



## **Form ADV Part 2A – Disclosure Brochure**

**Effective: March 20, 2022**

This Form ADV 2A ("Disclosure Brochure") provides information about the qualifications and business practices of RPg Family Wealth Advisory, LLC ("FWA" or the "Advisor"). If you have any questions about the contents of this Disclosure Brochure, please contact the Advisor at (888) 285-8600.

FWA is a Registered Investment Advisor with the U.S. Securities and Exchange Commission ("SEC"). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about FWA to assist you in determining whether to retain the Advisor.

Additional information about FWA and its Advisory Persons is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 158528.

**RPg Family Wealth Advisory, LLC**  
25 Burlington Mall Rd, Suite 404, Burlington, MA 01803  
Phone: (888) 285-8600 | Fax: (781) 273-0333  
[www.rpgfamilywealthadvisory.com](http://www.rpgfamilywealthadvisory.com)

## Item 2 – Material Changes

---

Form ADV 2 is divided into two parts: *Part 2A (the “Disclosure Brochure”)* and *Part 2B (the “Brochure Supplement”)*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor’s business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of FWA. For convenience, the Advisor has combined these documents into a single disclosure document.

FWA believes that communication and transparency are the foundation of its relationship and continually strive to provide you with the most complete and accurate information at all times. FWA encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

### Material Changes

The following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

- Robert McCauley has replaced Brandon Lamb as Chief Compliance Officer, effective March 18, 2022.
- The Advisor has moved its primary office location to Suite 404 at the same address.

### Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs in the business practices of FWA.

At any time, you may view the current Disclosure Brochure on-line at the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor’s firm name or CRD# 158528. You may also request a copy of this Disclosure Brochure at any time, by contacting the Advisor at (888) 285-8600.

## Item 3 – Table of Contents

---

<b>Item 1 – Cover Page .....</b>	<b>1</b>
<b>Item 2 – Material Changes .....</b>	<b>2</b>
<b>Item 3 – Table of Contents .....</b>	<b>3</b>
<b>Item 4 – Advisory Services .....</b>	<b>4</b>
A. Firm Information .....	4
B. Advisory Services Offered .....	4
C. Client Account Management .....	6
D. Wrap Fee Programs .....	7
E. Assets Under Management .....	7
<b>Item 5 – Fees and Compensation .....</b>	<b>7</b>
A. Types of Fees for Advisory Services .....	7
B. Billing and Payment of Fees .....	8
C. Other Fees and Expenses .....	8
D. Advance Payment of Fees and Termination .....	9
E. Compensation for Sales of Securities .....	9
<b>Item 6 – Performance-Based Fees .....</b>	<b>9</b>
<b>Item 7 – Types of Clients .....</b>	<b>10</b>
<b>Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss .....</b>	<b>10</b>
A. Methods of Analysis .....	10
B. Risk of Loss .....	10
<b>Item 9 – Disciplinary Information .....</b>	<b>12</b>
<b>Item 10 – Other Financial Activities and Affiliations .....</b>	<b>12</b>
<b>Item 11 – Code of Ethics and Personal Trading .....</b>	<b>13</b>
A. Code of Ethics .....	13
B. Personal Trading with Material Interest .....	13
C. Personal Trading in Same Securities as Clients .....	13
D. Personal Trading at Same Time as Client .....	13
<b>Item 12 – Brokerage Practices .....</b>	<b>13</b>
A. Recommendation of Custodian[s] .....	13
B. Aggregating and Allocating Trades .....	14
C. Cross Trades .....	14
<b>Item 13 – Review of Accounts .....</b>	<b>14</b>
A. Frequency of Reviews .....	14
B. Causes for Reviews .....	14
C. Review Reports .....	15
<b>Item 14 – Client Referrals and Other Compensation .....</b>	<b>15</b>
A. Compensation Received by FWA .....	15
B. Client Referrals from Solicitors .....	16
<b>Item 15 – Custody .....</b>	<b>16</b>
<b>Item 16 – Investment Discretion .....</b>	<b>16</b>
<b>Item 17 – Voting Client Securities .....</b>	<b>17</b>
<b>Item 18 – Financial Information .....</b>	<b>17</b>
<b>Privacy Policy .....</b>	<b>18</b>
<b>Form ADV Part 2B – Brochure Supplements .....</b>	<b>20</b>

## Item 4 – Advisory Services

---

### A. Firm Information

RPg Family Wealth Advisory, LLC (“FWA” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). FWA was founded in 2011 as a wholly-owned subsidiary of Risk Paradigm Group Holdings, LLC, a privately held limited liability company (“LLC”) that is organized under the laws of the State of Delaware. David C. Gatti (Chief Executive Officer, Chief Investment Officer) is the principal officer of FWA.

This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by FWA. Within FWA there is a team of Supervised Persons that are also known as TEG Advisors of RPg Family Wealth Advisory. Please contact Robert McCauley, FWA’s Chief Compliance Officer (“CCO”), with any questions regarding this Disclosure Brochure. Mr. McCauley can be reached at (781) 916-8176 or via email at [compliance@riskparadigmgroup.com](mailto:compliance@riskparadigmgroup.com).

### B. Advisory Services Offered

FWA provides customized wealth advisory services to individuals, high net worth individuals, trusts, estates, charities, businesses, and retirement plans (each referred to as a “Client”).

FWA’s primary mission is to understand Clients’ challenges and objectives, and to formulate comprehensive wealth management strategies that meet their individual needs. The Advisor adheres to the highest fiduciary standards, as demonstrated by always putting Clients’ interests first and continuously striving to act in the best interest of our Clients.

FWA serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. FWA’s fiduciary commitment is further described in the Advisor’s Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

#### Wealth Management Services

FWA provides Clients with wealth management services, which generally includes a broad range of comprehensive financial planning and consulting strategies as well as discretionary and non-discretionary management of investment portfolios.

This is achieved through a combination of (i) continuous personal Client contact and interaction, (ii) planning/consulting expertise utilized for the benefit of the Client, (iii) providing discretionary investment management services within Client accounts, and (iv) utilizing third party investment managers to achieve Client objectives. FWA works with each Client to identify their comprehensive goals as well as risk tolerance and financial situation in order initiate a strategy for supporting the Client.

*Financial Planning and Consulting Services* – FWA provides its Clients with comprehensive financial planning and consulting services either as a component of its wealth management services or pursuant to a financial planning or consulting agreement. Services are offered in several areas of a Client’s financial situation, depending on their goals, objectives and financial situation. FWA may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client’s financial situation, observations, and recommendations.

*Investment Management Services* – FWA will then construct a portfolio to meet the specific objectives of each Client. Portfolios are customized to the needs of each Client, but are typically constructed with a combination of individual equity securities, individual fixed income securities, mutual funds, exchange-traded funds (“ETFs”) and limited partnerships. Limited partnerships may include hedge funds, private investment pools and other limited partnerships that are appropriate to achieve the goals of the Client. The Advisor may also utilize other securities types, as appropriate, to meet the needs of Clients.

FWA may periodically deliver investment management services through an affiliated investment manager, Risk Paradigm Group, LLC (“RPg Asset Management” or “RPgAM”). In this capacity, RPgAM will serve as a sub-

advisor to FWA to conduct “Managed Accounts” activities for FWA and will administer investment management services through the individual Client accounts. For more information pertaining to this affiliation or potential conflicts, please see Item 10 of this Disclosure Brochure.

FWA’s investment approach is primarily long-term outcome focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to the acceptance by the Advisor.

FWA evaluates and selects securities, strategies, managers, funds, or models for inclusion in Client portfolios only after applying their internal due diligence process. FWA may recommend, on occasion, redistributing investment allocations to diversify the portfolio. FWA may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. FWA may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

At no time will FWA accept or maintain custody of a Client’s funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the terms of the investment advisory agreement, please see Item 12 – Brokerage Practices.

*Retirement Accounts* – When the Advisor provides investment advice to Clients regarding ERISA retirement accounts or individual retirement accounts (“IRAs”), the Advisor is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act (“ERISA”) and/or the Internal Revenue Code (“IRC”), as applicable, which are laws governing retirement accounts. When deemed to be in the Client’s best interest, the Advisor will provide investment advice to a Client regarding a distribution from an ERISA retirement account or to roll over the assets to an IRA, or recommend a similar transaction including rollovers from one ERISA sponsored Plan to another, one IRA to another IRA, or from one type of account to another account (e.g. commission-based account to fee-based account). Such a recommendation creates a conflict of interest if the Advisor will earn a new (or increase its current) advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by the Advisor.

*Selection of Third Party Investment Managers* – As part of its comprehensive wealth management services, FWA may periodically recommend and refer Clients to a third-party investment manager or investment advisor (referred to herein as the “Third Party Manager”) at FWA’s discretion or Client’s request. In this scenario, the Client will then either (i) enter into a separate agreement with that Third Party Manager for services or (ii) utilize an existing contracted sub-advisory relationship between that Third Party Manager and FWA (the “Sub-advisory Agreement”) for the services that Third Party Manager will provide to the Client, most commonly the administration of a proprietary investment strategy by the respective Third Party Manager. In consideration for such services, the Third Party Manager will receive a fee, billed based on the fee schedule established in the Sub-advisory agreement. Whenever an existing contracted sub-advisory relationship with a Third Party Manager is utilized, the Client will be requested to acknowledge the services provided by the Third Party Manager and the associated fees in writing. As noted above, FWA will, when appropriate for the Client, utilize our affiliate Risk Paradigm Group, LLC (“RPgAM”) as the Third Party Manager. FWA has a contracted sub-advisory relationship with RPgAM. Use of RPgAM presents a conflict of interest. Please see item 10 below for more information.

The Client, prior to entering into an agreement with a Third Party Manager, will be provided with the Third Party Manager’s Form ADV 2A (or a brochure that makes the appropriate disclosures).

*Managed Account Programs* – As part of its comprehensive wealth management services, FWA may recommend to Clients that all or a portion of their portfolio be implemented by utilizing one or more Third Party Managers participating in a Managed Accounts program (a “Program”) through the Client’s selected Custodian or another independent platform (the “Program Sponsor”). The Client will then enter into a Program and investment advisory agreement with the Program Sponsor. FWA will assist and advise the Client in establishing investment objectives for the account[s], the investment offerings within the Program, and defining any restrictions on the account.

FWA will continue to provide oversight of the Client's account[s] and ongoing monitoring of the activities through the Program.

In consideration for such services, the Program Sponsor will charge a Program fee that includes the investment advisory fee of any Third Party Managers, the administration of the Program and trading, clearance and settlement costs. The Program Sponsor will add FWA's investment advisory fee (described below in Item 5) and will deduct the overall fee from the Client account, generally at the start of each calendar quarter. The asset-based Program fee is tiered and varies depending on the size of the account[s], the asset class of the underlying securities and the Third Party Managers selected by the Client. The overall fee (including the Advisor's investment advisory fee as described in Item 5) will generally not exceed 3% annually.

**FWA does not receive any compensation from these Programs or the Program Sponsor, other than FWA's investment advisory fee as described in Item 5.**

The Client, prior to entering into an agreement with a Program Sponsor, will be provided with the Program Sponsor's Form ADV Part 2A (or a brochure that makes the appropriate disclosures). In addition, FWA and its Client will agree in writing that that selected Program Sponsor will manage the Client's account[s] on a discretionary basis.

#### Retirement Plan Advisory Services

FWA provides retirement plan advisory services on behalf of the retirement plans (each a "Plan") and the company (the "Plan Sponsor"). The Advisor's retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan and its Plan Participants. Each engagement is customized to the needs of the Plan and Plan Sponsor. Services generally include:

- Vendor Analysis
- Plan Participant Enrollment and Education Tracking
- Investment Policy Statement ("IPS") Design and Monitoring
- Investment Oversight Services (ERISA 3(21))
- Performance Reporting
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance

These services are provided by FWA serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of FWA's fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

#### **C. Client Account Management**

Prior to engaging FWA to provide wealth management services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authorities and responsibilities of the Advisor and the Client. These services may include:

- Wealth Planning – FWA provides comprehensive advice and guidance relating to the financial goals of its Clients.
- Establishing a Documented Financial Plan or Investment Policy Statement – FWA, in conjunction with the Client, will develop a strategy that seeks to achieve the Client's goals and objectives.
- Asset Allocation – FWA will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and risk tolerance for each Client.
- Portfolio Construction – FWA will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Advisory and Supervision – FWA will provide investment advisory and ongoing oversight of the Client's investment portfolio.



## **D. Wrap Fee Programs**

FWA does not manage or place Client assets into a wrap fee program.

## **E. Assets Under Management**

As of December 31, 2021, FWA manages \$421,471,827 in Client assets, \$410,963,712 of which are managed on a discretionary basis and \$10,508,115 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

## **Item 5 – Fees and Compensation**

---

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into one or more agreements with the Advisor.

### **A. Types of Fees for Advisory Services**

#### Financial Planning and Consulting Services

FWA offers financial planning and consulting services either on an hourly basis or for a fixed fee. Hourly fees range up to \$500 per hour. Fixed fees are offered based on the expected effort and duration at the Advisor's hourly rate. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. An estimate for total hours and/or total costs will be provided to the Client prior to engaging for these services.

#### Investment Advisory Services

Investment advisory fees are paid either monthly or quarterly and charged in advance pursuant to the terms of the FWA investment advisory agreement (herein the "Billing Period"). Fees are based on the last market value, as reported by the custodian or third-party administrator, of assets under management at the end of the prior Billing Period. Investment advisory fees generally range from 0.25% to 1.50%. Fees are negotiated depending on the size and complexity of the Client relationship and/ or other factors. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged higher fees. Certain Clients may have a fee schedule that differs from above.

The investment advisory fee in the first Billing Period of service is prorated from the inception date of the Client's account[s] to the end of the first Billing Period. Fees may be negotiable at the sole discretion of the Advisor. The Client's Fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by FWA will be independently valued by the Custodian. FWA does not have the authority to value portfolio securities. Certain Clients may be offered an alternate fee schedule pursuant to the terms of an FWA investment advisory agreement.

Client may be able to obtain similar services from other service providers for a lower fee.

The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees, and other related costs and expenses described in Item 5.C below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

#### Third Party Investment Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio utilizing one or more Independent Managers. To eliminate any conflict of interest, the Advisor does not earn any compensation from an Independent Manager. The Advisor will only earn its investment advisory fee as described above. Independent Managers typically do not offer any fee discounts but may have a breakpoint schedule which will reduce the fee with an increased level of assets placed under management with an Independent Manager. The terms of such fee arrangements are included in the Independent Manager's disclosure brochure and applicable contract[s] with the Independent Manager. The total blended fee, including the Advisor's fee and the Independent Manager's fee, will generally not exceed 2.25% annually.

#### Managed Account Programs

Fees charged by Managed Account Programs are pursuant to the terms, conditions, and fee schedule included in a separate Program agreement entered into between the Client and the Program Sponsor.

#### Retirement Plan Advisory Services

Fees for retirement plan advisory services are charged an annual asset-based fee of up to 0.75% determined pursuant to the terms, conditions and fee schedule included in the retirement plan advisory agreement.

### **B. Billing and Payment of Fees**

#### Financial Planning and Consulting Services

Financial planning and consulting fees are invoiced by the Advisor and are due upon receipt. The Advisor charges the financial planning fee in advance of services as long as such services are to be completed in less than six months.

#### Investment Advisory Services

Investment advisory fees will be calculated by the Advisor, or its delegate, and deducted from the Client's account[s] at the Custodian. The Advisor, or its delegate, shall instruct the Custodian at the beginning of the respective billing period indicating the amount of the fees to be deducted from the Client's account[s]. The amount due is calculated by applying the pro rata daily rate (annual rate divided by the number of days in the current calendar year, respectively) to the total assets under management with FWA at the end of the previous billing period. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting advisory fees to be deducted by FWA, or its delegate, directly from their accounts held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

#### Third Party Investment Managers

For Client accounts implemented through an Independent Manager, the Client's overall fees may include FWA's investment advisory fee (as noted above) plus investment management fees and/or platform fees charged by the Independent Manager[s], as applicable. In certain instances, the Independent Manager or the Advisor may assume responsibility for calculating the Client's fees and deduct all fees from the Client's account[s].

#### Managed Account Programs

Fees charged by Managed Account Programs are pursuant to the terms, conditions, and fee schedule included in a separate Program agreement entered into between the Client and the Program Sponsor. In general, Managed Account Program billing will coincide with the investment advisory fee billing practices.

#### Retirement Plan Advisory Services

Retirement plan advisory fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

### **C. Other Fees and Expenses**

Clients may also incur certain fees or charges imposed by third parties, other than FWA, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian, as applicable. The Advisor's current Custodian(s) do not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements, which are subject to change. However, the Custodians typically charges for mutual funds and other types of investments. The investment advisory fee charged by FWA is separate and distinct from these custody and execution fees.

All fees paid to FWA for investment advisory services are separate and distinct from the expenses charged by mutual funds, ETFs, options and limited partnerships to their shareholders, if applicable. Limited partnerships may include hedge funds, private investment pools and other limited partnerships. These fees and expenses are described in each fund's prospectus, limited partnership agreement, contract, or other applicable offering documents. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of FWA, but would not receive the services provided by FWA which are designed, among other things, to assist the Client in determining which



products or services are most appropriate to each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by FWA to fully understand the total fees to be paid. Please refer to Item 12- Brokerage Practices for additional information.

#### **D. Advance Payment of Fees and Termination**

##### Financial Planning and Consulting Services

FWA is compensated for its financial planning and consulting services at the start of the engagement. Either party may terminate the financial planning agreement, at any time, by providing written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. Upon termination, the Client shall be billed for actual hours logged on the planning project times the agreed upon hourly rate or the percentage completion for a fixed fee engagement. Any unearned, prepaid fees will be promptly refunded. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

##### Investment Advisory Services

FWA is compensated for its services in advance of the billing period in which investment advisory services are rendered. Either party may terminate the investment advisory agreement with FWA, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. Upon termination, the Client shall be responsible for investment advisory fees up to and including the effective date of termination and the Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the billing period. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

##### Third Party Investment Managers and Managed Account Programs

In the event that the Advisor has determined that an Independent Manager is no longer in the Client's best interest or a Client should wish to terminate their relationship with an unaffiliated investment advisor, the terms for termination will be set forth in the respective agreements between the Client and those third parties. FWA will assist the Client with the termination and transition as appropriate.

##### Retirement Plan Advisory Services

FWA is compensated for its retirement plan advisory services either in advance or in arrears, pursuant to the terms of the retirement plan advisory agreement. Either party may request to terminate their services with FWA, at any time, by providing advance written notice to the other party. The Client shall be responsible for retirement plan advisory fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's retirement plan advisory agreement with the Advisor is non-transferable without the Client's prior consent.

#### **E. Compensation for Sales of Securities**

FWA does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Certain Advisory Persons are also licensed as independent insurance professionals. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to Clients. Insurance commissions earned by these persons are separate and in addition to advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of the Advisor who are insurance agents have an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on Client needs. However, the Clients is under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm. Please see Item 10 – Other Financial Industry Activities and Affiliations.

### **Item 6 – Performance-Based Fees**

---

FWA does not charge performance-based fees for its investment advisory services. The fees charged by FWA are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

FWA does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

## **Item 7 – Types of Clients**

---

FWA offers investment advisory services to individuals, high net worth individuals, trusts, estates, charities, businesses, and retirement plans. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. FWA generally does not impose a minimum size for establishing a relationship.

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

---

### **A. Methods of Analysis**

FWA primarily employs both fundamental and technical analysis methods in developing investment strategies for its Clients. Research and analysis from FWA are derived from numerous sources, including financial media companies, third party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

*Fundamental analysis* utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

*Technical analysis* involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that FWA will be able to accurately predict such a reoccurrence.

As noted above, FWA generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. FWA will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, FWA may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

### **B. Risk of Loss**

Investing in securities and other financial instruments involves the risk of loss that Clients should be prepared to bear. Those risks can vary based on the nature and characteristics of the relevant investment approach and the specific securities and other financial instruments held. FWA will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the

analysis of a Client's account[s]. The Advisor shall rely on financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the information provided. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their risk tolerance as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment approach:

#### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

#### ETF Risks

The performance of an ETF is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

#### Mutual Fund Risks

The performance of a mutual fund is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

#### Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

#### Short Sales

A short sale involves the sale of a security that the Client does not own in the hope of purchasing the same security at a later date at a lower price. To make delivery to the buyer, the Client must borrow the security and is obligated to return the security to the lender, which is accomplished by a later purchase of the security. The Client realizes a profit or a loss as a result of a short sale if the price of the security decreases or increases respectively between the date of the short sale and the date on which the Client covers its short position, i.e., purchases the security to replace the borrowed security. A short sale involves the theoretically unlimited risk of an increase in the market price of the security that would result in a theoretically unlimited loss.

#### Inverse and Leveraged ETFs

Inverse ETFs seek to deliver the opposite of the performance of the index or benchmark they track. Like traditional ETFs, some leveraged and inverse ETFs track broad indices, some are sector-specific, and others are linked to commodities, currencies, or some other benchmark. Inverse ETFs often are marketed as a way for investors to profit from, or at least hedge their exposure to, downward moving markets.

#### Alternative Investments (Limited Partnerships)

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. Such investments often have concentrated positions and may carry higher risks. An investor could lose all or a portion of their investment. Client should only have a portion of their assets in these investments.

When considering alternative investments, including hedge funds, Clients should consider various risks including the fact that some alternative investment products: often engage in leveraging and other speculative investment practices that may increase the risk of investment loss, can be illiquid, are not required to provide periodic pricing or valuation information to investors, may involve complex tax structures and delays in distributing important tax

information, are not subject to the same regulatory requirements as other registered products, can charge high fees, and in many cases the underlying investments are not transparent and are known only to the investment manager.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

## **Item 9 – Disciplinary Information**

---

**There are no legal, regulatory or disciplinary events to disclose.** FWA values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor and its Advisory Persons are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 158528.

## **Item 10 – Other Financial Activities and Affiliations**

---

### Risk Paradigm Group Holdings, LLC

FWA is a wholly-owned subsidiary of Risk Paradigm Group Holdings, LLC ("RPg Holdings"), a Delaware limited liability holding company. Risk Paradigm Group Holdings, LLC is a privately held partnership consisting of eight partners, one of whom actively participate in the business. Risk Paradigm Group Holdings, LLC is also the parent to Risk Paradigm Group, LLC ("RPgAM"), an affiliated registered investment advisor organized under the laws of the State of Texas. Certain Advisory Persons of FWA are also Advisory Persons of RPgAM. RPgAM may also serve as a Third Party Manager for Client accounts. Please see Item 4 above.

The affiliation between Risk Paradigm Group Holdings, RPgAM, and FWA presents certain conflicts of interest and financial risks in that the revenues and expenses of the firms are comingled in addition to having shared clients.

### Risk Paradigm Group, LLC (RPgAM)

FWA also utilizes its affiliated registered investment advisor, RPgAM, for sub-advisory services, including but not limited to, the administration of investment Strategies on behalf of Client accounts. RPgAM is an investment management firm specializing in the design, delivery, and management of tactical investment strategies that primarily use ETFs for their underlying holdings. These strategies are commonly referred to as "Managed ETF Strategies" or "Tactical ETF Strategies" and are powered by policy based and/or quantitatively driven methodologies (the "Model Methodology[ies] or "Model[s]"). **Please note that RPgAM manages assets for many End Clients of FWA. These clients pay separate fees to RPgAM and FWA for the management and advisory services provided by each firm respectively.** Certain Advisory Persons of FWA are also Advisory Persons of RPgAM.

### RPg Insurance Solutions

Certain Advisory Persons of FWA are also representatives of RPg Insurance Solutions. FWA also utilizes RPg Insurance Solutions for insurance solutions for clients. RPg Insurance Solutions helps individuals, families and businesses find all lines of insurance solutions including Life, Group Health, Long-Term Care and Disability Benefits. The recommendation that a Client purchase an insurance product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than based on a particular Client's need. Advisory Persons will receive separate fees from RPg Insurance Solutions. Clients are under no obligation to implement any recommendations made by the Advisory Persons or the Advisor and are reminded that they remain free to purchase insurance products through other insurance agencies.

### Additional Lending Relationships

RPg Holdings has received capitalization through both debt and equity investments from certain family, friends, and Clients of FWA, one of whom is a partner in RPg Holdings. RPg Holdings has also received capitalization from retail lenders.

Neither FWA, nor any of its Supervised Persons, are registered (except as stated below), or have an application pending to register as a broker-dealer, futures commission merchant, commodity trading advisor ("CTA") or an associated person (or registered representative) of the foregoing entities.

## **Item 11 – Code of Ethics and Personal Trading**

---

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

FWA has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with FWA ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to the Client. FWA and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of FWA Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (888) 285-8600 or via email at [compliance@riskparadigmgroup.com](mailto:compliance@riskparadigmgroup.com).

### **B. Personal Trading with Material Interest**

FWA allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. FWA does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. FWA does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in Same Securities as Clients**

FWA allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of FWA have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by FWA requiring personal securities trades by its employees to be reviewed by the Chief Compliance Officer ("CCO"). The Advisor also adopted written policies and procedures to detect the misuse of material, non-public information.

### **D. Personal Trading at Same Time as Client**

While FWA allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterward. **At no time will FWA, or any Supervised Person of FWA, transact in any security to the detriment of any Client.**

## **Item 12 – Brokerage Practices**

---

### **A. Recommendation of Custodian[s]**

FWA does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize FWA to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, FWA does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where FWA does not exercise discretion over the selection of the Custodian, it may often recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using the custodian not recommended by FWA. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. FWA may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Advisor and Client, its reputation, and/or the location of the Custodian's offices.



The Advisor will generally recommend that Clients utilize the brokerage and clearing services of Fidelity Clearing & Custody Solutions and related entities of Fidelity Investments, Inc. (collectively "Fidelity"), Pershing Advisor Solutions LLC, a wholly owned subsidiary of The Bank of New York Mellon ("Pershing"), and/or Charles Schwab & Co, Inc. ("Schwab"). Fidelity, Pershing and Schwab are FINRA-registered broker-dealers and members SIPC (collectively the "Custodians"). The Custodians will serve as the Client's "qualified custodians". FWA maintains an institutional relationship with the Custodians whereby the Advisor receives economic benefits from the Custodians. Please see Item 14 below.

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **FWA does not participate in soft dollar programs sponsored or offered by any broker-dealer-custodian. However, FWA does receive certain benefits in connection with its institutional relationships with the Custodians. Please see Item 14 below.**

**2. Brokerage Referrals** - FWA does not receive any compensation from any third party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where FWA will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client assets are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account). Under certain circumstances, FWA may engage in securities cross-trades (i.e., purchase of a security into one Client account from another Client's account[s]). Please refer to item (C) below for FWA practices concerning securities cross trades. FWA will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

#### **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Unless otherwise instructed by the Client, FWA will execute its transactions through the Custodian, as authorized by the Client.

FWA may aggregate orders in a block trade or trades when securities are purchased or sold through the same Custodian for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

#### **C. Cross Trades**

Under certain circumstances, FWA may engage in securities cross-trades, whereby a Client account that is selling a particular security may be advantageous to the account(s) of one or more other Clients. In such instances, FWA will only engage in a cross trade that is in the best interests of each Client and will never engage in any transaction that favors one Client over another. FWA does not serve in the capacity as broker or agent in such transactions and does not receive any commission or compensation (aside from its investment advisory fees).

### **Item 13 – Review of Accounts**

---

#### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by Advisory Persons of FWA and periodically by the CCO. Formal reviews are generally conducted by Advisory Persons of FWA at least annually or more frequently depending on the needs of the Client.

#### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13, each Client account shall generally be reviewed at least annually. Accounts may be reviewed as a result of major changes in economic conditions, known changes



in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify FWA if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

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

---

### **A. Compensation Received by FWA**

FWA does not typically receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. FWA may refer Clients to various unaffiliated, non-advisory professionals (e.g., attorneys, accountants, estate planners, insurance agents) to provide certain financial services necessary to meet the goals of its Clients. Likewise, FWA may receive non-compensated referrals of new Clients from various third-parties.

#### Risk Paradigm Holdings, LLC

As noted in Item 10, certain Advisory Persons of FWA are also affiliated with Risk Paradigm Holdings, LLC and Risk Paradigm Group, LLC. These relationships will often result in the Advisory Persons receiving additional compensation. Please see the ADV 2B – Brochure Supplements included with this Disclosure Brochure for details.

#### RPg Insurance Solutions

As noted in Item 10, certain Advisory Persons of FWA are also affiliated with RPg Insurance Solutions. These relationships will often result in the Advisory Persons receiving additional compensation. Please see the ADV2B – Brochure Supplements included with this Disclosure Brochure for details.

#### Participation in Institutional Advisor Platform – Fidelity, Pershing

The Advisor has established an institutional relationship with Fidelity and Pershing to assist the Advisor in managing Client account[s]. Access to the Custodian's Institutional platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at the Custodians. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Additionally, the Advisor may receive the following benefits from the Custodians: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

#### Participation in Institutional Advisor Platform – Schwab

FWA has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like FWA. As a registered investment advisor participating on the Schwab Advisor Services platform, FWA receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

*Services that Benefit the Client* – Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client’s funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

*Services that May Indirectly Benefit the Client* – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

*Services that May Only Benefit the Advisor* – Schwab also offers other services to FWA that may not benefit the Client, including: educational conferences and events, financial start-up support, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a potential conflict of interest. FWA believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

#### **B. Client Referrals from Solicitors**

FWA may enter into referral agreements with third party advisors under which FWA pays a fee to a third party for client referrals as permitted by Rule 206(4)-3 of the Investment Advisers Act of 1940, as amended (the “Advisers Act”). FWA may pay the third party a percentage of the revenue generated from the assets of Clients introduced to FWA by the third party. Clients referred to FWA will never be charged a higher investment advisory fee than other clients to cover the third party’s fee percentage.

### **Item 15 – Custody**

---

FWA does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor’s fees. All Clients must place their assets with a “qualified custodian”. Clients are required to engage the Custodian to retain their funds and securities and direct FWA to utilize that Custodian for the Client’s security transactions. FWA encourages Clients to review statements provided by the Custodian. FWA, however, will seek to safeguard client assets against unauthorized access by maintaining access controls around the systems used by trading and other FWA personnel to ensure that trades are authorized. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client’s instructions.

### **Item 16 – Investment Discretion**

---

FWA generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by FWA. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client’s execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by FWA will be in accordance with each Client’s investment objectives and goals. For non-discretionary accounts, FWA must obtain approval by the Client, either verbally or in writing, prior to the execution of any purchases or sales of securities.

## **Item 17 – Voting Client Securities**

---

FWA does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

## **Item 18 – Financial Information**

---

As noted in Section 4.A Firm Information and Item 10 – Other Financial Activities and Affiliations, FWA is a wholly-owned subsidiary of Risk Paradigm Group Holdings, LLC (“RPg Holdings”). RPg Holdings also owns Risk Paradigm Group, LLC. (“RPgAM”). RPg Holdings has received material capitalization through both debt and equity investments from certain family, friends and Clients of FWA and RPgAM.

FWA is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not require prepayment of fees for services to be performed six months or more in advance. Neither FWA, nor any of its Advisory Persons, has been subject to a bankruptcy.

## Privacy Policy

---

### Overview

RPg Family Wealth Advisory, LLC ("FWA") is committed to safeguarding the use of your personal information that is obtained during the normal course of business. FWA's policy is to protect the security and confidentiality of personal information and ensure that such information is used for proper business purposes in connection with the management or servicing of your account. FWA's relationship with you is our most important asset and we understand that you have entrusted FWA with your private information, and will do everything we can to maintain that trust. This Privacy Policy has been adopted to promote the protection of client non-public information.

FWA respects the privacy of its clients and acts to meet the expectations of its clients in this regard. FWA does not sell your non-public personal information to anyone. Nor does FWA provide such information to others except for discrete and proper business purposes in connection with the servicing and management of accounts as discussed below.

Details of FWA's approach to privacy and how your personal non-public information is collected and used are set forth in this privacy policy.

### Information FWA Collects

FWA typically receives personal information when you complete the paperwork required to become a Client. Your information may include:

• Name and address	• Assets
• E-mail address[es]	• Income
• Phone number[s]	• Account balance
• Social security or taxpayer identification number	• Investment activity
	• Accounts at other institutions

In addition, FWA may collect non-public information about you from the following sources:

- Information FWA receives on Brokerage Agreements, Managed Account Agreements and other Subscription and Account Opening Documents;
- Information FWA receives in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires;
- Information about your transactions with FWA or others

### Information FWA May Disclose

FWA works to provide products and services that benefit our customers. FWA typically does not share non-public client information with non-affiliated third parties (such as brokers and custodians) other than as necessary for FWA to provide agreed services and products to you consistent with applicable law. For example, FWA may disclose non-public personal information to other financial institutions with whom there are joint business arrangements for proper business purposes in connection with the management or servicing of your account. In addition, your non-public personal information may also be disclosed to you, persons FWA believes to be your authorized agent or representative, regulators in order to satisfy FWA's regulatory obligations, and as otherwise required or permitted by law. Lastly, FWA may disclose your non-public personal information to companies FWA hires to help administrate our business. Companies hired to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. FWA limits their use of your personal information to the performance of the specific service(s) that are requested.

**To repeat, FWA does not sell your non-public personal information to anyone.**

### Information About Former Clients

FWA does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer clients.

### Confidentiality and Security

FWA Supervised Persons understand the requirement to respect the confidentiality of customers' non-public personal information and FWA periodically trains and educates Supervised Persons in the handling and safeguarding of personal information in accordance with applicable laws, rules, and regulations. Additionally, FWA maintains physical, procedural and electronic safeguards in an effort to ensure the security and confidentiality of customer records and to

protect the information from access by unauthorized parties. Employees who violate these policies are subject to disciplinary action, up to and including termination.

FWA understands the need to provide a secure environment for physical and electronic non-public client information. In addition to building security provided by building management, FWA has various controls in place to protect the security of the firm's offices. Administrators monitor visitors to the office and are trained on procedures for handling unauthorized individuals.

FWA regularly assesses its ability to protect the firm's network against unauthorized access to its electronic data by outside parties, and has systems designed to prevent intrusions. Systems are monitored and any potential security breaches are reviewed immediately and resolved on a high priority basis. Appropriate planning to address cybersecurity and a quick response capability may assist FWA in mitigating the impact of any such cyber-attacks and any related effects on clients.

FWA's vendor websites utilized for reporting account information to FWA clients have security features designed to protect against unauthorized access to client information. FWA will perform assessments of the contract provisions and confidentiality and privacy policies of the service provider(s) to determine if appropriate safeguards for protecting customer information accessible to the provider are in place.

The CCO will annually test the information safeguards to ensure that they remain effective. The CCO will also attempt to annually identify reasonably foreseeable risks to information security and assess the effectiveness of existing safeguards for controlling these risks.

#### Delivery of Privacy Policy

FWA will provide clients an initial privacy policy notice at the time the relationship is established and will also provide customers with an annual notice that accurately reflects the privacy policies and practices. Periodically, FWA may revise the privacy policy and will provide you with a revised policy if the changes materially alter the previous privacy policy. FWA will not, however, revise the privacy policy to permit the sharing of non-public personal information other than as described in this notice unless you are first notified and provided with an opportunity to prevent the information sharing. You may obtain a copy of the current privacy policy by contacting FWA at (888) 285-8600.

**Dated:** March 20, 2022



**Form ADV Part 2B – Brochure Supplement**

**for**

**David M. Gatti**  
**Chief Executive Officer, Chief Investment Officer**  
**Founding Partner**

**Effective: March 20, 2022**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of David M. Gatti (CRD# 2415422) in addition to the information contained in the RPg Family Wealth Advisory, LLC (“FWA” or the “Advisor” CRD #158528) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or FWA’s Disclosure Brochure, please contact the Advisor at (888) 285-8600.

Additional information about David M. Gatti is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2415422.

**RPg Family Wealth Advisory, LLC**  
25 Burlington Mall Rd, Suite 404, Burlington, MA 01803  
Phone: (888) 285-8600 | Fax: (781) 273-0333  
[www.rpgfamilywealthadvisory.com](http://www.rpgfamilywealthadvisory.com)



## Item 2 – Educational Background and Business Experience

The Chief Executive Officer and Chief Investment Officer of RPg Family Wealth Advisory, LLC is David M. Gatti. A Founding Partner of the firm, Mr. Gatti is dedicated to serving the Clients of FWA. Mr. Gatti earned a B.S. in Business Administration from University of Massachusetts at Lowell in 1992. Additional information regarding Mr. Gatti's employment history is included below.

### Employment History:

Chief Executive Officer and Founding Partner, Risk Paradigm Group Holdings, LLC	09/2011 to Present
Chief Executive Officer, Chief Investment Officer and Founding Partner, RPg Family Wealth Advisory, LLC	09/2011 to Present
Chief Executive Officer, Chief Investment Officer and Founding Partner, Risk Paradigm Group, LLC	09/2011 to Present
Registered Representative, Race Rock Capital LLC	09/2013 to 12/2014
Senior Investment Management Specialist (Registered Representative), Morgan Stanley Smith Barney	01/1996 to 09/2011
Financial Advisor (Registered Representative), Citigroup Global Markets Inc.	06/1994 to 01/1996

## Item 3 – Disciplinary Information

Securities laws require an advisor to disclose any instances where the advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

Mr. Gatti's U4 includes two events to disclose that were lodged against Morgan Stanley Smith Barney or predecessor entities (collectively "MSSB") by former clients of MSSB and Mr. Gatti as a registered representative of MSSB. The disputes did not include Mr. Gatti as a named party and MSSB settled both disputes prior to any formal hearings, which had been commenced as arbitration proceedings and had referenced conduct by Mr. Gatti. As these matters were lodged against MSSB and did not include Mr. Gatti as a party, all settlement proceeds were paid by MSSB with no monetary contribution from or findings of wrongdoing by Mr. Gatti.

You may independently view the background of Mr. Gatti on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2415422.

## Item 4 – Other Business Activities

### Risk Paradigm Group Holdings, LLC

Mr. Gatti also serves as the Chief Executive Officer of Risk Paradigm Group Holdings, LLC, the parent to FWA and related entities. In addition, Mr. Gatti is the Chief Investment Officer of Risk Paradigm Group, LLC. In his role as the Chief Investment Officer, Mr. Gatti is responsible for overseeing the investment policy and asset management services provided by Risk Paradigm Group, LLC.

### Insurance Agency Affiliation

Mr. Gatti is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from one's role with FWA. As an insurance professional, Mr. Gatti receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Gatti is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Gatti or the Advisor.

### RPg Insurance Solutions

Mr. Gatti also serves as the CEO of RPg Insurance Solutions and is responsible for providing suitable insurance products to clients. Clients are reminded that they remain free to purchase insurance products through other insurance agencies.

## **Item 5 – Additional Compensation**

---

### Risk Paradigm Group Holdings, LLC

Mr. Gatti is also a Founding Partner and the CEO of Risk Paradigm Group Holdings, LLC, the parent to FWA. Mr. Gatti receives compensation through Risk Paradigm Group Holdings, LLC for his role with FWA and its affiliated entities.

### RPg Insurance Solutions

In his role as CEO of RPg Insurance Solutions, Mr. Gatti also receives compensation for recommending certain insurance products to clients.

## **Item 6 – Supervision**

---

Mr. Gatti serves is supervised by Robert McCauley, the Chief Financial Officer and Chief Compliance Officer. Mr. McCauley can be reached at (781) 916-8176 or via email at [compliance@riskparadigmgroup.com](mailto:compliance@riskparadigmgroup.com).

FWA has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of FWA. Further, FWA is subject to regulatory oversight by various agencies. These agencies require registration by FWA and its Supervised Persons. As a registered entity, FWA is subject to examinations by regulators, which may be announced or unannounced. FWA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



**Form ADV Part 2B – Brochure Supplement**

**for**

**William T. Eaton, II, CIMA®**  
**Senior Managing Director**

**Effective: March 20, 2022**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of William T. Eaton, II (CRD# 1395701) in addition to the information contained in the RPg Family Wealth Advisory, LLC (“FWA” or the “Advisor” CRD #158528) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or FWA’s Disclosure Brochure, please contact the Advisor at (888) 285-8600.

Additional information about William T. Eaton, II is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 1395701.

**RPg Family Wealth Advisory, LLC**  
25 Burlington Mall Rd, Suite 404, Burlington, MA 01803  
Phone: (888) 285-8600 | Fax: (781) 273-0333  
[www.rpgfamilywealthadvisory.com](http://www.rpgfamilywealthadvisory.com)

## Item 2 – Educational Background and Business Experience

William T. Eaton, II, CIMA® is a Senior Managing Director for RPg Family Wealth Advisory, LLC. Mr. Eaton has over 30 years of industry experience. Mr. Eaton is dedicated to serving the Clients of FWA. Mr. Eaton earned a Bachelor of Arts degree in Economics and Political Science from Denison University in 1984. Additional information regarding Mr. Eaton's employment history is included below.

### Employment History:

Senior Managing Director – Potfolio Management, Director – Wealth Management, RPg Family Wealth Advisory, LLC	06/2015 to Present
Senior Managing Director of Asset Management & Senior Vice President of Portfolio Management, Detwiler Fenton Investment Management, LLC	08/2009 to 06/2015
Senior Managing Director of Asset Management & Senior Vice President of Portfolio Management (Registered Representative), Detwiler Fenton Wealth Management, Inc.	08/2009 to 05/2015
Senior Managing Director of Asset Management & Senior Vice President of Portfolio Management (Registered Representative), Detwiler Fenton & Co.	08/2009 to 05/2015
Registered Representative, UBS Financial Services, Inc..	01/1995 to 09/2009
Registered Representative, Kidder, Peabody & Co, Inc.	09/1985 to 01/1995

### CERTIFIED INVESTMENT MANAGEMENT ANALYST®

Mr. Eaton has earned the Certified Investment Management Analyst® (CIMA®) professional designation from The Investment Management Consultants Association, Inc. As a candidate, Mr. Eaton successfully completed the curriculum through The Wharton School, University of Pennsylvania, which is one of IMCA's three registered programs. The CIMA® certification curriculum provides the knowledge, tools, and strategies to effectively set investment objectives, evaluate and select managers, and manage an investment portfolio for individual or institutional clients. All CIMA® professionals must adhere to IMCA's Code of Professional Responsibility. CIMA® certification stands out as the only financial services credential in the U.S. to have met an international standard for personnel certification (ISO 17024) and earned accreditation by American National Standards Institute.

## Item 3 – Disciplinary Information

Securities laws require an advisor to disclose any instances where the advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

Mr. Eaton's U4 includes a disclosure event that was lodged against Detwiler Fenton & Co. by a client of Detwiler Fenton & Co. Mr. Eaton was the broker of record on the account. As a result of the arbitration proceedings, Detwiler Fenton was required to pay the claimant the requested damages amount. All settlement proceeds were paid by Detwiler Fenton with no monetary contribution from or findings of wrongdoing by Mr. Eaton.

You may independently view the background of Mr. Eaton on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 1395701.

## Item 4 – Other Business Activities

Mr. Eaton is dedicated to the investment advisory activities of FWA's Clients. Mr. Eaton does not have any other business activities.

## Item 5 – Additional Compensation

Mr. Eaton is dedicated to the investment advisory activities of FWA's Clients. Mr. Eaton does not receive any additional forms of compensation.

## **Item 6 – Supervision**

---

Mr. Eaton is supervised by Robert McCauley, the Chief Financial Officer and Chief Compliance Officer. Mr. McCauley can be reached at (781) 916-8176 or via email at [compliance@riskparadigmgroup.com](mailto:compliance@riskparadigmgroup.com).

FWA has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of FWA. Further, FWA is subject to regulatory oversight by various agencies. These agencies require registration by FWA and its Supervised Persons. As a registered entity, FWA is subject to examinations by regulators, which may be announced or unannounced. FWA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## **Form ADV Part 2B – Brochure Supplement**

**For**

**Mitchell A. Goldfeld, CIMA®  
Senior Managing Director**

**Effective: March 20, 2022**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Mitchell A. Goldfeld (CRD# 1903537) in addition to the information contained in the RPg Family Wealth Advisory, LLC (“FWA” or the “Advisor” CRD #158528) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or FWA’s Disclosure Brochure, please contact the Advisor at (888) 285-8600.

Additional information about Mitchell A. Goldfeld, II is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 1903537.

**RPg Family Wealth Advisory, LLC**  
25 Burlington Mall Rd, Suite 404, Burlington, MA 01803  
Phone: (888) 285-8600 | Fax: (781) 273-0333  
[www.rpgfamilywealthadvisory.com](http://www.rpgfamilywealthadvisory.com)



## Item 2 – Educational Background and Business Experience

Mitchell A. Goldfeld, CIMA® is a Senior Managing Director for RPg Family Wealth Advisory, LLC. Mr. Goldfeld has over 30 years of professional experience, which includes over 20 years of industry experience. Mr. Goldfeld is dedicated to serving the Clients of FWA. Mr. Goldfeld earned a Bachelor of Science degree with high honors in Economics at the State University of New York at Binghamton in 1988 as well as a Masters of Business Administration degree in Finance & Strategic Management from the Wharton School of the University of Pennsylvania in 1993. Additional information regarding Mr. Goldfeld's employment history is included below.

### Employment History:

Senior Managing Director – Wealth Management, Director – Portfolio Management, RPg Family Wealth Advisory, LLC	06/2015 to Present
Managing Director of Asset Management & Senior Vice President of Wealth Management, Detwiler Fenton Investment Management, LLC	07/2010 to 06/2015
Managing Director (Registered Representative), Detwiler Fenton Wealth Management, Inc.	06/2012 to 05/2015
Managing Director (Registered Representative), Detwiler Fenton & Co.	08/2009 to 01/2012
Vice President – Investments (Registered Representative), UBS Financial Services, Inc.	12/2002 to 08/2009
Director of Business Development, Sonicbids	05/2000 to 12/2002
Founder & President, MAGI Productions	01/1996 to 12/2002
Equity Research Analyst (Registered Representative), Wellington Asset Management Co.	08/1993 to 12/1995
Junior Equity Analyst (Registered Representative), Goldman Sachs & Co.	09/1988 to 05/1991

### CERTIFIED INVESTMENT MANAGEMENT ANALYST®

Mr. Goldfeld has earned the Certified Investment Management Analyst® (CIMA®) professional designation from The Investment Management Consultants Association, Inc. As a candidate, Mr. Goldfeld successfully completed the curriculum through The Wharton School, University of Pennsylvania, which is one of IMCA's three registered programs. The CIMA® certification curriculum provides the knowledge, tools, and strategies to effectively set investment objectives, evaluate and select managers, and manage an investment portfolio for individual or institutional clients. All CIMA® professionals must adhere to IMCA's Code of Professional Responsibility. CIMA® certification stands out as the only financial services credential in the U.S. to have met an international standard for personnel certification (ISO 17024) and earned accreditation by American National Standards Institute.

## Item 3 – Disciplinary Information

***There are no legal, civil or disciplinary events to disclose regarding Mr. Goldfeld.*** Mr. Goldfeld has never been involved in any regulatory, civil or criminal action. There have been no Client disputes, lawsuits, arbitration claims or administrative proceedings against Mr. Goldfeld

Securities laws require an advisor to disclose any instances where the advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Goldfeld.***

You may independently view the background of Mr. Goldfeld on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 1903537.

## Item 4 – Other Business Activities

Mr. Goldfeld is dedicated to the investment advisory activities of FWA's Clients. Mr. Goldfeld does not have any other business activities.

## **Item 5 – Additional Compensation**

---

Mr. Goldfeld is dedicated to the investment advisory activities of FWA's Clients. Mr. Goldfeld does not receive any additional forms of compensation.

## **Item 6 – Supervision**

---

Mr. Goldfeld is supervised by Robert McCauley, the Chief Financial Officer and Chief Compliance Officer. Mr. McCauley can be reached at (781) 916-8176 or via email at [compliance@riskparadigmgroup.com](mailto:compliance@riskparadigmgroup.com).

FWA has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of FWA. Further, FWA is subject to regulatory oversight by various agencies. These agencies require registration by FWA and its Supervised Persons. As a registered entity, FWA is subject to examinations by regulators, which may be announced or unannounced. FWA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



**Form ADV Part 2B – Brochure Supplement**

**for**

**Juan Donabedian**

**Director of Portfolio Management**

**Effective: March 20, 2022**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Juan Donabedian (CRD# 4595528) in addition to the information contained in the RPg Family Wealth Advisory, LLC (“FWA” or the “Advisor” CRD #158528) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or FWA’s Disclosure Brochure, please contact the Advisor at (888) 285-8600.

Additional information about Juan Donabedian is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**RPg Family Wealth Advisory, LLC**  
25 Burlington Mall Rd, Suite 404, Burlington, MA 01803  
Phone: (888) 285-8600 | Fax: (781) 273-0333  
[www.rpgfamilywealthadvisory.com](http://www.rpgfamilywealthadvisory.com)

## Item 2 – Educational Background and Business Experience

Juan Donabedian is the Director of Portfolio Management for RPg Family Wealth Advisory, LLC. Mr. Donabedian has over 25 years of experience in the accounting and financial service industries. Mr. Donabedian is dedicated to serving the Clients of FWA. Mr. Donabedian earned a Bachelor of Science from Bentley University in 1989. Additional information regarding Mr. Donabedian's employment history is included below.

### Employment History:

Director of Portfolio Management, RPg Family Wealth Advisory, LLC	06/2015 to Present
Vice President of Portfolio Management, Detwiler Fenton Investment Management, LLC	07/2010 to 06/2015
Senior Portfolio Manager, (Registered Representative), Detwiler Fenton Wealth Management, Inc.	12/2011 to 05/2015
Senior Portfolio Manager (Registered Representative), Detwiler Fenton & Co.	08/2009 to 07/2014
Financial Advisor & Investment Associate (Registered Representative), UBS Financial Services, Inc.	09/2002 to 08/2009
Founder and President, Illiad XXV, Inc.	10/1994 to 09/2002
Senior Account: Taxation, Arthur Anderson & Co.	11/1991 to 10/1994
Assistant Controller, Coptech, Inc.	08/1990 to 10/1991
Staff Accountant, Tax & Audit, Herman & Herman CPA	08/1986 to 05/1990

## Item 3 – Disciplinary Information

***There are no legal, civil or disciplinary events to disclose regarding Mr. Donabedian.*** Mr. Donabedian has never been involved in any regulatory, civil or criminal action. There have been no Client disputes, lawsuits, arbitration claims or administrative proceedings against Mr. Donabedian

Securities laws require an advisor to disclose any instances where the advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Donabedian.***

You may independently view the background of Mr. Donabedian on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4595528.

## Item 4 – Other Business Activities

Mr. Donabedian is dedicated to the investment advisory activities of FWA's Clients. Mr. Donabedian does not have any other business activities.

## Item 5 – Additional Compensation

Mr. Donabedian is dedicated to the investment advisory activities of FWA's Clients. Mr. Donabedian does not receive any additional forms of compensation.

## Item 6 – Supervision

Mr. Donabedian is supervised by Robert McCauley, the Chief Financial Officer and Chief Compliance Officer. Mr. McCauley can be reached at (781) 916-8176 (781) 916-8176 or via email at [compliance@riskparadigmgroup.com](mailto:compliance@riskparadigmgroup.com)

FWA has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of FWA. Further, FWA is subject to regulatory oversight by various agencies. These agencies require registration by FWA and its Supervised Persons. As a registered entity, FWA is subject to examinations by regulators, which may be announced or unannounced. FWA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## **Form ADV Part 2B – Brochure Supplement**

**for  
Deborah B. Friend  
Director – Wealth Management**

**Effective: March 20, 2022**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Deborah B. Friend (CRD# 4257503) in addition to the information contained in the RPg Family Wealth Advisory, LLC (“FWA” or the “Advisor” CRD #158528) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or FWA’s Disclosure Brochure, please contact the Advisor at (888) 285-8600.

Additional information about Deborah B. Friend is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 4257503.

**RPg Family Wealth Advisory, LLC**  
25 Burlington Mall Rd, Suite 404, Burlington, MA 01803  
Phone: (888) 285-8600 | Fax: (781) 273-0333  
[www.rpgfamilywealthadvisory.com](http://www.rpgfamilywealthadvisory.com)

## Item 2 – Educational Background and Business Experience

---

Deborah B. Friend is a Director – Wealth Management for RPg Family Wealth Advisory, LLC. Ms. Friend has almost 20 years of industry experience. Ms. Friend is dedicated to serving the Clients of FWA. Ms. Friend attended Barnard College, Columbia University in New York. Additional information regarding Ms. Friend's employment history is included below.

### Employment History:

Director of Wealth Management, RPg Family Wealth Advisory, LLC	06/2015 to Present
Vice President of Portfolio Management, Detwiler Fenton Investment Management, LLC	08/2009 to 06/2015
Investment Associate, UBS Financial Services, Inc.	02/2000 to 08/2009
Registered Representative, Detwiler Fenton Wealth Management, Inc.	06/2012 to 05/2015
Registered Representative, Detwiler Fenton & Co.	08/2009 to 01/2012
Registered Representative, UBS Financial Services, Inc.	04/2001 to 08/2009

## Item 3 – Disciplinary Information

---

***There are no legal, civil or disciplinary events to disclose regarding Ms. Friend.*** Ms. Friend has never been involved in any regulatory, civil or criminal action. There have been no Client disputes, lawsuits, arbitration claims or administrative proceedings against Ms. Friend.

Securities laws require an advisor to disclose any instances where the advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Friend.***

You may independently view the background of Ms. Friend on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 4257503.

## Item 4 – Other Business Activities

---

Ms. Friend is dedicated to the investment advisory activities of FWA's Clients. Ms. Friend does not have any other business activities.

## Item 5 – Additional Compensation

---

Ms. Friend is dedicated to the investment advisory activities of FWA's Clients. Ms. Friend does not receive any additional forms of compensation.

## Item 6 – Supervision

---

Ms. Friend is supervised by Robert McCauley, the Chief Compliance Officer. Mr. McCauley can be reached at (781) 916-8176 or via email at [compliance@riskparadigmgroup.com](mailto:compliance@riskparadigmgroup.com).

FWA has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of FWA. Further, FWA is subject to regulatory oversight by various agencies. These agencies require registration by FWA and its Supervised Persons. As a registered entity, FWA is subject to examinations by regulators, which may be announced or unannounced. FWA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.





## **Form ADV Part 2B – Brochure Supplement**

**for  
James F. Peters, Jr.  
Managing Director**

**Effective: March 20, 2022**

This Brochure Supplement provides information about the background and qualifications of James F. Peters, Jr. (CRD# 1543053) in addition to the information contained in the RPg Family Wealth Advisory, LLC ("FWA" or the "Advisor" CRD #158528) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or FWA's Disclosure Brochure, please contact the Advisor at (888) 285-8600.

Additional information about James F. Peters, Jr. is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 1543053.

**RPg Family Wealth Advisory, LLC**  
25 Burlington Mall Rd, Suite 404, Burlington, MA 01803  
Phone: (888) 285-8600 | Fax: (781) 273-0333  
[www.rpgfamilywealthadvisory.com](http://www.rpgfamilywealthadvisory.com)

## **Item 2 – Educational Background and Business Experience**

---

James F. Peters, Jr. is a Managing Director for RPg Family Wealth Advisory, LLC. Mr. Peters has over 40 years of financial services experience. Mr. Peters is dedicated to serving the Clients of FWA. Mr. Peters graduated from St. Louis University with a BS in Accounting, minors in Economics and Philosophy and a Master of Science in Taxation (MST) from Walsh College. He is a Certified Public Accountant and a member of the American and Michigan Association of CPAs. Additional information regarding Mr. Peters's employment history is included below.

### **Employment History:**

Managing Director, RPg Family Wealth Advisory, LLC	07/2016 to Present
Managing Director, Risk Paradigm Group, LLC	07/2016 to Present
Chief Executive Officer, Tactical Allocation Group, LLC	03/2004 to Present
Investment Advisor and Registered Representative, Leonard & Company	03/2004 to 10/2006
SVP, UBS Financial Services Inc.	01/1995 to 04/2004

## **Item 3 – Disciplinary Information**

---

Securities laws require an advisor to disclose any instances where the advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

Mr. Peters's U4 includes three events to disclose that were lodged against Morgan Stanley Smith Barney or predecessor entities and Shearson by former clients of the firms and Mr. Peters as a registered representative of the firms. The disputes did not include Mr. Peters as a named party and the firms settled the disputes prior to any formal hearings, which had been commenced as arbitration proceedings and had referenced conduct by Mr. Peters. As these matters were lodged against the firms and did not include Mr. Peters as a party, all settlement proceeds were paid by the firms with no monetary contribution from or findings of wrongdoing by Mr. Peters.

You may independently view the background of Mr. Peters on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 1543053.

## **Item 4 – Other Business Activities**

---

### Risk Paradigm Group, LLC

Mr. Peters also serves as a Managing Director and Investment Committee Co-Chair of Risk Paradigm Group, LLC, an affiliated registered investment advisor. In his role as Investment Committee Co-Chair, Mr. Peters is responsible for overseeing the investment policy and asset management services provided by Risk Paradigm Group, LLC.

## **Item 5 – Additional Compensation**

---

Mr. Peters has additional business activities where compensation may be received that are detailed in Item 4 above.

## **Item 6 – Supervision**

---

Mr. Peters is supervised by Robert McCauley, the Chief Financial Officer and Chief Compliance Officer. Mr. McCauley can be reached at (781) 916-8176 or via email at [compliance@riskparadigmgroup.com](mailto:compliance@riskparadigmgroup.com).

FWA has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of FWA. Further, FWA is subject to regulatory oversight by various agencies. These agencies require registration by FWA and its Supervised Persons. As a registered entity, FWA is subject to examinations by regulators, which may be announced or unannounced. FWA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.