

**FORM ADV PART 2A
DISCLOSURE BROCHURE**



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This brochure provides information about the qualifications and business practices of Genesis Asset Management Group, Inc.. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 212-856-9000. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

ADDITIONAL INFORMATION ABOUT GENESIS ASSET MANAGEMENT GROUP, INC. (CRD #125350) IS AVAILABLE ON THE SEC'S WEBSITE AT WWW.ADVISERINFO.SEC.GOV

Item 2: Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

This update is in accordance with the annual filing requirements for investment advisors. Since the last filing of this brochure on February 13, 2023, the following changes have occurred:

- Item 4 Client assets under management has been updated.
 - The term “Solicitor” has been updated to “Referring Party” or “Referral.”
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Full Brochure Available

This Firm Brochure being delivered is the complete brochure for the Firm.

Item 3: Table of Contents

Form ADV – Part 2A – Firm Brochure

Item 1: Cover Page

Item 2: Material Changes ii

Annual Update ii

Material Changes since the Last Update..... ii

Full Brochure Available..... ii

Item 3: Table of Contents..... iii

Item 4: Advisory Business 1

Firm Description 1

Types of Advisory Services 1

Client Tailored Services and Client Imposed Restrictions..... 2

Wrap Fee Programs..... 2

Client Assets under Management 2

Item 5: Fees and Compensation 2

Method of Compensation and Fee Schedule..... 2

Client Payment of Fees 5

Additional Client Fees Charged..... 6

Prepayment of Client Fees 6

External Compensation for the Sale of Securities to Clients..... 6

Item 6: Performance-Based Fees and Side-by-Side Management..... 6

Sharing of Capital Gains 6

Item 7: Types of Clients..... 6

Description 6

Account Minimums 6

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss 7

Methods of Analysis..... 7

Investment Strategy 7

Security Specific Material Risks..... 7

Item 9: Disciplinary Information..... 9

Criminal or Civil Actions 9

Administrative Enforcement Proceedings 9

Self- Regulatory Organization Enforcement Proceedings	9
Item 10: Other Financial Industry Activities and Affiliations	9
Broker-Dealer or Representative Registration	9
Futures or Commodity Registration	9
Material Relationships Maintained by this Advisory Business and Conflicts of Interest	9
Recommendations or Selections of Other Investment Advisors and Conflicts of Interest	10
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	10
Code of Ethics Description	10
Investment Recommendations Involving a Material Financial Interest and Conflict of Interest	11
Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest	11
Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest	11
Item 12: Brokerage Practices	12
Factors Used to Select Broker-Dealers for Client Transactions	12
Aggregating Securities Transactions for Client Accounts	12
Item 13: Review of Accounts	13
Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved	13
Review of Client Accounts on Non-Periodic Basis	13
Content of Client Provided Reports and Frequency	13
Item 14: Client Referrals and Other Compensation	13
Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest	13
Advisory Firm Payments for Client Referrals	13
Item 15: Custody	14
Account Statements	14
Item 16: Investment Discretion	14
Discretionary Authority for Trading	14
Item 17: Voting Client Securities	14
Proxy Votes	14
Item 18: Financial Information	14
Balance Sheet	14

Financial Conditions Reasonably Likely to Impair Advisory Firm’s Ability to Meet Commitments to Clients.....	14
Bankruptcy Petitions during the Past Ten Years.....	15

Brochure Supplement (Part 2B of Form ADV) 2

Principal Executive Officer – Sebastian Triscari, CFP®	2
Item 2 - Educational Background and Business Experience	2
Item 3 - Disciplinary Information	3
Item 4 - Other Business Activities.....	4
Item 5 - Additional Compensation.....	4
Item 6 - Supervision	5

Item 4: Advisory Business

Firm Description

Genesis Asset Management Group, Inc. ("GAMG") became registered as an investment advisor in 1999. Sebastian Triscari is 100% owner and Chief Compliance Officer.

Types of Advisory Services

ASSET MANAGEMENT

GAMG offers discretionary asset management services to advisory Clients. GAMG will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The Client will authorize GAMG discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement. GAMG also offers discretionary asset management services to Clients on the AssetMark, Inc. and Morningstar Investment Services, LLC program. For more information regarding these programs, please refer the AssetMark, Inc. and Morningstar Investment Services, LLC Disclosure Brochures.

FINANCIAL PLANNING

Financial planning services are available for any applicable topics that the Client would like reviewed. Typical topics reviewed may include but are not limited to: financial goals, personal financial consulting, investment analysis, retirement strategy, cash flow analysis, risk management, long-term investment and estate preservation. If a conflict of interest exists between the interests of GAMG and the interests of the Client, the Client is under no obligation to act upon any recommendation. Implementation of any recommendations will be at the discretion of the Client. If the Client elects to act on any of the recommendations, the Client is under no obligation to affect the transaction through GAMG. Financial plans will be completed and delivered inside of six (6) months contingent upon timely delivery of all required documentation.

THIRD PARTY MANAGERS

When deemed appropriate for the Client, we may recommend that Clients utilize the services of a Third Party Manager ("TPM") to manage a portion of, or your entire portfolio. All TPMs that we recommend must either be registered as investment advisers with the Securities and Exchange Commission or with the appropriate state authority(ies).

After gathering information about your financial situation and objectives, an investment advisor representative of our firm will make recommendations regarding the suitability of a TPM or investment style based on, but not limited to, your financial needs, investment goals, tolerance for risk, and investment objectives. Upon selection of a TPM(s), we will monitor the performance of the TPM(s) to ensure their performance and investment style remains aligned with your investment goals and objectives.

In such circumstances, GAMG receives referral fees from the TPM. We act as the liaison between the Client and the TPM in return for an ongoing portion of the advisory fees charged by the TPM. We help the Client complete the necessary paperwork of the TPM, provides ongoing services to the Client. Ongoing services include but are not limited to:

1. Meet with the Client to discuss any changes in status, objectives, time horizon or suitability;
2. Update the TPM with any changes in Client status which is provided to GAMG by the Client;
3. Review the statements provided by the TPM; and
4. Deliver the Form ADV Part 2, Privacy Notice and Disclosure Statement of the TPM to the Client.

GAMG will provide the TPM with any changes in Client status as provided to us by the Client and review the quarterly statements provided by the TPM. GAMG will deliver the Form ADV Part 2, Privacy Notice and Disclosure Statement of the TPM. Clients placed with TPM will be billed in accordance with the TPM's Fee Schedule which will be disclosed to the Client prior to signing an agreement.

Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without Client consent.

Wrap Fee Programs

GAMG does not sponsor any wrap fee programs.

Client Assets under Management

GAMG has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$64,930,202	\$0	December 31, 2023

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

ASSET MANAGEMENT

GAMG offers discretionary direct asset management services to advisory Clients for an annual fee not to exceed 1.60% of managed assets. The annual fee is negotiable.

Assets Under Management	Annual Fee
All assets	1.60%

Fees are billed quarterly in advance based on the amount of assets managed as of the close of business on the last business day of the previous quarter. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. After the initial five (5) business days, the agreement may be terminated by GAMG with thirty (30) days written notice to Client and by the Client at any time with written notice to GAMG. For accounts opened or closed mid-billing period, fees will be prorated based on the days services are provided during the given period. All unpaid earned fees will be due to GAMG. Additionally, all unearned fees will be refunded to the Client. Client shall be given thirty (30) days prior written notice of any increase in fees.

Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

AssetMark, Inc. ("AssetMark")

Fees and compensation for using the AssetMark platform are provided in more detail in AssetMark's Platform Disclosure Brochure and Client Billing Authorization.

The fees applicable to each account at AssetMark may include:

1) Financial Advisor Fee

The fees payable to GAMG will not exceed 1.60% of assets under management. The annual fee is negotiable.

2) Platform Fee Schedules

- Fees for the Strategies, Portfolios and Accounts range from 0.00% - 1.15%

Fees are payable quarterly, in advance. The quarterly account fee is calculated by multiplying the market value of all account assets as of the end of the previous calendar quarter by the "quarterly rate." The quarterly rate is number of calendar days in the quarter, divided by 365 days in the year, multiplied by the applicable annual account fee rate. AssetMark shall calculate and deduct fees from Client accounts to pay GAMG their portion of the fee.

Quarterly advisory fees are deducted from the Clients' account by AssetMark's custodian and will be reflected on the quarterly statement. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement for a full refund. Clients may terminate advisory services with thirty (30) days written notice. Client will be entitled to a pro rata refund for the days service was not provided in the final quarter. Client shall be given thirty (30) days prior written notice of any increase in fees, and Client will acknowledge, in writing, any agreement of increase in said fees.

Morningstar Investment Services, LLC

The Morningstar Managed Portfolios program ("Program") is a discretionary investment advisory program offered by Morningstar Investment Services, LLC ("MIS"). For these services, GAMG will receive a portion of the fee paid by each Client participating in this Program. The investment advisory programs available along with the fees for the programs are detailed in the Form ADV Part 2 of MIS.

For these services, the GAMG will receive a portion of the fee paid by each Client participating in this Program. Program fee is charged quarterly either in advance based on the prior period's ending balance or in arrears based on the average daily balance for the applicable period. The fee will be disclosed to the Client in the Investment Advisory Agreement.

Mutual Fund Strategies

The standard fee schedule for the Mutual Fund Strategies is:

	First \$500K	Next \$500K	Next \$1MM	Over \$2MM
MIS Fee	0.40%	0.35%	0.30%	0.20%
GAMG Fee	1.10%	1.05%	1.00%	0.90%
Total Fee	1.50%	1.40%	1.30%	1.10%

Annual Minimum MIS Fee: \$200

Select Stock Basket Strategy

The standard fee schedule for the Select Stock Basket Strategy is:

	First \$1MM	Next \$4MM	Thereafter
MIS Fee	0.55%	0.50%	0.45%
GAMG Fee	1.10%	1.10%	1.10%
Total Fee	1.65%	1.60%	1.55%

Annual Minimum MIS Fee – Custom: \$1,375, Strategist: \$550

ETF Only Strategies

The standard fee schedule for the ETF Only Strategies is:

	First \$1MM	Next \$4MM	Thereafter
MIS Fee	0.30%	0.25%	0.20%
GAMG Fee	1.10%	1.10%	1.10%
Total Fee	1.40%	1.35%	1.30%

Annual Minimum MIS Fee: \$150

FINANCIAL PLANNING

GAMG charges an hourly fee of \$595 for financial planning. Prior to the planning process the Client will be provided an estimated fee. Fees for financial planning are due in advance upon the signing of the Agreement. Services are completed and delivered inside of six (6) months contingent upon timely delivery of all required documentation. Implementation of any recommendations will be at the discretion of the Client. Client may cancel within five (5) business days of signing Agreement with no obligation and without penalty. Client cancels after five (5) business days, any unearned fees will be refunded to the Client based on the number of hours expended by GAMG.

THIRD PARTY MANAGERS

Cary Street Partners Investment Advisory LLC ("CSPIA")

GAMG has entered into a Referral Agreement with Cary Street Partners Investment Advisory LLC ("CSPIA"). CSPIA is an SEC registered investment advisor that provides investment management services. The investment advisory programs available along with the fees for the programs are detailed in the Form ADV Part 2 of CSPIA.

GAMG receives 40% of the revenue generated from the Annual Fee Percentage of the Total Assets Under Management, as described in the below fee schedule. CSPIA typically charges an annual investment advisory fee based upon a percentage of the fair market value of the assets placed under our management. The annual fee is paid either quarterly in advance or quarterly in arrears as described in the Fee Schedule of the Investment Advisory Agreement. The fee schedules will vary by Client and are negotiable.

Assets Under Management	Annual Fee Percentage
First \$500,000	1.25%
\$500,000 - \$1,000,000	1.00%
\$1,000,001 - \$3,000,000	0.85%
\$3,000,001 - \$5,000,000	0.75%
\$5,000,001 - \$10,000,000	0.65%
\$10,000,001 - \$25,000,000	0.50%
\$25,000,001 or more	Negotiable

Advisors Capital Management, LLC (“ACM”)

GAMG has entered into a Referral Agreement with Advisors Capital Management, LLC (“ACM”). CSPIA is an SEC registered investment advisor that provides investment management services. The investment advisory programs available along with the fees for the programs are detailed in the Form ADV Part 2 of ACM.

ACM portfolio management fee for Model Separate Account strategies may not exceed .65%. ACM portfolio management fee for Private Account strategies may not exceed .80%. The ACM portfolio management fee for Private Fixed Income Account strategies may not exceed .35%. Additional advisory and financial services fees will be applied.

GAMG and ACM have entered into a written agreement whereby the Referring Party has undertaken to contact those persons and organizations who it believes may wish to utilize the investment advisory services of ACM and to recommend to such persons that they entertain a proposal for such services by ACM. In return for GAMG’s services under this agreement, ACM has agreed to compensate GAMG with a cash referral fee based upon a percentage of the investment advisory fees actually received from the Clients who have been referred to ACM by GAMG and who subsequently become Clients of ACM. The agreement provides that GAMG will receive a portion of the advisory fee for so long as ACM continues to manage the portfolio(s) of the Client.

The advisory fee is payable quarterly in advance, based on the average daily balance or average monthly balanced of the prior quarter. The fee calculation of daily or monthly depends on the Custodian. In any particular calendar quarter, the advisory fee will be prorated based on the number of days that the Account was open during the quarter. ACM may use a third party reporting system for billing services. The fees are debited by the Custodian.

Client authorizes Custodian to deduct from this Account and pay to ACM the advisory fee for each applicable period. Custodian will send Client a statement showing all amounts paid from the Account, including all additional custodial fees. Direct payment of fees from Client shall not be accepted.

Client Payment of Fees

Fees for asset management services are deducted from a designated Client account to facilitate billing. The Client must consent in advance to direct debiting of their investment account.

Fees for financial planning will be billed to the Client and paid directly to GAMG.

Fees for asset management services provided by TPM are deducted from a designated Client account by TPM to facilitate billing. The Client must consent in advance to direct debiting of their investment account.

Additional Client Fees Charged

Custodians may charge transaction fees and other related costs on the purchases or sales of mutual funds, equities, bonds, options and exchange-traded funds. Mutual funds, money market funds and exchange-traded funds also charge internal management fees, which are disclosed in the fund's prospectus. GAMG does not receive any compensation from these fees. All of these fees are in addition to the management fee you pay to GAMG. For more details on the brokerage practices, see Item 12 of this brochure.

Prepayment of Client Fees

Asset management fees are billed quarterly in advance.

Fees for financial planning are billed in advance.

If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to GAMG.

External Compensation for the Sale of Securities to Clients

President Sebastian Triscari receives external compensation for the sale of securities to Clients as a registered representative of American Portfolios Financial Services, Inc., a broker-dealer. This represents a conflict of interest because it gives an incentive to recommend products based on the commission received. As a registered representative, he does not charge advisory fees for the services offered through American Portfolios Financial Services, Inc. This conflict is mitigated by disclosures, procedures and GAMG's fiduciary obligation to place the best interest of the Client first and Clients are not required to purchase any products or services. Clients have the option to purchase these products through another registered representative of their choosing.

Item 6: Performance-Based Fees and Side-by-Side Management

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

GAMG does not use a performance-based fee structure because of the conflict of interest. Performance based compensation may create an incentive for GAMG to recommend an investment that may carry a higher degree of risk to the Client.

Item 7: Types of Clients

Description

GAMG generally provides investment advice to individuals, high net worth individuals, trusts or estates. Client relationships vary in scope and length of service.

Account Minimums

GAMG doesn't require a minimum to open an account.

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

Methods of Analysis

Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

Manager selection is based upon listed returns and/or analytical databases conducted by Sebastian Triscari of Genesis Asset Management Group, Inc., as the introducing advisor/referring party of record. Portfolio construction, monitoring and trading the portfolio with discretion, is conducted by the outside third party manager(s). During an annual review, the client and I will determine whether or not the management style and portfolio are still suitable for their current risk tolerance. Genesis Asset Management Group, Inc. uses various tools for our research, including, but not limited to: Barron's, Morningstar, Standard and Poors, Yahoo Finance, CNBC, MSN Money as well as various online, print and media sources.

Investment Strategy

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time by providing written notice to GAMG. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

Security Specific Material Risks

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with GAMG:

- *Market Risk:* The prices of securities in which Clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.
- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Management Risk:* The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class

or fund are not realized in the expected time frame, the overall performance of the Client's portfolio may suffer.

- *Equity Risk:* Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the Client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.
- *Fixed Income Risk:* The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- *Investment Companies Risk:* When a Client invests in open end mutual funds or ETFs, the Client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value or (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which Client invests.
- *Foreign Securities Risk:* Funds in which Clients invest may invest in foreign securities. Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks may include, among others, currency risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government supervision, less publicly available information, limited trading markets and greater volatility. To the extent that underlying funds invest in issuers located in emerging markets, the risk may be heightened by political changes, changes in taxation, or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.
- *Long-term purchases:* Long-term investments are those vehicles purchased with the intention of being held for more than one year. Typically, the expectation of the

investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.

- *Short-term purchases:* Short-term investments are typically held for one year or less. Generally, there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk — the risk that your investment’s return will not keep up with inflation.

The risks associated with utilizing TPM’s include:

- Manager Risk
 - TPM fails to execute the stated investment strategy
- Business Risk
 - TPM has financial or regulatory problems
- The specific risks associated with the portfolios of the TPM’s which is disclosed in the TPM’s Form ADV Part 2.

Item 9: Disciplinary Information

Criminal or Civil Actions

GAMG and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

GAMG and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

GAMG and its management have not been involved in any self-regulatory organizational enforcement proceedings that are material to a Client’s or prospective Client’s evaluation of GAMG or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

GAMG is not registered as a broker-dealer; however, Sebastian Triscari is a registered representative of American Portfolios Financial Services, Inc., a broker-dealer.

Futures or Commodity Registration

Neither GAMG nor its affiliated representatives are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

President Sebastian Triscari is a licensed insurance agent and a registered representative with American Portfolios Financial Services, Inc. Approximately 50% of his time is spent on

these activities. He will offer Clients products and services from these activities and receive separate compensation.

These practices represent conflicts of interest because it gives an incentive to recommend products and services based on the compensation amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products or services. Clients have the option to purchase these products and services through another insurance agent or registered representative of their choosing.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

GAMG utilizes the AssetMark platform described in Items 4 and 5 of this brochure. GAMG may utilize the services of a Portfolio Strategist to manage Clients' investment portfolios. Portfolio Strategists will maintain the models or investment strategies. Portfolio Strategists execute all trades on behalf of GAMG in Client accounts. GAMG will be responsible for the overall direct relationship with the Client. GAMG retains the authority to terminate the Portfolio Strategists at GAMG's discretion.

GAMG charges their advisory fee when utilizing the AssetMark platform and doesn't receive any additional compensation. This does not present a conflict of interest as Client pays the Portfolio Strategist's management fee; The Portfolio Strategist's management fee is not included in GAMG's advisory fee.

Clients placed with TPM will be billed in accordance with the TPM's fee schedule which will be disclosed to the Client prior to signing an agreement. When referring Clients to a TPM, the Client's best interest will be the main determining factor of GAMG. GAMG ensures that before selecting other advisors for Client that the other advisors are properly licensed or registered as an investment advisor.

These practices represent conflicts of interest because GAMG is paid a Referral Fee for recommending the TPM and may choose to recommend a particular TPM based on the fee GAMG is to receive. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to act in the best interest of his Clients. Clients are not required to accept any recommendation of TPM given by GAMG and have the option to receive investment advice through other money managers of their choosing.

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

Code of Ethics Description

The affiliated persons (affiliated persons include employees and/or independent contractors) of GAMG have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of GAMG affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of GAMG. The Code reflects GAMG and its supervised persons' responsibility to act in the best interest of their Client.

One area which the Code addresses is when affiliated persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any affiliated persons to use non-public material information for their personal

profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

GAMG's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other affiliated person, officer or director of GAMG may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

GAMG's Code is based on the guiding principle that the interests of the Client are our top priority. GAMG's officers, directors, advisors, and other affiliated persons have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either affiliated persons or the company.

The Code applies to "access" persons. "Access" persons are affiliated persons who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

GAMG will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

GAMG and its affiliated persons do not recommend to Clients securities in which we have a material financial interest.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

GAMG and its affiliated persons may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as trading ahead of Client transactions, affiliated persons are required to disclose all reportable securities transactions as well as provide GAMG with copies of their brokerage statements.

The Chief Compliance Officer of GAMG is Sebastian Triscari. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not front run or disadvantage trading for Clients.

Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

GAMG does not have a material financial interest in any securities being recommended. However, affiliated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest such as front running, affiliated persons are required to disclose all reportable securities transactions as well as provide GAMG with copies of their brokerage statements.

The Chief Compliance Officer of GAMG is Sebastian Triscari. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not front run or disadvantage trading for Clients.

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

GAMG will require the use of a particular broker-dealer based on their duty to seek best execution for the Client, meaning they have an obligation to obtain the most favorable terms for a Client under the circumstances. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is affected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. GAMG will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. GAMG relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by GAMG. GAMG does not receive any portion of the trading fees.

GAMG will require the use of Pershing LLC, Fidelity Brokerage Services, LLC, or Charles Schwab & Co., Inc.

- *Research and Other Soft Dollar Benefits*

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by GAMG from or through a broker-dealer in exchange for directing Client transactions to the broker-dealer. Although GAMG has no formal soft dollar arrangements, GAMG may receive products, research and/or other services from custodians or broker-dealers connected to Client transactions or “soft dollar benefits”. As permitted by Section 28(e) of the Securities Exchange Act of 1934, GAMG receives economic benefits as a result of commissions generated from securities transactions by the custodian or broker-dealer from the accounts of GAMG. GAMG cannot ensure that a particular Client will benefit from soft dollars or the Client’s transactions paid for the soft dollar benefits. GAMG does not seek to proportionately allocate benefits to Client accounts to any soft dollar benefits generated by the accounts.

A conflict of interest exists because GAMG receives soft dollars which could result in higher commissions charged to Clients. This conflict is mitigated by the fact that GAMG has a fiduciary responsibility to act in the best interest of its Clients and the services received are beneficial to all Clients.

- *Brokerage for Client Referrals*

GAMG does not receive Client referrals from any custodian in exchange for using that broker-dealer.

- *Directed Brokerage*

GAMG does not allow Client directed brokerage accounts.

Aggregating Securities Transactions for Client Accounts

GAMG is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same

securities for other Clients of GAMG. All Clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis. If aggregation is not allowed or infeasible and individual transactions occur (e.g., withdrawal or liquidation requests, odd-lot trades, etc.) an account may potentially be assessed higher costs or less favorable prices than those where aggregation has occurred.

Item 13: Review of Accounts

Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory

Persons Involved

Account reviews are performed quarterly by the Chief Compliance Officer of GAMG, Sebastian Triscari. Account reviews are performed more frequently when market conditions dictate. Reviews of Client accounts include, but are not limited to, a review of Client documented risk tolerance, adherence to account objectives, investment time horizon, suitability criteria and reviewing target allocations of each asset class to identify if there is an opportunity for rebalancing.

Financial plans are updated as requested by the Client and pursuant to a new or amended agreement.

Review of Client Accounts on Non-Periodic Basis

Other conditions that may trigger a review of Clients' accounts are changes in the tax laws, new investment information, and changes in a Client's own situation.

Content of Client Provided Reports and Frequency

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by the Client's custodian. Client receives confirmations of each transaction in account from custodian and an additional statement during any month in which a transaction occurs.

Item 14: Client Referrals and Other Compensation

Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest

GAMG receives economic benefits from the broker-dealers utilized in the form of the support products and services they make available to us and other independent investment advisors whose Clients maintain their accounts the broker-dealer. You do not pay more for assets maintained at these broker-dealers as a result of these arrangements. However, we benefit from the arrangement because the cost of these services would otherwise be borne directly by us. You should consider these conflicts of interest when selecting a custodian. This conflict is mitigated by the fact that GAMG has a fiduciary responsibility to act in the best interest of its Clients and the services received are beneficial to all Clients.

Other than the economic benefits received from broker-dealers, GAMG does not receive any other benefits from third parties.

Advisory Firm Payments for Client Referrals

GAMG does not compensate for Client referrals.

Item 15: Custody

Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least monthly. Clients are urged to carefully compare the account statements received directly from their custodians to any documentation or reports prepared by GAMG.

GAMG is deemed to have limited custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of GAMG.

Item 16: Investment Discretion

Discretionary Authority for Trading

GAMG requires discretionary authority to manage securities accounts on behalf of Clients. GAMG has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. Client will authorize GAMG discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

GAMG allows Clients to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. These restrictions must be provided to GAMG in writing.

The Client approves the custodian to be used and the commission rates paid to the custodian. GAMG does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

Item 17: Voting Client Securities

Proxy Votes

GAMG does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, GAMG will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client. If the Client requires assistance or has questions, they can reach out to the investment advisor representatives of the firm at the contact information on the cover page of this document.

Item 18: Financial Information

Balance Sheet

A balance sheet is not required to be provided to Clients because GAMG does not serve as a custodian for Client funds or securities and GAMG does not require prepayment of fees of more than \$1200 per Client and six months or more in advance.

Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

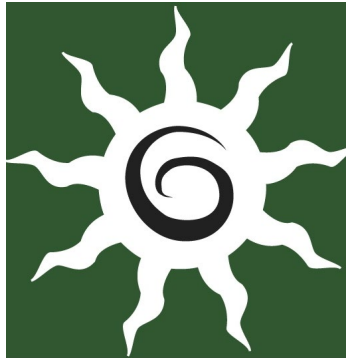
GAMG has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

Bankruptcy Petitions during the Past Ten Years

GAMG has not had any bankruptcy petitions in the last ten years.

Item 1 Cover Page
SUPERVISED PERSON BROCHURE
FORM ADV PART 2B

Sebastian Triscari, CFP®, CIMA



Genesis Asset Management Group, Inc.

Office Address:

236 Little Neck Road
Centerport, NY 11721

Tel: 212-856-9000

Email: sebastian@genesisassetmgmt.com

Website: www.genesisassetmgmt.com

February 20, 2024

This brochure supplement provides information about Sebastian Triscari and supplements the Genesis Asset Management Group, Inc. brochure. You should have received a copy of that brochure. Please contact Sebastian Triscari if you did not receive the brochure or if you have any questions about the contents of this supplement.

**ADDITIONAL INFORMATION ABOUT SEBASTIAN TRISCARI (CRD
#1480234) IS AVAILABLE ON THE SEC'S WEBSITE AT
WWW.ADVISERINFO.SEC.GOV.**

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Principal Executive Officer – Sebastian Triscari, CFP®, CIMA

- Year of birth: 1962
-

Item 2 - Educational Background and Business Experience

Educational Background:

- SUNY College at Buffalo; BS – Industrial Technology; 1985
- St. John's University; MBA – Finance/Economics; 1987

Business Experience:

- Genesis Asset Management Group, Inc.; President/CCO/Investment Advisor Representative; 03/1999 – Present
- American Portfolios Financial Services, Inc.; Registered Representative; 02/2004 – Present

Professional Certifications

CERTIFIED FINANCIAL PLANNER™ (CFP®)

I am certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and I may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold CFP® certification. You may find more information about CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP

Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the Client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A Client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the Client.
- **Continuing Education** – Complete 30 hours of continuing education hours every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Certified Investment Management Analyst (CIMA): Issued by the Investments & Wealth Institute. CIMA designations requirements:

- Prerequisites
 - Three years of financial services experience; and
 - A satisfactory record of ethical conduct, as determined by Investments & Wealth Institute Admissions Committee.
- Education Requirements
 - Educational component offered by one of the approved Registered Education Providers.
 - In-class program at The Wharton School, University of Pennsylvania, or online through Yale School of Management.
- Continuing Education Requirements
 - 40 hours every two years

Item 3 - Disciplinary Information

Mr. Triscari **has never been** involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:

- Was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
- Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
- Was found to have been involved in a violation of an investment-related statute or regulation; or

- Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.

Mr. Triscari **has never** had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:

- Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
- Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority (a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.

Mr. Triscari **has never been** the subject of a self-regulatory organization (SRO) proceeding in which he:

- Was found to have caused an investment-related business to lose its authorization to do business; or
- Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.

Mr. Triscari **has not been** involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

Item 4 - Other Business Activities

Mr. Triscari is a licensed insurance agent and a registered representative with American Portfolios Financial Services, Inc. Approximately 50% of his time is spent on these activities. He will offer Clients products and services from these activities and receive separate compensation.

These practices represent conflicts of interest because it gives an incentive to recommend products and services based on the compensation amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products or services. Clients have the option to purchase these products and services through another insurance agent or registered representative of their choosing.

Item 5 - Additional Compensation

Mr. Triscari receives commissions on the insurance and securities products he sells. He does not receive any performance-based fees and does not receive any additional compensation for performing advisory services other than what is described in Item 5 of Part 2A.

Item 6 - Supervision

Mr. Triscari is the Chief Compliance Officer of GAMG. He is responsible for all supervision, formulation and monitoring of investment advice offered to Clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual. He can be reached at sebastian@genesisassetmgmt.com or 212-856-9000.