



**BEACON GLOBAL
ADVISOR NETWORK**

**FORM ADV PART 2A APPENDIX 1
BEACON GLOBAL ADVISOR WRAP PROGRAM BROCHURE**

Item 1 - Cover Page
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This wrap fee program brochure provides information about the qualifications and business practices of Beacon Global Advisor Network, LLC. If you have any questions about the contents of this Brochure, please contact us at (678) 517-4474 and/or dawnbond@bganetwork.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 Beacon Global Advisor Network, LLC. also is available on the SEC's website at www.adviserinfo.sec.gov.

Any references to Beacon Global Advisor Network, LLC. as a registered investment adviser or its related persons as registered advisory representatives does not imply a certain level of skill or training.

Item 2 – Material Changes

This is the initial disclosure brochure. Therefore, there are no material changes to disclose.

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

Pursuant to new SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent brochures within 120 days of the close of our fiscal year, which is December 31st. We may further provide other ongoing disclosure information about material changes as necessary.

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

Our brochure may be requested free of charge by contacting Dawn Bond at 678-517-4474 or dawnbond@bganetwork.com. Additional information about BGAN is also available via the SEC's website www.adviserinfo.sec.gov. The website also provides information about any persons affiliated with BGAN who are registered, or are required to be registered, as investment adviser representatives of BGAN.

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Item 4 - Services, Fees and Compensation

Beacon Global Advisor Network, LLC (hereinafter referred to as “BGAN”) is an investment advisory firm offering a variety of advisory services customized to your individual needs.

BGAN was established in April 2017. The principal owners and members of BGAN are: Joseph Gruber, President; Robert Rigby-Hall, Treasurer; and Randy Landsman, Vice President.

BGAN is an investment adviser that consists of many independent contractors who have affiliated with BGAN as Advisory Representatives to offer the advisory services and programs described within this brochure. The Advisory Representatives each have their own businesses and offices through which they conduct not only advisory business but provide other financial services. They market a variety of financial related services including accounting and insurance services not offered by BGAN through their independent businesses. These businesses are separate from and not affiliated with BGAN. The Advisory Representatives have a direct interest in the fee charged to you since BGAN will pay a portion of the advisory fee charged to you to your Advisory Representative. It is important to refer to the Item 5 – Fees and Compensation below. Our Advisory Representatives may not exceed the fee disclosed under Item 5 below. However, the negotiability and the fee that you will pay for advisory services is determined between you and your Advisory Representative.

Adviser is a registered investment adviser. As an investment adviser, we are a fiduciary to our advisory clients. As fiduciaries, we are expected act and provide advice in the best interests of clients; have a duty to be loyal to our clients; make full and fair disclosure of all material conflicts of interest; seek best execution for client transactions; ensure that investment advice is suitable for clients' objectives, needs and circumstances; have a duty to have a reasonable, independent basis for investment advice; and refrain from effecting personal securities transactions that are inconsistent with client interests. If your account is a retirement account and subject to the Employee Retirement Income Security Act of 1974, we are also a fiduciary within Section 3(21) under the Employee Retirement Income Security Act of 1974 (ERISA), as amended. As ERISA fiduciaries, we are expected to provide advice that is in your best interest; only charge fees that are reasonable; and not make any materially misleading statements about recommended transactions, fees and compensation, conflicts of interest, or any other matters relevant to your investment decisions.

BGAN offers asset management services as a wrap program where the client will not pay transaction fees as further described below or a non-wrap program where the client will pay an advisory fee and transaction fees separately.

BGAN is an investment adviser that consists of many independent contractors who have affiliated with BGAN as Advisory Representatives to offer the advisory services and programs described within this brochure. The Advisory Representatives each have their own businesses and offices through which they conduct not only advisory business but provide other financial services. They market a variety of financial related services including accounting and insurance services not offered by BGAN through their independent businesses. These businesses are separate from and not affiliated with BGAN. The Advisory Representatives have a direct interest in the fee charged to you since BGAN

will pay a portion of the advisory fee charged to you to your Advisory Representative. It is important to refer to the Fees Schedules disclosed below. Our Advisory Representatives may not exceed the fee schedules disclosed below. However, the negotiability and the fee that you will pay for advisory services is determined between you and your Advisory Representative. Therefore, it should not be assumed that a wrap program will cost more or less than a non-wrap program. The fee structure charged by your advisory representative could be higher than a fee structure charged by another BGAN advisory representative.

Wrap accounts are more suitable for the client who wants the cost of management and trading in one single fee without being charged for each transaction. While a non-wrap account will be more suitable for a client who prefers to separate management fees and pay for each transaction. Actively management accounts will generally be better suited for a wrap account. Managed accounts infrequently traded or trade in no-transaction fee securities will be better suited for a non-wrap fee structure.

A wrap program could cost you more or less than if you purchased advisory and transactional services separately. Factors that affecting the relative cost of the program include:

- Advisory Representative's fee schedule
- Anticipated trading costs
- Costs incurred by BGAN and the Advisory Representative

BGAN offers two wrap programs as further described below:

1. Beacon Global Advisor Custom Wrap Program
2. Beacon Global Advisor Aptus Wrap Program

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

Investment recommendations and advice offered by BGAN are not legal advice or accounting advice. You should coordinate and discuss the impact of financial advice with your attorney and/or accountant. You are advised that it is necessary to inform BGAN promptly with respect to any changes in your financial situation and investment goals and objectives. Failure to notify BGAN of any such changes could result in investment recommendations not meeting your needs.

Beacon Global Advisor Custom Wrap Program (“BGAN Custom Wrap Program”)

This wrap program option offers the client a customized managed account managed directly by the client's advisory representative. Trading in the account will vary depending on the Advisory Representative's investment strategy and philosophy and the client's objective and risk profile. Trading can be frequent or infrequent.

Managed accounts will primarily consist of exchange traded funds and open-ended mutual funds and uses no-load and load waived or mutual funds using institutional shares or when in the best interest of the client mutual funds purchased at net asset value (NAV). Additionally, managed accounts can include exchange traded funds, and equity and fixed income securities.

The advice provided by Advisory Representatives often involves recommendations to invest assets according to an asset allocation primarily involving mutual funds, exchange traded funds, stocks, bonds, and other types of securities. Recommendations include investing into various share classes. Different share classes of securities involve different fee structures and internal costs. Institutional shares are often the least expensive from an internal cost perspective; however, the transaction fees can be higher. It is important you understand the internal cost structure of the various share classes. Additional information about costs and the various share classes can be found in the prospectus.

Registered investment company securities such as mutual funds, and variable products offer the securities in various share classes. Different share classes are priced differently and share classes other than institutional share classes will involve higher internal costs that over time will cost you more. Institutional share classes often have higher trading costs. A client needs to consider the amount being invested and the length of anticipated holding to make a decision as to the share class most suitable to the client. Please read the disclosures under Item 10 below for important information about the advice and recommendations offered by advisory representatives and registered representatives. Representatives will select the lowest share class funds available and appropriate to the situation. However, in selecting the lowest share class, trading costs are sometimes higher. Selecting the lowest share class appropriate to the situation does not imply the lowest cost share class but means what the Representative deems lowest cost for the situation. Representatives consider the anticipated holding period, cost structure, and administrative and transaction costs associated with selecting a share class. However, there is no way to predict the future and there could be occasions where a holding is liquidated sooner or held longer resulting in higher costs to the client. Additional information about share classes can be found in an Investor Alert issued by the Securities and Exchange Commission at <https://www.investor.gov/additional-resources/news-alerts/alerts-bulletins/investor-bulletin-mutual-fund-classes> and <https://www.investor.gov/additional-resources/news-alerts/alerts-bulletins/investor-bulletin-mutual-fund-classes>. Additionally, the SEC and FINRA provides investor information at www.sec.gov and www.finra.org.

Beacon Global Advisor Aptus Wrap Program (“BGAN Aptus Wrap Program”)

The BGAN Aptus Wrap Program offers model management involving a combination of a third-party manager and ongoing monitoring and oversight from BGAN and your advisory representative. The managed account model is selected based on client’s responses on a risk profile.

It is important you read the Disclosure Brochure to the Third-Party Service Providers prior to entering into any agreement to use a Third-Party Service Provider. The Disclosure Brochure contains important information about the fees, services, and conflicts of interests associated with the program and the Third-Party Service Provider.

Wrap Fee Schedule

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

You may make additions to the Account or withdrawals from the Account. Additional assets deposited into the Account after it is opened will be charged a pro-rata fee based upon the number of days remaining in the then current calendar quarter. Additionally, partial withdrawals from the account will result in a prorated portion of the fee being credited to the Account. Fee adjustments for inflows and outflows in accounts charged based on the average daily balance will be factored into the quarterly fee using the average daily value of the account. No fee adjustments will be made for Account appreciation or depreciation.

Beacon Global Advisor Custom Wrap Program (“BGAN Custom Wrap Program”)

Fee Breakpoint Levels	Advisor Directed Maximum Advisory Fee*
Up to \$250,000	2.75%
\$250,000 to \$500,000	2.00%
\$500,001 to \$1,000,000	1.75%
\$1,000,001 to \$3,000,000	1.50%
\$3,000,001 to \$5,000,000	1.00%
\$5,000,001 to \$10,000,000	0.80%
Over \$10,000,000	Negotiable

Your Advisory Representative will have the discretion to determine:

➤ ***How the fee will be determined***

Option A: A quarterly fee will be calculated based on the value of each account registration under management (e.g. you have four accounts and each is charged a fee based on the account value based on the negotiated fee schedule).

Option B: A quarterly fee will be calculated based on the aggregated value of all managed accounts for the household.

For example, if you have four managed accounts with a value as of the just completed calendar quarter of: \$101,569.40, \$55,498.46, \$675,879.50, and \$74,301.12 with a total value of \$907,248.48, you will not pay a fee on the managed accounts greater than 1.75%.

➤ ***Valuation of the account for purposes of calculating the fee***

Option A: Fees will be determined and calculated based on the average daily balance of the account for the calendar quarter.

Option B: Fees will be determined and calculated based on the just completed quarter ending account value.

Beacon Global Advisor Aptus Wrap Program (“BGAN Aptus Wrap Program”)

Fee Breakpoint Levels	BGAN Fee	BGAN Program Fee	Maximum Total Fee
Up to \$250,000	2.10%	0.25%	2.35%
\$250,000 to \$500,000	1.35%	0.25%	1.60%
\$500,001 to \$1,000,000	1.10%	0.25%	1.35%
\$1,000,001 to \$3,000,000	0.85%	0.25%	1.10%
\$3,000,001 and above	0.35%	0.25%	0.60%

Aptus is compensated based on receipt of internal fund costs of the Aptus funds in the models. Disclosure of the costs and expenses associated with the mutual funds and exchange traded funds is contained in the prospectus. The costs of the mutual funds and exchange traded funds could be higher or lower than other securities available.

How the fee will be determined

- A quarterly fee will be calculated based on the average daily balance of each account registration under management (e.g. you have two accounts, therefore, each account is charged a fee based on the account value based on the negotiated fee schedule.
- *Fee timing.* Fees will be deducted from the account on a calendar quarterly basis in arrears.

Fee Formula Calculation

The fee formula used to calculate your quarterly BGAN advisory fee is as follows. Value of the account x percentage fee x # of days in quarter / # of days in the year

➤ *Structure of the fee*

Option A: Flat or Fixed Fee based on value each calendar quarter.

Option B: Blended Fee – Each threshold of the account value is charged the agreed upon fee for that threshold.

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

Collection of Advisory Fees

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

Additional Fees and Costs

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

The custodian offers some securities, a limited number of open ended mutual funds and exchange traded fund, at no transaction fee. However, the security positions will be subject to a holding period or the client will incur early redemption fees which could be substantial in comparison to a transaction fee.

Termination Provisions

You may terminate investment advisory services obtained from BGAN, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with BGAN. You will be responsible for any fees and charges incurred from third parties as a result of maintaining the Account such as transaction fees for any securities transactions executed and Account maintenance or custodial fees. Thereafter, you may terminate investment advisory services upon delivery to BGAN and your Advisory Representative of your written notice to terminate.

- **Fees Paid in Advance:** Should you terminate investment advisory services during calendar quarter, you will be issued a pro-rated refund of the advisory fee from the date of termination to the end of calendar quarter if fees are charged in advance.
- **Fees Paid in Arrears:** Should you terminate or transfer funds and securities out of the account prior to the end of the calendar quarter, you will be charged a prorated advisory fee for the quarter up to the date of termination. In the event you transfer the account and no funds or securities remain in the account for BGAN to deduct its advisory fee, you will be sent a fee invoice. Fee invoices must be paid within 30 days of the date of the invoice or late fees of \$15 per 30 days after the date of the invoice will be charged plus interest of 18% per annum will be assessed until the invoice is paid in full.

IRA Rollover Considerations

As part of our consulting and advisory services, we may provide you recommendations and advice concerning your employer retirement plan or other qualified retirement account. Our recommendations can include you consider withdrawing the assets from your employer's retirement plan or other qualified retirement account and roll the assets over to an individual retirement account ("IRA"). Further, we offer our management services be applied to those funds and securities rolled into an IRA or other account for which we will receive compensation. If you elect to roll the assets to an IRA that is subject to our management, we will charge you an asset-based fee as described above under Item 5. This practice presents a conflict of interest because persons providing investment advice on our behalf have an incentive to recommend a rollover to you for the purpose of generating fee-based compensation. You are under no obligation, contractually or otherwise, to complete the rollover. Furthermore, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by us.

It is important for you to understand many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of each.

An employee will typically have four options:

1. Leave the funds in your employer's (former employer's) plan.
2. Move the funds to a new employer's retirement plan.
3. Cash out and taking a taxable distribution from the plan.
4. Roll the funds into an IRA rollover account.

Each of these options has advantages and disadvantages and before making a change we encourage you to speak with your CPA and/or tax attorney.

If you are considering rolling over your retirement funds to an IRA for us to manage it is important you understand the following:

1. Determine whether the investment options in your employer's retirement plan address your needs or whether you might want to consider other types of investments.
 - a. Employer retirement plans generally have a more limited investment menu than IRAs.
 - b. Employer retirement plans may have unique investment options not available to the public such as employer securities, or previously closed funds.
2. Your current plan may have lower fees than our fees.
 - a. If you are interested in investing only in mutual funds, you should understand the cost structure of the share classes available in your employer's retirement plan and how the costs of those share classes compare with those available in an IRA.
 - b. You should understand the various products and services you might take advantage of at an IRA provider and the potential costs of those products and services.
 - c. It is likely you will not be charged a management fee and will not receive ongoing asset management services unless you elect to have such services. In the event your plan offers asset management or model management, there may be a fee associated with the services that is more or less than our asset management fee.
3. Our strategy can have higher risk than the option(s) provided to you in your plan.
4. Your current plan may offer financial advice, guidance, and/or model management or portfolio options at no additional cost.
5. If you keep your assets titled in a 401k or retirement account, you could potentially delay your required minimum distribution beyond age 70.5 (70 ½).
6. Your 401k may offer more liability protection than a rollover IRA; each state may vary.
 - a. Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies. However, there can be some exceptions to the general rules so you should consult an attorney if you are concerned about protecting your retirement plan assets from creditors.
7. You may be able to take out a loan on your 401k, but not from an IRA.

8. IRA assets can be accessed any time; however, distributions are subject to ordinary income tax and may also be subject to a 10% early distribution penalty unless they qualify for an exception such as disability, higher education expenses or the purchase of a home.
9. If you own company stock in your plan, you may be able to liquidate those shares at a lower capital gains tax rate.
10. Your plan may allow you to hire us as the manager and keep the assets titled in the plan name.

It is important that you understand the differences between these types of accounts and to decide whether a rollover is best for you. Prior to proceeding, if you have questions contact your investment adviser representative, or call our main number as listed on the cover page of this brochure.

Item 5 - Account Requirements and Types of Clients

BGAN's services are geared toward individuals both high net worth (i.e. clients with a net worth of \$2,000,000, exclusive of primary residence or has \$1,000,000 under management with BGAN) and other than high net worth. Additionally, BGAN's services are suitable for businesses, pension and profit sharing plans, and trusts. Furthermore, BGAN offers tailored advisory services involving pension transfer services to British expatriates living in the United States as further described in BGAN's Form ADV Part 2A available upon request or found on the SEC's website at www.adviserinfo.sec.gov.

The minimum account size for participation in the BGAN Aptus Wrap Program is \$50,000.

Item 6 - Portfolio Manager Selection and Evaluation

Selection and Review of Managers

Advisory Representatives licensing under BGAN go through a due diligence process with BGAN management, which includes a review of education, experience in the industry, disciplinary history, and past business production, services, and product offerings. As disclosed above, BGAN Advisory Representatives have a direct interest in the wrap fee charged since a portion of the advisory fee will be paid to the advisory representative. Furthermore, Advisory Representatives have an incentive to purchase securities with lower or no transaction fees or to trade less frequently to reduce their expenses and increase the portion of the fee retained. This is a conflict of interest. To mitigate this conflict of interest, this disclosure is provided.

You have the independence to select your Advisory Representative or portfolio manager. Should you want to change your advisory representative you may contact the Compliance Department of BGAN at 770-713-9001.

Third party managers are selected after a due diligence process which includes review of the third-party manager's Form ADV, interviews, potentially a due diligence trip to visit facilities, model account objectives, investment strategy and philosophy, expense structure, performance, time in the industry, and regulatory issues. BGAN's guideline standards include: a minimum of 5 years of

investment management experience by the managers, no significant disciplinary issues, and fees under 1%, and performance is GIPS compliant.

Performance Reviews

Advisory Representatives of BGAN are not permitted to advertise their performance. Reports produced to clients reflecting performance are provided either directly by the account custodian or by the Advisory Representative using a reporting program acceptable to BGAN.

BGAN does not validate a third-party manager's performance or conduct any testing. Neither BGAN nor a third-party reviews portfolio manager performance information. Therefore, the performance information may not be calculated on a uniform and consistent basis.

Advisory Services Offered by BGAN

The following services are more fully disclosed in BGAN's Form ADV Part 2A.

BGAN offers the following advisory services. Each of the services is more fully described below.

- Asset Management
- Financial Planning
- Retirement Consulting Services
- Analysis, Recommendation and Monitoring of Third-Party Managed Programs
- Pension Advice for United Kingdom and other Nationals Expatriates

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

Services will begin with an initial consultation and data gathering. Your Advisory Representative will ask you various questions about your financial situation and request certain documents about your financial accounts. You may be asked to complete a fact finder or data gathering document. The information gathered by BGAN will assist BGAN to provide you with the requested services and customize the services to your financial situation. Depending on the services you have requested, BGAN will gather various financial information and history from you including, but not limited to:

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

Wrap Account Verses Non-Wrap Account

It is important to refer to the disclosures above under Item 4 – Advisory Business explaining the differences between a wrap account and non-wrap account and the cost structure.

Whether you select a wrap account option or non-wrap account, the management of your account will be treated the same. The difference lies in the pricing structure. The maximum fee an Advisory Representative can charge is the same whether clients participate in a wrap program or non-wrap program. However, in a non-wrap account, any transaction fees will be charged to the client and are in addition to the advisory fee.

Performance Based Fees and Side by Side Management

BGAN does not charge performance based fees.

Methods of Analysis, Investment Strategies and Risk of Loss

Each Advisory Representative conducts their own analysis to determine the securities and asset allocations they will use in a client's portfolio. They will use a variety of resources to gather information including but not limited to newspapers, magazines, due diligence visits and interviews with vendors, product literature and prospectuses, asset allocation programs and software. Advisory Representatives conduct economic analysis to attempt to analyze and determine trends as well as fundamental analysis. Fundamental analysis generally involves looking at economic and financial factors. Additionally, they will assess a company's or security's value based on factors such as sales, assets, markets, management, products and services, earnings, and financial structure. Some Advisory representatives employ technical market analysis and technical trend following. Technical analysis generally involves studying trends and movements in a security's price, trading volume, and other market-related factors in an attempt to discern patterns.

Depending on the needs of the client and the investment philosophy of the Advisory Representative, long term, short term and active trading strategies will be utilized. Factors that may result in a change to a client's portfolio include but are not limited to, economic factors, management changes with the security, tax law changes, objective change, and news or press releases, and financial changes with the client.

BGAN emphasizes that investment returns, particularly over shorter time periods, can be highly volatile and are dependent on a wide variety of factors. Thus, our investment management services are generally suitable only for long-term investment objectives or strategies, rather than for short-term trading purposes. Neither diversification nor asset allocation assure a profit or protect you against a loss, and there is no guarantee that your investment objectives will be achieved.

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

BGAN does not represent, warrant or imply that the services or methods of analysis used by BGAN can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to major market corrections or crashes. Past performance is no indication of future

performance. No guarantees can be offered that your goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by BGAN will provide a better return than other investment strategies.

Wrap accounts primarily include the use of mutual funds, exchange traded funds, individual equities and fixed income securities, and the use of third-party manager strategies. The following are some of the primary risks associated with the securities and strategies utilized. Please do not hesitate to contact us to discuss these risks and others in more detail.

Mutual Funds: Mutual fund fees are described in the fund's prospectus, which the custodian mails directly to the client following any purchase of a mutual fund that is new to the client's account. In addition, a prospectus is available online at each mutual fund company's Web site. At the client's request at any time BGAN will direct the client to the appropriate Web page to access the prospectus. The risks with mutual funds include

- Manager Risk: which is the risk that an actively managed mutual fund's investment adviser will fail to execute the fund's stated investment strategy.
- Market Risk: which is the risk that the Stock Market will decline, decreasing the value of the securities contained within the mutual funds we recommend to you.
- Industry Risk: which is the risk that a group of stocks in a single industry will decline in price due to adverse developments in that industry, decreasing the value of mutual funds that are significantly invested in that industry.
- Inflation Risk: which is the risk that the rate of price increases in the economy deteriorates the returns associated with the mutual fund.

Exchange Traded Funds (ETFs): ETFs are professionally managed pooled vehicles that invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities or any combination thereof. ETFs trade on an auctionable market. Therefore, there is more price fluctuation with ETFs than with mutual funds since ETFs trade throughout the day, whereas mutual funds are priced once a day. Also, since most ETFs only mirror a market index, such as the S&P 500, they won't outperform the index. While ETFs generally provide diversification, risks can be significantly increased for funds concentrated in a particular sector of the market, or that primarily invest in small cap or speculative companies, use leverage (i.e. borrow money) to a significant degree, or concentrate in a particular type of security rather than balancing the fund with different types of securities.

Individual Equities: The risks with stocks is prices fluctuate throughout the day. Stocks can drop in value and become worthless. The risks with stocks are market risk and company specific risk. The price of a stock can decline due to company-specific reasons as well as the health of the overall stock market. Even dividends, which many beginning investors believe are guaranteed payments by the company, can decline or be totally eliminated. Investing in micro, small or mid-sized companies may involve risks not associated with investing in more established companies. Since equity securities of smaller companies may not be traded as often as equity securities of larger, more established companies, it may be difficult or impossible for the securities to sell.

Bonds: Investing in bonds involves the assumption of risk including:

- Interest Rate Risk: which is the risk that the value of the bond investments we recommend to you will fall if interest rates rise.

- Call Risk: which is the risk that your bond investment will be called or purchased back from you when conditions are favorable to the bond issuer and unfavorable to you.
- Default Risk: which is the risk that the bond issuer may be unable to pay you the contractual interest or principal on the bond in a timely manner or at all.
- Inflation Risk: which is the risk that the rate of price increases in the economy deteriorates the returns associated with the bond.

Please refer to the third-party service provider's Form ADV and associated disclosure documents for details on their investment strategies, methods of analysis and associated risks. The risks with utilizing third party managed programs include:

- Market and economic risk.
- The risk the third-party manager is not managing to the objective or managing based on the stated strategy.
- The risk the securities managed by the third-party manager will decline or fluctuate impacting the overall performance of the portfolio.
- The risk that the performance of the portfolio will be diminished by the fees of the third-party manager and expenses associated with the securities.

Risks

The business of investing in securities is highly competitive and the identification of attractive investment opportunities is difficult and involves a high degree of uncertainty. Varied fluctuations in the price of investments are a normal characteristic of securities markets due to a variety of influences. Managed account programs should be considered a long-term investment and thus long-term performance and performance consistency are the major goals.

Tax Risk

Income tax costs may result from the sale of individual securities within your account, unless the account is otherwise tax sheltered or tax deferred. Income tax costs directly reduce investment returns. Under the current income tax system, securities held less than one year that are sold at a gain (short term capital gains) are taxed at the client's highest marginal tax rate, and securities held greater than one year that are sold at a gain (long term capital gains) are taxed at a reduced long-term capital gains rate. Furthermore, the potential Alternative Minimum Tax (AMT) impact of long and short-term capital gains incurred in the tax year in question should be considered. Client is responsible for all tax liabilities arising from the sale of securities within the account.

International investing presents certain risks not associated with investing solely in the United States. These include, for instance, risks relating to fluctuations in the value of the U.S. dollar relative to the values of other currencies, custody arrangements made for foreign holdings, political risks, differences in accounting procedures and the lesser degree of public information required to be provided by non-U.S. companies.

Investing in emerging markets involves greater risk than investing in more established markets. Such risks include exchange rate changes, political and economic upheaval, the relative lack of information about these companies, relatively low market liquidity, and the potential lack of strict financial and accounting controls and standards.

Investing in fixed income securities involves special risks not typically associated with equity securities. These risks include credit risk, which is the risk of potential loss due to the inability to meet contractual debt obligations, and interest rate risk, which is the risk that an investment's value will change due to a change in the level of interest rates. Additionally, there is an inverse relationship between bond prices and interest rates specific to fixed income securities. As interest rates rise, bond prices fall and, conversely, as interest rates fall, bond prices rise.

Long-term purchases – Using a long-term purchase strategy generally assumes the Financial Markets will go up in the long-term which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall Financial Markets advance. Purchasing investments long-term may create an opportunity cost - “locking-up” assets that may be better utilized in the short-term in other investments.

Active Trading – frequent trading of securities; explain how frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes

Fundamental Analysis does not attempt to anticipate market movements. This represents a potential risk, as the price of a security can move up or down along with the overall market, regardless of the economic and financial factors considered in evaluating the security. The success of this strategy depends in large part on the ability to accurately assess the fundamental value of securities. An accurate assessment of fundamental value deepens on a complex analysis of a number of financial and legal factors. No assurance can be given that we can assess the nature and magnitude of all material factors having a bearing on the value of securities.

Quantitative Analysis: The risk of the analysis using mathematical and statistical modeling is that they may not accurately predict future investment patterns. Day to day changes in the market prices of investments may follow random patterns and may not be predictable with any reliable degree of accuracy.

Qualitative Analysis: The risk of analysis using more subjective criteria is that the information obtained to make the analysis may be inaccurate and skew the analysis. In addition, measuring (or weighting) the criteria will likely be inconsistent from one analysis to another and could adversely affect the investment decisions.

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

Investing in securities involves risk of loss, including the potential loss of principal. Therefore, your participation in any of the management programs offered by BGAN will require you to prepare to bear the risk of loss and fluctuating performance.

Voting Client Securities

BGAN does not vote your securities. Unless you suppress proxies, securities proxies will be sent directly to you by the account custodian or transfer agent. You may contact BGAN about questions

you may have and opinions on how to vote the proxies. However, the voting and how you vote the proxies is solely your decision.

Item 7 - Client Information Provided to Portfolio Managers

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

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

Item 8 - Client Contact with Portfolio Managers

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

If you are participating in the BGAN model portfolio options, you may contact the management team directly at any time by calling 770-713-9001 or scheduling an appointment through your Advisory Representative.

Item 9 - Additional Information

Disciplinary Information

Investment Advisers must disclose any legal or disciplinary events that would be material to your evaluation of BGAN or the integrity of our services. In May of 2009, the Financial Industry Regulatory Authority (FINRA) alleged Joseph Gruber violated NASD Rule 2110 by permitting his unregistered assistant to complete the firm element web-based continuing education session by logging into the system as him by use of his user name and password. FINRA issued an Acceptance, Waiver & Consent (AWC) and ordered a fine and suspension in all capacities for a period of three months ending August 31, 2009.

Other Financial Industry Activities and Affiliations

Certain supervised persons and Advisory Representatives are associated or dually registered as advisory representatives of BGAN and as registered representatives of a broker/dealer, Regulus Advisors, LLC. For specific information regarding whether or not your Advisory Representative maintains multiple registrations with different entities and information about the broker/dealer with which your Advisory Representative is registered please refer to your Advisory Representative's Form ADV Part 2B Item 2 and 4 disclosures. It is important to understand investment advisers have a fiduciary obligation to provide advice and services through the investment adviser that are in the best interest of the client. However, when advisory representatives act in the capacity of a registered representative, their obligation is to make recommendation and conduct transactions that are suitable to you but are not necessarily be in your best interest.

If your Advisory Representative is a registered representative with a broker/dealer, you are under no obligation to purchase or sell securities through your Advisory Representative. However, if you choose to implement the plan the individual in their capacity as a registered representative of the broker/dealer, commissions will be earned in addition to any fees paid for advisory services. Commissions may be higher or lower at your Advisory Representative's broker/dealer than at other broker/dealers. Advisory Representatives who are registered representatives have a conflict of interest in having you purchase securities and/or insurance related products through their broker/dealer in that the higher their production with their broker/dealer the greater potential for obtaining a higher pay-out on commissions earned. Additionally, it is important to understand when offering advice and services through an investment adviser, an advisory representative has a fiduciary obligation to act in your best interests. However, registered representatives providing recommendations and engaging in securities transactions through the broker/dealer only have an obligation to make suitable recommendations and such advice and recommendations would not necessarily be in your best interest.

Under the rules and regulations of the FINRA, an Advisory Representative's broker/dealer has an obligation to perform certain supervisory functions regarding certain activities engaged in by the Advisory Representatives who is also a registered representative.

Certain Advisory Representatives may be affiliated with other Investment Advisers for purposes of offering other advisory program, platforms, or services not available through BGAN. Please refer to your Advisory Representative's Form ADV Part 2B for disclosure regarding whether your Advisory Representative is associated with another investment adviser or has direct ownership in another investment adviser. Advisory Representatives could offer advisory services that are similar or different from the advisory services offered through BGAN and services may cost more or less.

BGAN has an advisory representative who is a certified public accountant ("CPA"). Tax preparation and accounting services are not offered or sponsored by BGAN. Tax preparation and accounting services are an outside business activity from BGAN and are conducted through the advisory representative's independent business, unaffiliated with BGAN. Clients are under no obligation to participate in tax or accounting services offered by any advisory representative.

Certain advisory representatives are licensed insurance agents. BGAN does not offer or sponsor insurance products or services. The insurance business engaged in by advisory representatives is an outside business activity and is unaffiliated with the services offered by BGAN. Clients are under no obligation to participate in insurance products or services offered by any advisory representative.

Advisory Representatives who are insurance licensed have a conflict of interest to recommend and offer insurance products and services to you because they will earn a commission. To mitigate this conflict of interest this disclosure is provided to you. Further, you are encouraged to seek a second opinion on any insurance recommendations.

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

BGAN attempts to mitigate the conflicts of interest with the potential receipt of commissions if recommendations are implemented by providing you with these disclosures. Further, you are encouraged to consult other professionals and may implement recommendations through other financial professionals

BGAN recommends other investment advisers (i.e. third-party managers and third-party service providers). The fees charged to clients utilizing a third-party manager recommended by BGAN are higher than if the client obtained services directly from the third-party manager since client is paying the third-party manager and BGAN for advisory services.

Code of Ethics

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

Neither BGAN nor its associated persons recommend clients buy or sell securities in which we have a material financial interest. BGAN and its associated persons buy or sell securities identical to those securities recommended to you. Therefore, BGAN and/or its associated persons have an interest or position in certain securities that are also recommended and bought or sold to you. BGAN and its associated persons will not put their interests before your interest. BGAN and its associated persons may not trade ahead of you or trade in such a way to obtain a better price for themselves than for you or other clients.

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

You have the right to decline any investment recommendation. BGAN and its associated persons are required to conduct their securities and investment advisory business in accordance with all applicable Federal and State securities regulations.

Review of Accounts

Reviews will be performed not less than at least annually or as agreed to between you and your Advisory Representative. You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. Advisory Representatives will monitor for changes or shifts in the economy, changes to the management and structure of a mutual fund or company in which your assets are invested, and market shifts and corrections.

It is important you notify your Advisory Representative promptly of any changes to your financial goals, objectives or financial situation as such changes may require a review of your portfolio allocation and potential changes.

You will be provided statements at least quarterly direct from the account custodian. Additionally, you will receive confirmations of all transactions occurring direct from the account custodian.

Brokerage Practices

BGAN does not maintain custody of your assets, although we are deemed to have custody of your assets if you give us authority to withdraw our advisory fee directly from your managed account. Additionally, BGAN will be deemed to have custody in certain situations involving standing letters of authorization and if you give us authority to transfers funds or securities between your accounts. Your assets must be maintained in an account at a qualified custodian. Generally, a qualified custodian is a broker/dealer or bank.

BGAN participates in the institutional advisor program (the “Program”) offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc. (“TD Ameritrade”), member FINRA/SIPC. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer. Additionally, BGAN has a custodial arrangement with Interactive Brokers, LLC to enable expatriates who want to rollover their retirement assets from a 401k of a previous U.S. employer to a brokerage account for asset management services. Interactive Brokers, LLC is an independent and unaffiliated SEC-registered broker-dealer.

Client Referrals and Other Compensation

Product and service vendors recommended by BGAN can provide monetary and non-monetary assistance with client events, provide educational tools and resources. BGAN does not select products as a result of any monetary or non-monetary assistance. The selection of product is first and foremost. BGAN's due diligence of a product does not take into consideration any assistance it may receive. Additionally, those Advisory Representatives who are registered representatives have incentives and benefits offered by the broker/dealer enabling them to attend certain events and have the costs covered by the broker/dealer. The qualification for events and incentives or benefits is based on overall production with the broker/dealer or tenure. This is a conflict of interest for the Advisory Representative to recommend business be directed through the broker/dealer. To mitigate this conflict of interest this disclosure is provided.

BGAN has entered into a solicitor agreement with another investment adviser to act in the capacity of a solicitor to refer certain clients to the investment adviser for advisory services and programs not offered by BGAN. As a result of referring a client to the investment adviser, BGAN will receive a portion of the advisory fee paid by the referred client. This is a conflict of interest since BGAN has a direct interest in the client engaging the investment adviser. A portion of the advisory fee received by BGAN will be paid to the BGAN Advisory Representative. Clients will be provided with a Solicitor Disclosure explaining the arrangement and the receipt of compensation and the effect on the amount of fee paid by the client as a result of BGAN sharing in a portion of the advisory fee. To mitigate this conflict of interest, BGAN is informing you of this relationship.

As stated under Item 4 above, Advisory Representatives are independent contractors. As such, the Advisory Representatives have a direct incentive in the advisory fees being charged since a portion of the advisory fee collected by BGAN will be paid to the Advisory Representative for compensation for advisory services. In other words, Advisory Representatives are not salaried, but instead, share in the fees charged to you by BGAN. Further, clients are advised that the amount paid by BGAN to the Advisory Representative will be based on the production of the Advisory Representative. Therefore, the higher sales the Advisory Representative produces the more compensation the Advisory Representative will receive. Consequently, since production is a basis for determining the Advisory Representative's payout, and since a portion of the advisory fees will be retained by BGAN, there is a conflict of interest for the Advisory Representative to charge the maximum fee as disclosed under Item 5 above.

TD Ameritrade Important Information

As disclosed under Item 12 above, Advisor participates in TD Ameritrade's institutional customer program and Advisor may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between Advisor's participation in the program and the investment advice it gives to its Clients, although Advisor 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 Advisor 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 Advisor by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by Advisor's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Advisor but may not benefit its Client accounts. These products or services may assist Advisor in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Advisor manage and further develop its business enterprise. The benefits received by Advisor 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, Advisor endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

Financial Information

BGAN will not require you to prepay more than \$1,200 and six or more months in advance of receiving the advisory service.

As stated above, BGAN has discretionary authority over client accounts; however, that authority does not extend to the withdrawal of any client assets, with the exception of deduction of BGAN's advisory fees from your accounts. We are financially stable. There is no financial condition that is likely to impair our ability to meet our contract actual commitment to you or any other client.

Neither BGAN nor any of its Advisory Representatives has ever been the subject of a bankruptcy petition.