

**DISCLOSURE BROCHURE**

(FORM ADV: PART 2A)

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This brochure provides information about the qualifications and business practices of Resource Consulting Group Inc. If you have any questions about the contents of this brochure, please contact us at: (407) 422-0252, or by email at: [mikem@resourceconsulting.com](mailto:mikem@resourceconsulting.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC"), or by any state securities authority. Registration with the SEC or any state securities authority does not imply a certain level of skill or training.

Additional Information about Resource Consulting Group, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

MARCH 2012



Please retain a copy of this brochure for your records.

**Item 2. MATERIAL CHANGES SUMMARY**

There have been no material changes in the way Resource Consulting Group conducts business since the last annual update of this brochure in March 2011.

Each year we will deliver to you, by no later than April 30, a free updated brochure that includes or is accompanied by a summary of material changes; or a summary of material changes and an offer to provide a copy of the updated brochure and how to obtain it. Currently our brochure may be requested by contacting us at 407-422-0252.

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## Item 4. Advisory Business

### *Firm Description*

Resource Consulting Group, Inc. (“Adviser”), founded in 1988 by Michael H. Davis, CFP®, is a fee-only financial planning and investment advisory firm that provides a variety of goal-planning and investment advisory services to clients. Adviser’s primary service is providing comprehensive wealth management, including managing client portfolios on behalf of clients who grant Adviser investment discretionary authority.

### *Principal Owner*

Adviser has been independently owned and operated since it was founded in 1988. Adviser is primarily owned by its founder, Michael H. Davis, CFP®.

### *Types of Advisory Services*

Adviser provides financial planning and investment advisory services to clients based on the individual needs of the client. For financial planning clients, Adviser provides a broad-based financial plan, including analysis of the client’s present financial situation, formulation of a written financial plan and documentation of specific recommendations, all within the scope agreed upon in advance with the client. Adviser provides investment advisory services on a discretionary basis and these services may or may not be provided in conjunction with financial planning services.

General. All clients and entities seeking to begin a financial planning and investment management relationship with Adviser are required to sign a Client Agreement. The Client Agreement establishes the fiduciary relationship between Adviser and the client. In addition, Adviser and client will establish the client’s investment goals in an “Investment Policy Statement” approved by client. The Investment Policy Statement details the investment management procedures of Adviser and long-term goals of the client and serves as our framework for investing. Clients may establish restrictions on investing in certain types of securities in the Investment Policy Statement.

### *Client Assets Under Management*

Assets managed by Adviser as of December 31, 2011 are as follows:

- Discretionary: \$849,836,900.
- Non-Discretionary: \$20,057,114.

## Item 5. Fees and Compensation

### *Description*

Adviser is a **fee-only** financial planning and investment advisory firm. As a fee-only firm, Adviser sells no products and is only compensated by the fees paid by its clients. Annual fees may be fixed or calculated as a percentage of assets under management. Annual fee percentages are based on total assets under management and fees are reduced as assets increase. As of the date of this brochure, Adviser’s standard fee schedules are as follows:

For investment advisory services Adviser charges an annual fee based on assets under management:

Portion of assets up to \$1,000,000 - .90%

Portion of assets between \$1,000,000 and \$10,000,000 - .50%

Assets in excess of \$10,000,000 - .25%

For financial planning services, Adviser will charge a fee based on the complexity of the situation and will be determined in advance of the engagement. Subsequently, the first annual financial planning update fee is based on 40% of the initial financial planning fee. Each subsequent year, the financial plan update fee will be increased by five percent (5%) rounded to the nearest one hundred dollar (\$100.00) increment.

Adviser's fees may be negotiated or waived in certain circumstances.

Adviser does not receive any fees that are commission-based (such as sales charges, brokerage commissions or 12b-1 fees from mutual funds) or performance-based.

### *Fee Billing*

Fees are billed quarterly in advance, based on an annual fee and the assets under management as of the last day of the prior calendar quarter. Adviser prorates fees on deposits and withdrawals that are \$500,000 or more during the quarter. Investment advisory fees may be paid directly by the client or by the custodian holding the client's funds and securities. When payment is made by the custodian, the client must provide written authorization permitting the fees to be paid directly from the client's account held by the independent custodian. This authorization is typically included in the standard Client Agreement. [Adviser will send to the client a bill showing the amount of the fee, the value of the client's assets on which the fee was based, and the specific manner in which the fee was calculated. The custodian will send to the client a statement, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to Adviser. Adviser's quarterly statement will encourage clients to compare Adviser's statement with statements received from their custodian.] It is the client's responsibility to review fee deductions to ensure they are correct, as the client's custodian will not do so.

### *Other Fees & Expenses*

Adviser's philosophy is to design a structured diversified client portfolio comprised of institutional mutual funds with low expense ratios. We do not recommend any mutual funds with "loads" or sales charges attached to the fund. Mutual funds in which client's assets may be invested charge additional advisory fees and other fees and expenses, as described in the applicable fund's prospectus. The Adviser's fees do not include custodial fees or brokerage commissions or other transaction costs, if any, charged by client's custodian and broker. Adviser does not determine or receive any of these fees or commissions. Please refer to Item 12 for additional information regarding Brokerage Practices.

### *Termination of Advisory Agreement*

Upon termination of the Client Agreement by either party upon written notice to the other party, a pro rata portion of all advisory fees that were paid, but not yet earned as of the date of termination, will be refunded to the client promptly.

## **Item 6. Performance Based Fees and Side by Side Management**

Adviser does not charge any performance-based fees.

## **Item 7. Types of Clients and Minimum Requirements**

We provide financial planning, advisory services and investment management to individuals and institutional clients such as pension or profit sharing plans, trusts, estates, and charitable organizations, and corporations and other business entities. Adviser generally requires a minimum account size of \$1,000,000. Adviser in its discretion may accept accounts with assets below \$1,000,000. The application of the minimum account fee on these accounts will cause their percentage to be higher than the fees shown in the standard fee schedule. The minimum annual investment advisory fee is \$9,000. However,

the minimum is waived for the first six months of a financial planning engagement. Certain clients may be subject to lower minimum annual fees.

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

Adviser employs a wide range of methods to manage portfolios and evaluate investments. Adviser utilizes an investment approach based on Modern Portfolio Theory. Modern Portfolio Theory refers to the process of maximizing a portfolio's expected return for each given amount of portfolio risk through systematic diversification across asset classes and within those particular asset classes. Adviser develops an asset allocation model consistent with the client's financial objectives, time horizon, and tolerance for risk. Adviser adheres to the passive style of investing and, thus, typically recommends allocating assets among commingled investment vehicles, including indexed and passive mutual funds and investment trusts. Although adequate diversification is our primary goal, keeping client's investment fees, expenses and taxes under control are a top priority in Adviser's investment strategy.

When making investment decisions, Adviser relies on academic-based research and historical data accessed through databases including but not limited to, Dimensional Fund Advisors ("DFA") and Morningstar, Inc.

Adviser analyzes mutual funds recommended to clients based on a fund's structure, relative performance among its peer group, total operating expense ratio, portfolio turnover, investment objective and investment restrictions and limitations. Adviser typically recommends that clients invest in no-load funds advised by DFA or Vanguard that have low operating expenses, low portfolio turnover, below average capital gains distributions and a demonstrated expertise and focus in each particular asset class. DFA funds generally are available for investment only by clients of registered investment advisers, and all investments are subject to approval of the adviser. This means that you may not be able to make additional investments in DFA funds if you terminate your agreement with Adviser, except through another adviser authorized by DFA.

We believe in diversified asset class exposure obtained primarily through a diversified mix of low cost mutual funds that represent desired asset classes. Mutual funds and exchange-traded funds (ETFs) recommended by Adviser typically invest in some or all of the following types of securities:

- U.S. stocks of any market capitalization
- Foreign stocks, including emerging markets
- Investment grade fixed income securities including debt of U.S. and foreign corporations and sovereign debt
- U.S. Government and Government agency securities
- Real estate investment trusts (domestic and foreign)

Adviser recommends open-end mutual funds and exchange-traded funds to implement a client's portfolio. These underlying funds may, in turn, invest in a broad range of equity and fixed income securities, including foreign securities and securities of issuers located in emerging markets. Underlying funds may also invest in equity securities of any market capitalization including micro-, small- and mid-cap companies, real estate, commodities-related assets, fixed income securities of any maturity or credit quality, including high-yield, high-risk debt securities, and they may engage in leveraged or derivative transactions. Adviser has no control over the investment strategies, policies or decisions of the underlying funds and its only option would be to liquidate clients' investments in an underlying fund in the event of dissatisfaction with the fund.

## *Principal Investment Strategies*

Asset allocation models and specific funds recommended to clients typically are set forth in the client's Investment Policy Statement. Adviser primarily recommends low cost mutual funds for the reason that mutual funds can provide a diversified portfolio that is designed to limit the impact of large fluctuations in values of individual stocks and bonds. Mutual funds do not offer protection from market volatility. At times, different funds may be recommended to improve current client portfolios. Upon the request of a client, Adviser may provide a limited review of client assets for which we do not have discretionary authority in the context of the overall plan. Adviser invests for the long-term and does not engage in market timing.

We may give advice and take action with respect to other clients that is different from the advice, timing, and nature of action taken with respect to your account. Timing, allocation, and types of investments are determined as part of each client's overall financial objectives.

## *Principal Risks*

Adviser's primary goal for investing is to help the client maintain purchasing power over the long term. This may result in short term variability and loss of principal. Time horizon and need for risk are key determinates of the proper asset allocation. Our approach focuses on taking appropriate risks for which clients are compensated (i.e. market risk) and seeking to limit or eliminate risks that do not provide compensation over the long term (i.e. individual stock risk).

**Investing in securities involves risk of loss that clients should be prepared to bear.** Adviser cannot guarantee that it will achieve a client's investment objective. Client's returns will fluctuate, and you may lose money by investing. Below are some more specific risks of investing:

- **Market Risk.** The prices of securities held by mutual funds in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by the fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Clients should have a long-term perspective and be able to tolerate potentially sharp declines in market value.
- **Management Risk.** Adviser's investment approach may fail to produce the intended results. If the adviser's perception of the performance of a specific asset class or fund is not realized in the expected time frame, the overall performance of client's portfolio may suffer.
- **Equity Risk.** Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small-cap and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.
- **Fixed Income Risk.** The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by the fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- **Investment Companies Risk.** When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those

funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below its net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which client invests.

- **REIT Risk.** To the extent that a client invests in real estate investment trusts ("REITs"), it is subject to risks generally associated with investing in real estate, such as (i) possible declines in the value of real estate, (ii) adverse general and local economic conditions, (iii) possible lack of availability of mortgage funds, (iv) changes in interest rates, and (v) environmental problems. In addition, REITs are subject to certain other risks related specifically to their structure and focus such as: dependency upon management skills; limited diversification; the risks of locating and managing financing for projects; heavy cash flow dependency; possible default by borrowers; the costs and potential losses of self-liquidation of one or more holdings; the possibility of failing to maintain exemptions from securities registration; and, in many cases, relatively small market capitalization, which may result in less market liquidity and greater price volatility.
- **Foreign Securities Risk.** Funds in which clients invest may invest in foreign securities. Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks may include, among others, currency risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government supervision, less publicly available information, limited trading markets and greater volatility. To the extent that underlying funds invest in issuers located in emerging markets, the risk may be heightened by political changes, changes in taxation, or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.

#### **Item 9. Disciplinary Information**

Adviser and its principals have no disciplinary history or infractions.

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

Adviser's sole business and source of income is providing financial planning and investment management. Adviser does not take part in any other type of business.

Adviser is not owned or controlled by, or under common control with, any other company. We have no obligation to use a particular broker/dealer, vendor, or investment product.

Adviser is a member of Zero Alpha Group, LLC ("ZAG"), a global network of registered investment advisers who advocates the Modern Portfolio Theory of investment management. ZAG members share a common investment philosophy based on the principles of Modern Portfolio Theory which emphasizes a passive investment strategy. ZAG members are geographically diverse, and their executives meet regularly to share investment information, strategic and marketing plans and research related to Modern Portfolio Theory and passive investment management techniques. ZAG also may negotiate with mutual



fund companies and broker-dealers in an effort to obtain lower cost investment services on behalf of the members' respective clients.

## **Item 11. Code of Ethics, Interest in Client Transactions and Personal Trading**

### *Code of Ethics*

Adviser strives to maintain a responsible and ethical way of business. All employees are bound to abide by the ethics standards set forth in our policy and handbook, adopted pursuant to the Investment Advisers Act of 1940. Employees are responsible for reporting their personal securities transactions regularly and reviewing the Code of Ethics at least annually. A copy of the Code of Ethics is available to all clients, free of charge, upon request.

Employees of Adviser who have obtained the Certified Financial Planner (CFP®) designation are bound by the CFP Board's *Standards of Professional conduct*, which outline ethical and practice standards for CFP professionals.

### *Participation or Interest in Client Transactions*

Adviser generally does not recommend investments to clients in which Adviser or any of its principals has a financial interest. If any such investment were proposed, the principal shall disclose any participation or interest in the transaction to the client and obtain the approval of Adviser's Chief Compliance Officer in advance.

### *Personal Trading*

Adviser employees are subject to our Code of Ethics and must report their personal securities transactions to our Chief Compliance Officer for review on a regular basis to the extent required under the Investment Advisers Act of 1940, as amended. The adviser's investment adviser representatives may buy or sell shares of mutual funds that they also recommend to clients. Adviser has adopted an Insider Trading Policy that prohibits its investment advisory representatives from trading on material non-public information.

## **Item 12. Brokerage Practices**

### *Recommending Brokerage Firms*

Adviser currently recommends Charles Schwab & Co. ("Schwab"), an independent registered broker-dealer, as custodian and broker-dealer for most client accounts. We recommend Schwab based on its low fund transaction fees, execution capabilities, financial stability, good administrative capability, accurate communications/settlement processing, and corporate culture. Schwab charges each client a commission or fee to execute transactions. Schwab, not Adviser, determines the commission rate and fees charged to clients and, while Adviser believes the commissions and fees charged by Schwab are competitive, transactions may not always be executed at the lowest available commission rate.

Kimberly Sterling, the Adviser's President, serves on the Schwab Advisor Services Advisory Board ("Board"). The Board consists of approximately 20 representatives of independent investment advisory firms who have been invited by Schwab management to participate in meetings and discussions of Schwab Advisor Services' services for independent investment advisory firms and their clients. Board members serve for three-year terms. Kimberly Sterling's term ends December 2014. Board members enter nondisclosure agreements with Schwab under which they agree not to disclose confidential information shared with them. This information generally does not include material nonpublic information about the Charles Schwab Corporation, whose common stock is listed for trading on the New

York Stock Exchange and the NASDAQ stock market (symbol SCHW). The Board meets in person approximately twice per year and has periodic conference calls scheduled as needed. Board members are not compensated by Schwab for their service, but Schwab does pay for or reimburse Board members' travel, lodging, meals and other incidental expenses incurred in attending Board meetings

Although Adviser routinely requests that clients direct Adviser to execute all transactions through Schwab, clients may request the use of another qualified custodian and broker-dealer.

### *Best Execution*

As a fiduciary, Adviser has an obligation to obtain best execution of advisory clients' transactions under the circumstances of the particular transaction. Adviser seeks to execute client transactions in such a manner that the client's total cost or proceeds in each transaction is the most favorable under the circumstances. Adviser has evaluated the full range of brokerage services offered by Schwab, TD Ameritrade ("TDA") and Raymond James Financial Services ("Raymond James") and considers these broker-dealers to have reliable execution capabilities, compared to other comparable brokers. Based on these factors, Adviser believes that these broker-dealers provide the best price and execution to their clients compared to other broker-dealers that offer institutional advisory platforms. If a client establishes a brokerage/custodial account with any of these broker-dealers, then Adviser will place all orders pursuant to its investment determinations on behalf of client's portfolio through the applicable broker-dealer, even though the client potentially could obtain a more favorable net price and execution from another broker-dealer in particular transactions or from a discount broker in general. While Adviser believes these broker-dealers transaction rates to be competitive, transactions may not always be executed at the lowest available commission rate.

### *Soft Dollars*

Adviser does not enter into so-called "soft dollar arrangements," where an adviser directs client commissions to a broker-dealer that provides research and brokerage services to the adviser.

Certain broker-dealers, including Schwab, TDA, and Raymond James offer an institutional trading platform to advisers. As an adviser, Adviser receives certain benefits from these broker-dealers, including access to duplicate client confirmations and bundled duplicate statements; ability to have investment advisory fees deducted directly from client accounts; access, for a fee, to an electronic communication network for client order entry and account information; and discounts on services offered by the broker-dealer and its affiliates such as portfolio management and billing software. Adviser also receives compliance and marketing publications, industry research, client surveys from certain broker-dealers and mutual fund vendors at below market costs.

### *Order Aggregation*

The adviser does not aggregate trade orders.

## **Item 13. Review of Accounts**

### *Periodic Reviews*

Adviser offers initial review and recommendations as well as continuous review and monitoring of accounts. Investment advisory accounts are reviewed at least quarterly by at least one of Adviser's investment advisory personnel listed in our ADV Part 2B Brochure Supplement. Investment advisory accounts are reviewed weekly by a rebalancing software program that provides alerts to Adviser when balances deviate from established asset allocation thresholds. Adviser's investment advisory representatives use their discretion in making trading decisions, and all trading is reviewed by at least one other investment advisory representative of Adviser. Account reviews can also be triggered by general

economic conditions, mutual fund reports, performance publications, income tax changes and client requests.

### *Regular Reports*

Adviser provides quarterly performance reports to clients for whom the Adviser provides investment supervisory services. These reports generally contain, but are not limited to, portfolio performance versus benchmarks for the prior quarter, one year and since inception periods, list of current portfolio holding and asset allocation weights. Reporting for other clients is provided according to the individual needs of the client.

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

### *Incoming Referrals*

Adviser encourages and promotes referral of prospective clients to our advisory firm. We do not, but may in the future, compensate people or firms for providing referrals.

### *Referrals of Other Professionals*

Adviser emphasizes a “team approach” when providing investment advisory services to its clients. If requested by a client, or if Adviser believes legal or accounting services are required and in the best interests of a client’s financial plan, Adviser will recommend an independent attorney or accountant. Adviser does not pay for client referrals or enter into arrangements with other professionals for client referrals. However, Adviser may have a conflict of interest in making these recommendations because it may receive referrals from professionals that it has recommended to clients. Adviser will refer other professionals to its clients only when the Adviser believes that the services provided by the professional best suit the client’s needs.

### *Other Compensation*

Adviser does not receive sales charges, commissions, service fees, 12b-1 fees or other compensation from a non-client in connection with providing investment advice to a client.

Adviser receives an economic benefit from Schwab in the form of support products and services. These products and services, how they benefit the Adviser, and the related conflicts of interest are described above (see item 12 – Brokerage Practices). The availability of Schwab’s products and services is not based on Adviser giving particular investment advice, such as buying particular securities for clients.

## **Item 15. Custody**

### *Account Statements*

Schwab is the recommended custodian for accounts managed by Adviser. Adviser does not maintain physical custody of client funds or securities. All checks deposited into client’s custodial accounts must be made payable to either the account name or custodian. Clients will receive monthly account statements from their custodian. Clients should review their account statements carefully.

Performance reports are sent to all clients by Adviser on a quarterly basis. Clients are encouraged to compare Adviser performance reports with their custodial statements and to promptly report any issues.

## **Item 16. Investment Discretion**

### *Discretionary Authority for Trading*

Adviser will assist clients in opening an account with an independent custodian or broker-dealer or directly with a mutual fund company. Clients typically grant Adviser discretionary authority over the client's account to determine the securities to be bought and sold, to place trades, to negotiate transactions costs on their behalf, where possible, and periodically to rebalance the client's account back to the recommended allocation. Adviser has no obligation to supervise or direct investments held in client accounts that are not managed by the adviser.

### *Limited Power of Attorney*

Clients are required to grant a "Limited Power of Attorney" to Adviser over client's custodial account for purposes of trading and fee deduction. The client grants this authority in the brokerage account application.

### *Trade Errors*

On occasion, an error may be made in placing a trade. For example, a security may be erroneously purchased (instead of sold) or the wrong number of shares may be purchased (or sold). In these situations, for accounts held with the primary custodian (Schwab), Adviser has the option of making the client whole by a correcting trade in the client's account or Adviser's trade error account. If it appears correcting the error will result in a gain for the client, Adviser (with the client's permission) will correct trade in the client's account and the client may keep any resulting gain. If a loss is expected or cannot be accurately predicted due to possible market movement, Adviser may use its trade error account to record these corrections. Under certain circumstances, it may be necessary to remove a gain from client's account and retain it in Adviser's trade error account. If a net loss occurs, Adviser will pay for the loss. The client will be made whole as soon as possible upon discovery of the error and loss. All errors and their subsequent resolutions will be documented accordingly.

## **Item 17. Voting Client Securities**

Adviser currently does not exercise proxy-voting authority over securities held in our clients' account. Adviser does not receive any proxy voting materials on behalf of any clients. All proxy materials are sent directly to the client by the custodian of the account. Clients are responsible for voting proxies of securities held in their investment portfolios at their own expense. Clients may contact Adviser with any questions about a mutual fund proxy solicitation at the address on the cover page.

## **Item 18. Financial Information**

Adviser is not aware of any financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients.

## **Item 19. Requirements For State-Registered Advisers**

Because Adviser is a federally registered investment adviser, this Item is not applicable.

## Appendix 1 - Privacy Policy

The Securities and Exchange Commission (“SEC”) was required by the Gramm-Leach-Bliley Act to establish standards to safeguard client information and records. As a result, the SEC adopted Regulation S-P, which among other things, requires investment advisers registered with the SEC to adopt appropriate policies and procedures that address safeguards to protect this information and to disclose its privacy policies to clients annually.

Resource Consulting Group has always taken care to protect and safeguard information we gather on our clients. As part of this SEC regulation, we are required to give you this notice concerning our privacy policy.

We collect nonpublic personal information about you from the following sources:

- Information we receive from you on applications or other forms; and
- Information about your transactions with us or others.

We do not sell your personal information to anyone.

We do not disclose any nonpublic personal information about you to third parties, unless one of the following limited exceptions applies or you have specifically asked us to do so:

- We disclose personal information to companies that help us process or service your transactions or account(s) (such as Charles Schwab and Company, TD Ameritrade, Raymond James Financial Services, Dimensional Fund Advisors or others as applicable).
- We may disclose or report personal information in limited circumstances where we believe in good faith that disclosure is required or permitted under law, for example, to cooperate with regulators or law enforcement authorities.

Resource Consulting Group maintains physical, electronic, and procedural safeguards to guard your nonpublic personal information.

If you should ever decide to close your account(s) or become an inactive client, we will continue to adhere to the privacy policies and practices as described in this notice.

Should you have any questions about the privacy and protection of your records, please contact us and we will be happy to discuss this matter with you.