

Part 2A of Form ADV: *Firm Brochure*

CFG Wealth Management Services, Inc.

9840 Westpoint Drive, Suite 150
Indianapolis, IN 46256

Telephone: 317-841-7959
Email: jharrier@cfgwms.com
Web Address: www.cfgwms.com

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This brochure provides information about the qualifications and business practices of CFG Wealth Management Services, Inc. If you have any questions about the contents of this brochure, please contact us at 317-841-7959 or jharrier@cfgwms.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about CFG Wealth Management Services, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 108351.

Item 2 Material Changes

The SEC adopted "Amendments to Form ADV" in July, 2010. This Firm Brochure, dated 03/23/2011, is our new disclosure document prepared according to the SEC's new requirements and rules. As you will see, this document is a narrative that is substantially different in form and content, and includes some new information that we were not previously required to disclose.

After our initial filing of this Brochure, this Item will be used to provide our clients with a summary of new and/or updated information. We will inform you of the revision(s) based on the nature of the updated information.

Consistent with the new rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. Furthermore, we will provide you with other interim disclosures about material changes as necessary.

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Item 4 Advisory Business

CFG Wealth Management Services, Inc. is a SEC-registered investment adviser with its principal place of business located in Indiana. CFG Wealth Management Services, Inc. began conducting business in 1983, under the name Consolidated Financial Group.

Listed below are the firm's principal shareholders (i.e., those individuals and/or entities controlling 25% or more of this company).

- Michael Dillard Puckett, Chief Executive Officer
- Jonathan Wayne Harrier, Chief Compliance Officer, Chief Investment Officer

CFG Wealth Management Services, Inc. offers the following advisory services to our clients:

INVESTMENT SUPERVISORY SERVICES ("ISS") INDIVIDUAL PORTFOLIO MANAGEMENT

Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy and create and manage a portfolio based on that policy. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background.

The investment supervisory service, also referred to as the portfolio management service, typically starts with the creation of an investment policy statement (IPS) which is customized to meet the specific goals of the client. Defining and addressing factors such as the investment time horizon, spending policy, and risk tolerance of the client are part of the IPS development process. Typically, the IPS will consist of a target broad asset class allocation covering the areas of U.S. equity, non-U.S. equity, fixed income, and cash. Allowable ranges for investment within each broad asset class are also defined in the IPS. Once the IPS is adopted CFG will manage clients' assets placed under CFG's supervision according to the investment management strategy outlined in item 8 and according to each client's service contract with CFG.

We manage these advisory accounts primarily on a discretionary basis, but also on a non-discretionary basis in a very limited number of circumstances. Account supervision is guided by the client's stated objectives (i.e., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations.

Our investment recommendations and implementation are not limited to any specific product or service offered by a broker-dealer or insurance company and will generally include advice regarding the following securities:

- Exchange-listed securities
- Securities traded over-the-counter
- Foreign issuers
- Warrants
- Corporate debt securities (other than commercial paper)
- Commercial paper
- Certificates of deposit
- Municipal securities
- Variable life insurance
- Variable annuities
- Mutual fund shares
- United States governmental securities
- Options contracts on securities
- Interests in partnerships investing in real estate
- Interests in partnerships investing in oil and gas interests

Because some types of investments involve certain additional degrees of risk, they will only be implemented or recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

PENSION CONSULTING SERVICES

While the primary clients for these services will be pension, profit sharing and 401(k) plans, we offer these services, where appropriate, to individuals and trusts, estates and charitable organizations. Pension Consulting Services are comprised of four distinct services. Clients may choose to use any or all of these services.

Investment Policy Statement Preparation (hereinafter referred to as "IPS"):

We will meet with the client (in person or over the telephone) to determine an appropriate investment strategy that reflects the plan sponsor's stated investment objectives for management of the overall plan. Our firm then prepares a written IPS detailing those needs and goals, including an encompassing policy under which these goals are to be achieved.

The IPS also lists the criteria for selection of investment vehicles as well as the procedures and timing interval for monitoring of investment performance.

Selection of Investment Vehicles:

We assist plan sponsors in constructing appropriate asset allocation models. We will then review various mutual funds (both index and managed) to determine which investments are appropriate to implement the client's IPS. The number of investments to be recommended will be determined by the client, based on the IPS.

Monitoring of Investment Performance:

We monitor client investments continually, based on the procedures and timing intervals delineated in the Investment Policy Statement. Although our firm is not involved in any way in the purchase or sale of these investments, we supervise the client's portfolio and will make recommendations to the client as market factors and the client's needs dictate.

Employee Communications:

For pension, profit sharing and 401(k) plan clients with individual plan participants exercising control over assets in their own account ("self-directed plans"), we may also provide quarterly educational support and investment workshops designed for the plan participants. The nature of the topics to be covered will be determined by us and the client under the guidelines established in ERISA Section 404(c). The educational support and investment workshops will NOT provide plan participants with individualized, tailored investment advice or individualized, tailored asset allocation recommendations.

FINANCIAL PLANNING

We provide financial planning services as a part of our Wealth Enhancement Service and on a stand-alone basis.

The Wealth Enhancement Service culminates in the development, implementation, and management of a comprehensive financial plan. The main components of this process and financial plan development and management revolve around analyses covering a client's asset-liability structure, their cash flow, investment portfolio and risk tolerance considerations, and a financial independence assessment that attempts to model the likelihood of a client achieving financial independence based on model inputs from the previous analysis steps. A key component of this service is the continuous analysis and updating of the financial plan and action items resulting from the planning and analysis work done. The Wealth Enhancement Service can be thought of as a financial planning service coupled with the investment supervisory service detailed in the Investment Supervisory Services section.

Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. Through the financial planning process, all questions, information and analysis are considered as they impact and are impacted by the entire financial and life

situation of the client.

In general, the financial plan can address any or all of the following areas:

- **PERSONAL:** We review family records, budgeting, personal liability, estate information and financial goals.
- **TAX & CASH FLOW:** We analyze the client's income tax and spending and planning for past, current and future years; then illustrate the impact of various investments on the client's current income tax and future tax liability.
- **INVESTMENTS:** We analyze investment alternatives and their effect on the client's portfolio.
- **INSURANCE:** We review existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.
- **RETIREMENT:** We analyze current strategies and investment plans to help the client achieve his or her retirement goals.
- **DEATH & DISABILITY:** We review the client's cash needs at death, income needs of surviving dependents, estate planning and disability income.
- **ESTATE:** We assist the client in assessing and developing long-term strategies, including as appropriate, living trusts, wills, review estate tax, powers of attorney, asset protection plans, nursing homes, Medicaid and elder law.

We gather required information through in-depth personal interviews. Information gathered includes the client's current financial status, tax status, future goals, returns objectives and attitudes towards risk. We carefully review documents supplied by the client, including a questionnaire completed by the client, and prepare a written report. Should the client choose to implement the recommendations contained in the plan, we suggest the client work closely with his/her attorney, accountant, insurance agent, or other professionals. Implementation of financial plan recommendations is entirely at the client's discretion.

We also provide general non-securities advice on topics that may include tax and budgetary planning, estate planning and business planning.

- Exchange-listed securities
- Securities traded over-the-counter
- Foreign issuers
- Warrants
- Corporate debt securities (other than commercial paper)
- Commercial paper

- Certificates of deposit
- Municipal securities
- Variable life insurance
- Variable annuities
- Mutual fund shares
- United States governmental securities
- Options contracts on securities
- Interests in partnerships investing in real estate
- Interests in partnerships investing in oil and gas interests

Typically the financial plan is presented to the client within six months of the contract date, provided that all information needed to prepare the financial plan has been promptly provided.

Financial Planning recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. All recommendations are of a generic nature.

CONSULTING SERVICES

Clients can also receive investment advice on a more focused basis. This may include advice on only an isolated area(s) of concern such as estate planning, retirement planning, or any other specific topic. We also provide specific consultation and administrative services regarding investment and financial concerns of the client.

We also offer a comprehensive wealth management process that ultimately involves nine steps. This most comprehensive service level is referred to as the Wealth Management Service. This service includes advice to clients on matters not involving securities or investments. It may include the investment supervisory services described in the Investment Supervisory Services section. The nine-step process includes, on the front-end, an asset and liability analysis, a cash flow analysis, and investment portfolio analysis, income tax review and planning, a risk tolerance assessment, a risk management review, a business structure review, an estate planning and asset protection summary and a financial independence assessment. The initial review culminates in a final report and action plan.

Once the initial review and planning work is completed, addressing items detailed in the action plan begins. A key component of this service is the continuous analysis and updating of the financial plan and action items resulting from the planning and analysis work done at the onset of the relationship and on an ongoing basis.

Consulting recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. All recommendations are of a generic nature.

AMOUNT OF MANAGED ASSETS

As of 12/31/2010, we were actively managing \$68,000,000 of clients' assets on a discretionary basis plus \$3,000,000 of clients' assets on a non-discretionary basis.

Item 5 Fees and Compensation

INVESTMENT SUPERVISORY SERVICES ("ISS") INDIVIDUAL PORTFOLIO MANAGEMENT FEES

CFG's compensation for these services is determined by the amount of assets under CFG's supervision. Fees are not negotiable unless noted. Supervisory fees are payable quarterly, in advance, based on the long market value of the asset under management at the end of the prior quarter. These fees are debited directly from the clients' accounts per the terms described within each client's agreement with CFG. There is generally a minimum fee for these portfolio management services of \$1,500 per year per household. The basic fee schedule for portfolio management services is depicted below.

| <u>Asset Amount</u> | <u>Marginal Rate</u> |
|------------------------------------|----------------------|
| First \$1 million | 1.00% |
| Next \$1 million | 0.75% |
| Next \$3 million | 0.50% |
| Remaining amounts over \$5 million | 0.35% |

The implementation of CFG's portfolio management service may use pooled investment vehicles such as exchange traded funds (ETFs) and traditional open-end mutual funds. Each pooled investment vehicle has its own advisory fees and other expenses, which are explained in each vehicle's prospectus or other required disclosure documentation. The investment supervisory fees paid to CFG as detailed in the schedule above do not include the fees of the investment vehicles, transaction costs, or any potential custody fees that are realized as CFG provides these investment supervisory services and implements the portfolio management process.

The investment advisory contract may be terminated by any of the parties effective upon written notice to the other parties. Should the relationship terminate, the client will be entitled to a refund of any supervisory fee not already earned by CFG. Whenever possible the refund will be deposited in the client's account(s) managed by CFG up until the point of termination. If that is not possible, the refund will be given in the form of a check made payable directly to the client.

Limited Negotiability of Advisory Fees: Although CFG Wealth Management Services, Inc. has established the aforementioned fee schedule(s), we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs are considered in determining the fee schedule. These include the complexity of the client, assets

to be placed under management, anticipated future additional assets; related accounts; portfolio style, account composition, reports, among other factors. The specific annual fee schedule is identified in the contract between the adviser and each client.

We may group certain related client accounts for the purposes of achieving the minimum account size requirements and determining the annualized fee.

Discounts, not generally available to our advisory clients, may be offered to family members and friends of associated persons of our firm.

PENSION CONSULTING FEES

At times CFG will provide investment consulting services to plan sponsors of retirement plans. These services generally encompass the selection of other advisors and service providers, advisory services for retirement plans, plan sponsors, and plan participants, as well as assistance in business transactions, help with completing administrative issues related to estate planning, relocation services, etc.

Retirement plan services and fees are typically detailed in a separate Client Agreement tailored to the needs of the specific Client. In general, fees for retirement plan clients are a fixed quarterly fee, negotiated at the onset of the relationship.

FINANCIAL PLANNING FEES

Our fees for Financial Planning are determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering into a contract with any client. There are different methods of delivering financial planning services. The fees associated with financial planning services are charged differently depending on the method of service delivery.

For financial planning services provided as part of our Wealth Enhancement Service, compensation for the total service (goes beyond the financial planning services in that it includes Investment Supervisory Services as described earlier) is determined by the size and complexity of a client's financial circumstance. Fees are payable quarterly, in advance, based on assets under management at the beginning of the prior quarter's end. These fees are debited from the client's account per the terms described within each client's agreement with CFG. The basic fee schedule for the Wealth Enhancement Service is depicted here:

| <u>Asset Amount</u> | <u>Marginal Rate</u> |
|------------------------------------|----------------------|
| First \$250,000 | 2.00% |
| Next \$250,000 | 1.50% |
| Next \$500,000 | 1.00% |
| Next \$1 million | 0.75% |
| Next \$3 million | 0.50% |
| Remaining amounts over \$5 million | negotiable |

The Wealth Enhancement Service contract may be terminated by any of the parties effective upon receipt of written notice to the other parties. Should the relationship terminate, the client will be entitled to a refund of any supervisory fee not already earned by CFG. Should the client terminate the agreement within the first twelve months following implementation, CFG will be entitled to collect fees attributable to the work associated with the portfolio construction process performed at inception or an amount equal to one-half (50%) of the annualized supervisory fee that would have been paid based on the initial billable value.

Our Financial Planning fees for services outside the scope of the Wealth Enhancement Service are calculated and charged on an hourly basis which is currently \$250 per hour. Although the length of time it will take to provide a Financial Plan will depend on each client's personal situation, we will provide an estimate for the total hours at the start of the advisory relationship.

We may request a retainer upon completion of our initial fact-finding session with the client; however, advance payment will never exceed \$500 for work that will not be completed within six months. The balance is due upon completion of the plan.

CONSULTING SERVICES FEES

Our comprehensive consulting service is referred to as the Wealth Management Service. The fee is determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering into a contract with any client and are fully negotiable.

Outside of the Wealth Management Service, our single-project base (rather than ongoing, comprehensive services) consulting service fees are calculated and charged on an hourly basis which is currently \$250 per hour. An estimate for the total hours is determined at the start of the advisory relationship.

The client is billed quarterly in arrears based on actual hours accrued.

GENERAL INFORMATION

Termination of the Advisory Relationship: A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days written notice. As disclosed above, certain fees are paid in advance of services provided. Upon termination of any account, any prepaid, unearned fees will be promptly refunded. In calculating a client's reimbursement of fees, we will pro rate the reimbursement according to the number of days remaining in the billing period. Whenever possible the refund will be deposited in the client's account(s) managed by CFG up until the point of termination. If that is not possible, the refund will be given in the form of a check made payable directly to the client.

Mutual Fund Fees: All fees paid to CFG Wealth Management Services, Inc. for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. These fees and expenses are described in each

fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Additional Fees and Expenses: In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transactions for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

Advisory Fees in General: Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

Limited Prepayment of Fees: Under no circumstances do we require or solicit payment of fees in excess of \$1200 more than six months in advance of services rendered.

Item 6 Performance-Based Fees and Side-By-Side Management

CFG Wealth Management Services, Inc. does not charge performance-based fees.

Item 7 Types of Clients

CFG Wealth Management Services, Inc. provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals)
- High net worth individuals
- Pension and profit sharing plans(other than plan participants)
- Corporations or other businesses not listed above

As previously disclosed in Item 5, our firm has established certain initial minimum account requirements, based on the nature of the service(s) being provided. For a more detailed understanding of those requirements, please review the disclosures provided in each applicable service.

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

METHODS OF ANALYSIS

The investment strategy used to implement advice given to clients is largely a function of each client's time horizon risk preference, taxes, and desired return. For non-profit and corporate clients, we may also consider the spending policy, current and future capital contributions, and other fiduciary constraints of the organization. Taken together, this information will determine an appropriate broad asset class allocation strategy for each client. We take an objective approach to designing and managing client portfolios.

Using target long-term weightings for broad asset classes as formalized by clients' investment objectives, we implement a tactical asset allocation strategy in which specific asset classes within the broader weightings are shifted in response to changing market conditions, interest rates, and capital market assumptions. The investment policy statement establishes the allowable ranges for each broad asset class. Using a tactical asset allocation process, we determine the appropriate sub-asset classes to utilize at any given point in time.

Mean-variance optimization (MVO), or Markowitz optimization is used to maximize the expected return of client portfolios while at the same time minimizing the inherent volatility of the portfolio. The relevant data set includes historical performance, volatility, and asset class correlation results for a given period of each asset or sub-asset class utilized, as well as twelve-month expected returns. In theory, but not necessarily in practice, this optimization process seeks to find the most efficient portfolio – the safest portfolio (lowest risk) for a given expected average return. Portfolios are optimized and tactical shifts are made generally once every three months.

We may use the following methods of analysis in formulating our investment advice and/or managing client assets:

Fundamental Analysis. We may attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the security.

Technical Analysis. We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement.

Technical analysis does not consider the underlying financial attractiveness of a security. This presents a risk in that a poorly-managed or financially unsound company may underperform regardless of market movement.

Cyclical Analysis. In this type of technical analysis, we measure the movements of a particular security against the overall market in an attempt to predict the price movement of the security.

Quantitative Analysis. We use mathematical models in an attempt to obtain more accurate measurements of a security's quantifiable data and predict changes to that data.

A risk in using quantitative analysis is that the models used may be based on assumptions that prove to be incorrect.

Asset Allocation. Rather than focusing primarily on securities selection, we attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

Mutual Fund and/or ETF Analysis. A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the client's portfolio.

Risks for all forms of analysis. Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

INVESTMENT STRATEGIES

We use the following strategy(ies) in managing client accounts, provided that such strategy(ies) are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

Long-term purchases. We purchase securities with the idea of holding them in the client's account for a year or longer. Typically we employ this strategy when:

- we believe the securities to be currently undervalued, and/or
- we want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

Short-term purchases. When utilizing this strategy, we purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase.

A short-term purchase strategy poses risks should the anticipated price swing not materialize; we are then left with the option of having a long-term investment in a security that was designed to be a short-term purchase, or potentially taking a loss.

In addition, this strategy involves more frequent trading than does a longer-term strategy, and will result in increased brokerage and other transaction-related costs, as well as less favorable tax treatment of short-term capital gains.

Margin transactions. In very few circumstances, as directed by the client, we may purchase securities for your portfolio with money borrowed from your brokerage account. This allows you to purchase more than you would be able to with your available cash, and allows us to purchase stock without selling other holdings.

Option writing. Only on an unsolicited (client-mandated) basis will we may use options as an investment strategy. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option, just like a stock or bond, is a security. An option is also a derivative, because it derives its value from an underlying asset.

The two types of options are calls and puts:

- A call gives us the right to buy an asset at a certain price within a specific period of time. We will buy a call if we have determined that the stock will increase substantially before the option expires.
- A put gives us the holder the right to sell an asset at a certain price within a specific period of time. We will buy a put if we have determined that the price of the stock will fall before the option expires.

While options are used in only very rare circumstances, when they are used, we will only use "covered calls", in which we sell an option on security you own. In this strategy, you receive a fee for making the option available, and the person purchasing the option has the right to buy the security from you at an agreed-upon price.

Risk of Loss. Securities investments are not guaranteed and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk.

Item 9 Disciplinary Information

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no reportable disciplinary events to disclose.

Item 10 Other Financial Industry Activities and Affiliations

Our firm and our related persons are not engaged in other financial industry activities and have no other industry affiliations.

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

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

CFG Wealth Management Services, Inc. and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code. Our Code of Ethics and policy on personal securities transactions addresses issues such as those items involving participation or interest in client transactions in addition to qualitative issues covering integrity, objectivity, competence, fairness, confidentiality, professionalism, and diligence.

CFG Wealth Management Services, Inc.'s Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to jharrier@cfgwms.com, or by calling us at 317-841-7959. The *Principles* of our Code of Ethics is included with this section.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client. It is important to understand that the large majority of the securities held in client accounts are either exchange traded funds or mutual

funds. These securities are not generally subject to the same risks as single-issuer securities of debt or equity.

It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts.

We may aggregate our employee trades with client transactions where possible and when compliant with our duty to seek best execution for our clients. In these instances, participating clients will receive an average share price and transaction costs will be shared equally and on a pro-rata basis. In the instances where there is a partial fill of a particular batched order, we will allocate all purchases pro-rata, with each account paying the average price. Our employee accounts will be included in the pro-rata allocation.

As these situations represent actual or potential conflicts of interest to our clients, we have established the following policies and procedures for implementing our firm's Code of Ethics, to ensure our firm complies with its regulatory obligations and provides our clients and potential clients with full and fair disclosure of such conflicts of interest:

1. No principal or employee of our firm may put his or her own interest above the interest of an advisory client.
2. No principal or employee of our firm may buy or sell securities for their personal portfolio(s) where their decision is a result of information received as a result of his or her employment unless the information is also available to the investing public.
3. It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account. This prevents such employees from benefiting from transactions placed on behalf of advisory accounts.
4. Our firm requires prior approval for any IPO or private placement investments by related persons of the firm.
5. We have established procedures for the maintenance of all required books and records.
6. Clients can decline to implement any advice rendered, except in situations where our firm is granted discretionary authority.
7. All of our principals and employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
8. We require delivery and acknowledgement of the Code of Ethics by each supervised person of our firm.
9. We have established policies requiring the reporting of Code of Ethics violations to our senior management.

The *Code of Ethics Principles* described below is an expression of our associates' recognition of their responsibilities to the public, to clients, to colleagues, and to their employer.

Principle 1: Integrity: A CFG associate shall offer and provide professional services with integrity.

CFG associates may be placed in positions of trust and confidence. The ultimate source of such public trust is the associate's personal integrity. In deciding what is right and just, an associate should rely on his or her integrity as the appropriate touchstone. Integrity demands honesty and candor, which must not be subordinated to personal gain and advantage. Within the characteristic of integrity, allowance can be made for innocent error and legitimate difference of opinion; but integrity cannot co-exist with deceit or subordination of one's principles. Integrity requires an associate of CFG to observe not only the letter but also the spirit of this Code.

Principle 2: Objectivity: A CFG associate shall be objective in providing professional services to clients.

Objectivity requires intellectual honesty and impartiality. It is an essential quality for any professional. Regardless of the service rendered or the capacity in which a CFG associate functions, he or she should protect the integrity of his or her work, maintain objectivity, and avoid subordination of his or her judgment that would be in violation of this Code.

Principle 3: Competence A CFG associate shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which the designee is engaged.

One is competent only when he or she has attained and maintained an adequate level of knowledge and skill, and applies that knowledge effectively in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation or client referral is appropriate. In addition to assimilating the common body of knowledge required and acquiring the necessary experience, associates shall make a continuing commitment to learning and professional improvement.

Principle 4: Fairness A CFG associate shall perform professional services in a manner that is fair and reasonable to clients, principles, partners and employers and shall disclose conflict(s) of interest(s) in providing such services.

Fairness requires impartiality, intellectual honesty and disclosure of conflict(s) of interest(s). It involves a subordination of one's own feelings, prejudices and desires so as to achieve a proper balance of conflicting interests. Fairness is treating others in the same fashion that you would want to be treated and is an essential trait of any professional.

Principle 5: Confidentiality: A CFG associate shall not disclose any confidential client information without the specific consent of the client unless in response to proper legal process, to defend against charges of wrongdoing by an associate or in connection with a civil dispute between the associate and client.

A client, by seeking the services of CFG Wealth Management Services, will be interested in creating a relationship of personal trust and confidence. This type of relationship can only be built upon the understanding that information supplied to the associates of the firm or other information will be confidential. In order to provide the contemplated services effectively and to protect the client's privacy, CFG associates shall safeguard the confidentiality of such information.

Principle 6: Professionalism: A CFG associate's conduct in all matters shall reflect credit upon the profession.

Because of the importance of the professional services rendered by people in the financial services industry, there are attendant responsibilities to behave with dignity and courtesy to all those who use the service, fellow professionals, and those in related professions. An associate of the firm also has an obligation to cooperate with fellow colleagues to enhance and maintain the profession's public image and to work jointly with other personnel to improve the quality of services. It is only through the combined efforts of all personnel in cooperation with other staff members that this vision can be realized.

Principle 7: Diligence: A CFG associate shall act diligently in providing professional services.

Diligence is the provision of services in a reasonably prompt and thorough manner. Diligence also includes proper planning for and supervision of the rendering of professional services.

Item 12 Brokerage Practices

Although CFG does not have any authority to determine with broker or dealer to be used without obtaining specific client consent, when a client does not provide directions regarding placement of their investment holdings and related brokerage dealings, we will recommend a broker. Brokers will be selected as a result of our ongoing due research in assessing the available universe of brokerage service providers based on a variety of criteria including the reasonableness of commissions and competitiveness of commission rates relative to available alternatives, the efficiency of executions, and administrative services support. CFG and its employees are not Registered Representatives of any broker/dealer and consequently do not receive any compensation from any broker/dealer for executing security transactions.

We have recommended Charles Schwab & Co., Inc. for brokerage services for a majority of its client's accounts. In addition to being the primary provider of brokerage services for our client accounts, Charles Schwab & Co. Inc. typically serves as custodian of client funds. Our ability to negotiate commissions and to obtain best price and execution may be limited due to our practice of entering security transactions through the client's custodian which typically also serves as broker for those security transactions.

CFG may require that clients establish brokerage accounts with the Schwab Institutional® division of Charles Schwab & Co., Inc. (Schwab), a FINRA-registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although we may recommend that clients establish accounts at Schwab, it is the client's decision to

custody assets with Schwab. CFG is independently owned and operated and not affiliated with Schwab.

Clients must include any limitations on this discretionary authority in this written authority statement. Clients may change/amend these limitations as required. Such amendments must be provided to us in writing.

We reserve the right to decline acceptance of any client account for which the client directs the use of a broker other than Schwab if we believe that this choice would hinder our fiduciary duty to the client and/or our ability to service the account. In directing the use of Schwab, it should be understood that CFG Wealth Management Services, Inc. will not have authority to negotiate commissions or to necessarily obtain volume discounts, and best execution may not be achieved. In addition, a disparity in commission charges may exist between the commissions charged to the client and those charged to other clients. Commission rates may vary from client to client based on criteria such as the amount of assets custodied and Schwab and whether or not the client uses electronic delivery (as opposed to paper delivery) of trade confirmations and monthly statements.

Clients should note, while CFG Wealth Management Services, Inc. has a reasonable belief that Schwab is able to obtain best execution and competitive prices, our firm will not be independently seeking best execution price capability through other brokers. Not all advisers require clients to direct it to use a particular broker-dealer.

Schwab provides CFG Wealth Management Services, Inc. with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Schwab Institutional. To our knowledge, these services are not contingent upon our firm committing to Schwab any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For our client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab Institutional also makes available to our firm other products and services that benefit CFG Wealth Management Services, Inc. but may not directly benefit our clients' accounts. Many of these products and services may be used to service all or some substantial number of our client accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist us in managing and administering our clients' accounts include software and other technology that:

- i. provide access to client account data (such as trade confirmations and account statements);

- ii. facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- iii. provide research, pricing and other market data;
- iv. facilitate payment of our fees from clients' accounts; and
- v. assist with back-office functions, recordkeeping and client reporting.

Schwab Institutional also offers other services intended to help us manage and further develop our business enterprise. These services may include:

- i. compliance, legal and business consulting;
- ii. publications and conferences on practice management and business succession; and
- iii. access to employee benefits providers, human capital consultants and insurance providers.

Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to CFG Wealth Management Services, Inc.. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to our firm. Schwab Institutional may also provide other benefits such as educational events or occasional business entertainment of our personnel. In evaluating whether to recommend or require that clients custody their assets at Schwab, we may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors we consider and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

CFG Wealth Management Services, Inc. will block trades where possible and when advantageous to clients. This blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple client accounts, so long as transaction costs are shared equally and on a pro-rated basis between all accounts included in any such block trade.

At times, block trades of exchange traded funds are used when there is a significant number of shares to be traded. This is done in order to increase the operational efficiency of the portfolio management process across similarly structured accounts and to attempt to complete trades across client accounts at prices as close to one another as possible. "Significant" should not be interpreted to mean a specific number of shares or dollar amount, and can only be considered on a case by case basis depending on market conditions. If a block trade is used, trades will be allocated across client accounts that would have otherwise received individual trades directly and initially in those respective accounts using the average price per share received in the block trade.

Block trading may allow us to execute equity trades in a timelier, more equitable manner, at an average share price. We will typically aggregate trades among clients whose accounts can be traded at a given broker, and generally will rotate or vary the order of brokers through

which it places trades for clients on any particular day. Our block trading policy and procedures are as follows:

1) Transactions for any client account may not be aggregated for execution if the practice is prohibited by or inconsistent with the client's advisory agreement with CFG Wealth Management Services, Inc.

2) The trading desk in concert with the portfolio manager must determine that the purchase or sale of the particular security involved is appropriate for the client and consistent with the client's investment objectives and with any investment guidelines or restrictions applicable to the client's account.

3) The person placing the block trade must reasonably believe that the order aggregation will benefit, and will enable CFG Wealth Management Services, Inc. to seek best execution for each client participating in the aggregated order. This requires a good faith judgment at the time the order is placed for the execution. It does not mean that the determination made in advance of the transaction must always prove to have been correct in the light of a rear-viewing perspective. Best execution includes the duty to seek the best quality of execution, as well as the best net price.

4) If the order 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 pro rata among the participating client accounts. However, adjustments to this pro rata allocation may be made to participating client accounts in accordance with the initial order ticket or other written statement of allocation. Furthermore, adjustments to this pro rata allocation may be made to avoid having odd amounts of shares held in any client account, or to avoid excessive ticket charges in smaller accounts.

5) Generally, each client that participates in the aggregated order must do so at the average price for all separate transactions made to fill the order, and must share in the commissions on a pro rata basis in proportion to the client's participation. Under the client's agreement with the custodian/broker, transaction costs may be based on the number of shares traded for each client.

6) No client or account will be favored over another.

Trade Error Policy

In the rare occurrence of a trade error in a client account, if the error is in CFG's error it is our intent to leave the profits with the Client if the transaction is suitable. If it is not suitable, CFG will correct the error by placing a correcting trade with the broker-dealer. Clients that select Schwab Institutional as their broker/custodian should be aware that Schwab will keep all trade error profits on an error regardless of who caused the error. If a trade error results in a loss, clients will be made whole by the party who caused the error.

If there is a gain and it does not remain in the Client's account upon correction, and Schwab is the custodian, Schwab will donate the amount of any gain \$100 and over to charity. If a loss occurs greater than \$100, Advisor will pay for the loss. Schwab will maintain the loss or gain (if such gain is not retained in your account) if it is under \$100 to minimize and offset its

administrative time and expense. Generally, if related trade errors result in both gains and losses in your account, they may be netted.

Item 13 Review of Accounts

INVESTMENT SUPERVISORY SERVICES ("ISS")

INDIVIDUAL PORTFOLIO MANAGEMENT

REVIEWS: While the underlying securities within Individual Portfolio Management Services accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

Our investment supervisory service includes different review levels.

- The first level is an ongoing review of client investment activity. This review might include an assessment of current cash positions, any pending service requests, and a review of asset class positions relative to their current optimized weighting. Jonathan Harrier, as Chief Investment Officer is primarily responsible for conducting these reviews with assistance from Karen Hays as Office Manager.
- CFG will generally reposition client accounts quarterly. The repositioning consists of implementing the results of the most recent optimization analysis. Typically this is a client-by-client analysis that considers various factors discussed in each client's investment policy statement. Jonathan Harrier as Chief Investment Officer is primarily responsible for repositioning client accounts according to the firm's investment management process.
- CFG will generally review and assess the appropriateness of each client's stated objectives as detailed in their respective investment policy statements on an annual basis. We determine the success of the client's investment strategy based on their measured ability to obtain their stated goal and not solely on the success of the total return of their investment holdings. Michael Puckett, CFP, AIFA is primarily responsible for conducting this annual review and financial planning work.

REPORTS: Clients who are part of the investment supervisory services will receive monthly account statements and trade confirmations from a qualified custodian which will include changes in account values, asset composition, investment holding details, transaction details including purchase and sale information as well as deposits and withdrawals, dividends and interest, fees and charges, and asset transfers.

CFG will provide reports based on activity provided by the activity records of the custodian on a monthly and quarterly basis. These reports will generally:

- o list all of a client's holdings by security position as of a specified date
- o illustrate the client's asset allocation by comparing the actual portfolio allocation with the target allocation defined in each client's investment policy statement

- o detail portfolio returns over different time periods and detail different components of portfolio return including the beginning value by period, net contributions, capital appreciation, income, management fees, other expenses, and the portfolio ending value and investment gain for the period.
- o provide comparative performance benchmarks along with the client's portfolio performance

PENSION CONSULTING SERVICES

REVIEWS: CFG Wealth Management Services, Inc. will review the client's Investment Policy Statement (IPS) whenever the client advises us of a change in circumstances regarding the needs of the plan. CFG Wealth Management Services, Inc. will also review the investment options of the plan according to the agreed upon time intervals established in the IPS. Such reviews will generally occur quarterly.

REPORTS: These client accounts will receive reports as contracted for at the inception of the advisory relationship.

Jonathan Harrier (Chief Investment Officer) and Michael Puckett (CEO) are primarily responsible for the development and presentation of the reviews and reports for this service.

FINANCIAL PLANNING SERVICES

REVIEWS: While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for Financial Planning clients unless otherwise contracted for and as the need for a review arises.

REPORTS: Financial Planning clients will receive a completed financial plan. Additional reports will not typically be provided unless otherwise contracted for and as the need for a review arises.

Michael Puckett (CEO) is primarily responsible for the development and presentation of the reviews and reports for this service.

CONSULTING SERVICES

REVIEWS: While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for Consulting Services clients unless otherwise contracted for. Such reviews will be conducted by the client's account representative.

REPORTS: These client accounts will receive reports as contracted for at the inception of the advisory engagement.

Depending on the circumstance, Jonathan Harrier (Chief Investment Officer) and/or Michael Puckett (CEO) are primarily responsible for the development and presentation of the reviews and reports for this service.

Item 14 Client Referrals and Other Compensation

CLIENT REFERRALS

Currently CFG has no formal compensation arrangements for the receipt of client referrals. However, at CFG's discretion, gifts or client appreciation events may be given or held. These items or events could be considered to be a direct or indirect form of compensation to clients for past referrals to CFG.

OTHER COMPENSATION OR ECONOMIC BENEFIT

CFG may recommend/require that clients establish brokerage accounts with the Schwab Institutional® division of Charles Schwab & Co., Inc. (Schwab), a FINRA-registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although CFG may recommend/require that clients establish accounts at Schwab, it is the client's decision to custody assets with Schwab. CFG is independently owned and operated and not affiliated with Schwab.

Schwab provides CFG with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's clients' assets are maintained in accounts at Schwab Institutional. These services are not contingent upon CFG committing to Schwab any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For CFG's client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab Institutional also makes available to CFG other products and services that benefit CFG but may not directly benefit its clients' accounts. Many of these products and services may be used to service all or some substantial number of CFG accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist CFG in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing

and other market data; (iv) facilitate payment of CFG fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Schwab Institutional also offers other services intended to help CFG manage and further develop its business enterprise. These services may include: (i) compliance, legal and business consulting; (ii) publications and conferences on practice management and business succession; and (iii) access to employee benefits providers, human capital consultants and insurance providers. Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to CFG. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to CFG. Schwab Institutional may also provide other benefits such as educational events or occasional business entertainment of CFG personnel. In evaluating whether to recommend or require that clients custody their assets at Schwab, CFG may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors it considers and not solely the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

Item 15 Custody

We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm directly debits advisory fees from client accounts.

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

In addition to the periodic statements that clients receive directly from their custodians, we also send account statements directly to our clients on a monthly basis. We urge our clients to carefully compare the information provided on these statements to ensure that all account transactions, holdings and values are correct and current.

CFG will provide reports based on activity provided by the activity records of the custodian on a monthly and quarterly basis. These reports will generally:

- list all of a client's holdings by security position as of a specified date
- illustrate the client's asset allocation by comparing the actual portfolio allocation with the target allocation defined in each client's investment policy statement
- detail portfolio returns over different time periods and detail different components of portfolio return including the beginning value by period, net contributions, capital appreciation, income, management fees, other expenses, and the portfolio ending value and investment gain for the period.

- provide comparative performance benchmarks along with the client's portfolio performance

Our firm does not have actual or constructive custody of client accounts.

Item 16 Investment Discretion

Clients may hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission. In almost all cases, this is the type of arrangement we have with our clients. It is considered crucial to the effective implementation of our investment advisory services.

Clients give us discretionary authority when they sign a discretionary agreement with our firm, and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

To be more specific, upon adoption of the Client Agreement and the necessary brokerage account authorizations, CFG as the Investment Adviser/Manager will have the full power and authority to supervise and direct the investment of any assets held in the Client's account. This includes the power and authority to buy, sell, exchange, convert, and otherwise effect transactions in any stocks, bonds, mutual funds, exchange traded funds, or other securities, all without prior consultation from the Client.

Clients appoint CFG as attorney-in-fact for purposes of exercising the foregoing power and authority. This is typically accomplished by the client granting us a limited power of attorney during the brokerage account setup process. If, and in the event that any Client wishes to have the assets managed by CFG subject to certain investment objectives and/or restrictions, it will be the Client's responsibility to notify us, in writing, of the investment objectives of any account and of any changes or modifications.

Any and all Client-imposed objectives and/or restrictions, to be effective, must be acknowledged by CFG in writing. Unless any Client so notifies CFG of specific restrictions and/or investment objectives, the investments recommended for, or actions taken on behalf of the Client, shall be deemed not to be restricted and to be in accord with the Client's investment objectives.

Item 17 Voting Client Securities

As a matter of firm policy, we do not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Clients are responsible for instructing each custodian of the assets, to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

We do not offer any consulting assistance regarding proxy issues to clients.

Item 18 Financial Information

Under no circumstances do we require or solicit payment of fees in excess of \$1200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

As an advisory firm that maintains discretionary authority for clients we are also required to disclose any financial condition that is reasonable likely to impair our ability to meet our contractual obligations. CFG Wealth Management Services, Inc. has no additional financial circumstances to report.

CFG Wealth Management Services, Inc. has not been the subject of a bankruptcy petition at any time during the past ten years.