

BGM Wealth Management, LLC

Form ADV Part 2A

November 1, 2013

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This Brochure provides information about the qualifications and business practices of BGM Wealth Management, LLC. If you have any questions about the contents of this Brochure, please contact Jon Meyer at 952-844-2500. 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 BGM Wealth Management, LLC. is also available on the SEC's website at www.adviserinfo.sec.gov.

Material Changes

Since the date of BGM Wealth Management's last annual Brochure dated, November 15, 2012, BGM Wealth Management has not had any material changes to its business, or its service offerings.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to SEC Rules, we will ensure that you receive a summary of any materials changes within 120 days of the close of our business' fiscal year. We will also provide other ongoing disclosure information about material changes or new information as necessary. We will provide a current brochure at any time without charge. A Brochure may be requested by contacting Jon Meyer at 952.844.2500 or email at jmeyer@bgmwealth.com.

Additional information about BGM Wealth Management, LLC is also available via the SEC's website www.adviserinfo.sec.gov.

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Advisory Business

BGM Wealth Management, LLC (BGM Wealth) is an independent wealth management firm providing comprehensive financial services for a range of clients, including entrepreneurs, small business owners, corporate executives, and high-net-worth individuals. BGM Wealth's goal is to understand each client's lifestyle and goals, address investment concerns, and develop a complete plan to help maintain and ensure financial well-being. For more than a decade, the firm has helped implement financial solutions for clients that allow them to achieve their goals and live the life they want.

BGM Wealth was established in 1996 by BGM Holdings, LLC, as an affiliate to Boeckermann, Grafstrom and Mayer, LLC, a certified public accounting firm. As co-founder, Mr. Boeckermann continues to own 44% of BGM Holdings, LLC and acts as Chairman of the Board of BGM Wealth. Jon Meyer joined BGM Wealth in 1999 and as a minority owner acts as the firm's President.

At BGM Wealth, the comprehensive strategies for financial planning, investment management, retirement income planning and tax planning give clients the freedom to focus on the things that are truly important to them. The firm provides the following investment advisory services to help clients formulate positive decisions that will affect the rest of their lives:

Financial Planning and Consulting

Our goal is to help clients assess where they are today and where they want to be tomorrow, as well as to provide the tools to meet those goals. We believe financial planning is a process and not just a one-time event. Our Personal Financial Planning services are constructed around a minimum of three meetings, and more if necessary.

- In our first meeting, we discuss financial objectives and obtain detailed financial information and other pertinent data to complete an investor profile worksheet.
- In the second meeting, we explain our preliminary observations and how they relate to stated objectives. We then determine if any objectives, assumptions, or goals need to be changed.
- In the third meeting, and subsequent ones if necessary, we present our final recommendations.

Our customized approach will address any or all of the following issues:

- Net worth calculation: We review all assets and liabilities for potential opportunities or risks.
- Tax and cash flow analysis: We review past tax and spending to find opportunities for future tax savings and spending needs. Future tax liability is always taken into account in developing the investment portfolio.
- Risk management: We review a family's needs based on a death, disability, long-term care, liability or home/auto. When needed, we will bring in outside consultants in this analysis.
- Retirement planning: We analyze where you are today and where you want to be in the future. We then develop income strategies and investment portfolios to help achieve that vision.

- Estate planning: We assist in developing an ongoing estate plan (reviewed every three to five years) that may include wills, trusts, powers of attorney, healthcare directives, asset protection and multi-generational family issues. We will work with your attorney in their drafting the final documents.
- Investment planning: We review past investment decisions, develop an overall asset allocation to fit your goals, and monitor that plan on an ongoing basis.
- Education planning: We analyze the costs of the school you want your children or grandchildren to attend and develop a savings plan to achieve this goal.
- Business planning: We recognize that most business owners intertwine their business and personal lives. We analyze the business for opportunities to build the wealth of the owner outside the business and to protect the business from unknown liabilities. We will work with your accountant and attorney in this process.

At the end of this initial process, BGM Wealth produces our written analysis, which includes a summary of recommendations. We work closely with our clients to make sure all action items are implemented. BGM Wealth continues to monitor each client's investment life and make adjustments as necessary.

Portfolio Management Selection, Performance Evaluation and Monitoring Services

BGM Wealth consults with our clients to obtain detailed financial information and other pertinent data to determine appropriate individualized investment guidelines, confirm and understand unique risk tolerance, and identify other personalized factors that will assist us in ascertaining the investment style of each client's asset management account. This may include tax-related planning and other non-investment matters. We will construct a diversified selection of portfolio investments and manage the client's portfolio to meet a client's investment goals. We furnish performance monitoring services to clients, provided by an independent custodian broker/dealer and through internally generated reports. At a minimum, informative quarterly performance evaluation reports are provided to monitor how investments have performed over the selected period.

Assets Under Management:

As of September 30, 2013, BGM Wealth had \$276,480,000 in assets under management in 508 discretionary accounts and \$56,000 in assets under management in 3 non-discretionary accounts.

Fees and Compensation

BGM Wealth offers a complimentary "Get Acquainted" meeting so that prospective clients can determine if our services are right for them. We use this meeting to discuss and understand individual goals and objectives, review a prospective client's current financial situation, and to jointly determine if an investment advisory relationship with BGM Wealth would be a complimentary fit. This meeting is also a chance for a prospective client to better understand how BGM Wealth can add value to their financial life, to jointly identify any planning issues that may have been historically overlooked, and discuss the costs

involved in our services. At the time a new investment advisory relationship is established with BGM Wealth, a written agreement specifies the terms and conditions of the relationship. The agreement details the fees associated with advisory services and the specific assistance provided by BGM Wealth.

Typically, BGM Wealth requires a minimum \$250,000 of investable assets to establish an advisory relationship. We will, however, work with those that want to hire us for our minimum fee until they reach the \$250,000 threshold and then we would change back to our normal fee schedule. In these cases, our minimum fee is \$2,500 per year.

Contracts may be terminated by either party upon written notice. The client may receive a refund of any unearned fees during the first six months except for costs of set-up and early termination. Thereafter, fees are refunded to the client prorated to the amount of days in the quarter in which the client received services. A full refund is provided without penalty if the client terminates the contract, in writing, within five days of the contract execution.

Financial Planning and Consulting

Clients with more than \$1,000,000 in investable assets with us will receive our comprehensive financial planning services as part of their ongoing fees. For those with less than \$1,000,000, or for those who prefer to hire us on a project basis, we charge hourly for our services.

Our initial comprehensive financial planning services are established at an hourly fee or on a project basis. Fees charges range from \$40 to \$300 per hour, at a minimum, depending on the level of service and the individuals required to meet the client's needs. Our typical fees for an initial, comprehensive financial plan average \$3,500 and can be higher for more complex cases. Annual retainers for financial planning may be negotiated, depending on each client's needs and circumstances.

Portfolio Management Selection, Performance Evaluation and Monitoring Services

BGM Wealth typically advises on portfolios with a minimum value of \$250,000. Investment advisory fees will typically be a variable fee that may range from 0.50% to 1.00% of the client's investable assets, based on the size, nature and complexity of the account. Our fees are payable in advance on a quarterly basis, on the first day of the quarter and are based on the value (market value, or fair market value in absence of market value, plus any credit balance or minus any debit balance) of the assets at the end of the previous quarter. "Assets under management" includes assets held in an account whether or not the purchase of the assets was at the recommendation of BGM Wealth advisory personnel. There is a minimum annual fee of \$2,500. Fees may be subject to negotiation.

Clients with mutual funds in their portfolios are effectively paying BGM Wealth and the mutual fund advisor for the management of the client's assets because mutual funds pay advisory fees to the mutual fund advisor and such fees are therefore indirectly charged to all holders of the mutual fund shares. Clients who place mutual fund shares under the BGM Wealth's management are therefore subject to both a direct management fee of BGM Wealth, the indirect management fee of the mutual fund and all applicable trading costs.

Clients who elect to use Separate Account Managers (SAM) in the management of their portfolio will be paying BGM Wealth and the selected SAM for the management of the client's assets. SAM's have the

discretion to trade individual securities on behalf of the client, with the client's best interest in mind. Clients who use a SAM are subject to the direct management fee of BGM Wealth, the SAM fee and all applicable trading costs.

Performance-Based Fees and Side-By-Side Management

BGM Wealth does not charge any performance-based fees (fees based on a share of capital gains or on capital appreciation of the assets of a client) believing they may create an unintentional conflict of interest. Additionally, we do not charge side-by-side management fees.

Types of Clients

BGM Wealth provides services to high-net-worth individuals, entrepreneurs, small business owners, and corporate executives. In addition, BGM Wealth clients may also include banking institutions, corporations, pension and profit-sharing plans, and charitable organizations.

Methods of Analysis, Investment Strategies and Risk of Loss

BGM Wealth constructs portfolios that are diversified between equities, fixed income and cash. We encourage each client to have at least a small portion of his or her portfolio invested in equities because we believe in the U.S. economy. Reducing overall portfolio risk is the reason we diversify by market capitalization (large-cap versus small-cap), geography (domestic versus international), investment style (growth versus value), and management approach (passive/indexing versus active).

As investment advisors, we invest in equities through no-load mutual funds or separately managed accounts, depending on a client's circumstances. We use mutual funds and managed accounts to gain diversified exposure and professional management with lower costs in each asset class. Many clients come to us with concentrated stock positions and our job is to help clients diversify those positions with a prudent investment management style that considers the effect of taxes as well.

We also believe that every portfolio benefits from a fixed income allocation, no matter what the investor's age. Fixed income has a moderating effect in a down market. For those who need it, it can provide income. For clients with short-term goals, fixed income can be used to protect the principal earmarked for more immediate goals.

In the fixed-income portion of a portfolio allocation, we use short- and intermediate-term bonds. We do not use long-term bonds because of the higher interest rate risk for a nominal increase in yield. We typically do not use bond funds because unnecessary expenses can sometimes diminish overall yield. Instead, we may propose building a bond ladder, which averages out the return on interest over time while reducing interest rate risk without incurring additional fees charged by mutual fund providers. This approach involves purchasing individual bonds in two- to six-year maturities and holding each to

maturity. Then we roll them into new bonds at the prevailing rate of interest for an additional five years. This strategy can be effectively applied to many investors' time horizons to meet numerous goals.

Finally, BGM Wealth is strongly committed to an asset allocation approach. We tailor an investment portfolio that fits each individual client. We consult academic research, along with historical and statistical data, to produce various models that may help clients achieve their objectives. We establish a target allocation for each asset class. We determine an expected rate of return and standard deviation for the portfolio. We define this allocation and the corresponding expectations of portfolio performance in each client's investment policy statement.

BGM Wealth believes it is important for each client to understand investing in securities involves a risk of loss that each client should be prepared to bear. There is no assurance that an investment will provide positive performance over any period of time. Past performance, while important, is no guarantee of future results and different periods and market conditions may result in significantly different outcomes. Specific types of risk each client should understand, as they may be applicable to unique investment assets in a portfolio, include:

Market Risk

The market values of securities owned may decline, at times sharply and unpredictably. Market values of equity securities are affected by a number of different factors, including the historical and prospective earnings of the issuer, the value of its assets, management decisions, and decreased demand of an issuer's products or services, increased production costs, general economic conditions, interest rates, currency exchange rates, investor perceptions and market liquidity.

Economic Risk

Changes in economic conditions, for example, interest rates, inflation rates, political and diplomatic events and trends, tax laws and innumerable other factors, can substantially and adversely affect investments.

Asset Allocation Risk

Asset allocation may have a more significant effect on account value when one of the heavily weighted asset classes is performing more poorly than the others. Diversification and strategic asset allocation do not assure profit or protect against loss in declining markets.

Concentrated Portfolio Risk

To the extent a portfolio has a large portion in a single security or several securities it bears more risk because it is not diversified. Changes in the value of significantly over-weighted security positions may have a much more substantial directional effect, either negative or positive, on the portfolio's performance.

Emerging Foreign Market Risk

Investment in the securities of foreign issuers may experience more rapid and extreme changes in value than funds with investments solely in securities of U.S. companies. The securities markets of many

foreign countries are relatively small, with limited number of companies representing a small number of industries. Additionally, foreign securities issuers may not be subject to the same degree of regulation as U.S. issuers. Reporting, accounting, and auditing standards of foreign countries differ, in some cases significantly, from U.S. standards. Also, nationalization, expropriation or confiscatory taxation, currency blockage, political change or diplomatic developments could adversely affect investments in a foreign country.

Fixed Income Risk

Including: interest rate risk, which is the chance that bond prices overall will decline because of rising interest rates; income risk, which is the chance that a strategy's income will decline because of falling interest rates; credit risk, which is the chance that a bond issuer will fail to pay interest and principal in a timely manner, or that negative perceptions of the issuer's ability to make such payments will cause the price of the bond to decline; and call risk, which is the chance that during periods of falling interest rates, issuers of callable bonds may call (repay) securities with higher coupons or interest rates before their maturity dates. The investment would then lose any price appreciation above the bond's call price and would be forced to reinvest the unanticipated proceeds at lower interest rates, resulting in a decline in the investment's income.

Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of BGM Wealth or the integrity of BGM Wealth's management. BGM Wealth and its employees have not been involved in any legal or disciplinary events related to past or present activities.

Other Financial Industry Activities and Affiliations

BGM Wealth is not registered and does not have an application pending to become registered as a securities broker dealer, a futures merchant, commodity pool operator or a commodity trading adviser. None of our personnel are associated with a broker dealer, futures or commodity firm.

Daniel Boeckermann, Chief Manager and some associated persons of BGM Wealth are associated with Boeckermann, Grafstrom & Mayer, P.A., an accounting and consulting firm providing audit, compliance, tax and consulting services to clients. Many clients choose to work with both BGM Wealth and Boeckermann, Grafstrom & Mayer for tax preparation, business consulting, and other complementary services.

Daniel A. Boeckermann is the Chairman of the Board of Venture Bancshares, Inc. Clients of Venture Bancshares, Inc. may also be clients of BGM Wealth. Clients will be informed of conflicts or disclosures including that investments made through BGM Wealth are not obligations of BGM Wealth, the bank and are not federally insured by the FDIC, the Federal Reserve Board or any other government agency.

Clients may be solicited to invest in products in which a related person holds a financial interest. Currently, Mr. Boeckermann as well as other BGM Wealth personnel, holds a financial interest in Venture Bancshares, Inc., a limited partnership. BGM Wealth clients may also be clients of Venture bank and may use banking services.

Cornerstone Private Asset Trust Company, LLC is a Trust Company and an affiliate of BGM Wealth. Both the Trust Company and BGM Wealth are operated as separate and distinct business entities and do not share personnel or services beyond common ownership.

Jon T. Meyer is licensed to sell life, health, disability, and long-term care insurance products through BGM Financial Resource LLC, an affiliate of BGM Wealth. BGM Financial Resources and Mr. Meyer may receive compensation for the sale of such products. Our clients are under no obligation to purchase insurance products through BGM Financial Resource LLC and are free to choose other insurance sources through which to implement investment advisory recommendations.

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

We have a fiduciary duty to our clients; to act in the best interest of each client and always place the client's interests first and foremost. BGM Wealth takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as BGM Wealth's policies and procedures. We also strive to handle clients' non-public information in such a way to protect information from falling into hands that have no business reason to know such information and provides clients with our Privacy Policy (included as the attached supplement).

BGM Wealth maintains a Code of Ethics for its staff. The Code of Ethics contains provisions for standards of business conduct in order to comply with federal securities laws, personal securities reporting requirements, pre-approval procedures for certain transactions, code violation reporting requirements, and safeguarding of material non-public information about client transactions. BGM Wealth's Code of Ethics establishes expectations for business conduct and each employee must annually acknowledge the terms of the Code of Ethics.

Employees of BGM Wealth may trade for their own accounts in securities which are recommended to and/or purchased for our clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of BGM Wealth will not interfere with:

- Making decisions in the best interest of our advisory clients; and
- Implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of our clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market

activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, to reasonably prevent conflicts of interest between BGM Wealth employees and our clients.

Client accounts may trade in the same securities on an aggregated basis when consistent with BGM Wealth's obligation of best execution. In such circumstances, the client accounts will share commission costs equally and receive securities at a total average price. We will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis and any exceptions will be documented in writing.

BGM Wealth's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Jon Meyer at 952.844.2500 or email jmeyer@bgmwealth.com.

Brokerage Practices

The Custodian and Brokers We Use

Clients assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. BGM Wealth has maintained an exclusive relationship with Schwab Advisor Services, a division of Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, to maintain custody of investment assets and to effect trades. Schwab is recognized as an industry leader in providing superior execution quality and service. Schwab also continues to offer technical enhancements and on-line capabilities that allow the transactions entered by BGM Wealth to be handled efficiently with minimal problems or errors. BGM Wealth intentionally utilizes only one custodian to simplify processing and system support. Although BGM Wealth may recommend that clients establish accounts at Schwab, it is the client's decision of where to custody assets, with the understanding that using a custodian other than Schwab may result in the loss of possible advantages derived from bunching of orders for several clients as a single transaction or more attractive share classes at lower minimums. Also, even though an account is maintained at Schwab, clients can still use other brokers to execute trades for their account. BGM Wealth is not affiliated with Schwab.

How We Select Brokers/Custodians

BGM Wealth seeks to recommend a custodian/broker who will hold client assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. BGM Wealth considers a wide range of factors such as size of the organization, financial strength and stability, quality of service, competitive in the price of services and willingness to negotiate commission pricing, and reputation among its peers.

BGM Wealth may recommend transactions in fixed income securities. BGM Wealth may execute municipal bond transactions through broker dealers other than Schwab depending upon the type of bond and price comparisons. Best execution is tested periodically when similar or the same bonds appear in inventory at multiple dealers. Outside broker dealers may act as principal on those trades.

Schwab is compensated by charging commission, collecting shareholders service fees from Mutual Funds companies or other fees associated with trade execution. Schwab does not charge separately for custody services.

Brokerage and Custody Costs

For our clients' accounts that Schwab maintains, Schwab generally does not charge separately for custody services but is compensated by charging commissions or other fees on trades that it executes or that settle in a Schwab account. This includes shareholder service fees from mutual fund companies. This commitment benefits clients because the overall commission rates are lower than they would be otherwise. In addition to commissions, Schwab charges a flat dollar amount as a "prime broker" or "trade away" fee for each trade that is executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into a Schwab account. In your account, this will most likely be bond trades and the approximate fee is \$25 per transaction. This fee is evaluated against the potential higher yields we might find by purchasing bonds through broker-dealers other than Charles Schwab.

These fees are in addition to the commissions or other compensation clients pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for client accounts. We have determined that having Schwab execute most trades is consistent with our duty to seek "best execution" of client trades. Best execution means the most favorable terms for a transaction based on all relevant factors.

Products and Services Available to Us from Schwab

Schwab Advisor Services makes a business of serving independent investment advisory firms like BGM Wealth. They provide BGM Wealth and our clients with access to its institutional brokerage – trading, custody, reporting, and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of these services help us manage or administer our clients' accounts, while others help us manage our business. Generally, Schwab's support services are available at no charge to BGM Wealth.

Services that Benefit Clients. Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some which might not otherwise have access to or which would require a significantly higher minimum initial investment by our clients.

Services That May Not Directly Benefit Clients. Schwab also makes other products and services available to us that benefit us but may not directly benefit clients. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that (1) provides access to client account data (such as duplicate trade confirmations and account statements), (2) facilitate trade execution and allocated aggregated trade orders for multiple client

accounts, (3) provide pricing and other market data, (4) facilitate payment of our fees from clients' accounts, and (5) assist with operation functions, recordkeeping and client reporting. Schwab also offer other services intended to help us manage and further develop our business enterprise, which includes (1) educational conferences and events, (2) consultation on technology, compliance, legal and business needs, (3) publications and conferences on practice management and business succession.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to BGM Wealth. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees.

"Soft Dollars" is a recognized term that refers to the receipt of a product or service from a broker dealer or third party in exchange for the commissions generated from executing brokerage transactions on behalf of client accounts.

Access to Schwab's Services. BGM Wealth recognizes that these services may be available to us due to the collective total assets maintained by our clients. This benefit may give us an incentive to recommend that clients maintain accounts with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than a client's interest in receiving the best value in custody services and the most favorable execution of transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interest of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services and not Schwab's services that benefit only us. We do not believe there is a material conflict of interest present.

It is BGM Wealth's policy that the firm will not affect principal or agency cross securities transactions for client accounts. BGM Wealth will also typically not cross trades between client accounts, unless it would be mutually beneficial to both clients and in which case the transaction would be fully disclosed to and approved by both clients. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction.

Review of Accounts

BGM Wealth performs investment advisory security selection and portfolio recommendations for client's advisory accounts. Accounts are reviewed, at a minimum, quarterly and a transaction and investment report is provided to the client. Additional performance reports may be prepared at the client's discretion. On an as needed basis, a review may be triggered by tax law changes, market changes or market conditions. A more frequent review may also be instigated by a client inquiry due to personal changes. Clients are provided with a comprehensive annual investment review, including current investment recommendations. Clients also receive statements from the custodian broker/dealer of their accounts.

Those clients to whom BGM Wealth provides Financial Planning and Consulting services will receive reports summarizing our analysis and conclusions as requested by the client or otherwise agreed to in writing. Annually, we review clients' portfolios for tax opportunities (fourth quarter) and look forward to a one-on-one meeting to discuss their investments, concerns, and any changes in their personal situation.

Communication with our clients occurs by way of meetings, telephone calls, letter, email, and portfolio reports. The frequency is dependent on the client's need and wants. We also provide a quarterly economic analysis with our insights on the economy and its effects on personal portfolios, as well as a commentary with new ideas that may be of interest to clients.

Client Referrals and Other Compensation

BGM Wealth has arrangements with affiliated firms (i.e. Boeckermann, Grafstrom & Mayer, P.A., Cornerstone Private Asset Trust Company, LLC and Venture Bank, LLC) and individuals who may receive compensation from BGM Wealth for referring a new client relationship. If a client is referred under this arrangement, disclosure is provided to the prospective client at the time of the solicitation and referral. These referral fees represent no additional expenses to client accounts.

Custody

Clients should receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains each client's investment assets. BGM Wealth urges you to carefully review such statements and compare such official custodial records to the quarterly performance reports that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Investment Discretion

Clients must provide prior written authorization to establish a discretionary account with BGM Wealth. Even with discretion, BGM Wealth uses it in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, BGM Wealth observes the investment policies, limitations and restrictions established by each client. Investment guidelines and restrictions must be provided to BGM Wealth in writing.

Voting Client Securities

As a matter of firm policy and practice, BGM Wealth empowers each client with full rights and authority to vote on proxy matters in connection with their individual investments. Schwab (custodian, broker/dealer) sends proxy materials in a timely manner to each client. Clients are free to vote on proxy issues as they see fit. Private Managers receive and vote proxies for all client assets under their management.

Financial Information

As a registered investment adviser, BGM Wealth is required to provide clients with certain financial information or disclosures about BGM Wealth's financial conditions. BGM Wealth has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Brochure Supplement - Privacy Policy

BGM Wealth Management, LLC recognizes and respects the privacy of our client relationships and is committed to maintaining the highest standards of confidentiality. We will provide the annual Privacy Notice to all of our clients who obtain financial products and services in accordance with Title V of the Gramm-Leach-Bliley Act of 1999 and its implementing regulations.

BGM Wealth is entrusted with, or has access to, non-public personal information about its clients and is responsible for the confidentiality and security of that information. BGM Wealth recognizes and respects the privacy expectation of its customers and will only disclose customer information it collects to third parties who are not affiliated with BGM or its affiliates (1) as authorized or directed by a client, (2) as permitted by law, (3) to service providers who provide investment products or services to the client, (4) in connection with an audit or examination or (5) to respond to a subpoena or similar legal process. Information provided to BGM Wealth is used to help clients meet their personal financial goals while guarding against any real or perceived infringements of privacy rights. BGM Wealth may disclose client information we have collected to our affiliates Boeckermann, Grafstrom & Mayer, P.A., BGM Financial Resources, LLC and Cornerstone Private Asset Trust Company, LLC. BGM Wealth's policy with respect to personal information is stated below:

- BGM Wealth maintains a hardware firewall to protect our server from intrusion by outside parties whereby non-public personal information might be accessed from outside BGM Wealth.
- BGM Wealth maintains all customer records electronically, and in cases where we must maintain paper files, they are in a secure area in locked cabinets so that access to those records can be controlled. All electronic client records are password protected.
- BGM Wealth has a disaster recovery plan that provides for redundant recordkeeping.

- BMG Wealth personnel are regularly coached on providing a high level of professionalism to all clients, making each employee responsible for the security and confidentiality of client information. BGM Wealth limits employee access to non-public personal information to those employees who have a business reason for knowing such information.

All clients receive the BGM Wealth Privacy Policy as part of the process for establishing a client relationship. Annually, BGM Wealth also mails each client a Privacy Notice.