

## Form ADV Part 2A Brochure

Disclosure Information for the Registered Investment Advisor:

Sard Wealth Management Group, LLC  
5605 Glenridge Drive, Suite 895  
Atlanta, GA 30342  
[www.sardwealth.com](http://www.sardwealth.com)

This document also includes disclosures relating to the single owner and Investment Advisor Representative of the firm:

Jonathan Sard

January 23, 2015

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Contacts:

Jonathan Sard, President, Owner, and Chief Compliance Officer  
Michele Meyers, Client Service Manager

**This brochure provides information about the qualifications and business practices of Sard Wealth Management Group, LLC. For any questions about the contents of this brochure, please contact us at (404) 843-4483. 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 Sard Wealth Management Group, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

Sard Wealth Management Group, LLC is a Registered Investment Advisor and is registered with the Securities Exchange Commission (SEC). The term "Registered Investment Advisor" does not imply a certain level of skill or training.

## Item 2: Material Changes

This update is our required annual update. No material changes were made. Assets under management were updated based on the end of 2014 totals.

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 materials changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

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## Item 4: Advisory Business

### Ownership

Sard Wealth Management Group, LLC (SWMG) has been in business under this name since 2007. Prior to that, the company used the name Financial Alternatives, Inc. Jonathan Sard, the sole owner of the company, has been a financial advisor and planner since 1992.

### Services

SWMG offers planning and advisory services in the areas of personal financial planning, business planning, insurance, children's education, employee benefits, investments, retirement, estate planning and tax planning. Jonathan Sard, the Investment Advisor Representative, provides financial plans, investment management, insurance reviews, and advice on a variety of financial topics. Jonathan may provide advice concerning exchange-listed equities, over-the-counter equities, foreign-issuer equities, corporate debt, commercial paper, certificates of deposit (CDs), mutual funds, variable annuities, variable life insurance, United States Government securities, securities option contracts, and partnerships investing in real estate or oil and gas interests. Although clients may hold these investments when they become clients, mutual funds and ETFs are generally the recommended holdings as part of client portfolios. Clients may place restrictions on the sale of investments in their accounts as discussed more fully in the section titled "Investment Discretion".

The majority (85%) of the services provided are investment supervisory services, with 10% providing advisory services for non-securities issues and 5% for other securities advice. No timing services are provided.

More information about the analysis that is done to select investments is provided in the section titled "Methods of Analysis, Strategies, and Risk of Loss".

### Customization of Services

SWMG tailors services to the individual needs of clients. For example, recommendations for a young client with children may be different than for a client who is within a few years of retirement. To gather information, new clients complete an advisory questionnaire, which is reviewed and clarified during the initial meeting. Many clients hold some of the same investments; however, the ratio of the amounts owned may be different depending on the client's goals, risk tolerance, and personal situation. Clients may impose restrictions on the investments held. For example, some clients own stocks that they have inherited or owned for a long time and do not want to sell. A client's special considerations for their investments are discussed with them to determine what restrictions are required on their accounts.

### Retirement Plan Consulting Services

SWMG offers the following retirement plan consulting services and other consulting services as agreed between SWMG and the Plan. SWMG's role is only to offer generalized, non-discretionary advice concerning the merits and risks of investments.

- Assist in the search for the appropriate interested party providers and set up of the Plan.
- Assist in Determining Plan Objectives and Plan Design Options (e.g., employer matching levels, participant loan features, vesting levels, etc.)

- Attend Periodic Meetings with Plan Fiduciary (Upon Request by Plan Fiduciary)
- Provide educational materials for participants and participate in enrollment meetings with plan participants.
- Provide Periodic Benchmarking of Fees and Services to Assist Review for Reasonableness
- Reviewing ERISA Spending Accounts or Plan Expense Recapture Accounts (PERAs)
- Generating and Evaluating Service Provider Requests for Proposals (RFPs) and or Requests for Information (RFIs)
- Meet with designated fiduciaries of the Plan to assist in the Plan in developing an investment policy statement (the "IPS"). Alternatively, if the Plan has an existing IPS, then SWMG will review the existing IPS and assist the Plan in determining whether (i) the performance of the Plan's investments are consistent with the goals set forth in its IPS; and/or (ii) using information provided by the Plan, and based upon an analysis of the Plan's liquidity requirements, performance goals and risk tolerance levels, whether the IPS should be revised.
- SWMG will review the structure of the Plan (*e.g.*, product vendors, investment options) to gauge whether it is operating in accordance with the Plan's IPS (if any) and governing plan documents. SWMG will present recommendations and/or suggestions in connection with its review. The Plan is ultimately responsible for deciding whether or not to accept these recommendations and to consult with its legal counsel regarding its compliance with provisions of applicable law.

#### Wrap Fee Programs

SWMG does not use wrap fee programs for portfolio management. In a wrap-fee program, clients pay a single fee that covers management and transaction fees for their accounts. Transaction fees are separate from the management fees that are charged. Clients may pay different types of transaction fees based on the type of security so each transaction fee may be different. Type and amounts of transaction fees are outlined in the "Fees and Compensation" section under "Custodian Fees".

Clients can terminate their agreement or relationship with Sard Wealth Management Group, LLC at any time without penalty.

#### Assets Managed

As of December 31, 2013, SWMG manages client assets totaling \$189,167,422. Of these assets, \$151,237,787 are managed on a discretionary basis and the remainder are managed on a non-discretionary basis.

The methodology for determining the client assets managed is different than that used to compute Assets Under Management in Part 1 of the ADV, Item 5f. The assets reported here include all assets managed by Jonathan Sard, which includes discretionary brokerage accounts, non-discretionary brokerage accounts (both advisory and commissioned accounts), variable annuity accounts, and direct, commissioned business with mutual fund companies. Retirement plans are also included in the total client assets managed.

## Item 5: Fees and Compensation

Compensation for the Advisor is provided via advisory fees, flat-rate fees, and/or hourly fees. Flat rate fees are used for financial plans and range from \$500 to \$10,000, depending on the complexity of the plan. Hourly fees are \$250 per hour. For clients paying hourly fees, an estimate of the number of hours is provided in advance.

### Fee Schedule

Advisory fees are based on the calendar quarter ending value of client brokerage accounts and are paid in arrears in the first month following the end of the calendar quarter. Fees are normally charged based on a tiered schedule in which the percentage is reduced as the assets increase. Client accounts for the same household are grouped together to take advantage of the tiered fee schedule. Fees are rarely negotiable, except when there are extenuating circumstances. Although some clients may be currently billed on older fee schedules, the current fee schedule for new clients is as follows:

- First \$1M: 1.0%
- Next \$1M: .75%
- Over \$2M: .5%

### Billing

Investment advisory fees are calculated by Sard Wealth Management Group and are deducted from the client's accounts. If insufficient money market shares are available to pay the fees, Jonathan Sard will determine which investments will be liquidated to pay the fees. The fees debited from the account are shown on the custodian's statement for the month the fees are debited, provided the client has authorized fee debit. Accounts that are funded for less than the full calendar quarter may be charged prorated fees based on the number of days an account is funded during the quarter. If an account is closed during a calendar quarter, the fees are deducted from the balance before the closure occurs. In the case that an account is to be billed before the end of the quarter, the balance on the day prior to the calculation of the fees is used. Because no fees are paid in advance, there are no refunds of fees needed when an account is closed. There are no adjustments for inflows and outflows of cash and/or securities into or out of the account.

Fees that are not directly debited from a client's account will be paid by check, payable to Sard Wealth Management Group, LLC.

### Custodian Fees

Clients may incur fees charged by the broker/dealer/custodian of brokerage accounts. These costs may include the following, depending on the custodian:

- Transaction fees for some mutual funds (\$15 or \$19.50), ticket surcharge for some mutual fund transactions (\$10), transaction charge for stock transactions and for ETF transactions (\$7.50 or \$15), and a miscellaneous transaction fee of up to \$4.95 for each transaction
- IRA custodian fee of \$40 per year
- Inactivity fee of \$50 per year for accounts with no trading activity
- \$35 fee for certain "special" holdings
- Closure fee of \$50 for accounts closed and \$75 for IRA accounts closed

- Certain mutual funds and/or ETFs can be purchased with no transaction fees. However, the shares may be subject to a short-term redemption fee if liquidated with a specific time period, often 90 days.
- There may be other fees assessed by the broker/dealer such as wire fees, trade away fees, expedited check fees and other special request fees.

Additional information concerning brokerage accounts with National Financial Services (NFS) and TD Ameritrade is provided in the section of this document titled “Brokerage Practices”.

Sard Wealth Management Group primarily uses open-ended mutual funds in managed accounts. You will pay a proportionate share of Fund’s management and administrative fees and sales charges as well as the mutual fund advisor’s fee. Such fees are not shared with Sard Wealth Management Group and are compensation to the fund manager.

Annuity contracts are subject to expenses which vary from contract to contract. Expenses are disclosed and discussed with the client during the discussion of the particular product. Those expenses are rider costs, mortality and expense fees, surrender fees, administrative fees or fees associated with the subaccounts.

#### Retirement Plan Consulting Services

SWMG will not charge an advisory fee. Instead, Jonathan Sard, as a registered representative of Securities Service Network, Inc., (SSN), will be compensated by the receipt of commissions and ongoing trail compensation from the securities held within the Plan. It is important to refer to disclosures in this Item 5 and in Item 10, 11, 12 and 14 below.

#### Compensation for Sale of Securities by Supervised Persons

##### Commissions

There are no commissions paid to Jonathan Sard or Sard Wealth Management Group, LLC for sales of securities in a brokerage-based advisory account. Jonathan Sard, as a Registered Representative, receives commissions that are paid for the sale of annuity products based on the amount invested. This may constitute a conflict of interest in that the compensation is based on a specific product sold, which could incent the sale of a commissioned product. This potential conflict is managed by fully disclosing to the client all applicable fees and charges, along with a discussion of the pros and cons of any commissioned products. It is the fiduciary obligation of the firm to always do what is best for clients. Clients have the right to purchase the recommended investment products through other brokers or agents that are not affiliated with SWMG. Commissions do not provide the primary compensation for the business; the primary revenue is investment advisory fees (80%).

##### Mutual Fund Loads

Our fee-based clients purchase mutual funds at Net Asset Value (without a load). Therefore, clients who pay fees do not pay sales commissions for the mutual funds purchased. SWMG offers what we consider the most appropriate funds for our clients, regardless of whether they are “load” or “no-load” funds.

##### Mutual Fund 12b-1 Fees



Jonathan Sard, as an Investment Advisor Representative (IAR) with the Advisor, may receive 12b-1 fees based on some mutual fund holdings in some advisory accounts, which may create a conflict of interest. This conflict is mitigated by disclosing to clients how he is paid. For accounts in which the 12b-1 fees are not distributed to Jonathan Sard, such fees may be received by Securities Service Network, TD Ameritrade and/or NFS. Furthermore, advisory accounts at TD Ameritrade do not pay 12b-1 fees to Jonathan Sard.

#### Item 6: Performance-based Fees and Side-by-Side Management

SWMG's compensation is not performance-based; that is, compensation is not based on a share of capital gains or capital appreciation of the funds or any portion of the funds in which client accounts are invested.

#### Item 7: Types of Clients

SWMG provides investment advice to individuals, pension and profit sharing plans, trusts and estates, and corporations. In general, the required minimum investment is \$500K for new clients, although some exceptions may be made in cases of family members of existing clients and clients with the potential to meet the minimum within a reasonable period of time. The minimum represents a household invested value including commission and advisory accounts combined.

#### Item 8: Methods of Analysis, Investment Strategies, and Risk of Loss

SWMG analyzes investment options based on both fundamental and technical analysis. The strategy for investing client assets using technical analysis is to try to protect the downside by watching market trends and to take an offensive or defensive approach as indicated by these trends. The potential risk of technical analysis is that patterns and trends can reverse quickly, or take a long time to develop, which can cause false signals or cause the investor to miss out on potential gains. When using fundamental analysis, we look at macro-economic data, watch corporate earnings, pay attention to valuations, and try to have an understanding of the underlying strength or weakness in a particular investment. From a risk standpoint, news events, political changes, economic uncertainty, government actions and other factors can all affect how markets move at any point in time. Client assets are invested primarily in mutual funds and exchange traded funds. With mutual funds, we look for strong managers and solid historical performance on a risk-adjusted basis. The funds are monitored for changes in philosophy, management and/or performance. With exchange traded funds, we look for those that can provide exposure to a specific area of the market at a low cost. Any investment in securities involves risk of loss and clients must be prepared to bear a loss.

The investment supervision is based primarily on model portfolios, comprising mostly mutual funds and exchange traded funds (ETFs). The investments are selected through fundamental and technical analysis, as well as reviews and information from financial press and research, corporate rating services such as Morningstar, annual reports, prospectuses, and filings with the Securities and Exchange Commission. The investment philosophy includes both long-term purchases that will be held for at least one year and also short-term securities that may be sold within a year.

SWMG invests primarily in mutual funds and exchange traded funds (ETFs). The material risk in these investments is that, like any investment in securities, the value may go down and the principal is not protected. Because investing in securities involves risk of loss that clients need to be prepared to bear.

#### Item 9: Disciplinary Information

There are not, nor have there ever been any legal or disciplinary actions involving the company or any individual associated with the company. SWMG employees hold themselves to the highest standards of integrity in advising clients and running the practice.

Jonathan Sard has never relinquished a license or resigned in anticipation of any disciplinary or legal action.

#### Item 10: Other Financial Industry Activities and Affiliations

Jonathan Sard, the firm's principal, is an Investment Advisor Representative (IAR) of the Advisor and is a registered representative of Securities Service Network, Inc., (SSN) of Knoxville, Tennessee, a FINRA registered broker-dealer. As such, Jonathan Sard executes securities transactions through Securities Service Network, Inc.

Jonathan Sard is not registered, nor does he plan to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of these entities.

Jonathan Sard has a relationship with an insurance general agency and multiple insurance companies, through which he may offer insurance to clients. More information is provided in the section titled "Additional Information about Jonathan Sard".

Jonathan Sard may recommend another investment advisor or broker to potential clients who do not fit well with the practice; however, he is not compensated for those recommendations. Neither Jonathan nor SWMG compensate other professionals for referrals of potential clients.

#### Item 11: Code of Ethics

As a Registered Investment Advisor with the SEC, SWMG is required to maintain a code of ethics per SEC Rule 204A-1. The code of ethics sets forth standards of conduct expected of advisory personnel and addresses conflicts that arise from personal trading by advisory personnel. SWMG sets the highest ethical standards for all employees and as such, require employees to incorporate these into the tasks they undertake for our clients. We will gladly provide a copy of the code of ethics upon request by any client or prospective client.

SWMG does not have a financial interest in the securities recommended or sold to clients. For example, no securities are purchased from clients, nor is Jonathan Sard a general partner in a partnership in which a client investment is solicited. SWMG is not in any way related to an investment advisor for an investment company that is recommended to clients.

Jonathan Sard may invest in the same securities that he recommends to clients. Because SWMG generally recommends mutual funds and ETFs, this does not represent a conflict of interest since SWMG does not trade enough to affect the pricing in the market.

#### Item 12: Brokerage Practices

SWMG participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade") member FINRA/SIPC/NFA. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer. TD Ameritrade offers to

independent investment Advisors services which include custody of securities, trade execution, clearance, and settlement of transactions. SWMG receives some benefits from TD Ameritrade through its participation in the program. Please see the disclosure under Item 14 below.

SWMG has a combination of criteria for selecting a broker/dealer to work with on behalf of clients. As an independent advisor, decisions that affect clients should be made here, not by the broker/dealer. SWMG looks for the broker/dealer to provide the resources and level of service that clients expect. Expectations include accuracy, follow-through, proactive service, and responsiveness to client issues. It is expected that when there are questions, the broker/dealer will provide correct answers. Above all, the expectation is for service at a fair and reasonable price with value added services that are a benefit to clients.

Some broker/dealers provide incentives to advisors to recommend them to clients, including research or practice management products. These services may incent an advisor to select the broker/dealer to receive these incentives rather than based on clients receiving the most favorable execution.

As a fiduciary for clients, SWMG acts in the best interest of clients and seeks to minimize the costs incurred on their transactions. Client accounts may be held at National Financial Services and those trades are processed through the broker/dealer, SSN. SWMG has no other business or economic relationship with SSN. SSN and NFS charge transaction fees based on the types of securities bought and sold. The majority of advisory accounts are held at TD Ameritrade and trades are processed by TD Ameritrade. SWMG has obtained approval from SSN to utilize the services of TD Ameritrade.

SSN provides a list of mutual funds for advisory clients which do not incur the \$19.50 transaction-based ticket charge. Because these funds are not subject to a transaction-based ticket charge, there is an advantage to select these funds for client portfolios over other funds for which the client incurs the \$19.50 ticket charge and possibly the \$10 surcharge outlined in the "Custodian Fees" section of "Fees and Compensation". The Advisor must carefully weigh the performance and the full costs, including transaction costs, when selecting funds for client accounts.

SWMG monitors the costs and benefits of SSN and TD compared to other broker/dealers on a regular basis. The information from the inquiries is documented and used to try to negotiate improved pricing with SSN, or to decide if a change in broker/dealer is warranted. SWMG proactively identifies products and services that other broker/dealers provide to assist in negotiations.

All services other than execution that SWMG receives from the broker/dealer (SSN) are separately paid-for. These include the Streetscape trading platform and the Albridge reporting tool. Neither SSN nor NFS provides any research materials to advisors. There are no services based on certain production-levels with the broker/dealer and there are no discounts on the fees for these tools based on production. Therefore, the selection of SSN as the broker/dealer is not based on services or tools provided based on the size of SWMG's business with them. The focus is strictly on getting the best service and the best execution costs for clients.

SWMG receives an economic benefit from TD Ameritrade. TD Ameritrade has agreed to cover the costs of systems used to research or to manage clients. This benefit is re-evaluated each year and negotiated with TD Ameritrade. This is a conflict of interest since SWMG could recommend assets be directed to TD Ameritrade other than another custodian. Therefore, SWMG has an

incentive to recommend TD Ameritrade based on its interest, rather than clients' interests. Fees and expense at TD and SSN may be higher or lower than other firms offering similar services. The soft dollars are used to benefit all clients of SWMG and not just those clients with accounts at TD.

#### Marketing Support

Some mutual fund companies provide marketing support to Sard Wealth Management Group. This support may be based on the amount of business that SWMG does with these companies. There could be a conflict of interest in selecting mutual funds from mutual fund companies that provide marketing support instead of funds from mutual fund companies that do not provide marketing support. Because this marketing support is very limited, it has no bearing on SWMG's investment recommendations.

#### Brokerage for Client Referrals

Sard Wealth Management Group does not receive client referrals from the broker/dealer, nor is that a desired business model. SWMG builds the business through referrals from existing clients and centers of influence and that is the selected business model. Since SWMG receives no client referrals through the broker/dealer (SSN) there is no conflict of interest to recommend SSN to clients.

#### Directed Brokerage

SWMG requires that client brokerage accounts are setup through NFS or TD Ameritrade for reasons outlined in the section on "Brokerage Practices". Not all broker/dealers and clearing firms charge the same fees. Clients may be able to get smaller execution charges with another firm. While SWMG makes every effort to get the best execution for clients, there can be no guarantee that clients could not get better costs elsewhere. Conversely, clients could pay higher costs elsewhere because of the fee reductions that are negotiated by SWMG.

SWMG does not have an ownership relationship with the broker/dealer.

Transaction costs for client trades of mutual funds and ETFs would not be reduced by aggregating orders. Therefore, we do not conduct aggregated transactions.

#### Item 13: Review of Accounts

Client accounts are reviewed on a continuing and regular basis. SWMG personnel contact clients many times during the year and the client accounts are often reviewed before the contact. In addition, Jonathan Sard formally reviews client accounts during meetings throughout the year. The frequency of the meetings is based on the client's desired frequency. Clients are asked on a quarterly basis to notify SWMG if any of their goals or their situation has changed. That way, Jonathan can determine whether any modifications are required in the clients' portfolios. The securities that are held in client accounts are reviewed on an ongoing basis through information provided by the fund companies, technical analysis tools, and industry news. The investments are regularly compared to other investments using analysis tools to determine whether any changes are required. In addition to these reviews, client accounts are also reviewed when clients initiate a contact and during market changes.

During regular meetings, clients receive a written report of their accounts as of the meeting date. Reports provided to clients concerning their accounts may also be verbal in nature since they are provided during check-in calls. Clients may be given online access to their accounts or quarterly emailed reports of their accounts. Clients should compare any reports or account information provided by SWMG to the reports and statements received directly from the account custodian and report any discrepancies. The account custodian records are the ultimate source and will prevail in the case of a discrepancy.

#### Item 14: Client Referrals and Other Compensation

SWMG receives no compensation or economic benefit from a third party for providing investment advice or services to clients, except the marketing support noted in the section titled “Marketing Support” within “Brokerage Practices” and the services outlined here from TD Ameritrade.

Refer to the disclosures provided under Item 12, Brokerage Practices, above regarding benefits both financially and not financially SWMG receives. As disclosed above, TD Ameritrade has agreed, subject to annual review, to assist in covering the cost of systems that help manage and monitor advisory clients. This is a conflict of interest. SWMG may cause more assets to be directed to TD.

As disclosed under Item 12 above, SWMG participates in TD Ameritrade’s institutional customer program and SWMG may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between SWMG’s participation in the program and the investment advice it gives to its Clients, although SWMG 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 SWMG 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 SWMG by third party vendors.

SWMG also receives from TD Ameritrade certain additional economic benefits (“Additional Services”) that may or may not be offered to any other independent investment SWMGs participating in the program. Specifically, the Additional Services include:

- Redtail Technology CRM system
- Morningstar Principia
- MoneyGuide Pro financial planning software
- Dorsey Wright technical analysis software
- The Sherman Sheet technical analysis subscription
- Lowry Research analysis subscription
- The Fred Report research subscription
- eMoney wealth management system

TD Ameritrade provides the Additional Services to SWMG in its sole discretion and at its own expense, and SWMG does not pay any fees to TD Ameritrade for the Additional Services.

SWMG and TD Ameritrade have entered into a separate agreement “Additional Services Addendum”) to govern the terms of the provision of the Additional Services.

SWMG’s receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to SWMG, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, SWMG’s Client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with SWMG, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, SWMG may have an incentive to recommend to its Clients that the assets under management by SWMG be held in custody with TD Ameritrade and to place transactions for Client accounts with TD Ameritrade. SWMG’s receipt of Additional Services does not diminish its duty to act in the best interests of its Clients, including to seek best execution of trades for Client accounts.

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

SWMG does not compensate anyone for referrals of new clients, therefore SEC Rule 206(4)-3 does not apply to the practice. SWMG receives referrals of family and friends by clients; however, no cash fee is paid directly or indirectly as a result of the referral.

#### Item 15: Custody

Sard Wealth Management Group shall not have custody of client funds or securities at any time, with the single exception of the ability to deduct investment management fees directly from client accounts. Client accounts are custodied at NFS or with an insurance company (annuities). These companies will provide a statement on a monthly or quarterly basis. Transaction confirmations are also provided. Clients should carefully review those statements and contact SWMG with any questions or concerns that they have. Clients should review the written reports provided during client meetings and compare those to their statements. If clients notice any issues or discrepancies they should contact SWMG immediately.

#### Item 16: Investment Discretion

SWMG accepts discretionary authority to manage securities accounts on behalf of clients. This gives SWMG the authority to determine the securities to be purchased and sold and the timing and amount of the transactions. Clients may limit that authority by specifying holdings that should not be sold, by specifying an amount of cash to be maintained as a reserve and not invested, or by specifying securities that should not be purchased. SWMG assumes discretionary authority only after executing an agreement with the client. The agreement requires the client to specifically acknowledge the paragraph concerning discretionary authority.

Item 17: Voting Client Securities

Sard Wealth Management Group does not accept authority to vote client securities. Clients are responsible to vote any and all proxies. Clients will receive proxies and solicitations from NFS or other custodians directly. If a client has questions about a specific solicitation, SWMG will review it and answer those questions.

Item 18: Financial Information

SWMG does not require prepayment of fees by clients, therefore there is no requirement to disclose a balance sheet in this disclosure.

Neither Sard Wealth Management Group, nor Jonathan Sard, has been the subject of a bankruptcy petition at any time.

## **Additional Information about Jonathan Sard: Form ADV Part 2B**

This brochure supplement provides information about Jonathan Sard that supplements the Sard Wealth Management Group, LLC brochure. You should have received a copy of that brochure. Please contact our office if you did not receive Sard Wealth Management Group LLC's brochure or if you have any questions about the contents of this supplement.

Jonathan Sard, the owner of the company, provides the services and advice for SWMG clients. In addition to being the sole owner of the company, Jonathan is the firm's only Investment Advisory Representative or managed person.

### **Contact Information**

Jonathan Sard  
5605 Glenridge Drive, Suite 895  
Atlanta, GA 30342  
(404) 843-4483

### **Educational Background and Business Experience of Jonathan Sard**

Jonathan Sard was born in 1970. He earned his Bachelor of Science in Business Administration from the University of Florida in 1992. He became one of the youngest professionals to receive the CERTIFIED FINANCIAL PLANNER<sup>TM</sup> (CFP<sup>®</sup>) certification at the age of 25, after completing the coursework at the College for Financial Planning in 1995.

Jonathan Sard is the principal and sole owner of Sard Wealth Management Group, LLC (SWMG). SWMG has been in business under this name since 2007. Prior to that, the company used the name Financial Alternatives, Inc. Jonathan Sard has been a financial advisor and planner since 1992. Jonathan Sard has been affiliated with Securities Service Network, Inc. (SSN), a broker/dealer located in Knoxville, Tennessee, since 2002.

### **Disciplinary Information**

Jonathan Sard has had no disciplinary action taken against him by any regulatory agency during his career as an advisor, insurance agent, or registered representative.

### **Certified Financial Planner<sup>TM</sup>**

The CERTIFIED FINANCIAL PLANNER<sup>TM</sup>, CFP<sup>®</sup> and federally registered CFP (with flame design) marks (collectively, the "CFP<sup>®</sup> marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP<sup>®</sup> certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold a CFP<sup>®</sup> certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP<sup>®</sup> certification in the United States.

To attain the right to use the CFP<sup>®</sup> marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the



- competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
  - Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
  - Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services that are in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

#### Other Business Activities of Jonathan Sard

Jonathan Sard engages in activities in addition to his responsibilities as an Investor Advisor Representative (IAR) of Sard Wealth Management Group, LLC, the Registered Investment Advisor. These activities include investment recommendations as a registered representative of Securities Service Network (SSN) and insurance recommendations as an independent insurance representative, both of which help to serve the clients' overall wealth management needs.

#### Registered Representative

Jonathan Sard, in addition to being an Investment Advisor Representative (IAR) of the Advisor, is a registered representative of Securities Service Network, Inc., of Knoxville, Tennessee, a FINRA registered broker-dealer. As such, Jonathan Sard executes securities transactions through Securities Service Network, Inc. Jonathan Sard may from time to time receive commissions and other payments, including 12b-1 fees, generally received with respect to the sale of investment products, resulting in an inherent conflict of interest. Commissioned sales represent approximately 20% of the time spent in the business and commissions and 12b-1 fees represent approximately 15% of revenues.

#### Insurance Representative

Jonathan Sard is licensed to sell various insurance products. These products include life insurance, fixed and variable annuities, and health, disability, and long-term care insurance. He may provide advice to clients on insurance planning. Insurance products may be recommended based on the client's goals and objectives. Insurance products may pay a commission if purchased. Clients are not obligated to purchase recommended products through Sard Wealth Management Group; they may purchase them through any insurance agent they choose. Approximately 10% of time is spent on insurance and the insurance revenues make up approximately 5% of total revenue. As with any commissioned product, a conflict of interest can occur due to the different commissions provided by various products and providers.

#### Additional Compensation for Jonathan Sard

No third party provides an economic benefit to Jonathan Sard for providing advisory services to clients.

### Supervision of Jonathan Sard

Since SWMG is a firm with a single advisor who is also the firm principal, there is no hierarchical chain of supervision as there would be other firms to monitor the advice to clients. As the firm principal, Jonathan Sard sets the highest standards of conduct and ethics and personally provides the advice to clients.

In addition, Jonathan is supervised as a registered representative by the broker/dealer, Securities Service Network. The Office of Supervisory Jurisdiction reviews the investment business and conducts an audit each year in which they review business practices and client transactions. Willard Moore is the assigned compliance manager to the firm and to Jonathan Sard. Willard can be reached at (800) 264 5499.