

Item 1 – Cover Page
FORM ADV PART 2A

**Alpha Omega Group, Inc.
DBA
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March 2018

This brochure provides information about the qualifications and business practices of Alpha Omega Group, Inc. dba AOG Wealth Management. If you have any questions about the contents of this Brochure, please contact us at (703)757-8020 and/or info@aogwealth.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 Alpha Omega Group, Inc. dba AOG Wealth Management also is available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Alpha Omega Group, Inc. dba AOG Wealth Management is 159026.

Any references to Alpha Omega Group, Inc. dba AOG Wealth Management 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

January 2018

Updated assets under management under Item 4.E.

January 31, 2017	\$106,305,000 discretionary	\$81,171,000 non-discretionary
January 11, 2018	\$117,707,000 discretionary	\$94,899,000 non-discretionary

Item 4 – Inserted an updated model allocation chart.

Item 5 Added the following disclosure und asset management services: AOG excludes any assets in these breakpoint aggregates that are not billable assets, such as investments custodied at TD but not managed by AOG or investments where a one-time, up-front commission has previously been paid to AOG.

Item 8.C – Updated risk disclosure.

Item 10 – Disclosed Alpha Omega Group, Inc. maintains an insurance agents license and advisory representatives are licensed insurance agents and offer insurance products for a commission which is considered a conflict of interest.

Item 12 – Fidelity is no longer recommended as a custodian.

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.

The material changes discussed above are only those changes that have been made to this brochure since the firm's last annual update of the brochure. The date of the last annual update of the brochure was March 2018.

In the past, we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any 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 Frederick Baerenz at (703)757-8020 and/or info@aogwealth.com. Additional information about AOG Wealth Management is also available via the SEC's website www.adviserinfo.sec.gov. The website also provides information about any persons affiliated with AOG Wealth Management who are registered, or are required to be registered, as investment adviser representatives of AOG Wealth Management.

Item 3 - **TABLE OF CONTENTS**

Item 1 – COVER PAGE.....	Cover Page
Item 2 - MATERIAL CHANGES	2
Item 3 - TABLE OF CONTENTS	3
Item 4 - ADVISORY BUSINESS	4
AOG Wealth Management Program	4
Financial Planning Services.....	5
General Information	6
IRA Rollover Considerations.....	6
Item 5 - FEES AND COMPENSATION	8
AOG Wealth Management Program	8
Financial Planning Services.....	10
Item 6 - PERFORMANCE-BASED FEES AND SIDE BY SIDE MANAGEMENT	11
Item 7 - TYPES OF CLIENTS	11
Item 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS	11
Item 9 - DISCIPLINARY INFORMATION	14
Item 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS	14
Item 11 - CODE OF ETHICS, PARTICIPATION OF INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING	15
Item 12 - BROKERAGE PRACTICES	16
Item 13 - REVIEW OF ACCOUNTS	17
Item 14 - CLIENT REFERRALS AND OTHER COMPENSATION	18
Item 15 - CUSTODY	19
Item 16 - INVESTMENT DISCRETION	19
Item 17 - VOTING CLIENT SECURITIES	20
Item 18 - FINANCIAL INFORMATION	20
Item 19 - REQUIREMENTS FOR STATE REGISTERED ADVISERS	20
Part 2B – BROCHURE SUPPLEMENTS	

Item 4 - ADVISORY BUSINESS

Alpha Omega Group, Inc. dba AOG Wealth Management (hereinafter referred to as “AOG”) is an investment advisory firm offering a variety of advisory services customized to your individual needs.

- A. AOG was established in May 2000 and filed for investment adviser registration in 2011. AOG majority owned by the Frederick Peter Baerenz Revocable Trust with Frederick P. Baerenz as trustee. Additionally, Frederick P. Baerenz is the President of AOG.
- B. AOG offers the following advisory services. Each of the services is more fully described below.
 - Asset Management Program referred to as the AOG Wealth Management Program
 - Financial Planning

AOG Wealth Management Program

Upon AOG completing its analysis of your existing portfolio and goals, AOG will determine an asset allocation customized to your financial goals, objectives and risk tolerance.

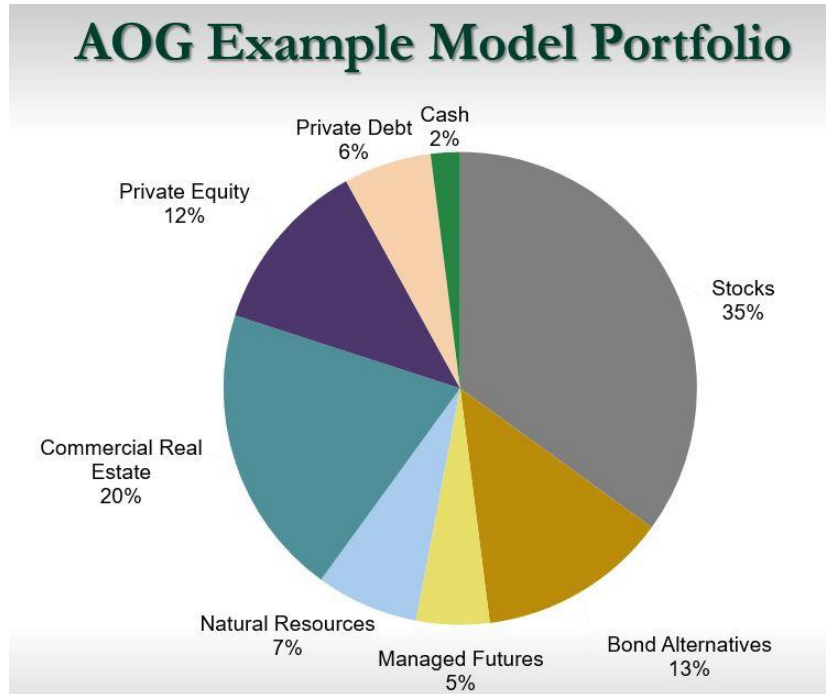
AOG will meet with you and present the recommended portfolio allocation. Upon your approval, AOG will implement the portfolio allocation. AOG will provide continuous and ongoing management of your account. Unless otherwise expressly requested by you, AOG will manage the account on a discretionary basis and make changes to the allocation as deemed appropriate by AOG. AOG will determine the securities to be purchased and sold in the account and will alter the securities holdings from time to time, without prior consultation. AOG may actively trade securities and hold such holdings for periods of 30 days or less or maintain positions for longer or shorter term periods. Discretionary authority will be granted by you to AOG by execution of the Asset Management agreement.

If you elect to have your accounts managed on a nondiscretionary basis, no changes will be made to the allocation of your account without prior consultation with you and your expressed agreement. However, AOG will periodically rebalance your account to maintain the initially agreed upon asset allocation. AOG does not deem rebalancing as a form of discretion.

AOG uses a modified endowment model portfolio allocation. Portfolios will be allocated across several asset classes and using several different investment vehicles. Portfolios will follow a model similar to the following and will be adjusted for each client based on the individual's goals, objectives and risk tolerance. Additionally, portfolios will be adjusted based on the economic environment at the time of investment.

Unless otherwise requested and documented, AOG will take all assets (including assets held outside of AOG's management) into consideration when balancing Investor's portfolio with the model selected through the Risk Tolerance Questionnaires and stated in the Investment Policy Statement. The Client's investments specifically managed by AOG Wealth

Management may make up only a portion of their entire investable net worth. AOG does not assume responsibility for the management of, or advice on assets held outside of our firm's custody. We will make our recommendations based on information provided by Clients and will request regular updates from them regarding their outside accounts.



The endowment model seeks higher investment returns over long periods of time on a more consistent basis by allocating to public and non-public, relatively illiquid markets. Typically fixed income allocations are minimized in favor of market neutral income options. In addition, long-only equity allocations are supplemented with private equity, venture capital and real asset investments.

Transactions in the account, account reallocations and rebalancing may trigger a taxable event, with the exception of IRA accounts, 403(b) accounts, 401(k) accounts, and other qualified retirement accounts.

Financial Planning Services

AOG assist you in working toward your financial goals.

Plans are based on your financial situation at the time and on financial information disclosed by you to AOG. Certain assumptions may be made with respect to interest and inflation rates and use of past trends and performance of the market and economy. However, past performance is in no way an indication of future performance. AOG cannot offer any guarantees or promises that your financial goals and objectives will be met. Further, you must continue to review the plan and update the plan based upon changes in your financial situation, goals, or objectives or changes in the economy. If your financial situation or investment goals

or objectives change, you must notify AOG promptly of the changes. You are advised that the advice offered by AOG may be limited and is not meant to be comprehensive. Therefore, you may need to seek the services of other professionals such as an insurance adviser, attorney and/or accountant.

You are not obligated to implement advice through AOG or their Advisory Representatives. If you implement the plan with AOG's Advisory Representatives commissions or other compensation may be received in addition to the advisory fee paid to AOG.

General Information

The investment recommendations and advice offered by AOG 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 AOG promptly with respect to any changes in your financial situation and investment goals and objectives. Failure to notify AOG of any such changes could result in investment recommendations that do not completely address your needs.

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 may 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 your behalf have an incentive to recommend a rollover to you for the purpose of generating fee based compensation rather than solely based on your needs. 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 may 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.

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.

- C. AOG 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.

AOG will meet with you and conduct an interview and data gathering session to compile information about you, your financial goals and objectives, and your financial concerns. You should expect at least two to three meetings during the due diligence, data gathering and analysis process. The information gathered by AOG will enable your advisors to provide you with the requested services that are customized to your financial situation. Depending on the services you have requested, AOG will gather various financial information and history from you including, but not limited to:

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

- D. AOG does not offer a wrap fee program. Clients will pay AOG an advisory fee as further described in Item 5 below and pay transaction charges to the broker/dealer through which transactions are executed.
- E. As of January 11, 2018, we have approximately \$117,707,000 of client assets under our discretionary management and approximately \$94,899,000 of non-discretionary client assets under management.

Item 5 - FEES AND COMPENSATION

AOG Wealth Management Program

- A. 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.

Additional assets deposited into the Account after it is opened will not be charged a pro-rata fee based upon the number of days remaining in the then current calendar month. Similarly, partial withdrawals from the account will not result in a prorated portion of the fee being

calculated on the withdrawal. No fee adjustments will be made for Account appreciation or depreciation.

Account Size	Annual Fee
First \$1,000,000	1.25%
Next \$4,000,000	1.00%
\$5,000,000 and above	0.80%

AOG aggregates or households all of your managed accounts together to determine your quarterly fee.

For example, if you have four managed accounts with a value as of the just completed calendar month of: \$1,001,569.40, \$550,498.46, \$675,879.50, and \$740,301.12 with a total value of \$2,968,248.48, fees will be calculated as follows.

First \$1,000,000 x 1.25%	\$12,500.00
Next 1,968,248.48 x 1%	<u>\$19,682.48</u>
Annual Fee	\$32,182.48 / 365 x number of days in the month = Monthly Fee

AOG excludes any assets in these breakpoint aggregates that are not billable assets, such as investments custodied at TD but not managed by AOG or investments where a one-time, up-front commission has previously been paid to AOG.

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

- B. Advisory fees will generally be collected directly from your account, provided you have given AOG written authorization. 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, AOG 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 AOG, except for ERISA and IRA accounts.
- C. In addition to the advisory fees above, you will pay for transaction charges on each transaction conducted in the managed account, custodial services, account maintenance fees, and other fees associated with maintaining the Account. Such fees are not charged by AOG and are charged by the product, broker/dealer or account custodian. AOG does not share in any portion of such fees. Additionally, you may 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 they purchase. Such advisory fees are not shared with AOG and are compensation to the fund-manager.
- D. Advisory fees are charged in arrears of each calendar month. The monthly advisory fee will be based on the value of the Account on the last business day of the just completed calendar month. Fees for partial periods will be prorated. The initial monthly fee will be a pro-rated portion of the fee based on the number of days remaining in the calendar month.

- E. You are advised Advisory Representatives of AOG are dually registered representatives of Kalos Capital, Inc. (“Kalos Capital”), a registered broker/dealer, member of the Financial Industry Regulatory Authority (FINRA) and SIPC. Advisory Representatives of AOG who are Registered Representatives may receive trail commissions (i.e. 12b-1 fees) for a period of time as a result of directing securities transactions through Kalos Capital. Load and no-load mutual funds may pay annual distribution charges, sometimes referred to as 12b-1 fees. 12b-1 fees come from fund assets, therefore, indirectly from your assets. 12b-1 fees may be initially paid to Kalos Capital and a portion passed to the Advisory Representatives. The receipt of such fees could represent an incentive for the Advisory Representatives to recommend funds with 12b-1 fees over funds that have no fees or lower fees. As a result, there is a potential conflict of interest.

As stated above, AOG recommends mutual funds that pay 12b-1 fees and no-load funds.

You may purchase the securities recommended by AOG directly or through other brokers or agents not affiliated with AOG.

Termination Provisions

You may terminate investment advisory services obtained from AOG, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with AOG. 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 with 30-days written notice to AOG. Should you terminate investment advisory services during a calendar quarter, you will be charged a pro-rated portion of the advisory fee for the quarter up to the date of termination.

Financial Planning Services

You are advised that fees for planning services are strictly for planning services. Therefore, you may pay fees and/or commissions for additional services obtained such as asset management or products purchased such as securities or insurance.

Fees are negotiable. Your fees will be dependent on several factors including time spent with AOG, number of meetings, complexity of your situation, amount of research, services requested and staff resources.

Fee Type	Maximum Fee	Payable
Fixed Fee	\$3,000	Payable one-half (1/2) upon execution of the advisory agreement with AOG and the balance due at the time of presentation of the plan, unless otherwise negotiated with you.
Hourly Fee	\$300 per hour	An estimated quote will be provided prior to executing an agreement with AOG. One-half (1/2) of the estimated fee is due upon execution of the advisory agreement and the balance due at the time of presentation, unless otherwise negotiated.

Termination Provisions

You may terminate advisory services obtained from AOG, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with AOG. Thereafter, you may terminate investment advisory services with 30-days written notice to AOG. You will be responsible for any time spent by AOG.

Item 6 - PERFORMANCE-BASED FEES AND SIDE BY SIDE MANAGEMENT

This section is not applicable to AOG since AOG does not charge performance based fees.

Item 7 - TYPES OF CLIENTS

AOG's services are focused on high net worth individuals (i.e. clients with a net worth of \$2,000,000), high net worth corporations or other business.

Item 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

- A. AOG conducts economic analysis and attempts to analyze and determine macroeconomic trends. Additionally, AOG conducts fundamental and technical analysis. Fundamental analysis generally involves assessing a company's or security's value based on factors such as sales, assets, markets, management, products and services, earnings, and financial structure. 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.
- B. You are advised investing in securities involves risk of loss, including the potential loss of principal. Therefore, your participation in any of the management programs offered by AOG will require you to be prepared to bear the risk of loss and fluctuating performance.

AOG does not represent, warrant or imply that the services or methods of analysis used by AOG 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 AOG will provide a better return than other investment strategies.

- C. As stated above under Item 4, AOG allocates managed portfolios across several different asset classes and investment vehicles. The following is a summary of the risks associated with the various investment vehicles used by AOG:

Endowment Model Risks include:

- Tax Risk
- Liquidity Risk
- Market Risk
- Interest Rate Risk
- Credit Risk
- Higher cost/fees

There are material differences between the terms under which endowments and individuals can invest in alternative investments. These differences include, but are not limited to commissions and fees, conflicts of interest, access to investment opportunities, size, investment time horizons, and the ability to tolerate illiquidity. There is no standard or exact definition of the endowment model. Portfolio design, specific investments and ultimately performance vary considerably among endowments and investors. AOG Wealth Management does not claim that any investor will achieve the same result as any endowment, institution, or other investor. AOG Wealth Management Investment Advisor Representatives may have a conflict of interest when they recommend securities where they earn a commission as Registered Representatives of Kalos Capital. We address this conflict by disclosing the fees and commissions related to the investments recommended to our clients. Also, Kalos representatives and AOG Wealth Management Investment Advisor Representatives do not earn both advisory fees and brokerage commissions on the same assets. The endowment model may incorporate asset classes and/or individual investments that are illiquid (less than quarterly liquidity) and contain speculative elements and therefore may not be suitable for investors with short-term liquidity needs or low tolerance of risk in their portfolios. There may be assets included in the endowment model that charge a higher fee or have higher administrative costs than other, traditional asset types. The additional cost of these funds could impact the long-term profitability of these funds.

The risks with mutual funds, variable annuities, ETFs, and unit investment trusts 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.

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 AOG will direct the client to the appropriate Web page to access the prospectus.

ETF Risks Include:

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.

Alternative Investments risks include:

- **Liquidity Risk:** For many of the private, non-traded alternative investments, there is no readily available market for liquidation, and therefore generally illiquid. If a market is available, the market is a limited secondary market. Investments that offer daily, quarterly or annual repurchases by the investment company are often limited to a total repurchase of 5% of the total outstanding shares during each repurchase period. Therefore, investors are not guaranteed liquidity of their shares at full market price
- **Valuation:** Since there are little or no public markets for alternative investments, the valuation is provided through third-party valuations at the request or requirement of the investment company. These valuations are provided to us and to clients via statements. The valuation may not be a complete or accurate picture of what an investor could reasonably sell the investment for on a secondary market.
- **Time Horizon:** Many alternative investments have a stated investment time horizon of 5-8 years. Due to the longer time horizon and lack of liquidity, these investments may not be suitable for investors with a short investment time horizon or significant short-term liquidity needs.
- **Speculation risk:** Some of the alternative investments contain speculative elements and are at risk of complete loss.

A detailed prospectus is provided for each recommended alternative investment. The prospectus provides details regarding the fees charged by the fund including acquisition fees, management fees, distribution fees, and advisor compensation.

Stock and Bond Risks Include:

The risks with stocks and bonds are that their prices fluctuate throughout the day. Stocks can drop in value and become worthless. The risks with bonds are interest rate, inflation and credit risk. Credit risk is the risk that the bond issuer will be unable to make its payments on time or at all, effectively defaulting on the bonds. 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.

These are some of the primary risks associated with the way we recommend investments to you, please do not hesitate to contact us to discuss these risks and others in more detail. We will discuss each individual client's risk tolerance, liquidity needs, and ability to withstand capital losses in their portfolios, prior to making any recommendations.

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

Item 9 - DISCIPLINARY INFORMATION

There is no reportable disciplinary information required for AOG or its management persons that is material to your evaluation of AOG, its business or its management persons.

Item 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

- A. As previously stated, Advisory Representatives are dually registered as advisory representatives of AOG and as registered representatives of Kalos Capital. You are under no obligation to purchase or sell securities through your Advisory Representative. However, if you choose to implement the plan, commissions may be earned in addition to any fees paid for advisory services. Commissions may be higher or lower at Kalos Capital than at other broker/dealers. Advisory Representatives may have a conflict of interest in having you purchase securities and/or insurance related products through Kalos Capital in that the higher their production with Kalos Capital the greater potential for obtaining a higher pay-out on commissions earned.

Under the rules and regulations of FINRA, Kalos Capital has an obligation to perform certain supervisory functions regarding certain activities engaged in by advisory representatives who are also registered representatives of Kalos Capital. For such supervisory functions, AOG may pay Kalos Capital a portion of the advisory fees they receive. Kalos Capital and AOG are not affiliated.

- B. AOG maintains an insurance agents license and Advisory Representatives of AOG are insurance licensed and offer insurance products and services for which compensation will be received. Clients are under no obligation to purchase insurance products and services through the individuals. There is a conflict of interest of recommend insurance products and services because of the receipt of compensation. To mitigate this conflict of interest, this disclosure has been provided.

AOG 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, AOG 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, other investment adviser or financial planner; futures commission merchant or commodity pool operator; banking or thrift institution; accountant or accounting firm; lawyer or law firm;

pension consultant; real estate broker or dealer; or sponsor or syndicator of a limited partnership.

AOG 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, AOG 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, other investment adviser or financial planner; futures commission merchant or commodity pool operator; banking or thrift institution; accountant or accounting firm; lawyer or law firm; insurance company or agency; pension consultant; real estate broker or dealer; or sponsor or syndicator of a limited partnership.

Item 11 - CODE OF ETHICS, PARTICIPATION OF INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Code Of Ethics

- A. AOG has a fiduciary duty to act in your best interest and always place your interests first and foremost. AOG takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as AOG's policies and procedures. Further, AOG 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 AOG's Privacy Policy. As such, AOG 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, AOG's Code of Ethics establishes AOG's expectation for business conduct. A copy of our Code of Ethics will be provided to you upon request.
- B. Neither AOG nor its associated persons recommends to clients or buys or sells for client accounts any securities in which we have a material financial interest.
- C. AOG and its associated persons may buy or sell securities identical to those securities recommended to you. Therefore, AOG and/or its associated persons may have an interest or position in certain securities that are also recommended and bought or sold to you. AOG and its associated persons will not put their interests before your interest. AOG 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.
- D. AOG 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.

Item 12 - BROKERAGE PRACTICES

As previously stated, Advisory Representatives are registered representatives of Kalos Capital. As a result they are subject to FINRA Conduct Rule 3040 which may restrict them from conducting securities transactions away from Kalos Capital unless Kalos Capital provides them with written authorization. Advisory Representatives have obtained approval to offer you the ability to maintain accounts through Kalos Capital at its clearing firm or through

- AOG participates in the institutional advisor program (the “Program”) offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC/NFA (“TD Ameritrade”), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. AOG receives some benefits from TD Ameritrade through its participation in the Program.

AOG is independently owned and operated and not affiliated with Kalos Capital or any of the above referenced firms.

You are advised that not all investment advisers require you to maintain accounts at a specific broker/dealer. You are advised you may maintain accounts at another broker/dealer. However, the services provided by AOG will be limited to only advice and will not include implementation, with the exception of accounts through Kalos Capital, LLC or TD Ameritrade. If you select another brokerage firm for custodial and/or brokerage services you will not be able to receive asset management services from AOG.

In initially selecting Kalos Capital, AOG conducted due diligence. AOG’s evaluation and criteria includes:

- Ability to service you
- Financial strength
- Industry reputation
- Ability to report to you and to AOG
- Availability of an efficient trading platform
- Products and services available
- Technology resources
- Educational resources
- Execution capability
- Financial responsibility and viability
- Confidentiality and security of your information
- Responsiveness
- Other factors that may bear on the overall evaluation of best price and execution

You are advised there is an incentive for AOG and the Advisory Representatives to recommend a broker/dealer over another based on the products and services that will be received rather than your best interest.

Due to the individual management of client accounts, we do not aggregate the purchase or sale of securities for various client accounts.

TD Ameritrade

Please see the disclosure under Item 14. below.

Kalos Capital

Kalos Capital has a wide range of approved securities products for which Kalos Capital performs due diligence prior to selection. Kalos Capital' registered representatives are required to adhere to these products when implementing securities transactions through Kalos Capital. Commissions charged for these products may be higher or lower than commissions you may be able to obtain if transactions were implemented through another broker/dealer. Kalos Capital also provides Advisory Representatives, and therefore the AOG, with back-office operational, technology, and other administrative support. Other services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. Such services are intended to help Advisory Representatives and AOG manage and further develop its business enterprise.

Kalos Capital and its clearing broker/dealer, National Financial Services, also make available to AOG other products and services that benefit AOG but may not directly benefit you. Some of these other products and services assist AOG with managing and administering your accounts. These include software and other technology that provide access to your account data (such as trade confirmation and account statements); facilitate trade execution; provide research, pricing information and other market data; facilitate payment of AOG's fees from your accounts; and assist with back-office functions; recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of AOG 's accounts, including accounts not held through Kalos Capital.

Item 13 - REVIEW OF ACCOUNTS

- A. If you are participating in the AOG Wealth Management Program you will be invited to participate in at least an annual review. You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. Your Advisory Representative 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.

If you are participating in Financial Planning Services you will not receive regular reviews. AOG recommends you have at least an annual review and update to any plans. However, the time and frequency of the reviews is solely your decision. Additionally, you will be charged review fees based on the fee schedule disclosed under the program. Other than the initial plan or analysis, there will be no other reports issued.

The following individuals conduct reviews:

Frederick P. Baerenz, President and Asset Manager
James T. Ortlip, Asset Manager

Michelle Whitlock

- B. You are advised that you must notify your Advisory Representative promptly of any changes to your financial goals, objectives or financial situation as such changes may require him review the portfolio allocation and make recommendations for changes.
- C. 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. AOG will provide you a quarterly report reflecting your managed account allocation and its performance. You should compare the report with statements received direct from the account custodian. Should there be any discrepancy the account custodian's report will prevail.

Item 14 - CLIENT REFERRALS AND OTHER COMPENSATION

- A. Product vendors recommended by AOG may provide monetary and non-monetary assistance with client events, provide educational tools and resources, and reimbursement for travel costs for due diligence and educational meetings. AOG does not select products solely as a result of any monetary or non-monetary assistance. The selection of product is first and foremost. AOG's due diligence of a product does not take into consideration any assistance it may receive.

TD Ameritrade provides AOG with certain brokerage and research products and services that qualify as "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934 ("Exchange Act").

As disclosed under Item 12. above, AOG participates in TD Ameritrade's institutional customer program and AOG may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between AOG's participation in the program and the investment advice it gives to its Clients, although AOG 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 AOG 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 AOG by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by AOG's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit AOG but may not benefit its Client accounts. These products or services may assist AOG in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made

available by TD Ameritrade are intended to help AOG manage and further develop its business enterprise. The benefits received by AOG 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, AOG endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by AOG or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the AOG's choice of TD Ameritrade for custody and brokerage services.

Additionally, Kalos Capital offers incentives to attend certain conferences based on achieving production thresholds. There is no requirement to sell a certain product or amount of a specific product. Qualification for trips and conferences is based on overall production and meeting the production levels determined by Kalos Capital. If the thresholds are satisfied, Kalos Capital can cover certain travel and conference costs.

- B. AOG does not directly or indirectly compensate any person who is not a supervised person of AOG for referrals. Further, AOG does not receive an economic benefit from a non-client for providing investment advice or advisory services to you.

Item 15 - CUSTODY

With the exception of deduction of AOG's advisory fees from your accounts, AOG does not take custody of your funds or securities.

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct your account custodian to deduct our advisory fees directly from your account or if you grant us authority to move your money to another person's account. Your account custodian maintains actual custody of your assets. You will receive account statements directly from your account custodian at least quarterly. They will be sent to the email or postal mailing address you provided. You should carefully review those statements promptly when you receive them.

Item 16 - INVESTMENT DISCRETION

You may grant AOG authorization to manage your account on a discretionary basis. Discretionary authority will give AOG the authority to buy, sell, exchange and convert securities in your managed accounts. You will grant such authority to AOG by execution of the advisory agreement. You may terminate discretionary authorization at any time upon receipt of written notice by AOG.

Additionally, you are advised that:

- 1) You may set parameters with respect to when account should be rebalanced and set trading restrictions or limitations;
- 2) Your written consent is required to establish any mutual fund, variable annuity, or brokerage account;
- 3) AOG requires the use of the broker/dealer with which your Advisory Representative is registered for sales in commissionable mutual funds or variable annuities, if you elect to

- implement recommendations through your Advisory Representative;
- 4) With the exception of deduction of AOG's advisory fees from the account, if you have authorized automatic deductions, AOG will not have the ability to withdraw your funds or securities from the account.

Item 17 - VOTING CLIENT SECURITIES

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

Item 18 - FINANCIAL INFORMATION

- A. AOG will not require you to prepay more than \$1,200 and six or more months in advance of receiving the advisory service.
- B. As stated above, AOG 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 AOG'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.
- C. Neither AOG nor any of its Advisory Representatives has ever been the subject of a bankruptcy petition.

Item 19 - REQUIREMENTS FOR STATE REGISTERED ADVISERS

This section is not applicable to AOG. AOG is not state registered. AOG is registered with the Securities and Exchange Commission.