

**Mowell Financial Group, NA (MFGNA)**  
**Part 2A of Form ADV**  
**The Brochure**  
**March 26, 2012**

This Brochure provides information about the qualifications and business practices of Mowell Financial Group NA (MFGNA). If you have questions about the content of this brochure, please contact us at 850-386-6161, or Caroline Scott at [cscott@mowellfinancial.com](mailto:cscott@mowellfinancial.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 Mowell Financial Group NA Corp is also available on the SEC's website at [www.advisoreinfo.sec.gov](http://www.advisoreinfo.sec.gov).

References to Mowell Financial Group NA as a "registered investment advisor" or any reference to being "registered" do not imply a certain level of skill or training.

## Material Changes

This Brochure contains information about Mowell Financial Group NA (“MFGNA”).

There are no material changes in our brochure since its last annual update on March 30, 2011.

MFGNA will provide a summary of any material changes to our Brochure on an annual basis prior to the 29<sup>th</sup> of April. We may also provide updated disclosure information about material changes on a more frequent basis as warranted. Our Brochure may be requested by calling or office at 850-386-6161 or by emailing Nancy Waddill at [nwaddill@mowellfinancial.com](mailto:nwaddill@mowellfinancial.com) or Caroline Scott at [cscott@mowellfinancial.com](mailto:cscott@mowellfinancial.com). Our Brochure is also available for viewing on the SEC website [www.advisoreinfo.sec.gov](http://www.advisoreinfo.sec.gov).

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### **Advisory Business:**

Mowell Financial Group NA Corp (MFGNA) is a Florida corporation, founded and owned by John B. Mowell in January of 1981. MFGNA is registered with the Securities and Exchange Commission (SEC) as an Investment Advisory Firm. Mr. Mowell is also the owner of Mowell Financial Group, Inc., (MFGINC), a broker/dealer registered with the SEC and a member of the Financial Industry National Regulatory Authority ("FINRA").

### **Advisory Services:**

MFGNA provides discretionary and non-discretionary investment advisory services defined as giving continuous investment advice to a client, and/or making investments for a client based on the individual needs of a client on a managed account basis. Mr. Mowell, through personal discussions with its clients in which goals and objectives based on a client's particular circumstances are identified, then manages the client's assets based on the investment objectives identified for that account.

As of December 31, 2011, MFGNA manages approximately \$43.8 million in assets. Approximately \$29 million is managed on a discretionary basis, in which MFGNA is authorized to make investment decisions for the account. Approximately \$14.6 million is managed on a non-discretionary basis, in which MFGNA makes recommendations which must be approved by the client before such recommendations are effected.

### **Fees and Compensation**

MFGNA is paid fees based on assets advised and not on a transactional basis. Generally, fees are payable quarterly in arrears on the basis of the value of the assets in the account as of the end of each calendar quarter. Any accounts opened or closed during a calendar quarter will have the advisory fee pro-rated for the period. In certain circumstances, fees may be negotiated and are set forth in the investment advisory agreement. Fees payable to the Adviser for services provided pursuant to the investment advisory agreements will be determined, in the Adviser's discretion, on a client-by-client basis, and may include a different rate, or a flat annual fee paid quarterly. Clients have the option to have fees deducted from their accounts, or to be billed for the fees incurred.

Accounts will be managed pursuant to discretionary authority limited to the selection, purchase and sale of primarily equity securities by advisory representatives of MFGNA. Specific securities to be purchased or sold will be selected based on their perceived value, their perceived potential for increase or decrease in value, and their consistency with the specific investment objectives of each individual client. An advisory fee will be assessed under one of the following contractual arrangements as follows:

1. MFGNA will manage accounts of \$200,000 or greater for a fee of not less than  $\frac{3}{4}$  of 1% per annum or more than 3% per annum, multiplied by the total value of assets under management as of the end of each calendar quarter. Said fee will be determined at the sole discretion of MFGNA by the size of the account and the total of all services required by the client.
2. Accounts less than \$200,000 will be managed individually for a fee, determined at the sole discretion of MFGNA, of not more than 3% per annum, and multiplied by the total value of assets under management as of the end of each calendar quarter.

Clients whose assets are invested in mutual funds may pay two advisory fees; an investment advisory fee to MFGNA and an additional advisory fee to the mutual fund manager.

As clients are billed on the total value of their accounts, clients who choose to have their accounts effect transactions on margin will pay both margin interest and an advisory fee on the margin loan amount. These increased costs could result in decreased returns for those accounts. While MFGNA does not, as a matter of practice, recommend the use of margin, the use of margin by a client could benefit MFGNA in that the compensation it receives will increase as the margin balance in a client's account increases.

Accounts may be managed on a non-discretionary basis meaning we will be required to have prior approval of any transactions. Fees for non-discretionary accounts are determined by the scope, complexity and/or volume of services specified by the client; however in no case will they exceed 3% per annum.

Fees under each of the above alternatives will be billed on a monthly or quarterly basis (depending upon the request of the client) only after the advisory services have been performed and approved by the client.

## **Performance Based Fees and Side-by-Side Management**

MFGNA does not charge any performance based fees. Performance based fees are based on a share of capital gains on or capital appreciation of the assets in the account.

## **Types of Clients**

MFGNA generally requires a minimum portfolio size of \$200,000. We, at our sole discretion, may accept clients with smaller portfolios based upon certain factors including anticipated future earning capacity, anticipated future additional assets, account composition, related accounts, and pre-existing client relationships. We may consider the portfolios of your family members to determine if your portfolio meets the minimum size requirements.

We primarily provide services to individuals, including high net worth individuals, their families, trusts, retirement accounts and their small individually owned businesses.

## Methods of Analysis, Investment Strategies and Risk of Loss

### **Determining Suitability**

In setting up an advisory account, the advisory representative will obtain basic investment information about the prospective client and record such information on a new account form. Mr. Mowell, as CCO, will use this information to monitor the ongoing activity in the client's account and ensure that such activity is in accordance with the financial wherewithal and investment objectives identified by the client. Mr. Mowell may, at his discretion, consult the client to confirm the accuracy of the information on file regarding the client. If the client's objectives have changed, the advisory representative is required to obtain updated information from the client and update the new account form before any further transactions are entered for the client's account.

### **Managing Client Accounts**

It is the responsibility of each advisory representative of MFGNA to devote the requisite amount of attention to professionally manage each of his/her client accounts in accordance with the investment requirements and objectives of each client. In managing accounts, each advisory representative is required to maintain regular communications with his/her clients. At a minimum these communications will include the following:

- At least annually, advisory representatives will undertake a comprehensive review of each of his/her client accounts to assess each client's financial situation and investment needs. In addition, on an on-going basis each advisory representative will evaluate the client's portfolio if he/she should become aware of any changes in any client's investment objectives or financial circumstances. All updated information will be reflected on a revised new account form.
- In addition to the daily review of executed and unexecuted order memoranda, Mr. Mowell, as CCO, will review the activity in a sampling of accounts at least quarterly to determine if the account has been managed in a manner consistent with the client's investment objectives. Mr. Mowell, as CCO, has the independent authority to discuss any questionable activities in any client account with that client.
- MFGNA will provide each client with a quarterly review and analysis of his/her account(s) and provide any additional information on the account(s) which may be requested by the client. It is the responsibility of each advisory representative to keep his/her clients apprised of relevant changes in the economy, market conditions, and MFGNA's investment views and expectations for the economy and the markets.

## Disciplinary Disclosure

MFGNA is required to disclose relevant facts about any legal or disciplinary "event" which would be material in evaluating the Firm's integrity or ability to meet contractual commitments. MFGNA has not been the subject of any disciplinary or legal action.

In order to promote complete transparency of their business practices, Mr. Mowell, as the Owner/President of the broker/dealer firm, MFGINC, and completely separate and non-related to MFGNA, must report the following disclosures:

October 1999 – a complaint was filed against John B Mowell and MFGINC by their client, Florida Transportation Builders Association (FTBA). Having full discretion and authorization to do so, Mr. Mowell and MFGINC invested this client into high risk debt instruments including CMO's, producing excellent returns over the term of the relationship with the client. When the client changed its Legal Charter from an unregulated member owned, self-insured association to a mutual company requiring a higher level of caution with investments and a much lower allowance for 'risk', Mr. Mowell and MFGINC were never notified of this change nor did the client give Mr. Mowell or MFGINC any policy instruction to change the nature of the original type of investments. In order to avoid an overwhelming amount in legal costs, MFGINC entered into a settlement of \$500,000. Mr. Mowell did not have to personally contribute to this settlement payment.

August 2004 – a complaint was filed against John B Mowell and MFGINC related to the sale of CMO securities and the termination of a former employee of MFGINC. The claimants were never clients of MFGINC or MFGNA. The case settled for \$275,000, but Mr. Mowell or MFGINC continue to deny any wrong doing and only settled this claim due to the exorbitant cost of litigation. Additional information is available at [www.finra.org](http://www.finra.org) through BrokerCheck.

March 2006 – a Cease and Desist order was filed by the State of Alabama Securities Commission against John B Mowell and Mowell Financial Group for securities transactions performed in the State of Alabama without being registered as a Broker/Dealer. These trades were made on behalf of an existing longtime client who had relocated to the State of Alabama, while maintaining a home in the State of Florida. Mowell and MFGINC made several offers of retribution to the client by rescinding all transactions effected. The customer refused. Alabama Securities Commission and Mr. Mowell and MFGINC entered into a Consent Order to amicably resolve this matter. Additional information is available at [www.finra.org](http://www.finra.org) through BrokerCheck.

October 2007 - a complaint related to the August 2004 filing (but not the same claimants) was filed against John B Mowell and Mowell Financial Group, Inc. (MFGINC) related to the termination of the above referenced former employee of MFGINC. The complaint was settled for \$50,000. The claimants were not clients of MFGINC or MFGNA. Mr. Mowell denied any wrong doing. Additional information is available at [www.finra.org](http://www.finra.org) through BrokerCheck.

## **Other Financial Industry Activities and Affiliations**

Mowell Financial Group, Inc., a FINRA-member broker/dealer, and Mowell Financial Group NA Corp., an SEC-registered Investment Adviser, are affiliated entities that provide investments and investment advisory services to a variety of retail and institutional customers.

Mowell Financial Group, NA Corp. ("MFGNA") effects the majority of the investment transactions for the accounts of its clients through Mowell Financial Group, Inc. (MFGINC) and that entity's clearing firm, Raymond James & Associates, Inc. ("Raymond James").

As a matter of policy, MFGNA recommends that clients execute securities transactions for their accounts through Mowell Financial Group, Inc. (MFGINC), an affiliated broker/dealer that clears its transactions through Raymond James. Notwithstanding this, MFGNA permits clients to direct the execution of transactions for their advisory accounts through the broker/dealer of their choice.

Transactions effected through MFGINC and Raymond James will generally result in MFGINC receiving a commission in conjunction with those transactions. As a matter of policy, commissions charged by MFGINC are discounted at least 30%.

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

### **Code of Ethics**

Under Rule 204A-1 of the Investment Company Act of 1940, MFGNA is required to establish, maintain and enforce written procedures reasonably necessary to prevent its employees from violating provisions of the Act with respect to personal securities trading and fiduciary obligations. In meeting such responsibilities to its clients, MFGNA has adopted a *Code of Ethics* regarding, among other things, the purchase and/or sale of securities in the personal accounts of its employees or in those accounts in which its employees may have a direct or indirect beneficial interest. That *Code of Ethics*, which is maintained separate from this *Manual*, is also intended to lessen the chance of any misunderstanding between MFGNA and its employees regarding such trading activities. Mr. Mowell, as CCO, will review the *Code of Ethics* annually and update or amend it as warranted.

### **Insider Trading**

In 1989, Congress enacted the Insider Trading and Securities Enforcement Act to address the potential misuse of material non-public information. Courts and the Securities and Exchange Commission currently define inside information as information that has not been disseminated to the public through the customary news media; is known by the recipient to be non-public; and has been improperly obtained. In addition, the information must be material (e.g. it must be of sufficient importance that a reasonably prudent person might base their decision to invest or not invest on such information).

The definition and application of inside information is continually being revised and updated by the regulatory authorities. If an MFGNA supervised person believes he/she is in possession of inside information, it is critical that that person not act on the information or

disclose it to anyone, but instead advise Mr. Mowell immediately. Acting on such information may subject the person to severe federal criminal penalties and the forfeiture of any profit realized from any transaction.

Although this section is included under the provisions of this Code, it is, in fact, a separate set of procedures required under Section 204A of the Advisers Act and is included in MFGNA's Supervisory Policies and Procedures Manual. All MFGNA supervised persons are required to read and annually acknowledge an understanding of those procedures.

### **Trading for Personal Accounts**

MFGNA may, from time to time, recommend to clients that they buy or sell securities which employees and/or related persons of MFGNA, are also purchasing or selling for their own accounts. MFGNA maintains a Code of Ethics which, among other things, prohibits employees and related persons of the firm from effecting transactions for their own accounts (including accounts of immediate family members and accounts over which they exercise control) in any manner that would conflict in any way with the interests of MFGNA's clients. At all times, recommendations to clients will be made independently of the securities holdings of MFGNA's employees and related persons. Upon request, clients and prospective clients may obtain a copy of MFGNA's Code of Ethics.

Employees and/or related persons of MFGNA may, from time to time, serve as directors, officers, managers, or employees of companies whose securities are publicly traded. MFGNA will not permit the exercise of discretion in the purchase or sale of such securities. Should a client independently elect to purchase or sell any such securities, said client will be informed at the time of the transaction and promptly thereafter in writing that MFGNA will be unable to advise as to when securities of such companies should be purchased or sold and that any such determinations must be made without the advice or assistance of MFGNA. MFGNA's advice shall be limited to informing or explaining any material or information which is otherwise available to the public either through press releases, research reports, or filings with governing regulatory agencies.

### **Client Complaints**

In the event that a client files a written complaint or makes an inquiry that requires response and resolution, MFGNA's Chief Compliance Officer will promptly conduct an investigation of the circumstances surrounding the complaint. We will evidence review and disposition of the complaint by drafting a memo detailing notes of his investigation and his conclusions. The original complaint letter, and copies of all communications and memoranda relating to the complaint, will be retained in a special file titled Client Complaints, with a copy

of the complaint placed in the client's personal file. Mr. Mowell will respond to each complaint promptly and will retain any subsequent correspondence from the client on the matter.

## **Brokerage Practices**

Unless otherwise directed in writing by a client, most transactions for the accounts of clients of MFG NA will be effected through its broker-dealer affiliate, MFGINC. As a result, clients may pay both investment advisory fees to MFGNA and brokerage transaction fees/commissions to MFGI. Because certain of MFGNA's employees are also registered representatives of MFGINC, they may receive a portion of both the advisory fees and the brokerage transaction fees/commissions that are assessed. Upon written request, MFGNA will provide clients, on an annual basis, with the total amount of all brokerage transaction fees/commissions earned by MFGINC and its registered representatives resulting from transactions effected in the client's account.

MFGINC has a contractual arrangement with Raymond James & Associates, Inc. ("Raymond James") to carry its customer accounts and to clear transactions effected for those accounts on a fully-disclosed basis. Raymond James serves as the custodian for the majority of advisory accounts of clients of MFG NA whose transactions are effected through MFGINC.

Transactions that MFGNA effects through MFGINC pursuant to the discretionary authority it has been granted, and which are executed through MFGINC's relationship with Raymond James shall reflect a discount of not less than 30% off the standard retail commission rates which Raymond James normally charges, but shall not be otherwise negotiated. At the sole discretion of MFGNA, transactions effected for non-discretionary accounts may or may not be subject to a discount off the standard retail commission rates.

MFGINC, Raymond James and all other broker/dealers through which clients may effect transactions for their respective advisory accounts are obligated to ensure that those transactions receive the best executions available in the market. MFGNA and MFGINC both have procedures in place to periodically review the quality of transaction executions by Raymond James. Similarly, MFGNA has procedures in place to periodically review the quality of executions by any other broker/dealers selected by clients to effect their advisory account transactions.

In its efforts to obtain the best overall execution on transactions effected for its clients, MFGNA may execute certain transactions for the accounts of multiple clients as "block transactions." Such transactions are normally executed at multiple prices but are confirmed to all clients at the same average price. MFGNA will, upon the written instruction of a client, exclude the execution of transactions for that client's account from such block transactions.

While MFGNA's investment practice is not based on a short-term trading strategy (i.e., securities sold within 30 days of purchase) there may be infrequent occasions where sales of securities held for a short period of time may be in the best interests of the client.

Margin transactions are only effected in client accounts at the specific direction of the client.

## **Review of Accounts**

MFGNA monitors and reviews your accounts on an ongoing basis with a formal review conducted at your request. These reviews focus on the consistency of portfolio investments with each client's own recorded objectives and risk tolerances. Reviews also consider investment restrictions requested by you, investment time horizons, liquidity needs, tax considerations and other circumstances unique to you.

On a quarterly basis, the performance of your account is reviewed to monitor consistency with market benchmarks that we deem applicable. Account reviews may also be triggered by other factors such as changes in general economic and market conditions, analyst reports, issuer news and interest rate movement. Mr. Mowell is responsible for all reviews.

You will receive statements from the custodian at least quarterly. These statements identify your current investment holdings, the cost of each of those investments, and their current market values. You will also receive performance analysis reports prepared by us which describe the returns realized on the investments in your account. They are also available for review at any time by Mr. Mowell, or the client, online at the Raymond James website. Mr. Mowell will ensure that MFGNA is able to promptly retrieve client portfolio data, including securities activities and portfolio holdings for each client account.

## **Client Referrals and Other Compensation**

MFGNA does not have any arrangements, oral or in writing, where it is paid cash by or receives some economic benefit (including commissions, equipment or non-research services from a non-client in connection with giving advice to clients. Nor does MFGNA have any arrangements directly or indirectly to compensate any person for client referrals.

As noted above, Mr. Mowell is the Owner and President of MFGINC, and at times, may receive commissions and other compensations for transactions which are effected through MFGINC.

## Custody

### Compliance with Custody Rule

Physical custody of client funds or securities for all accounts are maintained by a qualified custodian, ie Raymond James and Associates. You will receive statements from the custodian that holds your investment account on at least a quarterly basis. We urge you to carefully review these statements and compare them to the quarterly account statements that MFGNA mails to you directly. You should verify that the transactions in your account are consistent with your investment goals and the objectives for your account. We also encourage you to contact your advisory representative or our Chief Compliance Officer, should you have any questions or concerns regarding your account.

MFGNA will only withdraw quarterly advisory fees directly from a client's account(s) upon obtaining written authorization from the client as detailed in the client's *Investment Management Agreement*. Regardless of whether clients authorize MFGNA to withdraw advisory fees directly from their accounts, all clients will be sent a written invoice each calendar quarter setting forth the amount of the fees charged and how those fees were calculated.

## Investment Discretion

### Discretionary Trading

Discretionary transactions effected for the advisory accounts of MFGNA clients will only be entered if the client has provided MFGNA with written authorization granting such discretion. This written authorization will be evidenced in the *Investment Management Agreement* signed by the client. It is the policy of MFGNA that the discretionary authority granted to MFGNA will be restricted to **"limited trading authority"**, giving the advisory representative the power only to purchase and sell securities for the client's account. At no time will MFGNA or any of its associates enter into any written or verbal agreement or understanding with a client that gives the associate **"full trading authority"** over the client's account since that term may be interpreted as granting authority to withdraw funds and securities from a client's account.

MFGNA permits clients to select the broker/dealers through which transactions for their advisory accounts will be effected. MFGNA reserves the right, however, to refuse to provide advisory services relative to client accounts maintained at a broker/dealer whose services MFGNA believes are incompatible with its own. MFGNA may also refuse to provide advisory services for client accounts held at a broker/dealer if it believes that the transactions charges, quality of transaction executions, or quality of service provided by that broker/dealer are detrimental to its advisory clients.

## **Voting Client Securities**

### **Delivery of Proxies and Processing of Class-Action Lawsuit Notifications**

Inasmuch as MFGNA does not serve as custodian for any advisory client accounts, proxies for securities held in accounts will be provided to each client by the client's broker/dealer or custodian maintaining the client's account. It is the policy of MFGNA that any proxies it receives on behalf of clients will be promptly forwarded to those clients. MFGNA will not vote client proxies, unless required by law to do so.

With respect to class action lawsuits, MFGNA will not advise or act for its clients in any legal proceeding, including class actions and bankruptcies involving securities purchased or held in accounts managed by MFGNA. If MFGNA receives any information on behalf of a client regarding a class action lawsuit or bankruptcy pertaining to an issuer of securities, Mr. Mowell, as CCO, will ensure that that information is promptly forwarded to the appropriate client.

## **Financial Information**

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to you and we have not been the subject of a bankruptcy proceeding.

**John B. 'Jack' Mowell**

Investment Advisor

407 E. 6<sup>th</sup> Ave

Tallahassee, Florida 32303

Mowell Financial Group

March 28, 2012

**Name:** John Byard Mowell    **Year of Birth:** 1934

**Formal education after High School:**

B.S. Economics, Wharton School, Univ. of Pennsylvania, Philadelphia, PA

**Business Background for the Preceding Ten Years:**

- President/Owner, General Securities Principal, Representative and Financial Operations Principal, for Mowell Financial Group, Inc., a FINRA-registered Broker-Dealer, January 1981 - Present
- President/Owner of Mowell Financial Group, N.A. Corp., a SEC-Registered Investment Advisory Firm., January 1981 - Present

**Board Affiliations:**

**Private:**

- Entegriion, Inc, Chairman
- Rocky Mountain College – Advisory Board

**Disciplinary Actions**

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amicably resolve this matter. Additional information is available at [www.finra.org](http://www.finra.org) through BrokerCheck.

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### **Other Business Activities**

- Entegion, Inc  
Executive Director/Chairman of the Board of A Private Medical Device/BioMed Company located in Raleigh-Durham, NC.
- Beartooth Energy, LLC  
Managing Director of a private oil development/producing company located in Fishtail, Montana
- Montana Jacks Bar & Grill  
Owner of a small restaurant located in Dean, Montana

### **Additional Compensation**

As President and Owner of MFGINC, Mr. Mowell may receive compensation for securities transactions executed through the broker dealer.

### **Supervision**

As Owner/President of MFGNA, Mr. Mowell does not have a direct supervisor, but is bound by the firm's Code of Ethics and must adhere to the investment advisory guidelines set in place by the SEC, as well as any State Regulatory Office for which the Firm is registered with.

### **Requirements for State Registered Advisors**

No additional information is required that has not been disclosed elsewhere in this disclosure brochure.