

# The Pinnacle Financial Group

d/b/a North Star Wealth Investors

d/b/a Pension & Wealth Consultants

d/b/a Agrillo Financial Group

d/b/a McKenna Financial Planning

*This brochure provides information about the qualifications and business practices of The Pinnacle Financial Group. If you have any questions about the contents of this brochure, please contact us at (516) 763-9700 or by email at: [joseph.esposito@lpl.com](mailto:joseph.esposito@lpl.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.*

*Additional information about The Pinnacle Financial Group is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The Pinnacle Financial Group's CRD number is: 164395*

9 South Long Beach Road  
Rockville Centre, New York, 11570  
(516) 763-9700  
[joseph.esposito@lpl.com](mailto:joseph.esposito@lpl.com)

*Registration does not imply a certain level of skill or training.*

Version Date: 10/22/2015

## Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of The Pinnacle Financial Group d/b/a North Star Wealth Investors d/b/a Pension & Wealth Consultants on February 27, 2014 are described below. This list summarizes changes to policies, practices or conflicts of interests only.

- Some IAR's of The Pinnacle Financial Group d/b/a North Star Wealth Investors d/b/a Pension & Wealth Consultants conduct business under the d/b/a McKenna Financial Planning and d/b/a Agrillo Financial Group. This is reflected on the cover page.
- Item 4 was updated to indicate PFG provides pension consulting services and the firm provides advice about options.
- Item 5 was updated to clarify PFG's fee schedule, that PFG does not receive soft dollar benefits, to delete references to LPL accounts not offered by PFG, and to indicate PFG can only provide advisory services to clients who use certain custodians.
- Item 10 was updated to indicate LPL restricts the securities that PFG can recommend to its clients, and to reference additional LPL accounts offered to clients.
- Item 12 was updated to indicate PFG does not receive soft dollar benefits and PFG also uses Schwab and Pershing as custodians.
- Item 13 was updated to change the frequency of account reviews.

## Item 3: Table of Contents

Item 1: Table of Contents	
Item 2: Material Changes.....	i
Item 3: Table of Contents.....	ii
Item 4: Advisory Business .....	1
A. Description of the Advisory Firm.....	1
B. Types of Advisory Services .....	1
Investment Supervisory Services.....	1
Services Limited to Specific Types of Investments.....	1
C. Client Tailored Services and Client Imposed Restrictions.....	2
D. Wrap Fee Programs .....	2
E. Amounts Under Management .....	2
Item 5: Fees and Compensation.....	3
A. Fee Schedule .....	3
Investment Supervisory Services Fees .....	3
B. Payment of Fees.....	3
Payment of Investment Supervisory Fees .....	3
C. Clients Are Responsible For Third Party Fees .....	3
D. Prepayment of Fees.....	4
E. Outside Compensation For the Sale of Securities to Clients .....	4
1. Sale of Securities to Clients and Compensation .....	4
2. Clients Have the Option to Purchase Recommended Products From Other Brokers.....	5
3. Commissions are the Primary Source of Income for this RIA .....	5
4. Advisory Fees in Addition to Commissions or Markups .....	5
Item 6: Performance-Based Fees and Side-By-Side Management .....	5
Item 7: Types of Clients .....	5
Minimum Account Size.....	6
Item 8: Methods of Analysis, Investment Strategies, and Risk of Investment Loss .....	6
A. Methods of Analysis and Investment Strategies .....	6
Methods of Analysis.....	6
Fundamental analysis .....	6
Investment Strategies .....	6
B. Material Risks Involved.....	6
Methods of Analysis.....	6
Fundamental analysis.....	6
Investment Strategies .....	6

C. Risks of Specific Securities Utilized .....	7
Item 9: Disciplinary Information .....	8
A. Criminal or Civil Actions .....	8
B. Administrative Proceedings .....	8
C. Self-regulatory Organization (SRO) Proceedings .....	8
Item 10: Other Financial Industry Activities and Affiliations .....	8
A. Registration as a Broker/Dealer or Broker/Dealer Representative .....	8
B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor .....	8
C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests .....	8
D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections .....	9
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	9
A. Code of Ethics .....	9
B. Recommendations Involving Material Financial Interests.....	9
C. Investing Personal Money in the Same Securities as Clients .....	10
D. Trading Securities At/ Around the Same Time as Clients' Securities .....	10
Item 12: Brokerage Practices.....	10
A. Factors Used to Select Custodians and/or Broker/Dealers.....	10
1. Research and Other Soft-Dollar Benefits.....	10
2. Brokerage for Client Referrals .....	11
3. Clients Directing Which Broker/Dealer/ Custodian to Use.....	11
B. Aggregating (Block) Trading for Multiple Client Accounts .....	11
Item 13: Reviews of Accounts .....	11
A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews .....	11
B. Factors That Will Trigger a Non-Periodic Review of Client Accounts.....	11
C. Content and Frequency of Regular Reports Provided to Clients.....	11
Item 14: Client Referrals and Other Compensation .....	11
A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes).....	12
B. Compensation to Non – Advisory Personnel for Client Referrals.....	12
Item 15: Custody.....	12
Item 16: Investment Discretion .....	12
Item 17: Voting Client Securities (Proxy Voting).....	12
Item 18: Financial Information .....	12
A. Balance Sheet.....	12
B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients .....	13
C. Bankruptcy Petitions in Previous Ten Years.....	13

## Item 4: Advisory Business

### A. Description of the Advisory Firm

The Pinnacle Financial Group is a Corporation organized in the state of New York. The firm was formed in May of 2012, and the principal owner is Joseph Esposito.

### B. Types of Advisory Services

The Pinnacle Financial Group (hereinafter "PFG") offers the following services to advisory clients:

#### *Investment Supervisory Services*

PFG offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. PFG creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan (the Investment Policy Statement) to aid in the selection of a portfolio that matches each client's specific situation. Investment Supervisory Services include, but are not limited to, the following:

- |                       |                                |
|-----------------------|--------------------------------|
| • Investment strategy | • Personal investment policy   |
| • Asset allocation    | • Asset selection              |
| • Risk tolerance      | • Regular portfolio monitoring |

PFG evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. PFG will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

#### *Pension Consulting Services*

PFG offers ongoing consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans) based on the demographics, goals, objectives, time horizon, and/or risk tolerance of the plan's participants.

### *Selection of Other Advisors*

PFG may direct clients to third-party money managers. PFG will be compensated via a fee share from the advisors to which it directs those clients. The fees shared will not exceed any limit imposed by any regulatory agency. Before selecting other advisors for clients, PFG will always ensure those other advisors are properly licensed or registered as investment advisor.

### *Services Limited to Specific Types of Investments*

PFG generally limits its investment advice and money management to mutual funds, equities, bonds, fixed income, debt securities, ETFs, REITs, insurance products including annuities, options and government securities. PFG may use other securities as well to help diversify a portfolio when applicable.

## **C. Client Tailored Services and Client Imposed Restrictions**

PFG offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

## **D. Wrap Fee Programs**

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. PFG may recommend a wrap fee program sponsored by LPL and managed by outside third parties. Appropriate disclosure documents will be provided to any client investing in a wrap fee program.

## **E. Amounts Under Management**

PFG has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$170,346,408.00	\$9,159,081.00	October 2015

## Item 5: Fees and Compensation

### A. Fee Schedule

#### *Investment Supervisory Services Fees*

Fees for clients on LPL SWM platform:

Total Assets Under Management	Annual Fee
All assets under management	0.0 - 2.50% *

\*Clients pay an annual average fee of 1.75%. Clients with assets on the LPL SWM platform pay separate transactions fees.

Fees for clients in wrap fee accounts recommended by PFG:

Total Assets Under Management	Annual Fee
All assets under management	0.56 - 2.50% **

\*\*Clients pay an annual average fee of 2.4%. Clients with assets in wrap fee accounts do not pay separate transaction fees.

Fees for clients using Schwab or Pershing as a custodian:

Total Assets Under Management	Annual Fee
All assets under management	0.0 - 1.75%***

\*\*\*Clients pay separate transaction fees.

These fees are negotiable depending upon the needs of the client and complexity of the situation, and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Fees are paid quarterly in advance, and clients may terminate their contracts with seven days' written notice.

Refunds are given on a prorated basis, based on the number of days remaining in a quarter at the point of termination. Fees that are collected in advance will be refunded based on the prorated amount of work completed up to the day of termination within the quarter terminated. The fee refunded will be the balance of the fees collected in advance minus the daily rate\* times the number of days in the quarter up to and including the day of termination. (\*The daily rate is calculated by dividing the quarterly AUM fee by the number of days in the termination quarter). Clients may terminate their contracts without penalty, for full refund, within 5 business days of signing the advisory contract.

Advisory fees are withdrawn directly from the client's accounts with client written authorization.

### ***Pension Consulting Services Fees***

The rate for pension consulting services is 2.5% of the plan assets for which PFG is providing such consulting services. These fees are negotiable.

### ***Selection of Other Advisors Fees***

PFG will direct clients to third-party money managers. PFG will be compensated via a fee share from the advisors to which it directs those clients. This relationship will be disclosed in each contract between PFG and each third-party adviser. The fees shared will not exceed any limit imposed by any regulatory agency. These fees are negotiable depending upon the needs of the client and complexity of the situation. Payment of fees for third-party money managers will depend on the specific third-party advisor selected. Clients may terminate the contract without penalty, for full refund, within five business days of signing the contract. Thereafter, clients may terminate the contract with seven days' written notice.

## **B. Payment of Fees**

### ***Payment of Investment Supervisory Fees***

Advisory fees are withdrawn directly from the client's accounts with client written authorization. Fees are paid quarterly in advance.

## **C. Clients Are Responsible For Third Party Fees**

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by PFG. Please see Item 12 of this brochure regarding broker/custodian.



## **D. Prepayment of Fees**

PFG collects fees in advance. Fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination and the total days during the billing period. Fees will be returned within fourteen days to the client. Fees will be deposited back into client's account within fourteen days.

The fee refunded will be the balance of the fees collected in advance minus the daily rate\* times the number of days in the quarter up to and including the day of termination. (\*The daily rate is calculated by dividing the quarterly AUM fee by the number of days in the termination quarter).

## **E. Outside Compensation For the Sale of Securities to Clients**

Joseph Esposito and other investment adviser representatives are registered representatives with LPL Financial LLC and insurance agents. They accept compensation for the sale of securities to PFG clients.

### ***1. Sale of Securities to Clients and Compensation***

PFG and its supervised persons may accept compensation for the sale of securities or other investment products. This presents a conflict of interest and gives PFG or the supervised person an incentive to recommend products based on the compensation received rather than on the client's needs.

Please note that when PFG or its representatives provides investment advisory services, he or she is a fiduciary under the Investment Advisers Act and has a duty to act in your best interests and to make full and fair disclosure to you of all material facts and conflicts of interest.

### ***2. Clients Have the Option to Purchase Recommended Products From Other Brokers***

Clients always have the option to purchase PFG recommended products through other brokers or agents that are not affiliated with PFG. However, PFG can only provide advisory services to clients who purchase products through LPL Financial, Schwab, or Pershing.

### ***3. Commissions are not the Primary Source of Income for this RIA***

Commissions are not PFG's primary source of compensation.

### ***4. Advisory Fees in Addition to Commissions or Markups***

Advisory fees that are charged to clients are not reduced to offset the commissions or markups on securities or investment products recommended to clients.

## Item 6: Performance-Based Fees and Side-By-Side Management

PFG does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## Item 7: Types of Clients

PFG generally provides management supervisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Pension and Profit Sharing Plans
- ❖ Trusts, Estates, or Charitable Organizations
- ❖ Corporations or Business Entities

### *Minimum Account Size*

There is an account minimum, \$25,000, which may be waived by the investment advisor, based on the needs of the client and the complexity of the situation.

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

### A. Methods of Analysis and Investment Strategies

#### *Methods of Analysis*

PFG's methods of analysis include fundamental analysis.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

#### *Investment Strategies*

PFG uses long term trading and short term.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## B. Material Risks Involved

### *Methods of Analysis*

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

### *Investment Strategies*

Long term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Short term trading generally holds greater risk and clients should be aware that there is a material risk of loss using any of those strategies.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## C. Risks of Specific Securities Utilized

PFG generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss. Mutual funds are not guaranteed or insured by the FDIC or any other government agency. You can lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond "fixed income" nature (lower risk) or stock "equity" nature (mentioned above).

**Equity** investment generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

**Treasury Inflation Protected/Inflation Linked Bonds:** The Risk of default on these bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal.

**Fixed Income** is an investment that guarantees fixed periodic payments in the future that may involve economic risks such as inflationary risk, interest rate risk, default risk, repayment of principal risk, etc.

**Debt securities** carry risks such as the possibility of default on the principal, fluctuation in interest rates, and counterparties being unable to meet obligations.

**Stocks & Exchange Traded Funds (ETF):** Investing in stocks & ETF's carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Investments in these securities are not guaranteed or insured by the FDIC or any other government agency.

**REITs** have specific risks including valuation due to cash flows, dividends paid in stock rather than cash, and the payment of debt resulting in dilution of shares.

**Precious Metal ETFs** (Gold, Silver, Palladium Bullion backed “electronic shares” not physical metal): Investing in precious metal ETFs carries the risk of capital loss.

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various other types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear**

## **Item 9: Disciplinary Information**

### **A. Criminal or Civil Actions**

There are no criminal or civil action to report on behalf of the PFG and its management.

### **B. Administrative Proceedings**

There are no administrative proceedings to report on behalf of the PFG and its management.

### **C. Self-regulatory Organization (SRO) Proceedings**

There are no self-regulatory organization proceedings to report on behalf of the PFG and its management.

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

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Joseph Esposito and other investment adviser representatives are registered representatives of LPL Financial LLC.

### **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither PFG nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Joseph Esposito and other investment adviser representatives of PFG are registered representatives of LPL Financial LLC. LPL restricts the securities that its registered representatives such as Mr. Esposito and other representatives of PFG can recommend to their clients. PFG's representatives also may sell insurance and may receive commissions for insurance product sales.

From time to time, they may offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. PFG always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of PFG in their capacity as a registered representative. If you have any questions regarding the compensation PFG or its representatives receives when recommending a security or insurance product, you should ask PFG or its representatives

### **D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections**

PFG may recommend the following LPL platforms to clients:

OMP - Optimum Market Portfolios Program

PWP - Personal Wealth Portfolios Program

MWP - Model Wealth Portfolios Program

MAS - Manager Access Select Program

SWM - Strategic Wealth Management

SWM II - Strategic Wealth Management II

PFG will always act in the best interests of the client, including when determining which third party manager to recommend to clients. PFG will ensure that all recommended advisors or managers are licensed or notice filed in the states in which PFG is recommending them to clients. If PFG directs clients to third-party money managers, PFG will be compensated via a fee share from the advisors to which it directs those clients. This relationship will be disclosed in each contract between PFG and each third-party adviser. The fees shared will not exceed any limit imposed by any regulatory agency. These fees are negotiable depending upon the needs of the client and complexity of the situation. Payment of fees for third-party money managers will depend on the specific third-party advisor selected.

## **Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

### **A. Code of Ethics**

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

### **B. Recommendations Involving Material Financial Interests**

PFG does not recommend that clients buy or sell any security in which a related person to PFG or PFG has a material financial interest.

### **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of PFG may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of PFG to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. PFG will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold.

### **D. Trading Securities At/Around the Same Time as Clients' Securities**

From time to time, representatives of PFG may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of PFG to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. PFG will always transact client's transactions before its own when similar securities are being bought or sold.

## Item 12: Brokerage Practices

### A. Factors Used to Select Custodians and/or Broker/Dealers

PFG uses LPL Financial, LLC, Schwab and Pershing as custodians. The custodians were chosen based on their relatively low transaction fees and access to mutual funds and ETFs. PFG will never charge a premium or commission on transactions, beyond the actual cost imposed by the custodians.

#### 1. *Research and Other Soft-Dollar Benefits*

PFG receives no research, product, or services other than execution from a broker-dealer or third party in connection with client securities transactions ("soft dollar benefits").

#### 2. *Brokerage for Client Referrals*

PFG receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

#### 3. *Clients Directing Which Broker/Dealer/Custodian to Use*

PFG will not allow clients to direct PFG to use a specific broker-dealer to execute transactions. Clients must use PFG recommended custodian (broker-dealer).

### B. Aggregating (Block) Trading for Multiple Client Accounts

PFG maintains the ability to block trade purchases across accounts. Block trading may benefit a large group of clients by providing PFG the ability to purchase larger blocks resulting in smaller transaction costs to the client. Declining to block trade can cause more expensive trades for clients.

## Item 13: Reviews of Accounts

### A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Client accounts are reviewed at least annually by the investment adviser representative of PFG assigned to the account. Each investment adviser representative is instructed to review clients' accounts with regards to their investment policies and risk tolerance levels.

## **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

## **C. Content and Frequency of Regular Reports Provided to Clients**

Each client will receive at least quarterly from the custodian, a written report that details the client's account including assets held and asset value which will come from the custodian.

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

## **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

PFG or its representatives may receive compensation from product sponsors. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational or training events or marketing or advertising initiatives. Such compensation may not be tied to the sale of any products. LPL may pay PFG or its representatives bonuses based on production, award stock options to purchase shares of LPL's parent company, LPL Investment Holdings Inc., reimburse fees that PFG or its representatives pays to LPL for items such as administrative services, and provide other things of value such as free or reduced-cost marketing materials, payments in connection with the transition from another investment firm to LPL, or attendance at LPL conferences and events. These types of compensation from LPL may be based on overall business production and/or on the amount of assets serviced in LPL advisory programs. LPL is required to state in this item that these bonuses by LPL may give PFG or its representatives an incentive to recommend an advisory program over other programs and services. However, PFG or its representatives may only recommend a program or service that he or she believes is suitable for a client.

## **B. Compensation to Non – Advisory Personnel for Client Referrals**

PFG does not directly or indirectly compensate any person who is not advisory personnel for client referrals.



## **Item 15: Custody**

PFG, with client written authority, has limited custody of client's assets through direct fee deduction of PFG's Fees only. If the client chooses to be billed directly by LPL Financial LLC, Schwab or Pershing, PFG would have constructive custody over that account and must have written authorization from the client to do so. Clients will receive all required account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

## **Item 16: Investment Discretion**

For those client accounts where PFG provides ongoing supervision, the client has given PFG written discretionary authority over the client's accounts with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides PFG discretionary authority via a limited power of attorney in the Investment Advisory Contract and in the contract between the client and the custodian.

## **Item 17: Voting Client Securities (Proxy Voting)**

PFG will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

## **Item 18: Financial Information**

### **A. Balance Sheet**

PFG does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither PFG nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

### **C. Bankruptcy Petitions in Previous Ten Years**

PFG has not been the subject of a bankruptcy petition in the last ten years.