

## **Firm Brochure**

(Part 2A of Form ADV)

**ABG Consultants, LC**  
**3200 South 700 East, Suite 200**  
**Salt Lake City, UT 84106**  
**801-486-5069**  
**801-486-5063**  
**[www.consultabg.com](http://www.consultabg.com)**  
**[Larry@consultabg.com](mailto:Larry@consultabg.com)**

This brochure provides information about the qualifications and business practices of ABG Consultants, LC. If you have any questions about the contents of this brochure, please contact us at: 801-486-5069, or by email at: [larry@consultabg.com](mailto:larry@consultabg.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.

Additional information about ABG Consultants, LC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

June 23, 2011

## 2. Material Changes

---

### **Annual Update**

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

---

### **Material Changes since the Last Update**

The U.S. Securities and Exchange Commission issued a final rule in July 2010 requiring advisers to provide a Firm Brochure in narrative “plain English” format. The new final rule specifies mandatory sections and organization.

---

### **Full Brochure Available**

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 801-486-5069 or by email at: [larry@consultabg.com](mailto:larry@consultabg.com).

# Table of Contents

<b>2. Material Changes.....</b>	<b>i</b>
Annual Update .....	i
Material Changes since the Last Update .....	i
Full Brochure Available .....	i
<b>4. Advisory Business .....</b>	<b>1</b>
Firm Description.....	1
Principal Owners.....	1
Types of Advisory Services.....	1
Tailored Relationships .....	1
Types of Agreements.....	2
Advisory Service Agreement.....	2
Investment Management Agreement.....	4
Hourly Planning Engagements .....	4
Asset Management .....	4
Termination of Agreement .....	4
<b>5. Fees and Compensation .....</b>	<b>5</b>
Description .....	5
Fee Billing .....	5
Other Fees.....	5
Expense Ratios.....	6
Past Due Accounts and Termination of Agreement .....	6
<b>6. Performance-Based Fees .....</b>	<b>6</b>
Sharing of Capital Gains .....	6
<b>7. Types of Clients.....</b>	<b>6</b>
Description .....	6
Account Minimums.....	6
<b>8. Methods of Analysis, Investment Strategies and Risk of Loss.....</b>	<b>7</b>
Methods of Analysis.....	7
Investment Strategies .....	7
Risk of Loss .....	8

<b>9. Disciplinary Information .....</b>	<b>9</b>
Legal and Disciplinary.....	9
<b>10. Other Financial Industry Activities and Affiliations .....</b>	<b>10</b>
Affiliations .....	10
<b>11. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....</b>	<b>10</b>
Code of Ethics .....	10
Participation or Interest in Client Transactions.....	11
Personal Trading.....	11
<b>12. Brokerage Practices.....</b>	<b>11</b>
Selecting Brokerage Firms.....	11
Best Execution .....	11
Soft Dollars .....	11
Order Aggregation .....	12
<b>13. Review of Accounts .....</b>	<b>12</b>
Periodic Reviews .....	12
Review Triggers.....	12
Regular Reports.....	12
<b>14. Client Referrals and Other Compensation .....</b>	<b>12</b>
Incoming Referrals.....	12
Referrals Out .....	13
<b>15. Custody.....</b>	<b>13</b>
Account Statements.....	13
Performance Reports.....	13
<b>16. Investment Discretion.....</b>	<b>13</b>
Discretionary Authority for Trading.....	13
Limited Power of Attorney.....	13
<b>17. Voting Client Securities .....</b>	<b>14</b>
Proxy Votes .....	14
<b>18. Financial Information .....</b>	<b>14</b>
Financial Condition .....	14

<b>19. Requirements for State-Registered Advisers .....</b>	<b>14</b>
A. Executive Officers and Management Persons.....	14
B. Other Business Activities .....	16
 <b>Brochure Supplement (Part 2B of Form ADV) .....</b>	 <b>17</b>
Education and Business Standards .....	17

## 4. Advisory Business

---

### Firm Description

ABG Consultants, LC, ("ABGC") was founded in 2004.

ABGC provides personalized confidential investment management to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client.

ABGC is strictly a fee-only investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder's fees are accepted.

Investment advice is provided, with the client making the final decision on investment selection unless ABGC is hired as an ERISA section 3-38 (full fiduciary) investment manager for a qualified retirement plan. ABGC does not act as a custodian of client assets. The client always maintains asset control. ABGC places trades for clients under a limited power of attorney.

A written evaluation of each client's initial situation is provided to the client for each of their accounts and the account holdings.

---

### Principal Owners

ABG Consultants, LC is a wholly owned subsidiary of Alliance Benefit Group-Rocky Mountain.

---

### Types of Advisory Services

ABGC provides investment supervisory services, also known as asset management services; manages investment advisory accounts not involving investment supervisory services; furnishes investment advice through consultations; issues periodic newsletters; issues special reports about securities; and issues, charts, graphs, formulas, or other devices which clients may use to evaluate securities.

As of December 31, 2010, ABGC manages approximately \$73,000,000 in assets for approximately 70 clients. Approximately \$4,000,000 is managed on a discretionary basis, and \$69,000,000 is managed on a non-discretionary basis.

ABGC does not sponsor nor do they participate in any Wrap Fee Programs.

---

### Tailored Relationships

The goals and objectives for each client are documented in our client relationship management system. Investment policy statements are created

that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

---

## **Types of Agreements**

The following agreements define the typical client relationships.

---

### **Advisory Service Agreement**

Most clients choose to have ABGC manage their assets in order to obtain ongoing in-depth advice and life planning. All aspects of the client's financial affairs are reviewed, including those of their children. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work and fee for an Advisory Service Agreement is provided to the client in writing prior to the start of the relationship. An Advisory Service Agreement includes: cash flow management; insurance review; investment management (including performance reporting); education planning; retirement planning; estate planning, as well as the implementation of recommendations within each area.

The annual Advisory Service Agreement fee is based on a percentage of the investable assets according to the following schedule:

#### **Non-Discretionary Advisory Fees:**

\$	0	-	499,999	1.00%
\$	500,000	-	1,999,999	0.85%
\$	2,000,000	-	2,999,999	0.75%
\$	3,000,000	-	3,999,999	0.70%
\$	4,000,000	-	4,999,999	0.65%
\$	5,000,000	-	5,999,999	0.60%
\$	6,000,000	-	6,999,999	0.55%
\$	7,000,000	-	7,999,999	0.50%
\$	8,000,000	-	8,999,999	0.45%
\$	9,000,000	-	9,999,999	0.40%
\$	10,000,000	-	11,999,999	0.35%
\$	12,000,000	-	13,999,999	0.32%
\$	14,000,000	-	15,999,999	0.30%
\$	16,000,000	-	17,999,999	0.28%
\$	18,000,000	-	19,999,999	0.26%
\$	20,000,000	-	24,999,999	0.25%

\$ 25,000,000	-	29,999,999	0.23%
\$ 30,000,000	-	34,999,999	0.22%
\$ 35,000,000	-	39,999,999	0.21%
\$ 40,000,000	-		0.20%

The minimum annual fee is \$2,500. Current client relationships may exist where the fees are higher or lower than the fee schedule above.

#### Discretionary Advisory Fees:

\$ 0	-	399,999	1.20%
\$ 400,000	-	599,999	1.10%
\$ 600,000	-	799,999	1.00%
\$ 800,000	-	999,999	0.95%
\$ 1,000,000	-	1,499,999	0.90%
\$ 1,500,000	-	1,999,999	0.85%
\$ 2,000,000	-	2,999,999	0.80%
\$ 3,000,000	-	3,999,999	0.75%
\$ 4,000,000	-	4,999,999	0.70%
\$ 5,000,000	-	5,999,999	0.65%
\$ 6,000,000	-	6,999,999	0.60%
\$ 7,000,000	-	7,999,999	0.55%
\$ 8,000,000	-	8,999,999	0.50%
\$ 9,000,000	-	9,999,999	0.45%
\$ 10,000,000	-	14,999,999	0.40%
\$ 15,000,000	-	16,999,999	0.35%
\$ 17,000,000	-	18,999,999	0.33%
\$ 19,000,000	-	21,999,999	0.32%
\$ 22,000,000	-	24,999,999	0.31%
\$ 25,000,000	-	28,999,999	0.29%
\$ 29,000,000	-	32,999,999	0.28%
\$ 33,000,000	-	37,999,999	0.27%
\$ 38,000,000	-	42,999,999	0.25%
\$ 43,000,000	-	48,999,999	0.24%
\$ 49,000,000	-	54,999,999	0.23%
\$ 55,000,000	-	62,999,999	0.21%
\$ 63,000,000	-		0.20%



The minimum annual fee is \$3,600. Current client relationships may exist where the fees are higher or lower than the fee schedule above.

Although the Advisory Service Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the investment manager may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The portfolio value at the completion of the prior full billing quarter is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

---

### **Investment Management Agreement**

An *Investment Management Agreement* is executed with each relationship. The annual fee for an *Investment Management Agreement* is negotiable and set forth in the tables listed in this document.

---

### **Hourly Planning Engagements**

ABGC provides hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements is \$250.

---

### **Asset Management**

Assets are invested primarily in no-load or low-load mutual funds and exchange-traded funds, usually through discount brokers or fund companies. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Discount brokerages may charge a transaction fee for the purchase of some funds.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades. ABGC does not receive any compensation, in any form, from fund companies.

Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts, futures contracts, and interests in partnerships.

Initial public offerings (IPOs) are not available through ABGC.

---

### **Termination of Agreement**

A Client may terminate any of the aforementioned agreements at any time by notifying ABGC in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If the

client made an advance payment, ABGC will refund any unearned portion of the advance payment.

ABGC may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, ABGC will refund any unearned portion of the advance payment.

## 5. Fees and Compensation

---

### Description

ABGC bases its fees on a percentage of assets under management, hourly charges and/or fixed fees (not including subscription fees).

Some *Retainer Agreements* may be priced based on the complexity of work, especially when asset management is not the most significant part of the relationship.

Lower fees than those charged by ABGC may be available from other sources. It is the responsibility of the client to compare fees and services between those sources before engaging ABGC.

Fees are negotiable.

---

### Fee Billing

Investment management fees are billed quarterly, in arrears, meaning that we invoice you after the three-month billing period has ended. Payment in full is expected upon invoice presentation. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Clients may elect to pay their fees directly.

---

### Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

ABGC, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

New Advisory Service Agreement fees are calculated on a formula basis and adjusted for complexity of individual situations. *The formula is based on gross income, gross assets and other financial considerations.*

ABGC does not accept any compensation for the sale of securities or other investment products. ABGC does not accept any asset-based sales charges or service fees from the sale of mutual funds. In addition ABGC will recommend “no-load” funds or funds which have had their loads waived.

---

**Expense Ratios**

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to ABGC.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

---

**Past Due Accounts and Termination of Agreement**

ABGC reserves the right to stop work on any account that is more than 30 days overdue. Any unused portion of fees collected in advance will be refunded within 30 days.

## 6. Performance-Based Fees

---

**Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

ABGC does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the advisor to recommend an investment that may carry a higher degree of risk to the client.

## 7. Types of Clients

---

**Description**

ABGC generally provides investment advice to individuals, pension and profit sharing plans, trusts, estates, corporations or business entities.

Client relationships vary in scope and length of service.

---

**Account Minimums**

The minimum account size is \$250,000 of assets under management, which equates to an annual fee of \$2,500.

When an account falls below \$250,000 in value, the minimum annual fee of \$2,500 is charged for Non-discretionary advisory clients and when an account

falls below \$360,000 in value, the minimum annual fee of \$3,600 is charged for Discretionary advisory clients. Depending upon circumstances, ABGC will sign an *Hourly Agreement* with the client if assets have diminished significantly below \$250,000.

ABGC has the discretion to waive the account minimum. Accounts of less than \$250,000 may be set up when the client and the advisor anticipate the client will add additional funds to the accounts bringing the total to \$250,000 within a reasonable time. Other exceptions will apply to employees of ABGC and their relatives, or relatives or employees of existing clients.

Clients receiving ongoing asset management services will be assessed a \$2,500 minimum annual fee for non-discretionary advice and \$3,600 for discretionary advice. Clients with assets below the minimum account size may pay a higher percentage rate on their annual fees than the fees paid by clients with greater assets under management.

## **8. Methods of Analysis, Investment Strategies and Risk of Loss**

---

### **Methods of Analysis**

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis.

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

Other sources of information that ABGC may use include Morningstar Principia mutual fund information, Morningstar Principia stock information, Charles Schwab & Company's "SchwabLink" service, Zephyr Style Advisor, Plan Investment Plus by Newkirk/MasteryPoint and the World Wide Web.

---

### **Investment Strategies**

The primary investment strategy used on client accounts is strategic asset allocation. ABGC may also utilize a core and satellite approach. This means that we use passively-managed index and exchange-traded funds as the core investments, and then add actively-managed funds where there are greater opportunities to make a difference. Portfolios are globally diversified to control the risk associated with traditional markets.

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

Other strategies may include long-term purchases, short-term purchases, trading, short sales, margin transactions, and option writing (including covered options, uncovered options or spreading strategies).

---

**Risk of Loss**

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

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

financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

## 9. Disciplinary Information

---

### Legal and Disciplinary

A. The firm and its employees and Management Persons **have not been** involved in any criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which the firm or management person

1. was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any *felony*; (b) a *misdemeanor* that *involved* investments or an *investment-related* business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;

2. is the named subject of a pending criminal *proceeding* that involves an *investment-related* business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;

3. was *found* to have been *involved* in a violation of an *investment-related* statute or regulation; or

4. was the subject of any *order*, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, your firm or a *management person* from engaging in any *investment-related* activity, or from violating any *investment-related* statute, rule, or *order*.

B. The firm and its employees and Management Persons **have not been** involved in any administrative *proceeding* before the SEC, any other federal regulatory agency, any state regulatory agency, or any *foreign financial regulatory authority* in which the firm or a *management person*

1. was *found* to have caused an *investment-related* business to lose its authorization to do business; or

2. was *found* to have been *involved* in a violation of an *investment-related* statute or regulation and was the subject of an *order* by the agency or authority

(a) denying, suspending, or revoking the authorization of your firm or a *management person* to act in an *investment-related* business;

(b) barring or suspending your firm’s or a *management person’s* association with an *investment-related* business;

- (c) otherwise significantly limiting your firm's or a *management person's investment-related* activities; or
- (d) imposing a civil money penalty of more than \$2,500 on your firm or a *management person*.

C. The firm and its employees and Management Persons **have not been** involved in any *self-regulatory organization (SRO) proceeding* in which your firm or a *management person*

1. was *found* to have caused an *investment-related* business to lose its authorization to do business; or
2. was *found* to have been *involved* in a violation of the SRO's rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; (ii) otherwise significantly limited from *investment-related* activities; or (iii) fined more than \$2,500.

## 10. Other Financial Industry Activities and Affiliations

---

### Affiliations

ABGC nor any management persons or employees are registered or have an application pending to register as a broker-dealer or a registered representative of a broker-dealer.

ABGC nor any management persons or employees are registered or have an application pending to register as a futures commission merchant, a commodity pool operator, a commodity trading advisor or an associated person of any of the aforementioned entities.

ABGC has arrangements that are material to its advisory or its clients with a related person who is a pension consultant, Alliance Benefit Group-Rocky Mountain. Alliance Benefit Group-Rocky Mountain is a record keeper and Third Party Administrator for Retirement Plans.

There is no compensation or conflicts of interest as a result of any investment manager selection or other recommendations made to clients.

## 11. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

---

### Code of Ethics

The employees of ABGC have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Neither ABGC nor a related person recommends to clients, or buys or sells for client accounts any securities which ABGC or a related person has a material financial interest.

---

**Participation or Interest in Client Transactions**

ABGC and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the ABGC Compliance Manual

---

**Personal Trading**

The Chief Compliance Officer of ABGC is Lawrence Solomon. He reviews all employee trades each quarter. His trades are reviewed by Wesley Jensen. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

## **12. Brokerage Practices**

---

**Selecting Brokerage Firms**

ABGC does not have any affiliation with product sales firms. Specific custodian recommendations are made to Clients based on their need for such services. ABGC recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

ABGC recommends discount brokerage firms and trust companies (qualified custodians), such as Charles Schwab, Fidelity Investments or Matrix Financial.

ABGC does not receive fees or commissions from any of these arrangements.

---

**Best Execution**

ABGC reviews the execution of trades at each custodian each quarter. The review is documented in the ABGC Compliance Manual. Trading fees charged by the custodians is also reviewed on a quarterly basis. ABGC does not receive any portion of the trading fees.

---

**Soft Dollars**

ABGC reserves the right with permission from the client to participate in revenue sharing agreements that may directly or indirectly reduce the fees charged to the client. Any revenue sharing or soft dollars received is documented annually in a fee disclosure report.



Currently, all revenue sharing arrangements are held at the Custodian level and are only available in retirement accounts. Any revenue collected by the custodian is remitted to Alliance Benefit Group-Rocky Mountain, an affiliated party or other Record Keeper used for the purpose of administering the retirement plan. It is the practice of these firms to offset fees and return all excess revenue share to the account from which it was generated.

ABGC does not currently participate in any direct or indirect revenue sharing arrangements.

---

**Order Aggregation**

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

## **13. Review of Accounts**

---

**Periodic Reviews**

Account reviews are performed quarterly by ABGC's advisors, specifically Lawrence Solomon and Wesley Jensen (see part 2B of this document). Account reviews are performed more frequently when market conditions dictate.

---

**Review Triggers**

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

---

**Regular Reports**

Account reviewers are members of the firm's Investment Committee. They are instructed to consider the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client.

Clients receive periodic communications on at least an annual basis. *Advisory Service Agreement* clients, *Investment Management* clients, and *Retainer Agreement* clients receive written quarterly updates. The written updates may include a net worth statement and/or a portfolio statement.

## **14. Client Referrals and Other Compensation**

---

**Incoming Referrals**

ABGC has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar

sources. The firm is not allowed to and does not compensate referring parties for these referrals.

---

**Referrals Out**

ABGC does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

## **15. Custody**

---

**Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly.

---

**Performance Reports**

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by ABGC.

## **16. Investment Discretion**

---

**Discretionary Authority for Trading**

ABGC accepts discretionary authority to manage securities accounts on behalf of clients. ABGC has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. However, ABGC consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

The client approves the custodian to be used and the commission rates paid to the custodian. ABGC does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy that you have approved in writing.

---

**Limited Power of Attorney**

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute the trades that you have approved.

## 17. Voting Client Securities

---

### Proxy Votes

ABGC does not vote proxies on securities. Clients are expected to vote their own proxies.

When assistance on voting proxies is requested, ABGC will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

## 18. Financial Information

---

### Financial Condition

ABGC does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because ABGC does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$600 per client, and six months or more in advance.

## 19. Requirements for State-Registered Advisers

---

### A. Executive Officers and Management Persons

#### President and Chief Compliance Officer

#### LAWRENCE SOLOMON, MBA

Birth Date: 1965

Education:

- Utah State University, Logan, Utah, 1999, Bachelor of Science in Accounting
- Utah State University, Logan, Utah, 2001, Master of Business Administration

Business Background:

- ABG Consultants, LC; April 2004 to Present, President/CEO
- Rocky Mountain Employee Benefits, February 2001 to April 2004, CFO
- ELM, Inc., January 2000 to February 2001, CFO
- The Murdock Group, January 1998 to January 2000, CFO

Additional Compensation: None

Supervision:

Lawrence Solomon is the President and Chief Compliance Officer of ABGC. He is reviewed by Wesley Jensen. He reviews all other employees work through frequent office interactions as well as remote interactions. He also reviews all other employees activities through our client relationship management system.

Wesley Jensen's contact information:

801-486-5069, wes@consultabg.com

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

**Owner**

**Dennis E. Zobell**

Birth Date: 1949

Education:

- Brigham Young University

Business Background:

- Rocky Mountain Employee Benefits, March 1980 to Present, President and CEO

Additional Compensation: None

Supervision:

Dennis is an indirect owner of ABG Consultants and performs no day to day functions for the company.

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

**Owner**

**Dallin Zobell**

Birth Date: 1977

Education:

- University of Utah, Salt Lake City, Utah, 2010, Bachelor of Science in Finance

Business Background:

- Rocky Mountain Employee Benefits, 1999 to Present, VP Operations

Additional Compensation: None

Supervision:

Dallin Zobell is an indirect owner of ABG Consultants and does no day to day functions for the company.

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

### **Owner**

#### **William Jeffrey Zobell, QKA, QPA**

Birth Date: 1972

Education:

- University of Utah, Salt Lake City, Utah, 1995, Bachelors of Sociology

Business Background:

- Rocky Mountain Employee Benefits, 1990 to Present, Vice President.

Professional Designations:

- QKA – Qualified 401(k) Administrator – 2002
- QPA – Qualified Pension Administrator - 2007

Additional Compensation: None

Supervision:

Mr. Zobell is an indirect owner of ABG Consultants and has no day to day functions for the company.

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

### **B. Other Business Activities**

ABGC is not actively engaged in any other business at this time other than giving investment advice.

## Brochure Supplement (Part 2B of Form ADV)

---

### Education and Business Standards

ABGC requires that advisors in its employ have a bachelor's degree and further coursework demonstrating knowledge investment management. Examples of acceptable coursework include: an MBA, a CFP®, a CFA, a ChFC, JD, or CPA or other combination of work experience and education. Additionally, advisors must have work experience that demonstrates their aptitude for investment management. A combination of education and work experience may be a substitute for certain credentials listed above.

### LAWRENCE SOLOMON, MBA

Birth Date: 1965

Education:

- Utah State University, Logan, Utah, 1999, Bachelor of Science in Accounting
- Utah State University, Logan, Utah, 2001, Master of Business Administration

Business Background:

- ABG Consultants, LC; April 2004 to Present, President/CEO
- Rocky Mountain Employee Benefits, February 2001 to April 2004, CFO
- ELM, Inc., January 2000 to February 2001, CFO
- The Murdock Group, January 1998 to January 2000, CFO

Additional Compensation: None

Supervision:

Lawrence Solomon is the President and Chief Compliance Officer of ABGC. He is reviewed by Wesley Jensen. He reviews all other employees work through frequent office interactions as well as remote interactions. He also reviews all other employees activities through our client relationship management system.

Wesley Jensen's contact information:

801-486-5069, wes@consultabg.com

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

---

**WESLEY JENSEN, QKA**

Birth Date: 1979

Education:

- Brigham Young University, 2004 Bachelor of Science in Business Management/ Financial Services
- Utah State University, Logan, UT, Current, Master of Business Administration
- American Society of Pension Professionals and Actuaries, 2009, Qualified 401(k) Administrator (QKA)

Business Background

- Northwestern Mutual Investment Services 2002-2004, Registered Rep
- Nations Financial Group, Inc., 2004-2008, Registered Rep
- Alliance Benefit Group, 2008-Current, Advisor

Additional Compensation: None

Supervision:

Wesley Jensen is supervised by Lawrence Solomon, President. He reviews Wesley's work through frequent office interactions as well as remote interactions. He also reviews Wesley's activities through our client relationship management system.

Lawrence Solomon's contact information:

801-486-5069, [larry@consultabg.com](mailto:larry@consultabg.com)

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None