

## Client Relationship Summary

### Introduction

Portfolio Resources Advisor Group, Inc. (PRAG) is registered with the Securities and Exchange Commission (SEC) as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

### What investment services and advice can you provide me?

We offer investment advisory services to retail investors. We provide two types of services to retail clients:

- **Our financial planning services** help clients organize their personal finances. Financial planning is an individualized service specifically designed to address and meet the needs of the client being served. Financial planning may cover topics such as, but not limited to, estate planning, tax planning, education funding planning, insurance and risk management planning, investment planning, retirement planning, philanthropic planning, and employee benefit planning.

#### Conversation Starter

*Given my financial situation, should I choose an investment advisory service? Why or why not?  
How will you choose investments to recommend to me?  
What is your relevant experience, including your licenses, education, and other qualifications?  
What do these qualifications mean?*

- **Our investment management services** help clients develop an investment strategy designed to meet pre-determined objectives. We discuss a client's investment goal and summarize the strategies employed in an Investment Policy Statement (IPS) or a Statement of Investment Selection (SIS) that each client receives. Investment management is continuous and on-going. Our investment management services are performed on a discretionary or non-discretionary basis. Most of our client's accounts are on a **discretionary** basis, which means clients grant us the authority to buy and sell investments in their account without prior approval. On **non-discretionary accounts**, clients make the ultimate decision regarding the purchase or sale of investments. Our Investment Management Programs include Non-Wrap Fee and Wrap Fee Programs. On **Non-Wrap Fee Programs**, there is a separate custodial or transaction cost that is charged per transaction, besides the advisor (PRAG) fee and platform fee. On **Wrap Fee Programs** there is only one total fee that covers the cost of the portfolio manager, platform fees, transaction (custodial) costs, and the advisor (PRAG) fee. Therefore, the wrap fee may be higher since it is a consolidated, total fee, but could be lower depending on the number of transactions.

For **additional information** about our services please see our Form ADV Brochure, Part 2A, Items 4, 7, 13 and 16; and our Wrap Fee Program Brochure, Items 4 and 9, copies are available on our website at <https://prginc.net/advisors.php>.

### What fees will I pay?

We charge two types of fees, and clients choose the service level that best suits their needs. Our fee options are as follows:

- **Financial planning fees** are assessed partially at commencement of services and the balance when services are completed. It is a service fee that is either billed hourly or as a flat fee. Fees for financial planning services can be based on a per hour rate or be negotiated based upon the specifics of the project.

#### Conversation Starter

*Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

- **Investment management fees**, are asset-based fees. They are due quarterly in advance. It is an on-going fee. Fees are debited directly from your investment account. Our fee options are as follows for our Investment Management Programs:

	Investment Management Program	
	Non-Wrap Fee	Wrap Fee
<b>Manager</b>	Managed directly by individual advisor representatives of PRAG	Managed by firm sponsored or independent third-party managers in association with Management Platforms
<b>What is included</b>	Included: Advisor Fee and Cost of Sub-Managers. Not included: Custody Fees, Transactional Fees, Platform Fees, Billing & Reporting Fees	Included: Advisor Fee, Cost of Sub-Managers, Model Providers, Custody Fees, Transactional Fees, Platform Fees, Billing and Reporting Fees

	Investment Management Program	
	Non-Wrap Fee	Wrap Fee
<b>Account Value</b>	<b>Maximum Annual Non-Wrap Fee</b>	<b>Maximum Annual Wrap Fee</b>
First \$1,000,000	1.50%	2.75%
Next \$4,000,000	1.25%	2.50%
Above \$5 million	Fees are negotiable	2.25%
<b>Minimum Fees</b>	\$50.00 annually	Varies depending on specific Program and Sub-manager, ranges between \$100-\$500 annually
<b>Billing and Reporting Fees</b>	<b>Annual Billing and Reporting Fee</b>	Included in the Wrap Fee
First \$250,000	0.100%	
Next \$250,000	0.095%	
Next \$500,000	0.085%	
Next \$1 million	0.075%	
Next \$2 million	0.055%	

You will pay fees whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. There may be other fees and costs not included in the above, as account maintenance fees, fees related to mutual funds, ETFs, and variable annuities, wire fees, among others. For **additional information**, please see your advisory agreement and PRAG's ADV Disclosure Brochure (Form ADV Part 2A Brochure, Item 5; or Wrap Fee Program Brochure, Item 4).

### What are your legal obligations to me as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

We are held to a fiduciary standard that covers our entire investment advisory relationship with you. For example, we are required to monitor your portfolio, investment strategy and investments on an ongoing basis. A fiduciary standard means we must put your interests above our own and fully disclose all conflicts of interest, including the use of proprietary funds.

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money may create some conflicts with your interests. You should understand and ask us about these possible conflicts because they can affect the investment advice we provide you.

#### Conversation Starter

*How might your conflicts of interest affect me, and how will you address them?*

Here are some examples to help you understand what this means. For instance, we benefit from the advisory services we provide to you. The more of your money we manage under our investment management services the higher our absolute income. Therefore, we have an incentive to encourage you to increase the assets in your account. We may also recommend certain securities, transactions, strategies, type of accounts, platforms or custodians that could result in higher income to us and/or our representatives. Also, some of our financial professionals are also registered as brokers and/or insurance agents through our affiliate Portfolio Resources Group. This may affect the type of account and investments recommended to you. For **additional information** please see PRAG's ADV Disclosure Brochure (Form ADV Part 2A Brochure, Item 10; Wrap Fee Program Brochure, Item 9).

### How do your financial professionals make money?

The financial professionals at PRAG are paid as independent contractors based on the advisory services they render. We do not use sales-based awards to incentivize our financial professionals. None of our financial professional collect commissions or sales-based compensation from any third party or outside institution.

### Do you or your financial professionals have a legal or disciplinary history?

Yes. Visit [Investor.gov/CRS](https://investor.gov/CRS) for a free and simple search tool to research us and our financial professionals. You can find more detailed information in our Form ADV, Parts 2A and 2B Brochures. A copy is available on our website at <https://prginc.net/advisors.php>.

#### Conversation Starter

*As a financial professional, do you have any disciplinary history? For what type of conduct?*

### Where may I find additional information?

For **additional information** about our services, please search for our firm at [adviserinfo.sec.gov](https://adviserinfo.sec.gov). If you would like additional, up-to-date information or a copy of this disclosure, please call our offices at +1 (305) 372-0299, or contact us in writing at 4000 Ponce de Leon Blvd., Suite 670, Coral Gables, FL 33146.

#### Conversation Starter

*Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*

**Portfolio Resources Group, Inc.**  
**Client Relationship Summary**  
**June 30, 2020**

Our firm, Portfolio Resources Group, Inc. is registered with the Securities and Exchange Commission as a broker-dealer and is a member of FINRA, SIPC, MSRB, and FSI. Accounts are introduced on a “fully-disclosed basis” to our clearing firm, Pershing, LLC., a Bank of New York Mellon company. We provide full brokerage services rather than advisory accounts and services. It is important that you understand that brokerage and investment advisory services and fees differ. This document gives you a summary of the types of services we provide and how you pay. You may find free and simple tools at <https://www.investor.gov/CRS> a website provided by the SEC, to research firms and financial professionals and find educational materials about broker-dealers, investment advisers, and investing.

**What investment services and advice can you provide me?**

We provide brokerage services. You may select investments, or we may recommend investments for your account, but the ultimate investment decision as to your investment strategy and the purchase or sale of investments will be yours. The amount you pay will depend, for example, upon how much you buy or sell, what type of investment you buy or sell, and what kind of account you have with us. We may offer you additional services to assist you in monitoring the performance of your account for an additional cost. We will deliver account statements to you at least each quarter in paper or in electronic format. We are not required to monitor your portfolio or investments on an ongoing basis unless we agree otherwise in writing. You may find information about our and our affiliate’s services at <https://www.prginc.net/>.

**When considering our services, ask our financial professional:**

- **Given my financial situation, should I choose a brokerage service? Why or Why not?**
- **How will you choose investments to recommend to me?**
- **What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?**

**What fees will I pay?**

You will pay transactional fees based on specific transactions and not the value of your account. With stocks or exchange-traded funds, this fee is usually a separate commission. With other investments, such as bonds, this fee might be part of the price you pay for the investment (called a “mark-up” or “mark down”). With mutual funds, this fee (typically called a “load”) reduces the value of your investment.

You may have to pay other fees related to brokerage services. Fees can be charged directly or indirectly. Direct fees include service charges, custodial fees and account maintenance fees (including IRA fees) charged by the clearing firm; markups and markdowns; redemption fees; wire fees; transfer fees; etc. Direct fees will be shown on your trade confirmation and/or custodial statement. Indirect fees include internal expenses charged by mutual funds and ETF’s (including 12b-1 fees and annual fund operating expenses). You will be charged more when there are more trades in your account, which could be an incentive for our financial professional to encourage you to trade often.

You may be offered a kind of account with discounted commissions, and/or a specific fee based on the value of your account. Our fees vary and are negotiable. We charge you additional fees, such as custodian fees and account maintenance fees. The amount you pay will depend, for example, on how much you buy or sell, what type of investment you buy or sell, and what kind of account you have with us. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. Additional information about Brokerage Services can be found in PRG’s Regulation Best Interest Disclosure at <https://www.prginc.net/disclosures/prgbestinterest.html>.

**When considering our services, ask our financial professional:**

- **Help me understand how these fees and costs might affect my investments?**
- **If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?**

**What are your legal obligations to me when providing recommendations as my broker-dealer? How else does the firm make money and what conflicts of interest do you have?**

When we provide you with a recommendation, we have to act in your best interest and not put our interest ahead of yours. **At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the recommendations and investment advice, we provide you. Here are some examples to help you understand what this means.**

Our financial professionals may receive a portion of the revenues on specific types of accounts like margin accounts. Also, some of our financial professionals are also registered as financial adviser representatives through our affiliate Portfolio Resources Advisor Group or other Registered Investment Advisers. Some of our financial professionals are also registered with our affiliate Portfolio Resources Group Inc. insurance agency. This may affect the type of account recommended to you.

**When considering our services, ask our financial professional:**

- **How might your conflicts of interest affect me, and how will you address them?**

**How do your financial professionals make money?**

Our financial professionals are paid based on product sales commissions, markups, markdowns, and account fees were applicable. As commissions are based on a number of factors, so is the compensation paid to our Registered Representatives. For example, certain products pay higher commission rates than others. Some of our financial professionals are also registered as Investment Adviser Representatives (IAR) with our affiliate Portfolio Resources Advisor Group or other Registered Investment Advisers. When acting as IARs, our financial professionals are paid from a fee charged to you that is based on the market value of your investment portfolio. Our financial professionals are not allowed to charge both advisory fees and commissions on the same investment portfolio.

**Do you or your financial professionals have legal or disciplinary history?**

Yes. Visit [Investor.gov/CRS](https://investor.gov/CRS) for a free and simple search tool to research us and our financial professionals. You can also find information about us and our financial professionals at <https://brokercheck.finra.org/search/genericsearch/grid>

**When considering our services, ask our financial professional:**

- **As a financial professional, do you have any disciplinary history? For what type of conduct?.**

**Additional Information**

You may find a copy of our CRS form at <https://www.prginc.net/disclosures/prgcrs.html> .For additional information you may go to <https://www.prginc.net/disclosures/prgbestinterest.html> where we have posted our Best Interest Disclosure Form. **At any time, you may request up to date information and/or a copy of this relationship summary by calling (305)372-0299.**

**When considering our services, ask our financial professional:**

- **Who is my primary contact person?**
- **Is she or he a representative of an investment adviser or a broker dealer?**
- **Who can I talk to if I have concerns about how this person is treating me?**