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FORM ADV PART 2A BROCHURE

This brochure provides information about the qualifications and business practices of Family Wealth Consultants, Inc. If you have any questions about the contents of this brochure, please contact us at (408) 453-2220. 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 Family Wealth Consultants, Inc is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Family Wealth Consultants, Inc is 128494.

Family Wealth Consultants, Inc is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Summary of Material Changes

Form ADV Part 2A, Item 2

This disclosure brochure is a new document prepared according to new regulatory rules and requirements. As such, this document is different in structure and requires certain new information that our previous brochure did not require.

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 new SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new brochure as necessary based on changes or new information, at any time, without charge.

Any material conflicts of interest between you and our firm, or our employees are disclosed in this disclosure brochure. If at any time, additional material conflicts of interest develop, we will provide you with written notification of the material conflicts of interest or an updated disclosure brochure.

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Advisory Business

Form ADV Part 2A, Item 4

Family Wealth Consultants, Inc. is a registered investment adviser based in San Jose, CA. We are organized as a corporation under the laws of the State of California. We have been providing investment advisory services since 2003. Craig L. Martin, President/CCO is our principal owner. Currently, we offer the following investment advisory services, which are personalized to each individual client:

- **Portfolio Management Services**
- **Family Wealth Planning Services/ Consulting Services**
- **Planning Services for 401(k) Plans**

As used in this brochure, the words “we”, “our” and “us” refer to Family Wealth Consultants, Inc. and the words “you”, “your” and “client” refer to you as either a client or prospective client of our firm. Also, you may see the term Associated Person throughout this brochure. As used in this brochure, our Associated Persons are our firm’s officers, employees, and all individuals providing investment advice on behalf of our firm.

The following paragraphs describe our services and fees. Please refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs.

Portfolio Management Services

We provide Family Wealth Portfolio Management and Consulting Services for selected clients. Our Planning Team is experienced and trained to listen to your needs, wants, goals, and values. To best utilize the expertise of our team, a first step is for specially trained principals on our team to assist you in designing and drafting a Legacy Statement clearly explaining your goals, visions and values. The Legacy Statement then forms the architecture of a goal oriented consultation with you. Using this Legacy Statement the planning team will then help you make informed choices about the tax and economic consequences of the many decisions in accomplishing your Legacy Statement.

Our Planning Team utilizes your existing professional team, in addition to using our own experienced professionals, in designing and assisting in implementation a mutually agreed and effective plan that coordinates estate and income tax planning with investments and cash flow. Our Planning Team is best described as acting as your Personal Chief Financial Officer. We have more than 30 years experience in this complex knowledge base working with many of the existing professionals in the community. We recognize that all planning is dynamic. If desired a, you will be offered a web based Private Client Portal over which we communicate reports of our mutual planning decisions with updates as available. The Portal can become a constant source of reporting and communication with the planning team and with you.

Our Planning Team represents you in finding the best solutions to your desired goals. No one solution fits all situations. With our experience in this industry, we find the best providers for each unique solution. You can be assured that we are independent so all solutions are considered. All choices are considered and presented that our Planning Team would consider the best fit for you.

We provide non-discretionary portfolio management services on a continuous basis. As part of our portfolio management services, we may also offer to you access to a network of third-party asset management providers (TPAMPs), including but not limited to, Loring Ward Advisor Services and Aspen Partners, Inc. All TPAMPs to whom we might refer you to must be either a state licensed investment adviser or a registered investment adviser with the Securities and Exchange Commission.

We utilize the services of a third party, Loring Ward Advisor Services (“LWAS”), a division of LWI Financial Inc., to assist in the development of your portfolio(s) and to provide asset allocation models that are custom tailored to meet your needs and investment objectives. Portfolios consist of equity securities, mutual fund shares,

corporate debt securities, municipal securities, US government securities, and/or interest in partnerships, among others, if we determine such investments to be in your best interests. Once the portfolio is constructed, we will provide continuous supervision and re-optimization of the portfolio using the technology provided by LWAS. We will make all the final investment decisions for you based on the rebalancing calculations provided on the LWAS platform.

We will, among other things, make recommendations regarding the suitability of a TPAMP or investment style based on, but not limited to, your long-term goals, risk tolerance, time horizon, account profile, investment objectives and/or financial situation. In addition to evaluating and recommending TPAMPs to you, we will gather information from you about your financial situation and investment objectives. We will then monitor the TPAMP's performance; reviews reports provided to you; make contact with you at least annually to review your financial situation and objectives, and assists you in understanding and evaluating the services provided by the TPAMP. You are reminded to promptly notify us of any material change in your financial situation and/or investment objectives.

The TPAMP will actively manage your equity portfolio and will assume investment discretionary and trading authority over the managed account. We will not manage or obtain investment discretion or trading authority over the assets in any client's managed account. However, we will assume discretionary authority to hire and fire TPAMPs and reallocate your assets to other TPAMPs, where such action is deemed to be in your best interest.

Fees paid by you to TPAMPs are separate and distinct from the fees the client pays to us. The TPAMP's fees are established and payable in accordance with the Form ADV Part 2A or other equivalent disclosure document provided by each TPAMP to whom we refer our clients, and the fees may or may not be negotiable. These disclosures will be set forth in the disclosure documents of the TPAMP. Incentive or performance fees charged by specific managers will be fully disclosed, as these fees may exceed typical management fees.

Clients who are referred to TPAMPs will receive full disclosure, including services rendered, account minimums, and fee schedules, at the time of the referral by delivery of a copy of the TPAMP's relevant Form ADV Part 2A, or equivalent disclosure document. You are required to sign a management agreement with us and may be required to sign a management agreement directly with the TPAMP. Under such arrangements, our firm, the TPAMP, or you may terminate the advisory relationship, in accordance with the provisions of the TPAMP's agreement.

Our fees for portfolio management services are billed quarterly in advance based on the market value of the assets on the last day of the preceding quarter. Fees will be assessed pro rata in the event the portfolio management agreement is executed at any time other than the first day of a calendar quarter. Our fees for portfolio management services range from 0.70% to 1.50% of assets under management. In limited circumstances and at our discretion, the fee and account minimum may be subject to negotiation.

The qualified custodian holding the clients' funds and securities will debit your account directly for the advisory fees. When your account is debited directly for the advisory fee, you must provide written authorization permitting the fees to be paid directly from your account held by the qualified custodian. We will not have access to your funds for payment of fees without your consent in writing. Further, the qualified custodian must agree to deliver a quarterly account statement directly to you. You are encouraged to review their account statements for accuracy. We will receive a duplicate copy of the statement that was delivered to you.

Either the firm or you may terminate the management agreement within five days of the date of acceptance without penalty to you. After the five-day period, either party, upon 15 days written notice to the other, may terminate the management agreement. The management fee will be pro-rated for the quarter in which the cancellation notice was given, inclusive of the 15-day notice period, and any unearned fees will be refunded to you.

Family Wealth Planning Services/Consulting Services

Financial planning services will typically involve providing a variety of services, principally advisory in nature, to you regarding the management of your financial resources based upon an analysis of your individual needs. A principal or assigned professional of ours will first conduct a complimentary initial consultation. After the initial consultation, if you decide to engage us for financial planning services, the principal or assigned professional will conduct a follow up meeting during which pertinent information about your financial circumstances and objectives is collected. A Legacy Statement will be written. Once such information has been reviewed and analyzed, a written Family Wealth Plan – designed to achieve your stated financial goals and objectives – will be produced and presented to you. The primary objective of this process is to allow us to assist you in developing a strategy for the successful management of income, assets, and liabilities in meeting your financial goals and objectives.

Family Wealth Plans are based on your financial situation at the time the plan is presented and are based on financial information you disclose to us. You will be advised that certain assumptions may be made with respect to interest and inflation rates and use of past trends and performance of the market and economy. Past performance is in no way indicative of future performance. We cannot offer any guarantees or promises that your financial goals and objectives will be met. As the client's financial situation, goals, objectives, or needs change, you must notify us promptly.

Some clients, however, may only require advice on a single aspect of the management of their financial resources. For these clients, we offer financial plans in a modular format that address only those specific areas of concern.

We utilize the following financial planning fee schedule:

- **Fixed Fees:** Fixed fees for financial planning services generally range between \$3,700 and \$20,000.
- **Hourly Fees:** Hourly fees for our principals are \$300, while other assigned professional's fees will start at \$150 for these services.

When the scope of the financial planning services has been agreed upon, a determination will be made as to applicable fee. The final fee, subject to negotiation, is directly dependent upon the facts and circumstances of your financial situation and the complexity of the financial plan or service(s) requested.

We require that you pay an initial retainer of one-half of the estimated fee in advance of any services rendered. The remaining balance shall be due and payable upon completion of the contracted service.

Either our firm or you may terminate the financial planning agreement within five days of the date of acceptance without penalty to you. However, you will incur a pro rata charge for financial planning services actually rendered prior to such termination. After the five-day period, either party may terminate the financial planning agreement by providing written notice to the other party. In the event there are any prepaid unearned fees, we will promptly refund a pro rata share to you.

Planning Services for 401(k) Plans

We provide 401(k) planning meetings with plan participants. These meetings provide participants with education and advice regarding making suitable investment choices. We do not manage the participant's 401(k) investments or the plan assets. We charge the plan \$500 per meeting with participants for these services. Fees for meetings are determined in advance and may be negotiable based on the number of meetings the employer elects to hold for plan participants. Fees are payable one-half in advance with the remainder due upon completion of the meeting. The plan will reimburse us for any direct travel expenses incurred.

Types of Investments

We offer advice on equity securities, warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities, US Government securities, options contracts on

securities and commodities, futures contracts on securities and commodities, and interest in partnerships investing in real estate.

Additionally, we may advise you on any type of investment that we deem appropriate based on your stated goals and objectives. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship.

You may request that we refrain from investing in particular securities or certain types of securities. You must provide these restrictions to our firm in writing.

Assets Under Management

As of February 26, 2011, we manage \$10,000,000 in client assets on a discretionary basis, and \$71,000,000 in client assets on a non-discretionary basis.

Fees and Compensation

Form ADV Part 2A, Item 5

Please refer to the “Advisory Business” section in this brochure for information on our advisory fees, fee deduction arrangements, and refund policy according to each service we offer.

Additional Fees and Expenses

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund’s prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian.

Clients invested in FWCG Angel, LLC and FWCG Angel II, LLC pay an annual expense fee of 1.5%.

To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, private funds, and our firm, and others. For information on our brokerage practices, please refer to the “Brokerage Practices” section of this brochure.

Compensation for the Sale of Other Investment Products

Some of our Investment Advisor Representatives who provide investment advice on behalf of our firm are licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. As such, persons licensed as insurance agents have a financial incentive to recommend insurance products. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

Performance-Based Fees and Side-By-Side Management

Form ADV Part 2A, Item 6

We and/or Mr. Martin is entitled to receive, in addition to an asset based fee, a performance based fee in connection with serving as manager to the FWCG Angel, LLC and FWCG Angel II, LLC, and FWCG Opportunity Fund, LLC. For further details on these pooled investment vehicles please see the section entitled "Other Financial Industry Activities and Affiliations" below.

Accordingly, we manage accounts that are charged performance-based fees while at the same time managing accounts (perhaps with similar objectives) that are not charged performance-based fees ("side-by-side management"). Performance-based fees and side-by-side management may create conflicts of interest, which we have identified and described in the following paragraphs.

Performance-based fees may create an incentive for our firm to make investments that are riskier or more speculative than would be the case absent a performance fee arrangement. In order to address this potential conflict of interest, a senior officer of our firm periodically reviews client accounts to ensure that investments are suitable and that the account is being managed according to the client's investment objectives and risk tolerance.

Performance based fees may also create an incentive for our firm to overvalue investments which lack a market quotation. In order to address such conflict, we have adopted policies and procedures that require our firm to "fairly value" any investments, which do not have a readily ascertainable value.

Side-by-side management might provide an incentive for our firm to favor accounts for which we receive a performance-based fee. For example, we may have an incentive to allocate limited investment opportunities, such as initial public offerings, to clients who are charged performance-based fees over clients who are charged asset based fees only. To address this conflict of interest, we have instituted policies and procedures that require our firm to allocate investment opportunities (if they are suitable) in an effort to avoid favoritism among our clients, regardless of whether the client is charged performance fees.

Types of Clients

Form ADV Part 2A, Item 7

We offer investment advisory services to individuals, trusts, and estates.

In general, we require a minimum of \$500,000 to open and maintain an advisory account; however, at our discretion, we may waive or lower this minimum account size. We may also have household client accounts to meet the stated account minimum.

Investors that are charged performance based fees will be required to meet the definition of a "qualified client" which is a natural person who have a net worth greater than \$1,500,000 or have at least \$750,000 under management, immediately after entering into an investment advisory agreement.

Methods of Analysis, Investment Strategies and Risk of Loss

Form ADV Part 2A, Item 8

Our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial horizon, financial information, liquidity needs, and other various suitability factors. Your restrictions and guidelines may affect the composition of your portfolio.

Methods of Analysis

We apply both an academic and practical analysis of the Modern Portfolio Theory ("MPT") to build risk-managed portfolios. MPT is a theory of investing which attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully choosing the proportions of various assets. MPT is a mathematical formulation of the concept of diversification in investing, with the aim of selecting a collection of investment assets that has collectively lower risk than any individual asset.

In addition, we may employ the analysis and information provided by third-party advisers to evaluate investment products. We use 30 years of our experience with a Master's level of education to perform due diligence on asset classes offered in the FWCG Opportunity Fund.

Investment Strategies

When we manages your assets, we use long term purchases, or securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year. Our FWCG Opportunity Fund, LLC includes a diversified portfolio of all the asset classes that you may use as a diversification tool in your total portfolio.

Tax Considerations

Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

Moreover, as a result of revised IRS regulations, custodians and broker-dealers will begin reporting to the IRS, the cost basis of equities acquired on or after January 1, 2011. Our firm will either instruct the custodian to use the first-in, first-out "FIFO" accounting method for calculating and reporting the cost basis of your equity investments or the custodian will default to the FIFO method where no instruction is given.

You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes another accounting method is more advantageous, please provide written notice to our firm immediately and we will alert your account custodian of your individually selected accounting method. Please note that decisions about cost basis accounting methods will need to be made before trades settle, as the cost basis method cannot be changed after settlement.

Risk of Loss

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

Recommendation of Particular Types of Securities

We primarily recommend the "Dimensional Fund Advisors Mutual Funds" as these mutual funds makes up our core risk-managed portfolios. You should be advised of the following risks when investing in mutual funds.

Mutual funds are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. The returns on mutual funds can be reduced by the costs to manage the funds. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, the fund, other types of mutual funds do charge such fees which can also reduce returns. Mutual funds can also be "closed end" or "open end".

Disciplinary Information

Form ADV Part 2A, Item 9

Family Wealth Consultants, Inc. has been registered and providing investment advisory services since 2003. Neither our firm nor any of our management persons has any reportable disciplinary information.

Other Financial Industry Activities and Affiliations

Form ADV Part 2A, Item 10

Management of Pooled Investment Vehicles

Craig L. Martin, President of our firm, provides investment advisory services to certain private funds ("Fund(s)") that are offered for sale to a limited number of accredited investors. Mr. Martin has the authority and responsibility to formulate investment strategies for the Fund(s), including the types and amounts of securities or investments to be bought and/or sold, in accordance with the investment program and investment restrictions set forth from time to time in the confidential offering memoranda of the Fund(s), as amended or supplemented from time to time. In addition, Mr. Martin has the authority and responsibility to perform various other functions, including selecting brokers/dealers and executing securities transactions.

Typically, the investment objective of the Fund(s) is superior capital appreciation of its invested assets and/or to generate cash returns. Mr. Martin expects to invest Fund assets in a broad array of privately placed securities and/or of real estate funds.

Investments in the Fund(s) are offered only to accredited investors within the meaning of SEC Rule 501 of Regulation D of the Securities Act of 1933. Investors in the Fund(s) are also required to be qualified purchasers as defined by Section 2(a)(51) under the Investment Company Act. Investments in the Fund(s) are offered by private offering memorandum, which provides investors with full disclosure regarding the objectives of the particular Fund and the risks involved with the offering. Investors that purchase interests in the Fund(s) will be admitted to such funds as members. The minimum initial capital contribution required to become a member of the Fund(s) is typically \$100,000. In its sole discretion, from time to time, Mr. Martin may raise or lower such minimums.

Investors and potential investors should refer to relevant Fund offering documents for complete disclosure of the risks, investment objectives, and restrictions associated with the offering(s).

Insurance Sales Activity

Although Mr. Martin is a licensed insurance agent who will provide advice on insurance products as part of an

overall financial plan, he does not sell or service insurance products to or for his clients. All insurance sales will be referred to Mrs. Peggy D. Martin, a licensed insurance agent. You are under no obligation to use the services of Mrs. Martin in her capacity as an insurance agent. Clients may use the services of any agent or broker they choose. Although, Mrs. Martin is an officer and advisory representative with our firm, she does not share her insurance income with the firm. However, Mr. and Mrs. Martin are married, and therefore, Mr. Martin may indirectly benefit from the commissions earned by Mrs. Martin from assisting FWCI clients with the purchase of traditional insurance products.

We are affiliated with Estate Guidance and Insurance, Inc. through common control and ownership. Therefore, certain individuals providing investment advice on behalf of our firm are licensed as insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate from our advisory fees.

While we believe that fees charged by our affiliates are competitive, such fees may be higher than fees charged by other firms providing the same or similar services. You are under no obligation to use our affiliates' services and may obtain comparable services and/or lower fees through other firms. Please see the "Fees and Compensation" section in this brochure for more information on the compensation received by insurance agents who are affiliated with our firm.

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

Form ADV Part 2A, Item 11

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for our Associated Persons. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All of our Associated Persons are expected to adhere strictly to these guidelines.

Our Code of Ethics also requires that certain persons associated with our firm submit reports of their personal account holdings and transactions to a qualified representative of our firm who will review these reports on a periodic basis. Persons associated with our firm are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm.

You may obtain a copy of our Code of Ethics by contacting us at the telephone number on the cover page of this brochure.

Participation or Interest in Client Transactions

Neither our firm nor any of our Associated Persons has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

Personal Trading Practices

Our firm or persons associated with our firm may buy or sell securities for you at the same time we or persons associated with our firm buy or sell such securities for our own account. Our firm or persons associated with our firm may recommend securities to you at the same time we or persons associated with our firm purchase such securities for our own account.

A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To eliminate this conflict of interest, it is our policy that neither our Associated Persons nor we shall have priority over your account in the purchase or sale of

securities.

Brokerage Practices

Form ADV Part 2A, Item 12

We maintain relationships with several broker-dealers. While you are free to choose any broker-dealer or other service provider, we recommend that you establish an account with a brokerage firm with which we have an existing relationship, such as Schwab Institutional ("Schwab") and Fidelity Investments ("Fidelity"), among others. Such relationships may include benefits provided to our firm, including but not limited to, research, market information, and administrative services that help our firm manage your account(s). We believe that recommended broker-dealers provide quality execution services for our clients at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by recommended broker-dealers, including the value of research provided, the firm's reputation, execution capabilities, commission rates, and responsiveness to our clients and our firm. In recognition of the value of research services and additional brokerage products and services recommended broker-dealers provide, you may pay higher commissions and/or trading costs than those that may be available elsewhere.

We do not receive any soft dollars from broker/dealers or other investment advisers. We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

Block Trades

We do not combine multiple orders for shares of the same securities purchased for advisory accounts we manage (the practice of combining multiple orders for shares of the same securities is commonly referred to as "block trading"). Accordingly, you may pay different prices for the same securities transactions than other clients pay. Furthermore, we may not be able to buy and sell the same quantities of securities for you and you may pay higher commissions, fees, and/or transaction costs than other clients.

Review of Accounts

Form ADV Part 2A, Item 13

Principals and advisory representatives who manage investment advisory accounts will review those accounts on a quarterly basis for risk and performance. Your accounts are monitored on a continuous basis to ensure your requested risk level is maintained and that the account remains aligned with your stated needs and goals. The calendar or client events are the triggering factor for an account review.

Reports will vary depending on the services chosen on your individual Investment Advisory Agreement. For managed investment accounts you will generally receive a monthly statement for each account directly from the custodian and a quarterly performance report for each portfolio from us, our affiliates, or third party asset managers.

Client Referrals and Other Compensation

Form ADV Part 2A, Item 14

Non-employee (outside) consultants, who are directly responsible for bringing a client to us, may receive compensation from us. Such agreements will comply with the requirements set out in Rule 206(4)-3 of the Investment Advisers Act of 1940, including the requirement that the relationship between the solicitor and the investment adviser be disclosed to the client at the time of the solicitation or referral. Under these arrangements, you will not pay higher fees than our normal/typical advisory fees.

In any case, applicable state laws may require these persons to become licensed either as representatives of ours or as an independent investment adviser. We will request that you acknowledge this arrangement prior to acceptance of your account for advisory services.

As disclosed under the "Fees and Compensation" section in this brochure, persons providing investment advice on behalf of our firm are licensed insurance agents. For information on the conflicts of interest this presents, and how we address these conflicts, please refer to the "Fees and Compensation" section.

Custody

Form ADV Part 2A, Item 15

Provided we receive your written authorization, we will instruct your independent custodian to directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities.

Your funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian. You will receive account statements from the independent, qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy.

Mr. Martin, as Managing Partner FWCG Opportunity Fund, LLC, has access to the pooled investment vehicles' funds and securities, and therefore has custody over such funds and securities. As required, those assets are subject to surprise verification.

Investment Discretion

Form ADV Part 2A, Item 16

You may grant our firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. Before we can buy or sell securities on your behalf, you must first sign our discretionary management agreement, a power of attorney, and/or trading authorization forms.

You may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for your account(s). For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry or security. Please refer to the "Advisory Business" section in this brochure for more information on our discretionary management services.

If you enter into non-discretionary arrangements with our firm, we will obtain your approval prior to the execution of any transactions for your account(s). You have an unrestricted right to decline to implement any advise provided by our firm on a non-discretionary basis.

Voting Client Securities

Form ADV Part 2A, Item 17

We will not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of applicable securities, you are responsible for exercising your right to vote as a shareholder.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward any electronic solicitation to vote proxies.

Financial Information

Form ADV Part 2A, Item 18

Our firm does not have any financial conditions or impairments that would prevent us from meeting our contractual commitments to you. We do not take physical custody of client funds or securities, or serve as trustee or signatory for client accounts, and we do not require the prepayment of more than \$1,200 in fees six or more months in advance. Therefore, we are not required to include a financial statement with this brochure.

Additional Information

Your Privacy

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any nonpublic personal information about you to any nonaffiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to nonpublic personal information about you to employees, who need that

information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your nonpublic personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Please contact our main office at the telephone number on the cover page of this brochure if you have any questions regarding this policy.

Trade Errors

In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account. If a trade error results in a profit, you will keep the profit.

Class Action Lawsuits

We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.