

The Asset Consulting Group, Inc.

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This Brochure provides information about the qualifications and business practices of The Asset Consulting Group, Inc. If you have any questions about the contents of this Brochure, please contact us at (208) 333-9922 or via email at gb@assetconsultinggroup.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.

The Asset Consulting Group, Inc. (“ACG”) is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information that you may use to determine whether to hire or retain them.

Additional information about ACG is also available via the SEC’s website www.adviserinfo.sec.gov. You can search this site by using a unique identifying number, known as a CRD number. The CRD number for ACG is **XXXXXXXXXX**. The SEC’s web site also provides information about any persons affiliated with ACG who are registered, or are required to be registered, as Investment Adviser Representatives of ACG.

Item 2 – Material Changes

This Brochure, dated August 2014, is a new document that describes the business of the newly created RIA entity, The Asset Consulting Group, Inc.

In the future, this section of the Brochure will discuss only the specific material changes that were made to the Brochure since the last annual filing of the Adviser with the SEC. This section will also identify the date of ACG's last annual Brochure update.

We will ensure that you receive a summary of any material changes to this and subsequent Brochures within 90 days of the close of our business' fiscal year end which is December 31st. We will provide other ongoing disclosure information about material changes as they occur. We will also provide you with information on how to obtain the complete brochure. Currently, ACG's Brochure may be requested at any time, without charge, by contacting Gary Barton at (208) 333-9922.

Item 3 – Table of Contents

Item 2 – Material Changes.....	2
Item 3 – Table of Contents	3
Item 4 – Advisory Business Introduction	5
Services	5
1. Retirement Plan Services	5
ERISA Fiduciary Services	6
Plan Structure	6
Investment Committee	6
Investment Policy Service.....	7
Investment Selection, Monitoring, and Replacement	7
Participant Meetings	8
Reporting.....	9
Other Services	9
2. Third Party Asset Management Services.....	9
Item 5 – Fees and Compensation	10
1. Retirement Plan Advisory Fees	11
2. Other Fees	11
3. Benchmarking Fee Schedule	11
4. Third Party Asset Management Fee Schedule	11
Item 6 – Performance Based Fee and Side by Side Management	12
Item 7 – Types of Client(s)	12
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	12
1. Fundamental Analysis	12
2. Risks.....	13
Item 9 – Disciplinary Information	16
Item 10 – Other Financial Industry Activities and Affiliations	16
1. Broker-Dealer Relationship	16
2. Insurance Agent	16
3. Other Affiliations	16
Item 11 – Code of Ethics, Participation or Interest in Client Accounts and Personal Trading.....	16
1. General Information.....	16
2. Participation or Interest in Client Accounts	17
3. Personal Trading.....	17

4. Privacy Statement	18
5. Conflicts of Interest	18
Item 12 – Brokerage Practices	18
1. Soft Dollars	18
2. Best Execution	19
3. Brokerage for Client Referrals	19
4. Directed Brokerage	19
5. Trading	20
Item 13 – Review of Accounts	20
1. Reviews	20
2. Reports	20
Item 14 – Client Referrals and Other Compensation	21
Item 15 – Custody	21
Item 16 – Investment Discretion	21
Item 17 – Voting Client Securities	21
Item 18 – Financial Information	22

Item 4 – Advisory Business Introduction

The Asset Consulting Group, Inc. (“ACG” or “firm”) is a Registered Investment Adviser (“Adviser”) which offers investment advice, securities, and other financial services to qualified retirement plan sponsors and individual clients. We are registered through and regulated by the Securities and Exchange Commission (“SEC”).

We provide consulting and advisory services for employer-sponsored retirement plans in accordance with the Employee Retirement Income Security Act (“ERISA”). We also provide asset management services to individuals, high net worth individuals, trusts, estates, charitable organizations, foundations, endowments, corporations, and small businesses.

We provide investment advice and consulting services through representatives (“Advisors”) associated with us. These individuals provide advisory services on our firm’s behalf. In addition, all advisors are required to have a college degree, professional designation, or equivalent professional experience.

ACG was founded in June 2000 by Gary Barton and Kathryn Barton. Gary Barton serves as the Chief Compliance Officer and Kathryn Barton is a passive investor, who owns 50% of ACG. The registered investment adviser is a new endeavor in 2014.

We are committed to the precept that by placing our clients’ interests first, we will add value to the asset management process and earn the client’s trust and respect. We value long term relationships with our clients whom we regard as strategic partners in our business.

Services

As of September 2014, we do not have any asset under management nor do we have accounts for which we provide asset management services.

We do not participate in a wrap fee program.

ACG defines excellence through what can be done to improve a plan sponsor’s fiduciary responsibilities and an individual’s investment decision-making process. The excellence is established by best practices which are intended to provide the framework of a disciplined investment process.

1. Retirement Plan Services

For our firm’s Retirement Plan accounts, our service begins with an analysis of the current retirement plan structure, custodian, third party administrator, daily record keeper, investments, managed investment models, and fees. The analysis is designed to determine if we are able to add value to the plan and what areas, if any, may be deficient from both a regulatory perspective and from a financial advisory perspective.

The services we offer to our clients are as follows:

- Plan design and asset selection consultation
- Develop and annually review Investment Policy Statement (“IPS”)

- Develop investment menu according to the IPS
- Review plan sponsor's stated financial criteria for each investment option
- Monitor each investment option according to the IPS
- Quarterly portfolio statements, rate of return reports, asset allocation statements
- Provide investment research and performance information on investment options
- Investment option replacement guidance
- Personal consultations with the plan sponsor as necessary
- Develop Plan Investment Committee Charter, as needed
- Fiduciary due diligence assistance
- Attendance at Plan Committee and other meetings
- Annual Fiduciary Plan Review
- Fiduciary education services to Plan Committee
- Participant education, guidance, and enrollment
- Vendor coordination assistance
- Benchmarking services

ERISA Fiduciary Services

When delivering ERISA fiduciary services, we will perform those services for the retirement plan as a fiduciary under ERISA Section 3(21)(A)(ii) will act in good faith and with the degree of diligence, care and skill that a prudent person rendering similar services would exercise under similar circumstances. In our capacity as a 3(21) plan fiduciary, we will conduct research to determine appropriate investment selections and allocations and to project potential ranges of returns and market values over various time periods and using various cash flows to assist the plan sponsor in determining the appropriate model(s) investment(s) for the retirement plan.

We also encourage plan sponsors to consult with other professional advisors since we do not provide tax or legal advice that may affect asset classes or allocations. We will apply any guidelines our client supplies, as directed, however, compliance with these restrictions or guidelines, is our client's responsibility.

Plan Structure

We will assist our client in evaluating the current plan's structure to determine if a change in the design of the plan better suits the needs of plan participants. We will facilitate any changes with the appropriate parties including the third-party administrator, record keeper, and custodian as well as facilitating the execution of the required plan document amendments or new plan documents. However we will not draft any amendments as an attorney or a TPA will need to perform this service.

Investment Committee

We will assist you in the establishment of the Investment Committee (if a Committee is deemed appropriate) and the establishment of a formal investment committee charter, delineating committee responsibilities and fiduciary roles. We will also serve on the Committee in a non-fiduciary capacity if needed.

The Investment Committee may be charged with the fiduciary responsibility of the prudent management of the investment portfolio, selecting and retaining professional advisors to the portfolio including investment managers, investment consultants, custodians, attorneys, and clerical staff, and the establishment, execution, and interpretation of an Investment Policy Statement for the portfolio. We will assist the Investment Committee in meeting the committee's responsibilities according to the investment committee charter, and fulfilling its fiduciary duty to the plan, including their review of service providers, third party administration firms, daily record keeper, and custodian to ensure that their services, along with ours, remain competitive to other alternatives that are available to the client.

Investment Policy Service

ACG's Investment Policy Service is designed to assist you in creating a written investment policy statement ("IPS") to document the plan's investment goals and objectives as well as certain policies governing the investment of assets. The IPS also identifies an investment strategy that seeks to attain the plan's goals. The service is generally designed for corporate retirement plans that are managed on a non-discretionary basis.

We will assist the Investment Committee with the establishment, execution, and interpretation of the Investment Policy Statement. The Investment Policy Statement serves as a guide to assist the Investment Committee in effectively supervising, monitoring, and evaluating the investment of the plan's assets. We will prepare a draft of the IPS based upon information furnished by you and your firm designed to profile various factors for the account such as investment objectives, risk tolerances, projected cash flow, and demographics of your retirement plan participants. It is the client's responsibility to provide all necessary information for the preparation of the IPS, particularly any limitations imposed by law or otherwise. This draft IPS is then submitted to you for review and approval. We recommend that your professional advisors, such as an attorney, actuary, and/or accountant, also review the IPS. The review and acceptance of the IPS is the responsibility of the plan fiduciary and your retirement program's governing entity.

Upon client's final approval, the IPS is ready to be sent to client's Investment Committee. It is client's responsibility to confirm the Investment Committee's acceptance of the IPS, and it is the Investment Committee's responsibility to adhere to the IPS in managing the retirement program. We encourage you to review accounts periodically to verify investment committee's compliance with the IPS.

The Investment Policy Statement will be reviewed at least annually to determine whether stated investment objectives are still relevant and the continued feasibility of achieving those objectives. However, the Investment Policy Statement is not expected to vary much from year to year and the IPS will not be updated to account for short term changes in market conditions or the economic environment.

Investment Selection, Monitoring, and Replacement

We will conduct research to determine allocations and to project potential ranges of returns and market values over various time periods and using various cash flows. As the financial advisor to the Plan, we will assist the Investment Committee in selecting the non-managed investment line up including evaluating investment managers and mutual fund companies, individual mutual funds, and money market funds which may be retained or replaced.

The data used to select the investment options is based on estimated, forward-looking performance of various asset classes and subclasses to create forward looking capital markets assumptions (e.g., expected return, expected standard deviation, correlation, etc.). Past performance and the return estimates of the asset classes and the indices that correspond to these asset classes may not be representative of actual future performance. Actual results could differ, based on various factors including the expenses associated with the management of the portfolio, the portfolio's securities versus the securities comprising the various indices and general market conditions. Before a specific investment is selected, other factors such as economic trends, which may influence the choice of investments and risk tolerance, should be considered. We have the responsibility and authority to recommend the investment line up including evaluating investment managers and mutual fund companies, individual mutual funds, and money market funds which may be retained or replaced. The plan sponsor has the responsibility and authority to make the final decision regarding what investments to include in the model portfolio and when to add or exclude a specific security.

It is client's responsibility to select the final mix and to determine whether to implement any strategy. We also encourage you to consult with your other professional advisors since ACG does not provide tax or legal advice that may affect asset classes or allocations used in the modeling. We will apply guidelines you supply, as directed; however, compliance with these restrictions or guidelines is client's responsibility.

We will also monitor the current non-managed investment line up including the investment's performance, performance compared to an applicable benchmark index, fees, management changes, style and fundamental investment strategy changes, and fund composition to determine if an investment no longer meets the criterion defined in the Investment Policy Statement. If the Investment Committee determines that a fund no longer meets the IPS criterion, we will advise the Investment Committee on possible alternatives and assist in the selection of a replacement investment.

If you decide to implement any of the firm's recommendations, we will help you open a custodial account(s) for the plan. The funds in this account will generally be held in a separate account, in the plan's name, at an independent custodian, not with us. We use many different vendors and custodians. The identity of your custodian will be communicated to you before the account is opened. The custodian will effect transactions, deliver securities, make payments, etc. You will at all times maintain full and complete ownership rights to all assets held in the account for the benefit of the plan participants.

We are available during normal business hours either by telephone, fax, email, or in person by appointment to answer your questions.

Participant Meetings

We will conduct plan participant meetings when a change is made either to the structure of the plan or if the investment lineup changes as a result of the decisions of the Investment Committee. We will detail the changes being made, how it affects the current participants, review the current investment opportunities, how participants may make changes to their investment selections, and will answer any and all questions a participant may have. We will review with the participants how to select the investments.

Reporting

We will send, on a quarterly basis, a performance report detailing the overall performance of the plan's assets and a detailed list of the investment holdings.

Other Services

We also offer consulting services for non-investment related matters.

2. Third Party Asset Management Services

Asset management is the professional management of securities (stocks, bonds and other securities) and assets in order to meet your specified investment goals. With an Asset Management Account, you engage us to assist you in developing a personalized asset allocation program and custom-tailored portfolio designed to meet your unique investment objectives. The investments in the portfolio account may include stocks, mutual funds, bonds, REITs, etc.

We may determine that opening an account with a professional third party money manager is in your best interests. We have contracts with several third party money managers and will evaluate them on an ongoing basis.

These programs may allow you to obtain portfolio management services that typically require higher minimum account sizes outside of the program. The money managers selected under these programs will have discretion to determine the securities they buy and sell within the account, subject to reasonable restrictions imposed by you. Due to the nature of these programs, each of the independent money managers is obligated to provide you with a separate disclosure document. You should carefully review this document for important and specific program details, including pricing.

Under these programs, we may:

- Assist in the identification of investment objectives
- Recommend specific investment style and asset allocation strategies
- Assist in the selection of appropriate money managers
- Quarterly review performance and progress
- Recommend reallocation among managers or styles within the program
- Recommend the hiring and firing of money managers utilized by you.

We will meet with you to discuss your financial circumstances, investment goals and objectives, and to determine your risk tolerance. We will ask you to provide statements summarizing current investments, income and other earnings, recent tax returns, retirement plan information, other assets and liabilities, wills and trusts, insurance policies, and other pertinent information. Based on the information you share with us, we will analyze your situation and recommend an appropriate strategy and third party money manager. The firm's recommendations and ongoing management are based upon your investment goals and objectives, risk tolerance, and the investment portfolio you have selected. We will monitor the account, trade as necessary, and communicate regularly with you. Your circumstances shall be monitored in annual account reviews. These reviews will be conducted in person, by telephone conference, and/or

via a written inquiry/questionnaire. We will work with you on an ongoing basis to evaluate your asset allocation as well as rebalance your portfolio to keep it in line with your goals as necessary. We will be reasonably available to help you with questions about your account. You will also receive ACG's Advisory Agreement which describes what services you will receive and what fees you will be charged.

You are obligated to notify us promptly when your financial situation, goals, objectives, or needs change.

You may have the ability to impose reasonable restrictions on the management of your account, including the ability to instruct us not to purchase certain mutual funds, stocks or other securities. These restrictions may be a specific company security, industry sector, asset class, or any other restriction you request.

You should read the ADV Part 2 disclosure document of the money manager for complete details on the charges and fees you will incur.

Item 5 – Fees and Compensation

We provide qualified retirement plan advisory services and asset management services for a fee.

All fees paid to us for investment advisory services or retirement plan services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These types of investment vehicles are commonly offered through 401(k), simple IRA, 403b, or 457 defined contribution retirement plans. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. Accordingly, the client should review both the fees charged by the funds and the fees charged by us to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

ACG's fees will not include brokerage commissions, transaction fees, and other related costs and expenses. You may incur certain charges imposed by custodians, third party investment companies and other third parties. These include fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. We do not receive any compensation from these fees. All of these fees are in addition to the management fee you pay us.

As an individual client, you could invest in a mutual fund directly, without our services. In that case, you would not receive the services provided by us which are designed, among other things, to assist you in determining which mutual fund or funds are most appropriate to your financial condition and objectives.

Either party may terminate the relationship with a thirty (30) day written notice. Upon termination of any account, any prepaid fees that are in excess of the services performed will be promptly refunded to you on a prorated basis from the date of termination. Any fees that are due, but have not been paid, will be billed to you and are due immediately.

1. Retirement Plan Advisory Fees

ACG's standard fee includes establishing your Investment Policy Statement, reviewing your plan structure, investment management, investment selection and monitoring, fund changes, participant education and reporting. Advisory fees for the plan are paid to us by the plan, or directly from the plan sponsor, or in some cases a combination of both. These fees are generally collected by the plan record keeper or vendor and paid directly to our firm. The fees consist of an initial setup fee of \$375 to \$750 paid at the time contracts are signed. For initial and subsequent years, the fee paid for our services will range between .15% and .85% on assets under management. This fee includes services as an ERISA section 3(21) fiduciary with respect to client's plan.

The timing of fees paid is generally in advance of the upcoming quarter, based upon asset levels at the end of the preceding quarter. ACG's advisory agreement with each plan sponsor outlines the timing of fees collected and the process of fee remittance to our firm.

2. Other Fees

We also offer consulting services for ERISA non-investment related matters. Our fees range from \$150 to \$350 per hour and the client's Consulting Agreement will describe all fees in detail, if appropriate.

3. Benchmarking Fee Schedule

ACG provides a documented process for regular benchmarking of retirement plan features, plan design, fees, and Plan Providers. The benchmarking services fee includes comparison of the incumbent provider and up to four competing vendors. The pricing also includes an Investment menu analysis from the selected providers. Fees range from \$150 to \$350 per hour depending upon number of vendor comparisons and comparison details desired by client.

4. Third Party Asset Management Fee Schedule

The fees charged by third party managers will be provided in their ADV part 2A and the client paperwork you sign with them. ACG's fee will range between 0.10% to 1.0% of the value of the account on the last day of the month. This fee is in addition to any fee charged by the third party money manager. All fees are paid monthly or quarterly, as negotiated. Client's advisory agreement with us will disclose the fees you will pay to us for our services.

No increase in the annual fee shall be effective without prior written notification to you, and your written approval. It is our belief that the fees ACG charges are reasonable relative to the fees charged by other investment advisers offering similar services/programs.

The fees we charge may be deducted directly from client's account at the custodian. If so, we will instruct the custodian to deduct the fees from your account at the end of the quarter. This fee will show up as a deduction on the following month's account statement from the custodian.

Management fees are prorated for each contribution and withdrawal made during the applicable calendar quarter (with the exception of small inconsequential contributions and withdrawals). You will be provided with a quarterly statement reflecting deduction of the advisory fees.

Item 6 – Performance Based Fee and Side by Side Management

We do not charge any performance-based fees. These are fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7 – Types of Client(s)

We provide services to pension and profit sharing plans, trusts, estates, charitable organizations, corporations, businesses and governmental entities.

We also provide portfolio management services to individuals and high net worth individuals, trusts, estates, corporate pension and profit-sharing plans, charitable organizations, foundations, endowments, corporations, and small businesses.

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

We use Fundamental Analysis as part of our overall investment management discipline; the implementation of these analyses as part of our investment advisory services to you may include any, all or a combination of the following:

1. Fundamental Analysis

Fundamental analysis is a technique that attempts to determine a security's value by focusing on the underlying factors that affect a company's actual business and its future prospects. Fundamental analysis is about using real data to evaluate a security's value. It refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements.

The end goal of performing fundamental analysis is to produce a value that we can compare with the security's current price, with the aim of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short).

In order to perform this fundamental analysis, we use many resources, such as:

- Morningstar
- Financial newspapers and magazines (e.g. Wall Street Journal, Forbes, etc.)
- Annual reports, prospectuses, filings with the Securities and Exchange Commission
- Company press releases and websites

The investment strategies we use to implement any investment advice given to you include, but are not limited to:

- Long term purchases -securities held at least a year

- Short term purchases - securities sold within a year
- Trading - securities sold within 30 days
- Option writing, including covered options and option purchases.

2. Risks

We cannot guarantee our analysis methods will yield a return. In fact, a loss of principal is always a risk. Investing in securities involves a risk of loss that you should be prepared to bear. You need to understand that investment decisions made for your account by us are subject to various market, currency, economic, political and business risks. The investment decisions we make for you will not always be profitable nor can we guarantee any level of performance.

A list of all risks associated with the strategies, products and methodology we offer are listed below:

1. Bond Fund Risk

Bond funds generally have higher risks than money market funds, largely because they typically pursue strategies aimed at producing higher yields. The risks associated with bond funds include:

- Call Risk - The possibility that falling interest rates will cause a bond issuer to redeem—or call—its high-yielding bond before the bond's maturity date.
- Credit Risk — the possibility that companies or other issuers whose bonds are owned by the fund may fail to pay their debts (including the debt owed to holders of their bonds). Credit risk is less of a factor for bond funds that invest in insured bonds or U.S. Treasury bonds. By contrast, those that invest in the bonds of companies with poor credit ratings generally will be subject to higher risk.
- Interest Rate Risk — the risk that the market value of the bonds will go down when interest rates go up. Because of this, you can lose money in any bond fund, including those that invest only in insured bonds or Treasury bonds.
- Prepayment Risk — the chance that a bond will be paid off early. For example, if interest rates fall, a bond issuer may decide to pay off (or "retire") its debt and issue new bonds that pay a lower rate. When this happens, the fund may not be able to reinvest the proceeds in an investment with as high a return or yield.

2. Fundamental Analysis Risk

Fundamental analysis, when used in isolation, has a number of risks:

- There are an infinite number of factors that can affect the earnings of a company, and its stock price, over time. These can include economic, political and social factors, in addition to the various company statistics.
- The data used may be out of date.
- It is difficult to give appropriate weightings to the factors.
- It assumes that the analyst is competent.

- It ignores the influence of random events such as oil spills, product defects being exposed, and so called “acts of God”, etc.

3. Insurance Product Risk

The rate of return on variable insurance products is not stable, but varies with the stock, bond and money market subaccounts that you choose as investment options. There is no guarantee that you will earn any return on your investment and there is a risk that you will lose money. Before you consider purchasing a variable product, make sure you fully understand all of its terms. Carefully read the prospectus. Some of the major risks include:

- **Liquidity and Early Withdrawal Risk** – There may be a surrender charges for withdrawals within a specified period, which can be as long as six to eight years. Any withdrawals before a client reaches the age of 59 ½ are generally subject to a 10 percent income tax penalty in addition to any gain being taxed as ordinary income.
- **Sales and Surrender Charges** – Asset-based sales charges or surrender charges. These charges normally decline and eventually are eliminated the longer you hold your shares. For example, a surrender charge could start at 7 percent in the first year and decline by 1 percent per year until it reaches zero.
- **Fees and Expenses** – There are a variety of fees and expenses which can reach 2% and more such as:
 - Mortality and expense risk charges
 - Administrative fees
 - Underlying fund expenses
 - Charges for any special features or riders.
- **Bonus Credits** – Some products offer bonus credits that can add a specified percentage to the amount invested ranging from 1 percent to 5 percent for each premium payment. Bonus credits, however, are usually not free. In order to fund them, insurance companies typically impose high mortality and expense charges and lengthy surrender charge periods.
- **Guarantees** – Insurance companies provide a number of specific guarantees. For example, they may guarantee a death benefit or an annuity payout option that can provide income for life. These guarantees are only as good as the insurance company that gives them.
- **Market Risk** – The possibility that stock fund or bond fund prices overall will decline over short or even extended periods. Stock and bond markets tend to move in cycles, with periods when prices rise and other periods when prices fall.
- **Principal Risk** – The possibility that an investment will go down in value, or "lose money," from the original or invested amount.

4. Mutual Funds Risk

The following is a list of some general risks associated with investing in mutual funds.

- Country Risk - The possibility that political events (a war, national elections), financial problems (rising inflation, government default), or natural disasters (an earthquake, a poor harvest) will weaken a country's economy and cause investments in that country to decline.
- Currency Risk -The possibility that returns could be reduced for Americans investing in foreign securities because of a rise in the value of the U.S. dollar against foreign currencies. Also called exchange-rate risk.
- Income Risk - The possibility that a fixed-income fund's dividends will decline as a result of falling overall interest rates.
- Industry Risk - The possibility that a group of stocks in a single industry will decline in price due to developments in that industry.
- Inflation Risk - The possibility that increases in the cost of living will reduce or eliminate a fund's real inflation-adjusted returns.
- Manager Risk -The possibility that an actively managed mutual fund's investment adviser will fail to execute the fund's investment strategy effectively resulting in the failure of stated objectives.
- Market Risk -The possibility that stock fund or bond fund prices overall will decline over short or even extended periods. Stock and bond markets tend to move in cycles, with periods when prices rise and other periods when prices fall.
- Principal Risk -The possibility that an investment will go down in value, or "lose money," from the original or invested amount.

5. Overall Risks

- Clients need to remember that past performance is no guarantee of future results. All funds carry some level of risk. You may lose some or all of the money you invest, including your principal, because the securities held by a fund goes up and down in value. Dividend or interest payments may also fluctuate, or stop completely, as market conditions change.
- Before you invest, be sure to read a fund's prospectus and shareholder reports to learn about its investment strategy and the potential risks. Funds with higher rates of return may take risks that are beyond your comfort level and are inconsistent with your financial goals.
- While past performance does not necessarily predict future returns, it can tell you how volatile (or stable) a fund has been over a period of time. Generally, the more volatile a fund, the higher the investment risk. If you'll need your money to meet a financial goal in the near-term, you probably can't afford the risk of investing in a fund with a volatile history because you will not have enough time to ride out any declines in the stock market.

6. Stock Fund Risk

Overall "market risk" poses the greatest potential danger for investors in stocks funds. Stock prices can fluctuate for a broad range of reasons, such as the overall strength of the economy or demand for particular products or services.

Item 9 – Disciplinary Information

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to the client's evaluation of us or the integrity of ACG's management. We have no information to disclose here about the ACG or any of our investment advisors. We adhere to high ethical standards for all advisors and associates. We strive to do what is in the client's best interests.

Item 10 – Other Financial Industry Activities and Affiliations

The investment adviser representatives of ACG have the following outside business activities and/or affiliations to disclose.

1. Broker-Dealer Relationship

None of ACG's advisors are registered representatives of a broker-dealer.

2. Insurance Agent

Gary Barton is a licensed insurance agent/broker with various companies. The sale of these products accounts for approximately 15% of his time.

Gary Barton may recommend insurance products and may also, as an independent insurance agent, sell those recommended insurance products to Clients. When such recommendations or sales are made, a conflict of interest exists as the Insurance licensed Investment Adviser Reps earn insurance commissions for the sale of those products, which may create an incentive to recommend such products. We require that all Investment Adviser Reps disclose this conflict of interest when such recommendations are made. Also, we require Investment Adviser Reps to disclose that Clients may purchase recommended insurance products from other insurance agents not affiliated with us.

3. Other Affiliations

Gary and Kathryn Barton also own ESOPS of Idaho. Kathryn Barton is a passive investor and Gary Barton runs the company. This firm educates small to mid-sized enterprises on the practicality of ESOP plans and how they might be helpful to the company. The ESOP Plans are set up by an independent third party and ESOPS of Idaho receives a fee if the plan is established. All this information is described in the document that will be signed by the client. Gary Barton spends 12 to 15 hours per month in the management of this firm.

Item 11 – Code of Ethics, Participation or Interest in Client Accounts and Personal Trading

1. General Information

We have adopted a Code of Ethics for all supervised persons of the firm describing its high standards of business conduct, and fiduciary duty to you, our client. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts, the reporting of certain gifts and business entertainment items, and personal securities trading procedures. All of our supervised persons must acknowledge the terms of the Code of Ethics annually, or as amended.

2. Participation or Interest in Client Accounts

Our Compliance policies and procedures prohibit anyone associated with ACG from having an interest in a client account or participating in the profits of a client's account without the approval of the CCO.

The following acts are prohibited:

- Employing any device, scheme or artifice to defraud
- Making any untrue statement of a material fact
- Omitting to state a material fact necessary in order to make a statement, in light of the circumstances under which it is made, not misleading
- Engaging in any fraudulent or deceitful act, practice or course of business
- Engaging in any manipulative practices

You may request a copy of the firm's Code of Ethics by contacting Gary Barton.

3. Personal Trading

We may recommend securities to you that ACG will purchase for our own accounts. We may trade securities in our account that we have recommended to you as long as we place our orders after your orders. This policy is meant to prevent us from benefiting as a result of transactions placed on behalf of advisory accounts.

Certain affiliated accounts may trade in the same securities with your accounts on an aggregated basis when consistent with our obligation of best execution. When trades are aggregated, all parties will share the costs in proportion to their investment. We will retain records of the trade Order (specifying each participating account) and its allocation. Completed Orders will be allocated as specified in the initial trade order. Partially filled Orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

We have established the following restrictions in order to ensure ACG's fiduciary responsibilities regarding insider trading are met:

- No securities for ACG's personal portfolio(s) shall be bought or sold where this decision is substantially derived, in whole or in part, from the role of Investment Advisory Representative(s) of ACG, unless the information is also available to the investing public on reasonable inquiry. In no case, shall we put ACG's interests ahead of client's.

4. Privacy Statement

We are committed to safeguarding client's confidential information and hold all personal information provided to us in the strictest confidence. These records include all personal information that we collect from you or receive from other firms in connection with any of the financial services they provide. We also require other firms with whom we deal with to restrict the use of your information. ACG's Privacy Policy is available upon request.

5. Conflicts of Interest

Gary Barton may employ the same strategy for his personal investment account as he does for his clients. However, he does not place his orders in a way to benefit from the purchase or sale of a security. He does not employ the same strategy for plan sponsor retirement plan accounts.

We act in a fiduciary capacity. If a conflict of interest arises between us and you, we shall make every effort to resolve the conflict in client's favor. Conflicts of interest may also arise in the allocation of investment opportunities among the accounts that we advise. We will seek to allocate investment opportunities according to what we believe is appropriate for each account. We strive to do what is equitable and in the best interests of all the accounts we advise.

Item 12 – Brokerage Practices

1. Soft Dollars

We do not receive any soft dollars for retirement plan accounts.

For ACG's retail clients, the custodian(s) and other third party managers may provide us 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"). These research products and/or services will assist the Advisor in its investment decision making process. Such research generally will be used to service all of the Advisor's clients, but brokerage commissions paid by the client may be used to pay for research that is not used in managing the client's account. The account may pay to a broker-dealer a commission greater than another qualified broker-dealer might charge to effect the same transaction where the Advisor determines in good faith that the commission is reasonable in relation to the value of the brokerage and research services received.

Because soft dollar benefits could be considered to provide a benefit to the adviser that might cause the client to pay more than the lowest available commission without receiving the most benefit, they are considered a conflict of interest in recommending or directing custodial and third party managerial services. ACG mitigates these conflicts of interest through strong oversight of soft-dollar arrangements by the Chief Compliance Officer, in order to assure the soft dollar benefits serve the best interests of the client.

There may other benefits from recommending custodians or other third party managers such as 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.

Other services may include, but are not limited to, performance reporting, 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 ACG may contract directly.

2. Best Execution

We have an obligation to seek best execution for you. In seeking best execution, the determinative factor is not the lowest possible commission cost but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, reputation and responsiveness. Therefore, we will seek competitive commission rates, but we may not obtain the lowest possible commission rates for account transactions.

3. Brokerage for Client Referrals

We do not receive any compensation or incentive for referring you to broker-dealers for brokerage trades.

4. Directed Brokerage

Client may direct us to use the broker-dealer of their choice. We are independently owned and operated and not affiliated with any of the custodians that we recommend. It is the responsibility of the plan's Investment Committee to review custodial and service provider relationships. When evaluating a custodian or service provider, we analyze and compare custodians on both trade capabilities and execution and fees. We will also review the custodian's size, market share, ability to timely execute trades electronically as well as over the phone, the markets in which the custodian participates and its market making capabilities, the ability to negotiate fees, the custodian's trade error procedures, its ease of use, the availability of the sales, operations, and technology teams to improve our ability to serve our clients, the custodians financials, regulatory actions taken against the custodian, and general news about the custodian. We will also review the fee schedule of each custodian and service provider as well as those of other custodians and service providers currently not used by our client to compare fees and to ensure the reasonableness of the fees charged. We do not necessarily weight any particular capability of a custodian or service provider over another however trade execution and the ability to negotiate fees to reduce client's total costs are two very important factors.

If requested, we will arrange for the execution of securities brokerage transactions for your account through Broker-Dealers that we reasonably believe will provide "best execution." These transactions will take place through one of several broker-dealers depending upon where your account is custodied. In seeking best execution, the determinative factor is not the lowest possible commission cost but whether the transaction represents the best qualitative execution, taking into consideration the full range of a Broker-Dealer's services including the value of research provided, execution capability, commission rates, and responsiveness. Therefore, we will seek competitive commission rates, but we may not obtain the lowest possible commission rates for account transactions.

By directing brokerage, you may pay higher fees or transaction costs than those obtainable by other broker-dealers or custodians. In most cases, we believe you are paying a discounted and reasonable rate.

If client elects to select their own broker-dealer or custodian and direct ACG to use them, client may pay higher or lower fees than what is available through ACG's relationships. Generally, we will not negotiate lower rates below the rates established by the executing broker-dealer or custodian for this type of directed brokerage account, unless we believe that such rate is unfair or unreasonable for the size and type of transaction.

5. Trading

Transactions for each client account generally will be effected independently, unless the third party manager decides to purchase or sell the same securities for several clients at approximately the same time. They may (but are not obligated to) combine or "batch" such Orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among our clients' differences in prices and commission or other transaction costs. Under this procedure, transactions will be price-averaged and allocated among our clients in proportion to the purchase and sale orders placed for each client account on any given day.

We do not trade any qualified retirement plan accounts.

Item 13 – Review of Accounts

1. Reviews

For ACG's retirement plan clients, ACG will meet with the plan's Investment Committee and/or plan fiduciaries at least annually to review the current investments, custodial and service provider arrangements, and the Investment Policy Statement. The Investment Committee may decide to increase the frequency of its meetings. Should that occur, the IPS will be revised to denote such a change and we will begin reviewing the plan's investments at the intervals determined by the Investment Committee. Unless directed to do so by the Investment Committee, we will only review custodial and service provider arrangements on an annual basis.

For ACG retail clients, reviews are conducted at least quarterly or as agreed to by us. Reviews will be conducted by our Chief Compliance Officer Gary Barton. You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. Generally, we will monitor for changes and shifts in the economy, changes to the management and structure of a mutual fund or company in which client assets are invested, and market shifts and corrections.

2. Reports

We do not provide any other statements except the ones provided by client's custodian.

Item 14 – Client Referrals and Other Compensation

We do not receive any compensation for referring clients to another advisor nor do we pay any compensation to another advisor if they refer clients to us.

We do not receive an economic benefit for providing investment advice or other advisory services from someone that is not our client.

Item 15 – Custody

ACG does not have physical custody of any accounts or assets. However, we may be deemed to have custody of your account(s) if we have the ability to deduct your quarterly fees from the custodian. You should receive at least quarterly statements from the broker-dealer or custodian that holds and maintains your investment assets. We urge you to carefully review such statements and if you notice any discrepancies, please contact Gary Barton.

We do not debit the client fees directly from client's advisory account. We send information to client's custodian to debit your fees and to pay them to ACG. This happens only after client authorizes the custodian to pay ACG directly.

Item 16 – Investment Discretion

We do not receive discretionary authority for qualified retirement plan advisory services. The plan sponsor retains the decision-making authority over the plan. When recommending securities, we observe the investment policies, limitations and restrictions set by the plan and plan sponsor.

We do not directly manage nor accept investment discretion over any client account.

We require that any investment guidelines and/or restrictions be provided to us in writing.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, we do not have any authority to and do not vote proxies on behalf of advisory clients. Client retains the responsibility for receiving and voting proxies for any and all securities maintained in their portfolios. We may provide advice to you regarding your voting of proxies. You may contact the Adviser to discuss any questions that you may have about a particular solicitation. The custodian will forward you copies of all proxies and shareholder communications relating to your account assets and any information regarding class action legal matters involving any security held in the Account.

Item 18 – Financial Information

ACG is required to provide our clients with certain financial information or disclosures about our financial condition. ACG has no financial commitment that would impair our ability to meet any contractual and fiduciary commitments to our clients. We have not been the subject of any bankruptcy proceedings. Under no circumstances do we require or solicit payment of fees in excess of \$1,200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.