



**12B N. Congress Street
York, SC 29745
336-838-4100**

**1836 West US Highway 421
Wilkesboro, NC 28697
336-838-4100**

www.concordefinancialresources.com

**Form ADV Part 2A
Client Brochure**

February 10, 2025

This Brochure provides information about the qualifications and business practices of Concorde Financial Resources. If you have any questions about the contents of this brochure, please contact us at 336-838-4100 or email us at info@concordeplanning.com. 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.

Concorde Financial Resources is an investment adviser. Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information with which you determine to hire or retain an adviser. Additional information about Concorde Financial Resources is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This Brochure dated February 10, 2025, is prepared according to the SEC’s new requirements and rules.

This item will discuss only specific material changes that are made to the Brochure and provide a summary of such change. Our brochure was last updated May 20, 2024. In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 30 days of the change. If there are no changes you will receive the Brochure within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes, as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information at any time. Currently, our Brochure may be requested by contacting Jessica Trunck, Chief Compliance Officer at 937-665-0117 or jtrunck@westminsterfinancial.com.

- Cover Page – Address updated to 12B N. Congress St. York, SC 29745**

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Item 4 – Advisory Business

Concorde Financial Resources, operating since August 2001, provides investment supervisory services, general investment advice, and advice to clients not involving securities. Over 95% of advisory billings are related to the investment supervisory business. A small percentage of advisory revenues involve special projects, retirement plan reviews, and consultations. We engage prospective clients in a pre-advisory consultation to gain better insight into their individual circumstances, needs, risk tolerance, time frame, and objectives. From this discussion, we determine the appropriateness of an investment advisory relationship.

If an investment advisory relationship is recommended, we build a portfolio recommendation in the context of the comprehensive client circumstance. The advisory fee may include general financial advice: retirement planning, insurance reviews, tax advice and return preparation, education funding, and coordination of estate plans with qualified professionals.

Concorde Financial Resources is an S Corporation owned and managed by Mary Catherine “Cathy” Ferguson.

Mary Catherine “Cathy” Ferguson is President, and responsible for the leadership and direction of Concorde investment activities. She is actively involved in portfolio construction and client meetings. Cathy is a Registered Representative and an Investment Advisor Representative. She also manages our office, administration, and is our branch person in charge. Cathy is a state licensed insurance agent for annuities and life insurance products. As an Investment Advisor Representative, as well as a broker/dealer Registered Representative, Cathy’s services can be commission or fee based. Cathy is paid a commission on sales of insurance products and transactions executed through the broker/dealer creating a conflict of interest; clients are not required to purchase these products.

Jessica Trunck is the Chief Compliance Officer of Concorde Financial Resources. She is also Chief Compliance Officer for Westminster Financial Securities, 50 Chestnut Street, Suite A-200 Beavercreek, OH 45440. As the Chief Compliance Officer, she is responsible for supervision of Concorde’s Investment Advisory.

Westminster Financial Securities, Inc. is the only broker/dealer utilized for Concorde Financial Resources.

Mary C. Ferguson	President – Owner 100%
Born 1958	
Practice	Over 20 Years Professional Experience
Licenses:	Series 7, Series 24, and Series 65 NC Life, Health Insurance & Variable Annuity
Business:	08/2001 to Present Concorde Financial Resources

Concorde Financial does not sponsor or participate in any wrap fee programs. As discussed in Concorde Financial Resources Form ADV Part 1, Concorde Financial Resources manages \$211,197,002 in client assets through our advisor service of which \$199,069,336 is on a discretionary basis. These totals are calculated using the closing US market prices from December 31, 2024.

Item 5 – Fees and Compensation

Fees are calculated as a percentage of assets under management. Accounts are charged in advance for a three-month period based on the account balances. Accounts are debited for the appropriate fee. If you have more than one account, we may debit only one account for the combined total balance of all of your accounts. For initial periods, the beginning balance and date range is described by the management contract. When an account is first placed under management, billing generally begins on the first business day of the following month, unless the account is open on the first business day of the month, in which case, billing begins on that day. In addition to our standard fees, you may incur other charges from other parties for clearing, custody, or independent investment management.

Mutual fund managers and annuity issuers charge certain fees for their services and products. Those fees are in addition to the management fees paid to the Adviser and are separate and distinct from the management fees charged by the Adviser. These fees and expenses are described in the prospectuses for each mutual fund, annuity, or underlying annuity fund. These fees include front-end or back-end loads (initial or deferred sales charges), management fees, other fund expenses and distribution fees (“12b-1 fees”). The type of mutual fund share class used in client portfolios will determine if there is an initial or deferred sales charge which a client will pay, as well as the existence and amount of other fund or product expenses to be paid by the client. These charges, fees and expenses will impact the cost to the client of purchasing, holding and/or selling the mutual fund or annuity product. Many mutual fund share classes pay 12b-1 fees or trailing commissions to our affiliated Broker/Dealer, Westminster Financial Securities, Inc., which increases the cost to the client of holding the mutual fund. This fee is generally .25% annually but varies from fund to fund. In many instances, a portion of these trailing commissions are then paid to the investment adviser representative who is also a registered representative of the Broker/Dealer. Such payments create an incentive for the investment adviser representative to recommend, purchase and hold a higher-cost share class, which incentivizes, therefore, constitutes a conflict of interest. In many instances, lower-cost mutual fund share classes are available. Accordingly, the client should review both the fees charged by the funds and the applicable program fee charged by the Adviser to fully understand the total amount of fees to be paid by the client and to thereby evaluate the Advisory services being provided.

The advisory fee is determined based on the fair market value of the client’s account on the last day of each three-month period multiplied by one-fourth of the corresponding annual percentage rate. The fee schedule is as follows:

Guidelines for Estimating Fee to Clients
Household Assets*

Quarterly Rate	From	To	Annual Rate
.275	0.00	\$1,000,000.00	1.1% for First \$1,000,000
.2125	\$1,000,000.01	\$2,000,000.00	.85% on next \$1,000,000
.1875	\$2,000,000.01	\$3,000,000.00	.75% on next \$1,000,000
.1625	3,000,000.01		.65% on remaining balance

* Concorde defines a household as any number of people sharing a residence, *or* members of the same nuclear family regardless of residence.

A client may terminate an agreement within five business days after signing, without penalty. After the five-day period expires, a client may terminate a contract by written notice and any fees paid will be refunded on a prorated basis.

Publications of periodicals and/or newsletters are always provided to clients as a free service.

Assets deposited by a client into their management account between billing cycles will not result in additional management fees being billed to the client. For accounts closed by a client, Concorde does make partial refunds of their management fees. Just as with deposits, withdrawals may require modifications and adjustments to be made in the account to correct the client's allocation of assets.

As a broker/dealer Registered Representative Cathy, receives additional compensation for transactional business held at Westminster Financial Securities, Inc.

Item 6 – Performance Based Fees and Side by Side Management

Concorde Financial Resources does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

Concorde has registered financial advisors focused on assisting individuals and their families, trusts, estates, and charitable organizations (hereinafter referred to as the "client") manage their wealth and comprehensive financial plans. Our central duty is to provide investment counsel and guidance, which stresses fiscal responsibility and disciplined asset allocation strategies to meet client needs, goals, and risk tolerance.

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

Methods of Analysis

Concorde's asset allocation process utilizes multiple asset classes. We analyze individual investments based on their potential contribution to the asset class in an attempt to meet or exceed the risk adjusted benchmark for each asset class. As an example, mutual fund management is selected based on consistent performance that exceeds the asset class index or selected benchmark, within a desired risk level. We also employ cyclical analysis based on economic, interest rate, and market cycles.

Sources of Information

Concorde relies on numerous financial websites, subscriptions, and publications as well as independent research sources for information. Other sources may include, but are not limited to, company press releases, newspapers, magazines, books, rating services and other professional subscription services. On occasion, we will use material prepared by investment companies and research releases prepared by other research entities.

Investment Strategies

Concorde implements strategies using long-term purchases (securities held for at least one year) and, on occasion, short-term purchases (securities sold within a year). We employ strategic asset allocation strategies driven by client objectives within risk parameters. Tactical allocation strategies are often overlaid to enhance performance or reduce risk, based on cyclical factors such as interest rates, economic stage, or market trends. We do not believe that trading, market timing, or speculative options are in our clients' best interests.

Risk of Loss

Some of the risks involved investing in securities are:

- **Call Risk** The possibility that falling interest rates will cause a bond or preferred stock issuer to redeem – or Call – as its issue before the maturity date.
- **Country Risk** The possibility that political events (a war, national elections), financial problems (rising inflation, government default), or natural disasters (an earthquake, a poor harvest) will weaken a country's economy and cause investments in that country to decline.
- **Credit Risk** The possibility that a bond issuer will fail to repay interest and principal in a timely manner. Also called default risk.
- **Currency Risk** The possibility that returns could be reduced for Americans investing in foreign securities because of a rise in the value of the U.S. dollar against foreign currencies. Also called exchange rate risk.
- **Income Risk** The possibility that a fixed income fund's dividend will decline as a result of falling interest rates.

- **Industry Risk** The possibility that a group of stocks in a single industry will decline in price due to developments in that industry.
- **Inflation Risk** The possibility that increases in the cost of living will reduce or eliminate a fund's real inflation adjusted returns.
- **Interest Rate Risk** The possibility that a bond fund will decline in value because of an increase in interest rates.
- **Manager Risk** The possibility that a mutual fund's investment adviser will fail to execute the fund's investment strategy effectively resulting in the failure of stated objectives.
- **Market Risk** The possibility that stock fund or bond fund prices overall will decline over short or even extended periods. Stock and bond markets tend to move in cycles, with periods when prices rise and other periods when prices fall.
- **Principal Risk** The possibility that an investment will go down in value, or "lose money," from the original or invested amount.

Generally speaking, risk and potential return are related. While an investment with higher risk may have the potential for higher return, it may also have a greater potential for losses, increased volatility, or negative returns, particularly in response to above normal challenges related to economic or political pressures or other events.

Concorde Financial Resources collaborates with each client to develop an investment strategy that suits their financial goals and tolerance for risk.

We primarily utilize a buy-and-hold strategy with adjustments in asset class targets based on current conditions or anticipated developments. We may sell mutual fund investments when management changes, prospectus objectives change, the fund's relative performance is poor, or the economic climate for an asset class changes. We also may buy or sell funds when the portfolio needs to be rebalanced to adhere to the client's asset allocation for cash requirements.

Any investment in securities involves the possibility of financial loss that clients should be prepared to bear.

Item 9 – Disciplinary Information

Investment Advisor Representatives are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation or the integrity of Concorde Financial Resources. Concorde Financial Resources has no information applicable to this item.

Item 10 – Other Financial Industry Activities and Affiliations

Concorde utilizes Westminster Financial Securities, Inc. as a broker/dealer registered with FINRA. Westminster is headquartered in Beavercreek, Ohio. Concorde Financial Resources may also affiliate directly with an insurance provider or mutual fund company.

Cathy Ferguson is an insurance agent licensed in the state of North Carolina. She works with insurance brokers and direct providers to find appropriate insurance solutions for clients.

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

As a fiduciary, Concorde has a duty to act with utmost integrity in serving each of our clients, in pursuit of their financial goals. Concorde’s Investment Advisory Policies and Procedures Manual contains a Code of Ethics which is available for inspection. Concorde’s governing principles are outlined below:

Integrity

We shall offer and provide professional services with integrity.

Objectivity

We will be objective in providing professional services to clients.

Competence

We shall provide services competently and maintain the necessary knowledge and skill to continue to do so in those areas in which the designee is engaged.

Fairness

All professional services shall be performed in a manner that is fair and reasonable to clients, partners, employees, and employers; and disclose conflicts of interests in providing such services.

Confidentiality

We shall not disclose confidential client information without the specific consent of the client unless in response to proper legal process, to defend against legal or regulatory charges of wrongdoing, or in connection with a civil suit between the supervised person and client.

Professionalism

Conduct in all matters shall reflect positively on the business entity and the profession.

Diligence

We shall act diligently in providing professional services. Diligence is the providing of services in a reasonable, prompt, and thorough manner, including the proper planning for and supervision of the rendering of professional services.

It is against Concorde policies for managers or employees to invest with a client or with a group of clients, or to advise a client or a group of clients to invest in a private business interest or other non-marketable investments. Concorde managers and employees are permitted to personally invest their own monies in stocks, bonds, investment company products and other publicly traded

securities which may also be from time to time recommended to clients. Such investment purchases are independent of, and are not connected in any way to, investment decisions made on behalf of Concorde's clients. Personal trading activities conducted by Concorde's managers and employees are monitored to ensure that such activities do not impact upon client security or create conflicts of interest.

Item 12 – Brokerage Practices

Concorde Financial Resources has access to a comprehensive universe of investment vehicles in the marketplace. We will construct a portfolio based on the client's goals and risk tolerance and monitor the portfolio using market measurement and analytical techniques. We will allocate investment assets among the following:

- Exchange-listed securities
- Exchange Traded Funds (ETF's)
- Over the counter traded securities
- Mutual fund shares
- Corporate debt securities (bonds)
- Commercial paper
- Certificates of deposit
- Municipal securities
- Variable life insurance
- Variable annuities
- Fixed annuities
- United States government securities
- Option contracts on securities
- Exchange Traded Limited Partnership Securities: Real Estate/Oil and Gas

Individual allocation strategies may use some or all of the above asset classes.

Custodians and Brokers We Use

Concorde Financial Resources does not maintain custody of your assets. Your assets must be maintained in an account with a "qualified custodian" generally a broker dealer or a bank. Concorde Financial Resources will establish brokerage accounts with Fidelity Clearing and Custody Solutions (NFS) as custodian for client assets and to effect trades for their account. Fidelity Clearing and Custody Solutions provides a comprehensive clearing and custody platform, brokerage services, trading capabilities, and practice management and consulting to registered investment advisors (RIAs), including strategic acquirers and professional asset managers, as well as retirement recordkeepers, broker-dealer firms, banks, and insurance companies through National Financial Services LLC (NFS) or Fidelity Brokerage Services LLC, members NYSE, SIPC. In addition to providing services to third-party institutions, the NFS brokerage platform supports all the clearing

and custody businesses at Fidelity, including Fidelity's retail and capital markets businesses, bringing NFS assets under administration to \$3.1 trillion.

Client accounts held at Fidelity are accessed and trades are executed through our broker dealer Westminster Financial Securities, Beavercreek, Ohio. Accounts are generally not charged a separate fee for custody. Fidelity and Westminster are compensated in some cases by charging you a service fee or other charge on transactions in your accounts.

Item 13 – Review of Accounts or Financial Plans

All accounts are reviewed in the context of the client's stated investment objectives, risk tolerance and client-specific guidelines, if applicable. Accounts are reviewed no less than quarterly, but can be triggered by unexpected position performance, market conditions, or changing client circumstances. Household assets are monitored by a portfolio management system that provides current and comprehensive information concerning account performance, asset allocation, and position performance. Clients receive quarterly reports for assets under management containing an invoice which clearly shows managed assets versus unmanaged assets, a portfolio holdings report, and page which reflects the asset class breakdown by percentage as well as pie chart. The quarterly report also contains a chart reflecting portfolio value versus the client's net investment.

Item 14 – Client Referrals and Other Compensation

Concorde Financial Resources does not receive cash or other economic benefit including commissions, equipment, and non-research services from a non-client in connection with providing investment management. We also do not compensate people or firms for providing referrals.

Item 15 – Custody

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct the custodian to deduct our advisory fees from your account. Fidelity maintains actual custody of your accounts. You will receive account statements directly from the custodians at least quarterly. They will be sent to the email or postal mailing address you provided to the custodian. Concorde Financial Resources urges you to carefully review such statements and compare such official custodial records to the account statements that we provide to you. Our statements may vary slightly from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

Clients are given a choice as to Concorde's use of discretionary trading authority in managing their accounts. Concorde is permitted to withdraw money from client accounts to collect advisory fees.

Concorde is not permitted to withdraw money from client accounts for any other reason. The nature of the fee-based (rather than commission-based) pricing model assures that preservation and/or growth of the account is a shared interest. As most account management is strategic and long term in nature, Concorde's methods involve client knowledge and approval prior to the execution of most trades. On occasion, time-sensitive opportunities arise to purchase a security in volume and spread among the discretionary accounts. Prudent risk management precludes a discretionary trade that would overly weigh the position as a percentage of household assets. A large majority of the existing advisory clients have opted for Concorde's use of discretionary trading authority; discretionary trading authority is recommended.

Item 17 – Voting Client Securities

Concorde Financial Resources does not have any authority to and does not vote proxies on behalf of advisory clients. You will receive proxy information directly from the custodian or transfer agent.

Item 18 - Financial Information

Registered investment advisers are required to provide, upon request, certain financial information, or disclosures regarding Concorde Financial Resources financial condition. Concorde Financial Resources has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding. However, on May 12, 2020, the firm received a Paycheck Protection Plan Loan through the SBA in the amount of \$69,504.16 in conjunction with the relief afforded from the CARES Act. The firm used the PPP loan proceeds in accordance with the terms of the loan program and the firm did not suffer any interruption of service.

Item 19 - Form ADV Part 2 Client Brochure

Brochure Supplement (Team Bio's)

Mary "Cathy" Ferguson (CRD #4463477)

Concorde Financial Resources

12B N. Congress Street York, SC 29745

1836 West US Highway 421 Wilkesboro, NC 28697

Phone: 336-838-4100

This brochure supplement provides information about Cathy Ferguson that supplements the Concorde Financial Resources brochure. You should have received a copy of that brochure. Please contact Jessica Trunck if you did not receive a copy of the brochure and if you have any questions about the contents of this supplement.

Name: Mary Catherine "Cathy" Ferguson

D.O.B.: June 13, 1958

Business: President, Owner, 100%, Concorde Financial Resources 2018 - Present

- Over 15 years of Client Services experience
- Registered as an Investment Advisor Representative
- Licensed Life, Health and Variable Annuity, Long Term Care, and Medicare Supplement Agent

Disciplinary Information: None (100% clean record)

Other Business Activities: Cathy is a registered representative of Westminster Financial Securities, Inc. to execute trades for transactional and advisory accounts, and process back-office requests. She is also the office manager for both offices. Cathy allocates approximately 5 hours a week to Westminster Financial Securities, Inc. Cathy is also a licensed insurance agent, so she can offer insurance products to her financial planning customers.

Additional Compensation: Cathy receives additional compensation for transactional business processed through Westminster Financial Securities, Inc., and the sale of insurance products.

Supervision: Cathy is an Investment Adviser Representative and provides advice directly to clients. She does trades and makes investment decisions and therefore requires supervision for those activities. Jessica Trunck is the direct supervisor for Cathy Ferguson and monitors her work on a continuous basis. Jessica Trunck is Chief Compliance Officer for Concorde Financial Resources and Westminster Financial Securities, Inc. Westminster is the broker-dealer for Concorde Financial Resources and is located at 50 Chestnut St. Suite A-200 Beaver Creek, OH 45440.

Brochure Supplement (Team Bio's)

Kenan C. Kurtz (CRD #7462722)

Concorde Financial Resources

1836 West US Highway 421

Wilkesboro, NC 28697

Phone: 336-838-4100

This brochure supplement provides information about Kenan Kurtz that supplements the Concorde Financial Resources brochure. You should have received a copy of that brochure. Please contact Jessica Trunck if you did not receive a copy of the brochure and if you have any questions about the contents of this supplement.

Name: Kenan C. Kurtz

D.O.B.: April 2, 1999

Degree: BA Economics & Psychology, University of North Carolina at Chapel Hill 2021

Business: Account Manager, Concorde Financial Resources 2021 - Present

- 2 years of Client Services experience
- Investment Advisor Representative

Disciplinary Information: None (100% clean record)

Other Business Activities: Kenan is a registered representative of Westminster Financial Securities, Inc. to process transactional business and back-office requests. Kenan allocates approximately five hours a week to Westminster Financial Securities, Inc.

Additional Compensation: Kenan receives additional compensation for transactional business processed through Westminster Financial Securities, Inc.

Supervision: Kenan is an Investment Adviser Representative. He does trades and makes investment decisions and is supervised by Cathy Ferguson for those activities. She continually monitors his work and works together with him to serve and advise clients at Concorde Financial Resources.