity needs and investment strategy.

## Manager Risk

Investment decisions made by EFG or by managers of funds or other investments recommended by EFG may not produce the desired results. Investment strategies and judgments may prove incorrect or may underperform relevant markets, benchmarks, or alternative investment approaches.

## Concentration Risk

Concentration risk is the risk of increased loss or volatility resulting from a significant portion of a client's assets being exposed to a single issuer, industry, sector, asset class, business, or other closely related investment exposure.

Concentrated positions may result from investment appreciation, employer equity compensation, inheritance, client-directed holdings, ownership of a closely held business, or investment decisions made by the client or EFG. Employer equity may include stock



acquired through incentive stock options, non-qualified stock options, restricted stock units, employee stock purchase plans, or other equity compensation arrangements.

When evaluating concentration risk, EFG will consider, as applicable, the size and nature of the concentration, the client's overall financial circumstances, risk tolerance, investment objectives, tax consequences of diversification, liquidity needs, investment time horizon, and assets held outside EFG-managed accounts of which EFG is aware.

EFG does not impose a fixed maximum concentration applicable to every client. A concentrated position may be appropriate under certain circumstances. EFG will evaluate material concentrations based upon the individual client's circumstances and document significant recommendations concerning diversification or retention when appropriate.

### **Cybersecurity Risk**

The Firm relies on technology systems and third-party service providers. Although reasonable safeguards are maintained, cybersecurity incidents, system failures, or unauthorized access may adversely affect client accounts or information.

### **Tax-efficient Investing Risk**

Tax considerations are one factor in portfolio management decisions. Efforts to improve tax efficiency may not always result in lower overall taxes or improved investment performance, and investment decisions made for tax purposes may result in different investment outcomes than decisions made without regard to tax considerations.

No investment strategy can guarantee profits or prevent losses.

## **Item 9 – Disciplinary Information**

Neither the Firm nor its management persons have any material legal or disciplinary events requiring disclosure.

## **Item 10 – Other Financial Industry Activities and Affiliations**

The Firm is independent and fee-only.

The Firm and its management persons are not registered representatives of a broker-dealer.



The Firm and its management persons do not receive commissions from securities transactions.

The Firm and its management persons are not insurance agents and do not receive insurance commissions.

## Outside Business Activities

The Managing Member of Escarpment Financial Group, LLC also owns and operates residential rental properties, including short-term rental properties. This activity involves property ownership, rental management, and related administrative functions and is conducted separately from the Firm's investment advisory business.

The rental property business does not involve investment advisory services, securities transactions, or recommendations to advisory clients. Advisory clients are under no obligation to engage in any rental property-related activity with the Managing Member.

The Managing Member receives rental income from these properties.

The Managing Member of Escarpment Financial Group, LLC also engages in a separate engineering and technology consulting practice. Through this activity, the Managing Member provides consulting services related to engineering, technology, operations, and management based upon prior professional experience in those fields.

This consulting activity is conducted independently of the firm's investment advisory business and does not involve the recommendation, sale, or solicitation of investment products or advisory services. Advisory clients are under no obligation to engage the Managing Member for engineering consulting services, and consulting clients are under no obligation to engage Escarpment Financial Group for investment advisory services.

The Managing Member receives compensation from this consulting activity independent of the advisory business.

The Managing Member devotes a limited portion of professional time to this consulting activity.

The Firm has adopted policies and procedures designed to identify and address potential conflicts that may arise from outside business activities.

The Managing Member is responsible for all advisory activities of the Firm. The Firm monitors outside business activities to ensure sufficient time and resources remain available to meet all fiduciary obligations to clients.



## Item 11 – Code of Ethics

The Firm has adopted a Code of Ethics designed to promote:

- Fiduciary conduct
- Fair treatment of clients
- Compliance with securities laws
- Prevention of conflicts of interest

Employees may invest in the same securities recommended to clients.

The Code of Ethics includes policies addressing:

- Personal securities transactions
- Insider trading
- Confidentiality
- Gifts and entertainment

A copy of the Code of Ethics is available to any prospective client upon request.

Supervised Persons must avoid situations in which personal interests could conflict with client interests. Potential conflicts must be disclosed promptly to the Chief Compliance Officer. Examples include: outside business activities; gift; family relationships; referral arrangements; personal investments. The Firm prohibits: front running; trading on material nonpublic information; manipulating markets; trading designed to disadvantage clients.

## Item 12 – Brokerage Practices

### Custodian Recommendation

The Firm generally recommends that clients maintain accounts with a qualified custodian such as:

- Charles Schwab & Co., Inc.

The Firm's back-office procedures and processes are optimized for interface with Charles Schwab & Co. Certain technology integrations, reporting capabilities, and operational efficiencies may not be available through all custodians.

The Firm receives access to certain institutional services, technology, research, and practice management resources from Charles Schwab. These benefits create a conflict of interest because they provide value to the Firm independent of advisory services provided to clients.



Clients are not required to use the Firm's recommended custodian.

## Factors Considered

The Firm evaluates:

- Custody services
- Technology
- Reporting capabilities
- Trading execution
- Client service
- Overall value

The Firm does not select custodians solely based on lowest transaction cost. The Firm seeks best execution for client transactions, considering the full range and quality of a broker-dealer's services, including execution capability, commission rates, financial responsibility, responsiveness, and overall value.

## Soft Dollars

The Firm may receive access to research, technology, practice management support, or other services provided by custodial platforms.

These benefits create a potential conflict of interest because they may incentivize recommending particular custodians. The Firm considers these benefits when recommending custodial services.

The Firm believes such arrangements are reasonable and benefit clients by improving service capabilities. Soft dollar benefits available to the Firm are intended to benefit servicing all client accounts. Soft dollar benefits are not assigned specifically to benefit any specific account, including the accounts which may generate the soft dollar benefits.

## Trade Aggregation

The Firm may aggregate client trades when doing so is believed to be equitable and beneficial.

## Item 13 – Review of Accounts

Investment accounts are generally reviewed at least quarterly.

Reviews may also occur due to:

- Significant market events



- Changes in client objectives
- Changes in financial circumstances

Reviews are conducted by the Firm's Principal.

Clients receive account statements directly from their custodian.

## Item 14 – Client Referrals and Other Compensation

The Firm does not currently compensate solicitors, promoters, or referral sources.

The Firm does not receive compensation from third parties for recommending products or services.

Should such arrangements be established in the future, required disclosures will be provided.

## Item 15 – Custody

The Firm is generally deemed to have custody solely because it is authorized to deduct advisory fees directly from client accounts. Clients make election regarding authorization of fee deductions in the Investment Advisory Agreement.

The Firm shall send the Client an invoice, showing: fee calculation, value of assets on which the fee was based, time period covered, amount deducted. The invoice shall be sent to the Client at the same time as the invoice is sent to the custodian or trustee.

Clients receive account statements directly from their qualified custodian. Account statements will reflect fee deductions.

Clients should carefully compare custodial statements with any reports received from the Firm.

## Item 16 – Investment Discretion

Clients may authorize the Firm to exercise discretionary authority over investment accounts.

When discretion is granted, the Firm may:



- Buy securities
- Sell securities
- Rebalance portfolios

The Firm does not have authority to withdraw client funds except for authorized advisory fees.

Clients may place reasonable restrictions on investment authority.

## Item 17 – Voting Client Securities

The Firm does not vote proxies on behalf of clients.

Clients receive proxy materials directly from issuers or custodians.

Clients may contact the Firm with questions regarding proxy matters.

## Item 18 – Financial Information

The Firm has no financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients.

The Firm has not been the subject of any bankruptcy proceeding.

The Firm does not require or solicit fees of more than \$500 per client six months or more in advance.

## Item 19 – Requirements for State-registered Advisors

### Principal Executive Officers and Management Persons

Brian Scott Crow is the Firm's Managing Member and Chief Compliance Officer.

Information regarding Mr. Crow's formal education and business background is provided in his Form ADV Part 2B Brochure Supplement.

### Other Business Activities

Information regarding Mr. Crow's outside business activities is provided in his Form ADV Part 2B Brochure Supplement.



## Performance-Based Fees

EFG does not charge performance-based fees.

## Disciplinary Information

EFG and its management person have not been involved in any events requiring disclosure under this Item.

## Relationships with Issuers of Securities

EFG and its management person have no relationships or arrangements with issuers of securities requiring disclosure under this Item.

## Privacy Statement

The Firm respects the confidentiality of client information and maintains policies designed to protect nonpublic personal information.

The Firm does not sell client information to third parties.

Information is shared only as permitted by law and as necessary to service client accounts.

Clients may request a copy of the Firm's Privacy Notice at any time.