

# Your Private Client Group, Inc. Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of Your Private Client Group, Inc. If you have any questions about the contents of this brochure, please contact us at (800) 346-0138 or by email at: [info@yourpcg.com](mailto:info@yourpcg.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 Your Private Client Group, Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Your Private Client Group, Inc.'s CRD number is: 292621.*

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

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## **Item 2: Material Changes**

Your Private Client Group, Inc. has the following material changes to report. Material changes relate to Your Private Client Group, Inc.'s policies, practices or conflicts of interests.

- Your Private Client Group, Inc. has updated contact information (cover page).
- Your Private Client Group, Inc. has updated advisory business, fees and compensation (Item 4, Item 5).
- Your Private Client Group, Inc. manages assets on a discretionary basis (Item 4, Item 16).

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## **Item 4: Advisory Business**

### **A. Description of the Advisory Firm**

Your Private Client Group, Inc. (hereinafter “YourPCG”) is a Corporation organized in the State of California. The firm was formed in January 2018, and the principal owners are Todd D'Agostino and Kenneth R. Graham.

### **B. Types of Advisory Services**

YourPCG offers the following services to advisory clients:

#### ***Portfolio Management Services***

YourPCG offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. YourPCG creates an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels) Portfolio management services include, but are not limited to, the following:

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

YourPCG evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

YourPCG seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of YourPCG’s economic, investment or other financial interests. To meet its fiduciary obligations, YourPCG attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and, accordingly, YourPCG’s policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is YourPCG’s policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent[, including initial public offerings (“IPOs”) and other investment opportunities] that might have a limited supply, among its clients on a fair and equitable basis over time.

#### ***Selection of Other Advisers***

YourPCG may direct clients to third-party investment advisers. Before selecting other advisers for clients, YourPCG will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where YourPCG is recommending the adviser to clients.

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

YourPCG generally limits its investment advice to mutual funds, fixed income securities and ETFs. YourPCG may use other securities as well to help diversify a portfolio when applicable.

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

YourPCG offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client's current situation (income, tax levels, and risk tolerance levels). 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 wherein the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. YourPCG does not participate in any wrap fee programs.

### **E. Assets Under Management**

YourPCG has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$ 406,189,661.00	\$0.00	December 2018

## **Item 5: Fees and Compensation**

### **A. Fee Schedule**

#### *Portfolio Management Services Fees*

#### *Fixed Income Tiered Schedule*

Total Assets	Annual Fee
First \$500,000	0.50%
Next \$500,000	0.50%

Total Assets	Annual Fee
Next \$4,000,000	0.25%
Over \$5,000,000	0.15%

### ***Equities Tiered Schedule***

Total Assets	Annual Fee
First \$500,000	1.00%
Next \$500,000	0.80%
Next \$4,000,000	0.50%
Over \$5,000,000	0.30%

These fees are negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Lower fees for comparable services may be available from other sources. The balance in the client's account on the last day of the prior billing period is used to determine the market value of the assets upon which the advisory fee is based.

Clients may terminate the agreement without penalty, for full refund of YourPCG's fees, within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract with thirty days' written notice.

### ***Selection of Other Advisers Fees***

YourPCG may direct clients to third-party investment advisers. YourPCG will receive its standard fee on top of the fee paid to the third party adviser. The fees shared are negotiable and will not exceed any limit imposed by any regulatory agency. The notice of termination requirement and payment of fees for third-party investment advisers will depend on the specific third-party adviser selected. YourPCG will direct client to AssetMark.

## **B. Payment of Fees**

### ***Payment of Portfolio Management Fees***

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

### ***Payment of Selection of Other Advisers Fees***

Fees for selection of AssetMark as third-party adviser are withdrawn by AssetMark directly from client accounts. YourPCG then receives its portion of the fees from AssetMark; YourPCG does not directly deduct the advisory fees. Fees are collected in advance.

### **C. Client Responsibility For Third Party Fees**

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

### **D. Prepayment of Fees**

For all asset based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate\* times the number of days elapsed in the billing period up to and including the day of termination. (\*The daily rate is calculated by dividing the annual asset-based fee by 365.)

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

Neither YourPCG nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

YourPCG 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**

YourPCG generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals

There is an account minimum of \$100,000, which may be waived by YourPC at its discretion.

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



## A. Methods of Analysis and Investment Strategies

### *Methods of Analysis*

YourPCG's methods of analysis include Cyclical analysis, Fundamental analysis, Modern portfolio theory and Quantitative analysis.

**Cyclical analysis** involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

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

**Modern portfolio theory** is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

**Quantitative analysis** deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

### *Investment Strategies*

YourPCG uses long term trading.

**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*

**Cyclical analysis** assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

**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.

**Modern portfolio theory** assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected

returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

**Quantitative analysis** Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

### *Investment Strategies*

**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 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.

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

### **C. Risks of Specific Securities Utilized**

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked 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. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance.

**Past performance is not indicative of future results. 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 actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

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

There are no self-regulatory organization proceedings to report.

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

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

Neither YourPCG nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

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

Neither YourPCG nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

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

Neither YourPCG nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

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

YourPCG may direct clients to third-party investment advisers. YourPCG will be compensated via a fee share from the advisers to which it directs those clients. The fees shared will not exceed any limit imposed by any regulatory agency. This creates a conflict of interest in that YourPCG has an incentive to direct clients to the third-party investment advisers that provide YourPCG with a larger fee split. YourPCG will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. YourPCG will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where YourPCG is recommending the adviser to clients.

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

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

YourPCG has 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. YourPCG's Code of Ethics is available free upon request to any client or prospective client.

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

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

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

From time to time, representatives of YourPCG may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of YourPCG 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. YourPCG will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage 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 YourPCG may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of YourPCG 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; however, YourPCG will never engage in trading that operates to the client's disadvantage if representatives of YourPCG buy or sell securities at or around the same time as clients.

### **Item 12: Brokerage Practices**

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

YourPCG does not trade client's accounts. However, YourPCG will recommend AssetMark to clients.

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

YourPCG does not trade client's accounts and therefore receives no research, product, or services from a broker-dealer ("soft dollar benefits").

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

YourPCG 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***

YourPCG does not trade client's accounts or recommend broker/custodians, and therefore does not direct brokerage.

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

YourPCG does not trade clients' accounts and therefore does not have the ability to block trade purchases across accounts.

## **Item 13: Review of Accounts**

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

All client accounts for YourPCG's advisory services provided on an ongoing basis are reviewed at least Annually by Todd D'Agostino, President & CCO, with regard to clients' respective investment policies and risk tolerance levels. All accounts at YourPCG are assigned to this reviewer.

### **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 of YourPCG's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report 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)**

YourPCG receives compensation from third-party advisers to which it directs clients.

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

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

## **Item 15: Custody**

YourPCG does not take custody of client accounts at any time. Custody of client's accounts is held primarily at the client's custodian. Clients will receive account statements from the custodian and should carefully review those statements for accuracy.

## **Item 16: Investment Discretion**

YourPCG provides discretionary and non-discretionary investment advisory services to clients. The Investment Advisory Contract established with each client outlines the discretionary authority for trading. Where investment discretion has been granted, YourPCG generally manages the client's account and makes investment decisions without consultation with the client as to what securities to buy or sell, when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, or the price per share.

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

YourPCG 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**

YourPCG neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

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

Neither YourPCG nor its management has any financial condition that is likely to reasonably impair YourPCG's ability to meet contractual commitments to clients.

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

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