

# **AOG WEALTH MANAGEMENT WRAP PROGRAM**

Item 1 – Cover Page

**Alpha Omega Group, Inc.  
DBA  
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**March 4, 2013**

**This wrap fee program brochure provides information about the qualifications and business practices of AOG Wealth Management. If you have any questions about the contents of this Brochure, please contact us at (703) 757-8020 and/or [info@aogwealth.com](mailto:info@aogwealth.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 AOG Wealth Management also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Any references to AOG Wealth Management as a registered investment adviser or its related persons as registered advisory representatives does not imply a certain level of skill or training.**

<b>Item 2 - Material Changes</b>
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This is the initial disclosure brochure. Therefore, there are no material changes to disclose.

At least annually, this Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. Additionally, reference to the date of the last annual update to this Brochure will be provided.

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The material changes discussed above are only those changes that have been made to this brochure since the firm's last annual update of the brochure. This is the initial brochure.

In the past, we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent brochures within 120 days of the close of our fiscal year, which is December 31st. We may further provide other ongoing dis-closure information about material changes as necessary.

Additionally, we will further provide you with a new brochure as necessary based on change or new information, at any time, without charge.

Our brochure may be requested free of charge by contacting Frederick Baerenz at (703)757-8020 and/or [info@aogwealth.com](mailto:info@aogwealth.com). Additional information about AOG Wealth Management is also available via the SEC's website [www.adviser.sec.gov](http://www.adviser.sec.gov). The website also provides information about any persons affiliated with AOG Wealth Management who are registered, or are required to be registered, as investment adviser representatives of AOG Wealth Management.

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<b>Item 4 - Services, Fees and Compensation</b>
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### **AOG Wealth Management Wrap Program**

AOG Wealth Management offers a wrap program. A wrap program is an asset management program that provides clients with asset management and transactional services for one all-inclusive fee.

Wrap accounts may be more suitable for the client who wants the cost of management and trading in one single fee without being charged for each transaction. While a non-wrap account will be more suitable for a client who prefers to separate management fees and pay for each transaction. Actively managed accounts will generally be better suited for a wrap account. Managed accounts that are infrequently traded or trade in no-transaction fee securities will be better suited for a non-wrap fee structure. A wrap program may cost you more or less than if you purchased advisory and transactional services separately.

Upon AOG completing its analysis of your existing portfolio and goals, AOG will determine an asset allocation customized to your financial goals, objectives and risk tolerance.

AOG will meet with you and present the recommended portfolio allocation. Upon your approval, AOG will implement the portfolio allocation. AOG will provide continuous and ongoing management of your account. Unless otherwise expressly requested by you, AOG will manage the account on a discretionary basis and make changes to the allocation as deemed appropriate by AOG. AOG will determine the securities to be purchased and sold in the account and will alter the securities holdings from time to time, without prior consultation.. AOG may actively trade securities and hold such holdings for periods of 30 days or less or maintain positions for longer or shorter term periods. Discretionary authority will be granted by you to AOG by execution of the Asset Management agreement.

If you elect to have your accounts managed on a nondiscretionary basis, no changes will be made to the allocation of your account without prior consultation with you and your expressed agreement. However, AOG will periodically rebalance your account to maintain the initially agreed upon asset allocation. AOG does not deem rebalancing as a form of discretion.

AOG uses a modified endowment model portfolio allocation. Portfolios will be allocated across several asset classes and using several different investment vehicles. Portfolios will follow a model similar to the following and will be adjusted for each client based on the individual's goals, objectives and risk tolerance. Additionally, portfolios will be adjusted based on the economic environment at the time of investment.

Wrap programs are considered expensive for managed accounts that are managed in a passive manner or are not actively traded. Wrap programs will typically charge a higher management fee than other non-wrap asset managed programs since a portion of the wrap fee collected by AOG must pay for transactions.

## Wrap Fees

Fees are negotiable and are not based on a share of capital gains upon or capital appreciation of the funds or any portion of the funds.

Additional assets deposited into the Account after it is opened will not be charged a pro-rata fee based upon the number of days remaining in the then current calendar month. Similarly, partial withdrawals from the account will not result in a prorated portion of the fee being calculated on the withdrawal. No fee adjustments will be made for Account appreciation or depreciation.

Account Size	Annual Fee
First \$1,000,000	1.25%
Next \$4,000,000	1.00%
\$5,000,000 and above	0.80%

AOG aggregates or households all of your managed accounts together to determine your quarterly fee.

For example, if you have four managed accounts with a value as of the just completed calendar month of: \$1,001,569.40, \$550,498.46, \$675,879.50, and \$740,301.12 with a total value of \$2,968,248.48, fees will be calculated as follows.

First \$1,000,000 x 1.25%	\$12,500.00
Next 1,968,248.48 x 1%	<u>\$19,682.48</u>
Annual Fee	\$32,182.48 / 365 x number of days in the month = Monthly Fee

AOG may change the above fee schedule upon 30-days prior written notice to you.

Advisory fees will generally be collected directly from your account, provided you have given AOG written authorization. You will be provided with an account statement reflecting the deduction of the advisory fee direct from the account custodian. If the Account does not contain sufficient funds to pay advisory fees, AOG has limited authority to sell or redeem securities in sufficient amounts to pay advisory fees. You may reimburse the account for advisory fees paid to AOG, except for ERISA and IRA accounts.

In addition to the advisory fees above, you will pay for custodial services, account maintenance fees, transaction fees, and other fees associated with maintaining the Account. Such fees are not charged by AOG and are charged by the product, broker/dealer or account custodian. AOG does not share in any portion of such fees. Additionally, you may pay your proportionate share of the fund's management and administrative fees and sales charges as well as the mutual fund adviser's fee of any mutual fund they purchase. Such advisory fees are not shared with AOG and are compensation to the fund-manager.

Advisory fees are charged in arrears of each calendar month. The monthly advisory fee will be based on the value of the Account on the last business day of the just completed calendar month. Fees for

partial periods will be prorated. The initial monthly fee will be a pro-rated portion of the fee based on the number of days remaining in the calendar month.

Advisory Representatives of AOG are dually registered representatives of Cetera Advisors, LLC (“Cetera Advisors”), a registered broker/dealer, member of the Financial Regulatory Association (FINRA) and SIPC. Advisory Representatives of AOG who are Registered Representatives may receive trail commissions (i.e. 12b-1 fees) for a period of time as a result of directing securities transactions through Cetera Advisors. Load and no-load mutual funds may pay annual distribution charges, sometimes referred to as 12b-1 fees. 12b-1 fees come from fund assets, therefore, indirectly from your assets. 12b-1 fees may be initially paid to Cetera Advisors and a portion passed to the Advisory Representatives. The receipt of such fees could represent an incentive for the Advisory Representatives to recommend funds with 12b-1 fees over funds that have no fees or lower fees. As a result, there is a potential conflict of interest.

As stated above, AOG recommends mutual funds that pay 12b-1 fees and no-load funds.

You may purchase the securities recommended by AOG directly or through other brokers or agents not affiliated with AOG.

#### Termination Provisions

You may terminate investment advisory services obtained from AOG, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with AOG. You will be responsible for any fees and charges incurred from third parties as a result of maintaining the Account such as transaction fees for any securities transactions executed and Account maintenance or custodial fees. Thereafter, you may terminate investment advisory services with 30-days written notice to AOG. Should you terminate investment advisory services during a calendar quarter, you will be charged a pro-rated portion of the advisory fee for the quarter up to the date of termination.

### **Item 5 - Account Requirements and Types of Clients**

AOG’s services are focused on high net worth individuals (i.e. clients with a net worth of \$1,500,000), high net worth corporations or other businesses.

### **Item 6 - Portfolio Manager Selection and Evaluation**

Portfolio management is conducted by advisory representatives of AOG. The advisory representatives as a group determine the allocations and manage client accounts.

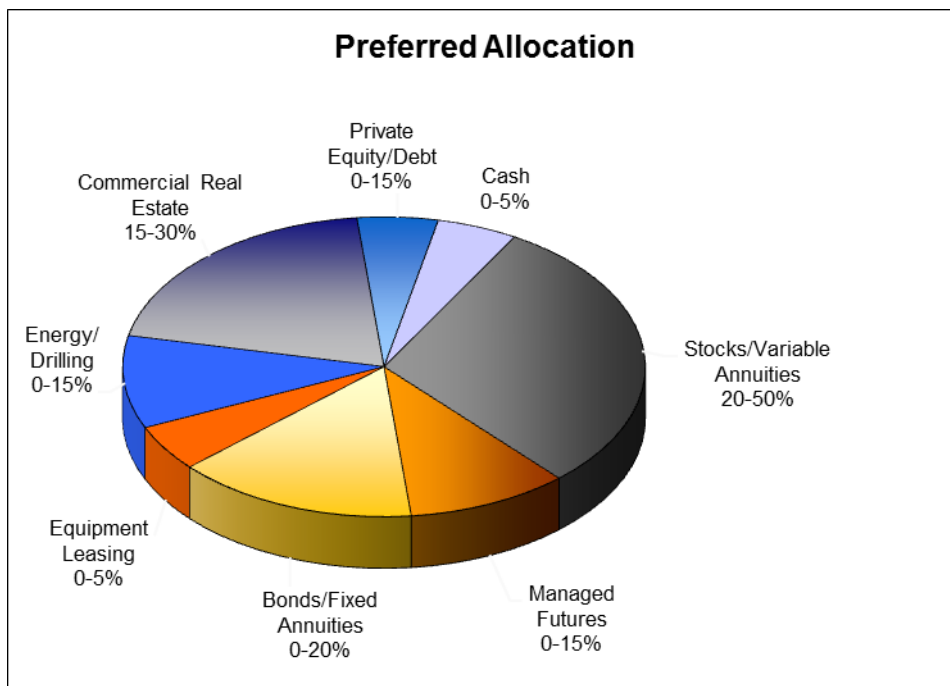
AOG tailors the advisory services it offers to your individual needs. You may impose restrictions and/or limitations on the investing in certain securities or types of securities.

AOG will meet with you and conduct an interview and data gathering session to compile information about you, your financial goals and objectives, and your financial concerns. You should expect at least two to three meetings during the due diligence, data gathering and analysis process. The

information gathered by AOG will enable your advisors to provide you with the requested services that are customized to your financial situation. Depending on the services you have requested, AOG will gather various financial information and history from you including, but not limited to:

- Retirement and financial goals
- Investment objectives
- Investment horizon
- Investment Experience
- Financial needs
- Cash flow analysis
- Income Protection
- Cost of living needs
- Education-funding needs
- Saving tendencies
- Other applicable financial information required by AOG in order to provide the investment advisory services requested.

AOG uses a modified endowment model portfolio allocation. Portfolios will be allocated across several asset classes and using several different investment vehicles. Portfolios will follow a model similar to the following and will be adjusted for each client based on the individual's goals, objectives and risk tolerance. Additionally, portfolios will be adjusted based on the economic environment at the time of investment.



The endowment model seeks higher investment returns over long periods of time on a more consistent basis by allocating to public and non-public, relatively illiquid markets. Typically fixed income

allocations are minimized in favor of market neutral income options. In addition, long-only equity allocations are supplemented with private equity, venture capital and real asset investments.

Transactions in the account, account reallocations and rebalancing may trigger a taxable event, with the exception of IRA accounts, 403(b) accounts, 401(k) accounts, and other qualified retirement accounts.

AOG does not charge performance based fees.

AOG conducts economic analysis and attempts to analyze and determine macroeconomic trends. Additionally, AOG conducts fundamental and technical analysis. Fundamental analysis generally involves assessing a company's or security's value based on factors such as sales, assets, markets, management, products and services, earnings, and financial structure. Technical analysis generally involves studying trends and movements in a security's price, trading volume, and other market-related factors in an attempt to discern patterns.

You are advised investing in securities involves risk of loss, including the potential loss of principal. Therefore, your participation in any of the management programs offered by AOG will require you to be prepared to bear the risk of loss and fluctuating performance.

AOG does not represent, warrant or imply that the services or methods of analysis used by AOG can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to major market corrections or crashes. Past performance is no indication of future performance. No guarantees can be offered that your goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by AOG will provide a better return than other investment strategies.

AOG allocates managed portfolios across several different assets classes and investment vehicles. The following is a summary of the risks associated with the various investment vehicles used by AOG.

Some of the risks associated with the endowment model include:

- Tax Risk
- Liquidity Risk
- Market Risk
- Interest Rate Risk
- Credit Risk

The risks with mutual funds, variable annuities, and unit investment trusts include:

- Manager Risk: which is the risk that an actively managed mutual fund's investment adviser will fail to execute the fund's stated investment strategy.
- Market Risk: which is the risk that the Stock Market will decline, decreasing the value of the securities contained within the mutual funds we recommend to you.



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- Industry Risk: which is the risk that a group of stocks in a single industry will decline in price due to adverse developments in that industry, decreasing the value of mutual funds that are significantly invested in that industry.
- Inflation Risk: which is the risk that the rate of price increases in the economy deteriorates the returns associated with the mutual fund.

ETFs trade on an auctionable market. Therefore, there is more price fluctuation with ETFs than with mutual funds since ETFs trade throughout the day, whereas mutual funds are priced once a day. Also, since most ETFs only mirror a market index, such as the S&P 500, they won't outperform the index.

Alternative Investments risks include:

- No readily available market for liquidation, therefore generally illiquid
- If a market is available, the market is a limited secondary market
- Difficulty in ascertaining an accurate value

The risks with stocks and bonds are that their prices fluctuate throughout the day. Stocks can drop in value and become worthless. The risks with bonds are interest rate, inflation and credit risk. Credit risk is the risk that the bond issuer will be unable to make its payments on time or at all, effectively defaulting on the bonds. The risks with stocks are market risk and company specific risk. The price of a stock can decline due to company-specific reasons as well as the health of the overall stock market. Even dividends, which many beginning investors believe are guaranteed payments by the company, can decline or be totally eliminated.

These are some of the primary risks associated with the way we recommend investments to you, please do not hesitate to contact us to discuss these risks and others in more detail. Mutual fund fees are described in the fund's prospectus, which the custodian mails directly to the client following any purchase of a mutual fund that is new to the client's account. In addition, a prospectus is available online at each mutual fund company's Web site. At the client's request at any time AOG will direct the client to the appropriate Web page to access the prospectus.

No investment strategy can avoid loss. Investing in securities involves risk of loss that you need to be prepared to bear.

AOG does not vote clients' securities.

### **Item 7 - Client Information Provided to Portfolio Managers**

Your financial history and information and personal information such as social security number, identify verification information, account numbers, etc. will be gathered and obtained by your Advisory Representative. The aforementioned information will be communicated as required by the account custodian you select to establish your account. Your non-public information will not be disclosed to any third party unless required by law or to provide you services you have requested.

At least annually your Advisory Representative will offer to meet with you to update your personal information, review your account and determine if the management of your account is suitable to your financial situation. Should your financial situation or investment goals or objectives change, you must notify AOG promptly of the changes.

#### **Item 8 - Client Contact with Portfolio Managers**

There are no restrictions or limitations on your ability to contact your Advisory Representative or any member of the AOG management team of the AOG model portfolios. You along with your Advisory Representative determine the frequency of meetings and reviews.

#### **Item 9 - Additional Information**

There is no reportable disciplinary information required for AOG or its advisory representative that would be deemed material to your evaluation of the advisory services offered by AOG or the integrity of AOG, its principal owners or your Advisory Representative.

As previously stated, Advisory Representatives are dually registered as advisory representatives of AOG and as registered representatives of Cetera Advisors. You are under no obligation to purchase or sell securities through your Advisory Representative. However, if you choose to implement the plan, commissions may be earned in addition to any fees paid for advisory services. Commissions may be higher or lower at Cetera Advisors than at other broker/dealers. Advisory Representatives may have a conflict of interest in having you purchase securities and/or insurance related products through Cetera Advisors in that the higher their production with Cetera Advisors the greater potential for obtaining a higher pay-out on commissions earned.

Under the rules and regulations of FINRA, Cetera Advisors has an obligation to perform certain supervisory functions regarding certain activities engaged in by advisory representatives who are also registered representatives of Cetera Advisors. For such supervisory functions, AOG may pay Cetera Advisors a portion of the advisory fees they receive. Cetera Advisors and AOG are not affiliated.

AOG is not and does not have a related person who is a: futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities. Further, AOG is not and does not have a related person who is: broker/dealer or other similar type of broker or dealer; investment company or other pooled investment vehicle, other investment adviser or financial planner; futures commission merchant or commodity pool operator; banking or thrift institution; accountant or accounting firm; lawyer or law firm; insurance company or agency; pension consultant; real estate broker or dealer; or sponsor or syndicator of a limited partnership.

AOG is not and does not have a related person who is a: futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities. Further, AOG is not and does not have a related person who is: broker/dealer or other similar type of broker or dealer; investment company or other pooled investment vehicle, other investment adviser or financial planner; futures commission merchant or commodity pool operator; banking or thrift institution;

accountant or accounting firm; lawyer or law firm; insurance company or agency; pension consultant; real estate broker or dealer; or sponsor or syndicator of a limited partnership.

## **Code Of Ethics**

AOG has a fiduciary duty to act in your best interest and always place your interests first and foremost. AOG takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as AOG's policies and procedures. Further, AOG strives to handle your non-public information in such a way to protect information from falling into hands that have no business reason to know such information and provides you with AOG's Privacy Policy. As such, AOG maintains a code of ethics for its Advisory Representatives, supervised persons and staff. The Code of Ethics contains provisions for standards of business conduct in order to comply with federal securities laws, personal securities reporting requirements, pre-approval procedures for certain transactions, code violations reporting requirements, and safeguarding of material non-public information about your transactions. Further, AOG's Code of Ethics establishes AOG's expectation for business conduct. A copy of our Code of Ethics will be provided to you upon request.

Neither AOG nor its associated persons recommends to clients or buys or sells for client accounts any securities in which we have a material financial interest.

AOG and its associated persons may buy or sell securities identical to those securities recommended to you. Therefore, AOG and/or its associated persons may have an interest or position in certain securities that are also recommended and bought or sold to you. AOG and its associated persons will not put their interests before your interest. AOG and its associated persons may not trade ahead of you or trade in such a way to obtain a better price for themselves than for you or other clients.

AOG is required to maintain a list of all securities holdings for its associated persons and develop procedures to supervise the trading activities of associated persons who have knowledge of your transactions and their related family accounts at least quarterly. Further, associated persons are prohibited from trading on non-public information or sharing such information.

AOG will not require you to prepay more than \$500 and six or more months in advance of receiving the advisory service.

## **Review of Accounts**

You will be invited to participate in at least an annual review. You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. Your Advisory Representative will monitor for changes or shifts in the economy, changes to the management and structure of a mutual fund or company in which your assets are invested, and market shifts and corrections.

You are advised you must notify your Advisory Representative promptly of any changes to your financial goals, objectives or financial situation as such changes may require a review of your portfolio allocation and potential changes.

The following individuals conduct reviews:

Frederick P. Baerenz, President and Asset Manager  
James T. Ortlip, Asset Manager  
David S. Sweat, Asset Manager

You will be provided statements at least quarterly direct from the account custodian. Additionally, you will receive confirmations of all transactions occurring direct from the account custodian. AOG will provide you a quarterly report reflecting your managed account allocation and its performance. You should compare the report with statements received direct from the account custodian. Should there be any discrepancy the account custodian's report will prevail.

### **Brokerage Practices**

Advisory Representatives are registered representatives of Cetera Advisors. As a result they are subject to FINRA Conduct Rule 3040 which may restrict them from conducting securities transactions away from Cetera Advisors unless Cetera Advisors provides them with written authorization. Advisory Representatives have obtained approval to offer you the ability to maintain accounts through Cetera Advisors at its clearing firm or through

- National Financial Services LLC and Fidelity Brokerage Services LLC (collectively, and together with all affiliates, "Fidelity") through which Fidelity provides AOG with "institutional platform services."
- AOG participates in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC/NFA ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. AOG receives some benefits from TD Ameritrade through its participation in the Program.

AOG is independently owned and operated and not affiliated with Cetera Advisors or any of the above referenced firms.

Not all investment advisers require you to maintain accounts at a specific broker/dealer. You may maintain accounts at another broker/dealer. However, the services provided by AOG will be limited to only advice and will not include implementation, with the exception of accounts at Pershing, LLC and Frontier Fidelity. If you select another brokerage firm for custodial and/or brokerage services you will not be able to receive asset management services from AOG.

In initially selecting Cetera Advisors, AOG conducted due diligence. AOG's evaluation and criteria includes:

- Ability to service you
- Financial strength
- Industry reputation
- Ability to report to you and to AOG

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- Availability of an efficient trading platform
- Products and services available
- Technology resources
- Educational resources
- Execution capability
- Financial responsibility and viability
- Confidentiality and security of your information
- Responsiveness
- Other factors that may bear on the overall evaluation of best price and execution

You are advised there is an incentive for AOG and the Advisory Representatives to recommend a broker/dealer over another based on the products and services that will be received rather than your best interest.

Due to the individual management of client accounts, we do not aggregate the purchase or sale of securities for various client accounts.

### Fidelity

The institutional platform services include, among others, brokerage, custody, and other related services. Fidelity's institutional platform services that assist AOG in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Fidelity also offers other services intended to help AOG manage and further develop its advisory practice. Such services include, but are not limited to, performance reporting, financial planning, contact management systems, third party research, publications, access to educational conferences, roundtables and webinars, practice management resources, access to consultants and other third party service providers who provide a wide array of business related services and technology with whom AOG may contract directly.

Fidelity generally does not charge its advisor clients separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Fidelity or that settle into Fidelity accounts (i.e., transactions fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Fidelity provides access to many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges.

### TD Ameritrade

Please see the disclosure under Client Referrals and Other Compensation below.

### Cetera Advisors

Cetera Advisors has a wide range of approved securities products for which Cetera Advisors performs due diligence prior to selection. Cetera Advisors' registered representatives are required to adhere to

these products when implementing securities transactions through Cetera Advisors. Commissions charged for these products may be higher or lower than commissions you may be able to obtain if transactions were implemented through another broker/dealer. Cetera Advisors also provides Advisory Representatives, and therefore the AOG, with back-office operational, technology, and other administrative support. Other services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. Such services are intended to help Advisory Representatives and AOG manage and further develop its business enterprise.

Cetera Advisors and its clearing broker/dealer, Pershing, LLC also make available to AOG other products and services that benefit AOG but may not directly benefit you. Some of these other products and services assist AOG with managing and administering your accounts. These include software and other technology that provide access to your account data (such as trade confirmation and account statements); facilitate trade execution; provide research, pricing information and other market data; facilitate payment of AOG's fees from your accounts; and assist with back-office functions; recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of AOG 's accounts, including accounts not held through Cetera Advisors.

### **Client Referrals and Other Compensation**

Product vendors recommended by AOG may provide monetary and non-monetary assistance with client events, provide educational tools and resources, and reimbursement for travel costs for due diligence and educational meetings. AOG does not select products as a result of any monetary or non-monetary assistance. The selection of product is first and foremost. AOG's due diligence of a product does not take into consideration any assistance it may receive. Therefore, this is not considered a conflict of interest but a benefit for you and AOG.

Fidelity and TD Ameritrade provide AOG with certain brokerage and research products and services that qualify as "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934 ("Exchange Act").

As disclosed above, AOG participates in TD Ameritrade's institutional customer program and AOG may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between AOG's participation in the program and the investment advice it gives to its Clients, although AOG receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving AOG participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to AOG by third party vendors.

TD Ameritrade may also have paid for business consulting and professional services received by AOG's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit AOG but may not benefit its Client accounts. These products or services may assist AOG in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help AOG manage and further develop its business enterprise. The benefits received by AOG or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, AOG endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by AOG or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the AOG's choice of TD Ameritrade for custody and brokerage services.

AOG does not directly or indirectly compensate any person who is not a supervised person of AOG for referrals. Further, AOG does not receive an economic benefit from a non-client for providing investment advice or advisory services to you.

#### **Item 10 - Additional Information**

The formal education and business backgrounds of the principal executive officers and management persons are disclosed on the attached Supplements.

AOG is not actively engaged in any other business. Other businesses in which the principal executive officers and management persons are actively engaged are disclosed on the attached Supplements.

The principal executive officers and management persons have not been involved in any of the following.

An event involving an arbitration claim alleging damages in excess of \$2,500 involving:

- An investment or an investment related activity;
- fraud, false statement(s), or omissions;
- theft, embezzlement, or other wrongful taking of property;
- bribery, forgery, counterfeiting, or extortion; or
- dishonest, unfair, or unethical practices.

An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- an investment or an investment-related business or activity;
- fraud, false statement(s), or omissions;
- theft, embezzlement, or other wrongful taking of property;
- bribery, forgery, counterfeiting, or extortion; or
- dishonest, unfair, or unethical practices.

AOG does not have any relationship or arrangement with any issuer of securities.