

Form ADV Part II Brochure

Disclosure Information for the Registered Investment Advisor:

Sard Wealth Management Group, LLC
1100 Johnson Ferry Road, Suite 695
Atlanta, GA 30342
www.sardwealth.com

This document also includes disclosures relating to the single owner and Investment Advisor Representative of the firm:

Jonathan Sard

December 31, 2010

Contacts:

Jonathan Sard, President, Owner, and Chief Compliance Officer
Michele Meyers, Client Service Manager

This brochure provides information about the qualifications and business practices of Sard Wealth Management Group, LLC. For any questions about the contents of this brochure, please contact us at (404) 843-4483. 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 Sard Wealth Management Group, LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

Sard Wealth Management Group, LLC is a Registered Investment Advisor and is registered with the Securities Exchange Commission (SEC). The term "Registered Investment Advisor" does not imply a certain level of skill or training.

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 December 31, 2010 is a new document prepared according to the SEC’s new requirements and rules. As such, this Document is materially different in structure and requires certain new information that our previous brochure did not require.

In the future, this Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure.

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 materials changes to this and subsequent Brochures 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, without charge.

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Item 4: Advisory Business

Ownership

Sard Wealth Management Group, LLC (SWMG) has been in business under this name since 2007. Prior to that, the company used the name Financial Alternatives, Inc. Jonathan Sard, the sole owner of the company, has been a financial advisor and planner since 1992.

Services

SWMG offers planning and advisory services in the areas of personal financial planning, business planning, insurance, children's education, employee benefits, investments, retirement, estate planning and tax planning. Jonathan Sard, the Investment Advisor Representative, provides financial plans, investment management, insurance reviews, and advice on a variety of financial topics. Jonathan may provide advice concerning exchange-listed equities, over-the-counter equities, foreign-issuer equities, corporate debt, commercial paper, certificates of deposit (CDs), mutual funds, variable annuities, variable life insurance, United States Government securities, securities option contracts, and partnerships investing in real estate or oil and gas interests. Although clients may hold these investments when they become clients, mutual funds and ETFs are generally the recommended holdings as part of client portfolios. Clients may place restrictions on the sale of investments in their accounts as discussed more fully in the section titled "Investment Discretion".

The majority (85%) of the services provided are investment supervisory services, with 10% providing advisory services for non-securities issues and 5% for other securities advice. No timing services are provided.

More information about the analysis that is done to select investments is provided in the section titled "Methods of Analysis, Strategies, and Risk of Loss".

Customization of Services

SWMG tailors services to the individual needs of clients. For example, recommendations for a young client with children may be different than for a client who is within a few years of retirement. To gather information, new clients complete an advisory questionnaire, which is reviewed and clarified during the initial meeting. Many clients hold some of the same investments; however, the ratio of the amounts owned may be different depending on the client's goals, risk tolerance, and personal situation. Clients may impose restrictions on the investments held. For example, some clients own stocks that they have inherited or owned for a long time and do not want to sell. A client's special considerations for their investments are discussed with them to determine what restrictions are required on their accounts.

Wrap Fee Programs

SWMG does not use wrap fee programs for portfolio management. In a wrap-fee program, clients pay a single fee that covers management and transaction fees for their accounts. Transaction fees are separate from the management fees that are charged. Clients may pay different types of transaction fees based on the type of security so each transaction fee may be different. Type and amounts of transaction fees are outlined in the "Fees and Compensation" section under "Custodian Fees".

Client can terminate their agreement or relationship with Sard Wealth Management Group, LLC at any time without penalty.

Assets Managed

As of December 31, 2010, SWMG manages client assets totaling \$113,237,700. Of these assets, \$91,400,500 are managed on a discretionary basis and the remainder are managed on a non-discretionary basis.

The methodology for determining the client assets managed is different than that used to compute Assets Under Management in Part 1 of the ADV, Item 5f. The assets reported here include all assets managed by Jonathan Sard, which includes discretionary brokerage accounts, non-discretionary brokerage accounts (both advisory and commissioned accounts), variable annuity accounts, and direct, commissioned business with mutual fund companies. Retirement plans are also included in the total client assets managed.

Item 5: Fees and Compensation

Compensation for the Advisor is provided via advisory fees, flat-rate fees, and/or hourly fees. Flat rate fees are used for financial plans and range from \$500 to \$10,000, depending on the complexity of the plan. Hourly fees are \$250 per hour. For clients paying hourly fees, an estimate of the number of hours is provided in advance.

Fee Schedule

Advisory fees are based on the average daily balance of client brokerage accounts for the past quarter and are paid in arrears in the first month following the end of the calendar quarter. They are normally charged based on a tiered schedule in which the percentage is reduced as the assets increase. Accounts covered by the fee schedule are aggregated to take advantage of the tiered fee schedule. Fees are rarely negotiable, except when there are extenuating circumstances. Although some clients may be currently billed on older fee schedules, the current fee schedule for new clients is as follows:

- First \$3M: 1.0%
- Next \$2M: .75%
- Over \$5M: .5%

Billing

Investment advisory fees are calculated by National Financial Services (NFS) and are deducted from the client's accounts. If insufficient money market shares are available to pay the fees, Jonathan Sard will determine which investments will be liquidated to pay the fees. The fees debited from the account are shown on the NFS statement for the month the fees are debited. Accounts that are funded for less than the full calendar quarter pay prorated fees based on the number of days an account is funded during the quarter. If an account is closed during a calendar quarter, the fees are deducted from the balance before the closure occurs. Because no fees are paid in advance, there are no refunds of fees needed when an account is closed.

Any fees that are not directly debited from a client's account will be paid by check, payable to Sard Wealth Management Group, LLC.

Custodian Fees

Clients may incur fees charged by NFS, the custodian of brokerage accounts. These costs include the following:

- Transaction fees for some mutual funds (\$19.50), ticket surcharge for some mutual fund transactions (\$10), transaction charge for stock transactions (\$19.50), transaction charge for ETF transactions (\$15), and a miscellaneous transaction fee of \$4.95 for each transaction
- IRA custodian fee of \$40 per year
- Inactivity fee of \$50 per year for accounts with no trading activity
- \$35 fee for certain “special” holdings
- Closure fee of \$50 for accounts closed

Additional information concerning brokerage accounts with NFS is provided in the section of this document titled “Brokerage Practices”.

Annuity contracts are subject to expenses which vary from contract to contract. Expenses are disclosed and discussed with the client during the discussion of the particular product.

Compensation for Sale of Securities by Supervised Persons

Commissions

There are no commissions paid to Jonathan Sard or Sard Wealth Management Group, LLC for sales of securities in a brokerage-based advisory account. Jonathan Sard, as an Investment Advisor Representative (IAR) with the Advisor, receives commissions that are paid for the sale of annuity products based on the amount invested. This may constitute a conflict of interest in that the compensation is based on a specific product sold, which could incent the sale of a commissioned product. This potential conflict is managed by fully disclosing to the client all applicable fees and charges, along with a discussion of the pros and cons of any commissioned products. It is the fiduciary obligation of the firm to always do what is best for clients. Clients have the right to purchase the recommended investment products through other brokers or agents that are not affiliated with SWMG. Commissions do not provide the primary compensation for the business; the primary revenue is investment advisory fees (80%).

Mutual Fund Loads

Our fee-based clients purchase mutual funds at Net Asset Value (without a load). Therefore, clients who pay fees do not pay sales commissions for the mutual funds purchased. SWMG offers what we consider the most appropriate funds for our clients, regardless of whether they are “load” or “no-load” funds.

Mutual Fund 12b-1 Fees

Jonathan Sard, as an Investment Advisor Representative (IAR) with the Advisor, may receive 12b-1 fees based on some mutual fund holdings in advisory accounts, which may create a conflict of interest. This conflict is mitigated by disclosing to clients how he is paid.

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

SWMG's compensation is not performance-based; that is, compensation is not based on a share of capital gains or capital appreciation of the funds or any portion of the funds in which client accounts are invested.

Item 7: Types of Clients

SWMG provides investment advice to individuals, pension and profit sharing plans, trusts and estates, and corporations. In general, the required minimum investment is \$750K for new clients, although some exceptions may be made in cases of family members of existing clients and clients with the potential to meet the minimum within a reasonable period of time.

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

SWMG analyzes investment options based on both fundamental and technical analysis. Client assets are invested primarily in mutual funds with strong managers and strong historical performance on a risk-adjusted basis. The funds used are monitored for changes in philosophy, management and/or performance. The strategy for investing client assets is to try to protect the downside by watching market trends and to take an offensive or defensive approach as indicated by these trends. Any investment in securities involves the risk of loss and clients must be prepared to bear a loss.

The investment supervision is based primarily on model portfolios, comprising mostly mutual funds and exchange traded funds (ETFs). The investments are selected through fundamental and technical analysis, as well as reviews and information from financial press and research, corporate rating services such as Morningstar, annual reports, prospectuses, and filings with the Securities and Exchange Commission. The investment philosophy includes both long-term purchases that will be held for at least one year and also short-term securities that may be sold within a year.

SWMG invests primarily in mutual funds and exchange traded funds (ETFs). The material risk in these investments is that, like any investment in securities, the value may go down and the principal is not protected.

Item 9: Disciplinary Information

There are not, nor have there ever been any legal or disciplinary actions involving the company or any individual associated with the company. SWMG employees hold themselves to the highest standards of integrity in advising clients and running the practice.

Jonathan Sard has never relinquished a license or resigned in anticipation of any disciplinary or legal action.

Item 10: Other Financial Industry Activities and Affiliations

Jonathan Sard, the firm's principal, is an Investment Advisor Representative (IAR) of the Advisor and is a registered representative of Securities Service Network, Inc., (SSN) of Knoxville, Tennessee, a FINRA registered broker-dealer. As such, Jonathan Sard executes securities transactions through Securities Service Network, Inc.

Jonathan Sard, the firm's principal, is an Investment Advisor Representative (IRA) of Perimeter Wealth Advisors and a registered representative with TD Ameritrade. Please see full disclosure of this relationship under Additional Information about Jonathan Sard on page 14 and 15.

Jonathan Sard is not registered, nor does he plan to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of these entities.

Jonathan Sard has a relationship with an insurance general agency and multiple insurance companies, through which he may offer insurance to clients. More information is provided in the section titled "Additional Information about Jonathan Sard".

Jonathan Sard may recommend another investment advisor or broker to potential clients who do not fit well with the practice; however he is not compensated for those recommendations. Neither Jonathan nor SWMG compensate other professionals for referrals of potential clients.

Item 11: Code of Ethics

As a Registered Investment Advisor with the SEC, SWMG is required to maintain a code of ethics per SEC Rule 204A-1. The code of ethics sets forth standards of conduct expected of advisory personnel and addresses conflicts that arise from personal trading by advisory personnel. SWMG sets the highest ethical standards for all employees and as such, require employees to incorporate these into the tasks they undertake for our clients. We will gladly provide a copy of the code of ethics upon request by any client or prospective client.

SWMG does not have a financial interest in the securities recommended or sold to clients. For example, no securities are purchased from clients, nor is Jonathan Sard a general partner in a partnership in which a client investment is solicited. SWMG is not in any way related to an investment advisor for an investment company that is recommended to clients.

Jonathan Sard may invest in the same securities that he recommends to clients. Because SWMG generally recommends mutual funds and ETFs, this does not represent a conflict of interest since SWMG does not trade enough to affect the pricing in the market.

Item 12: Brokerage Practices

SWMG has a combination of criteria for selecting a broker/dealer to work with on behalf of clients. As an independent advisor, decisions that affect clients should be made here, not by the broker/dealer. SWMG looks for the broker/dealer to provide the resources and level of service that clients expect. Expectations include accuracy, follow-through, proactive service, and responsiveness to client issues. It is expected that when there are questions, the broker/dealer will provide correct answers. Above all, the expectation is for service at a fair and reasonable price with value added services that are a benefit to clients.

As a fiduciary for clients, SWMG acts in the best interest of clients and seeks to minimize the costs incurred on their transactions. Client trades are processed through the broker/dealer, SSN. SSN and NFS charge transaction fees based on the types of securities bought and sold.

SSN provides a list of mutual funds for advisory clients which do not incur the \$19.50 transaction-based ticket charge. Because these funds are not subject to a transaction-based ticket charge, there is an advantage to select these funds for client portfolios over other funds for which the client incurs the \$19.50 ticket charge and possibly the \$10 surcharge outlined in the

“Custodian Fees” section of “Fees and Compensation”. The Advisor must carefully weigh the performance and the full costs, including transaction costs, when selecting funds for client accounts.

SWMG monitors the costs and benefits of SSN compared to other broker/dealers on a regular basis. The information from the inquiries is documented and used to try to negotiate improved pricing with SSN, or to decide if a change in broker/dealer is warranted. SWMG proactively identifies products and services that other broker/dealers provide to assist in negotiations.

All services other than execution that SWMG receives from the broker/dealer (SSN) are separately paid-for. These include the Streetscape trading platform and the Albridge reporting tool. Neither SSN nor NFS provides any research materials to us. There are no services based on certain production-levels with the broker/dealer and there are no discounts on the fees for these tools based on production. Therefore, the selection of SSN as the broker/dealer is not based on services or tools provided based on the size of SWMG’s business with them. The focus is strictly on getting the best service and the best execution costs for clients. Additionally, since no commissions are generated by transactions on advisory accounts, there is no conflict of interest in generating commissions to cover the costs of these items.

While SWMG negotiates to get the best execution costs for clients, these costs may be higher than those charged by other broker/dealers. They may also be lower than those charged by other broker/dealers who provide a wide array of research and other services.

Marketing Support

Some mutual fund companies provide marketing support to Sard Wealth Management Group. This support may be based on the amount of business that SWMG does with these companies. There could be a conflict of interest in selecting mutual funds from mutual fund companies that provide marketing support instead of funds from mutual fund companies that do not provide marketing support. Because this marketing support is very limited, it has no bearing on SWMG’s investment recommendations.

SWMG uses only one broker/dealer for all client advisory transactions. No commissions are paid for these transactions, so no benefit is received in products and services is received based on directing business to a particular broker/dealer.

Brokerage for Client Referrals

Sard Wealth Management Group does not receive client referrals from the broker/dealer, nor is that a desired business model. SWMG builds the business through referrals from existing clients and centers of influence and that is the selected business model. Since SWMG receives no client referrals through the broker/dealer (SSN) there is no conflict of interest to recommend SSN to clients.

Directed Brokerage

SWMG requires that client brokerage accounts are setup through NFS for reasons outlined in the section on “Brokerage Practices”. Not all broker/dealers and clearing firms charge the same fees. Clients may be able to get smaller execution charges with another firm. While SWMG makes every effort to get the best execution for clients, there can be no guarantee that clients could not

get better costs elsewhere. Conversely, clients could pay higher costs elsewhere because of the fee reductions that are negotiated by SWMG.

SWMG does not have an ownership relationship with the broker/dealer. SWMG is free to move accounts to another firm if it would be in the client's best interest.

Transaction costs for client trades of mutual funds and ETFs would not be reduced by aggregating orders.

Item 13: Review of Accounts

Client accounts are reviewed on a continuing and regular basis. SWMG personnel contact clients many times during the year and the client accounts are often reviewed before the contact. In addition, Jonathan Sard formally reviews client accounts during meetings throughout the year. The frequency of the meetings is based on the client's desired frequency. Clients are asked on a quarterly basis to notify SWMG if any of their goals or their situation has changed. That way, Jonathan can determine whether any modifications are required in the clients' portfolios. The securities that are held in client accounts are reviewed on an ongoing basis through information provided by the fund companies, technical analysis tools, and industry news. The investments are regularly compared to other investments using analysis tools to determine whether any changes are required. In addition to these reviews, client accounts are also reviewed when clients initiate a contact and during market changes.

During regular meetings, clients receive a written report of their accounts as of the meeting date. Reports provided to clients concerning their accounts may also be verbal in nature since they are provided during check-in calls. Clients may be given online access to their accounts or quarterly emailed reports of their accounts.

Item 14: Client Referrals and Other Compensation

SWMG receives no compensation or economic benefit from a third party for providing investment advice or services to clients, except the marketing support noted in the section titled "Marketing Support" within "Brokerage Practices".

SWMG does not compensate anyone for referrals of new clients, therefore SEC Rule 206(4)-3 does not apply to the practice. SWMG receives referrals of family and friends by clients; however, no cash fee is paid directly or indirectly as a result of the referral.

Item 15: Custody

Sard Wealth Management Group shall not have custody of client funds or securities at any time, with the single exception of the ability to deduct investment management fees directly from client accounts. Client accounts are custodied at NFS or with an insurance company (annuities). These companies will provide a statement on a monthly or quarterly basis. Transaction confirmations are also provided. Clients should carefully review those statements and contact SWMG with any questions or concerns that they have. Clients should review the written reports provided during client meetings and compare those to their statements. If clients notice any issues or discrepancies they should contact SWMG immediately.

Item 16: Investment Discretion

SWMG accepts discretionary authority to manage securities accounts on behalf of clients. Clients may limit that authority by specifying holdings that should not be sold, by specifying an amount of cash to be maintained as a reserve and not invested, or by specifying securities that should not be purchased. SWMG assumes discretionary authority only after executing an agreement with the client. The agreement requires the client to specifically acknowledge the paragraph concerning discretionary authority.

Item 17: Voting Client Securities

Sard Wealth Management Group does not accept authority to vote client securities. Clients are responsible to vote any and all proxies. Clients will receive proxies and solicitations from NFS or other custodian directly. If a client has questions about a specific solicitation, SWMG will review it and answer those questions.

Item 18: Financial Information

SWMG does not require prepayment of fees by clients, therefore there is no requirement to disclose a balance sheet in this disclosure.

Neither Sard Wealth Management Group, nor Jonathan Sard, has been the subject of a bankruptcy petition at any time.

Additional Information about Jonathan Sard

Jonathan Sard, the owner of the company, provides the services and advice for SWMG clients. In addition to being the sole owner of the company, Jonathan is the firm's only Investment Advisory Representative or managed person.

Contact Information

Jonathan Sard
1100 Johnson Ferry Road, Suite 695
Atlanta, GA 30342
(404) 843-4483

Educational Background and Business Experience of Jonathan Sard

Jonathan Sard was born in 1970. He earned his Bachelor of Science in Business Administration from the University of Florida in 1992. He became one of the youngest professionals to receive the CERTIFIED FINANCIAL PLANNERTM (CFP[®]) certification at the age of 25, after completing the coursework at the College for Financial Planning in 1995.

Certified Financial PlannerTM

The CERTIFIED FINANCIAL PLANNERTM, CFP[®] and federally registered CFP (with flame design) marks (collectively, the "CFP[®] marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP[®] certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP[®] certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP[®] certification in the United States.

To attain the right to use the CFP[®] marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP[®] Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP[®] professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP[®] marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Other Business Activities of Jonathan Sard

Jonathan Sard engages in activities in addition to his responsibilities as an Investor Advisor Representative (IAR) of Sard Wealth Management Group, LLC, the Registered Investment Advisor. These activities include investment recommendations as a registered representative of Securities Service Network (SSN) and insurance recommendations as an independent insurance representative, both of which help to serve the clients' wealth management needs.

Registered Representative

Jonathan Sard, in addition to being an Investment Advisor Representative (IAR) of the Advisor, is a registered representative of Securities Service Network, Inc., of Knoxville, Tennessee, a FINRA registered broker-dealer. As such, Jonathan Sard executes securities transactions through Securities Service Network, Inc. Jonathan Sard may from time to time receive commissions and other payments, including 12b-1 fees, generally received with respect to the sale of investment products, resulting in an inherent conflict of interest. Commissioned sales represent approximately 20% of the time spent in the business and commissions and 12b-1 fees represent approximately 15% of revenues.

Insurance Representative

Jonathan Sard is licensed to sell various insurance products. These products include life insurance, fixed and variable annuities, and health, disability, and long-term care insurance. He may provide advice to clients on insurance planning. Insurance products may be recommended based on the client's goals and objectives. Insurance products may pay a commission if purchased. Clients are not obligated to purchase recommended products through Sard Wealth Management Group; they may purchase them through any insurance agent they choose. Approximately 15% of time is spent on insurance and the insurance revenues make up approximately 5% of total revenue. As with any commissioned product, a conflict of interest can occur due to the different commissions provided by various products and providers.

Investment Advisory Representative with Perimeter Wealth Advisors

Jonathan Sard is designated as an Investment Advisor Representative of Perimeter Wealth Advisors, Inc. The arrangement has been setup as part of a succession plan for Carl Rosenthal, an advisory representative of Perimeter Wealth Advisors, Inc. The succession plan would only become operative if Carl Rosenthal is no longer able to perform his duties as a Registered Investment Advisor. Under those circumstances Jonathan Sard would be authorized to take over

the responsibility of providing services to the clients of Perimeter Wealth Advisors, Inc. There are presently no referral arrangements between the two advisory firms and no clients of either firm are obligated to use the advisory services of the other firm.

Registered Representative of TD Ameritrade

In order to prepare to perform the duties as successor to Carl Rosenthal in the future, as outlined above, Jonathan is a registered representative of TD Ameritrade. This relationship has been developed so that he is poised to provide advisory services to the clients of Carl Rosenthal and Perimeter Wealth Advisors, Inc. at some time in the future when Mr. Rosenthal requires a successor. At this time, Jonathan does not effect transactions for any clients through TD Ameritrade.

Additional Compensation for Jonathan Sard

No third party provides an economic benefit to Jonathan Sard for providing advisory services to clients.

Supervision of Jonathan Sard

Since SWMG is a small firm with a single advisor who is also the firm principal, there is no hierarchical chain of supervision as there would be in a larger firm to monitor the advice to clients. As the firm principal, Jonathan Sard sets the highest standards of conduct and ethics and personally provides the advice to clients.

In addition, Jonathan is supervised as a registered representative by the broker/dealer, Securities Service Network. The Office of Supervisory Jurisdiction reviews the investment business and conducts an audit each year in which they review business practices and client transactions. Willard Moore is the assigned compliance manager to the firm and to Jonathan Sard. Willard can be reached at (800) 264 5499.