

## **FIRM BROCHURE**

(Part 2A of Form ADV)

### **NEXT GENERATION WEALTH MANAGEMENT, INC.**



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**March 29, 2018**

This Brochure provides information about the qualifications and business practices of Next Generation Wealth Management, Inc. If you have any questions about the contents of this Brochure, please contact us at: (414) 257-4248, or by email at: [jkralovec@ngwealth.com](mailto:jkralovec@ngwealth.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.

Next Generation Wealth Management, Inc. is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Next Generation Wealth Management, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2        Material Changes

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The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure. If there are any material changes to an adviser's brochure, the adviser is required to notify you and provide you with a description of the material changes.

Below is a summary of material changes made to our Form ADV Part 2A since our March 24, 2017 annual update filing.

### Item 15 – Custody

We updated this item to indicate we have custody due to our ability to direct transactions to a third party contingent upon a signed standing letter of authorization from a client.

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## Item 4      Advisory Business

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NG Wealth was founded January 2, 2005 and is located in Milwaukee, Wisconsin.

NG Wealth is an independent, fee only firm that provides personalized investment management, comprehensive financial planning, and advisory services to a variety of clients. Including; individuals, high net worth individuals, retirement plans, trusts, estates, pension and profit sharing plans, charitable institutions, foundations and endowments. We offer customized professional investment and advisory services focusing on: asset allocation, investment manager evaluation / selection, portfolio risk management, and comprehensive financial planning. Customized solutions are provided through a consultative approach with the client and may include:

- Active Asset Allocation Strategies
- Socially Responsible Investment Strategies
- Determination of Financial Goals and Objectives
- Coordination with Professional Advisers
- Development of an Investment Policy Statement
- Investment Manager Evaluation and Selection
- Implementation of Investment Strategies and Ongoing Monitoring and Review
- Risk and Suitability Assessment
- Tax Management Strategies
- Initial and Ongoing Financial Planning Services, including;
  - Financial Cash Flow Analysis
  - Retirement Planning
  - Charitable Giving
  - Distribution Planning
  - Education Funding Strategies
  - Insurance / Risk Management Planning
  - Trust and Estate Planning

We are a fee only investment management firm and do not receive any compensation from commissions. Our investment philosophy focuses on wealth preservation and risk adjusted

returns on investment through active asset allocation, tax efficient strategies, and global diversification across asset classes / investment styles.

NG Wealth considers various types of securities and non-affiliated investment managers (separate account managers and hedge funds) in determining how to achieve a client's personal investment goals and objectives. We recommend asset allocation plans and, pursuant to a power of attorney, will allocate applicable percentages of client assets to various investment strategies to implement the asset allocation plans. (Please see Item 8, Investment Strategies for more detail.).

Clients may impose restrictions on investing in certain securities or types of securities.

### **Financial Planning Services**

A financial plan is designed to help the client with relevant aspects of financial planning and includes preparation of a formal plan and the implementation and monitoring of the plan.

The planning services will consider the client's current financial situation, goals and objectives and strategies for achieving those goals. The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; charitable giving strategies; and education planning with funding recommendations.

Detailed investment advice and specific recommendations are provided as part of a financial plan. Implementation, monitoring and ongoing investment management is a part of the plan, unless otherwise agreed upon.

### **Fees**

NG Wealth does not charge an additional fee for a financial plan for a client paying an asset based fee (see Fees and Compensation), unless otherwise agreed upon by the client.

NG Wealth also provides financial planning services for an hourly fee of \$250. Clients billed at the hourly rate do not receive ongoing financial plan updates or investment management services unless otherwise agreed upon by NG Wealth and the client.

## **Assets Under Management**

NG Wealth assets under management as of March 24, 2018:

	U.S Dollar Amount
Discretionary:	\$278,758,522
Non-Discretionary:	\$3,416,352
Total:	\$282,174,874

## **Principal Owners**

David A. Massart

David A. Braaten

## **Item 5 Fees and Compensation**

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NG Wealth bases its fees on a percentage of assets under management (“asset based fee”), hourly charges and fixed fees depending on the client’s agreement. NG Wealth may negotiate their fees.

In most cases clients are charged an asset based fee. Our annual fee generally ranges from 0.25% to 1.25% of assets under management. Fees charged may vary depending upon account size, asset allocation (e.g., fixed income versus equity), complexity of investment strategies and client service requirements. The specific manner in which fees are charged is established in a client’s written agreement with NG Wealth.

We do not charge other fees, such as acceptance, termination fees, or annual account fees.

Clients may incur certain charges imposed by custodians, brokers, third party investment managers and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund’s prospectus.

Such charges, fees and commissions are exclusive of and in addition to NG Wealth’s fee, and NG Wealth does not receive any portion of these commissions, fees, and costs.

## **Fee Billing**

Our fee is billed quarterly in arrears, meaning that we invoice you after the three-month billing period has ended, unless otherwise agreed upon by the client, in which case our fee is billed

quarterly in advance. For the purpose of calculating the fee in arrears, we take the average balance of every day end market value of assets under management in the billing period (“daily average balance”). For the purpose of calculating the fee in advance, the fee is based on the market value of the assets under management at the end of the preceding quarter.

Fees are usually deducted from a designated client account; however clients may elect to be billed directly. The client must consent in advance to direct debiting of their account. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable

Client advisory fees for assets managed by outside investment managers may be calculated and invoiced in different ways. Each outside investment manager typically submits an invoice to the client’s custodian and the fee is deducted from the clients account, with the clients’ authorization.

Clients can terminate their advisory agreement with NG Wealth upon 30 days' written notice to the firm. We reserve the right to waive written policy notice. In addition, the advisory agreement may be terminated during the five (5) business days following execution of the agreement. Termination of an advisory agreement by the client will not affect transactions NG Wealth or sub-advisors have initiated on the client’s behalf prior to the effective date of such termination.

We reserve the right to adjust or waive minimum account sizes and to adjust fees to reflect factors determined by NG Wealth to be material. Fees are subject to change with a minimum of 30 days' notice. We may terminate the investment advisory agreement at any time by giving 30 days written notice.

### **Portfolio Valuation**

NG Wealth uses information from the client's custodian as its main pricing source for valuing client portfolios, whether for fee billing or investment performance calculation purposes. Prices of securities we routinely recommend to clients are widely available through financial publications, and do not generally require us to independently determine a value.

In the event a security is not priced, we also employ a third party pricing service designed to provide assurance the prices we use for fee billing and investment performance calculation purposes are accurate.

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

NG Wealth does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of, the assets of a client).

## Item 7      Types of Clients

NG Wealth provides advisory services to a variety of clients including individuals, high net worth individuals, retirement plans, trusts, estates, pension and profit sharing plans, charitable institutions, foundations and endowments.

We generally require a minimum account balance of \$250,000, but reserve the right to adjust or waive minimum account sizes.

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

### **Methods of Analysis**

NG Wealth may employ fundamental, technical, or cyclical analysis of securities and passive or tactical allocation strategies in providing investment advice to clients. In doing so, we may use research and other materials prepared by independent, unaffiliated third-parties, financial newspapers and magazines, inspections of corporate activities, corporate rating services and annual reports, prospectuses, filings with the US Securities & Exchange Commission, company press releases, information posted on the internet, and similar informative materials. We may also consult with other investment managers and industry professionals about the investments and investment strategies being considered. We will also use software we have licensed from outside vendors to create financial plans, account reports, asset allocation models, portfolio analysis, net worth statements, historical investment reports, and similar client reports.

NG Wealth may use an investment advisory board comprised of outside investment professionals. NG Wealth's use of an advisory board is to provide advice on general economic, asset allocation and portfolio construction. The advisory board is not paid by NG Wealth or its clients, and does not have access to client account information. However, members of the advisory board may have sub-adviser relationships with NG Wealth's clients or may be a client of NG Wealth.

### **Investment Strategies**

We make specific investment recommendations through a six step investment process with an emphasis on asset allocation, investment selection / evaluation and portfolio risk management.



Through our investment process a customized, global diversified investment portfolio is designed utilizing multiple “asset classes” or types of investments including: open-end mutual funds, exchange traded funds (“ETF’s), separate account managers (equities and fixed income) and hedge funds.

The investment strategy for each client is based upon their unique goals and objectives which are discussed during client consultations. The client or NG Wealth may change these goals and objectives at any time.

### **General Risks**

We do not offer any products or services that guarantee rates of return on investments for any time period to any client. All clients assume the risk that investment returns may be negative or below the rates of return of other investment advisers, market indices or investment products

### **Risk of Loss**

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

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security’s particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment’s originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on

finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

### **Cybersecurity Risk**

We rely on information technology and electronic communications to conduct business, which subjects us and our clients to the risk of cyber incidents. While we have controls we believe are reasonably designed to protect against cyber incidents resulting in unauthorized access to confidential information or business disruptions, not all cyber incidents are preventable. Should a cyber incident occur, it would likely have a negative impact on our firm and its clients.

## **Item 9      Disciplinary Information**

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NG Wealth has no disciplinary information applicable to this Item.

## **Item 10      Other Financial Industry Activities and Affiliations**

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NG Wealth is not actively engaged in a business other than giving investment advice and does not have other financial industry activities or affiliations.

Mr. David Massart, the President of NG Wealth, however, serves as a trustee of the Managed Portfolio Series Trust and the ETF Series Solutions Trust (the "Trust"), a Delaware statutory trust that is registered with the SEC as an open-end management investment company, and as a director for each series fund in the Trust (each a "Fund"). The Trust and the Funds are related persons of NG Wealth based on the fact that Mr. Massart serves as the President of NG Wealth, as a trustee of the Trust, and as a director for each fund.

## Item 11 Code of Ethics

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NG Wealth has adopted a Code of Ethics for all supervised persons of the firm describing the high standard of business conduct, and fiduciary duty to clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at NG Wealth must acknowledge the terms of the Code of Ethics annually, or as amended.

All employees are required to adhere to NG Wealth's Code of Ethics and Personal Trading Policy (the "Code"), which includes standards of conduct the firm expects of employees. NG Wealth believes the ideals of honesty, integrity and trust should be the minimum requirements of professional conduct for employees. The following core principles are specifically addressed within the Code:

- Employees are expected to comply with Federal Securities Laws as well as applicable State of Wisconsin securities laws. Strict adherence to NG Wealth's compliance policy manual and instructions provided by the President will assist employees in complying with this important requirement;
- The interests of clients should be placed ahead of those of NG Wealth and employees;
- Employees are expected to conduct their personal securities transactions in accordance with this policy and employees will strive to avoid any actual or appearance of a conflict of interest;
- Non-public inside information shall not be used when trading either in personal accounts or on behalf of NG Wealth's clients;
- Employees shall not take inappropriate advantage of their position with NG Wealth;
- Employees shall avoid any actual or potential conflict of interest with any NG Wealth client in all personal securities transactions;
- Diligence and care shall be taken in maintaining and protecting nonpublic information concerning NG Wealth's clients; and
- NG Wealth will strive to foster a healthy culture of compliance.

As NG Wealth generally does not have knowledge of individual trades placed by its sub-advisers on a daily basis, it is possible for NG Wealth employees to purchase or sell securities within their

personal accounts at the same time as (or immediately prior to or after) such securities are being purchased or sold by the sub-adviser.

NG Wealth's employees may maintain accounts with sub-advisers that the firm recommends to clients, and these accounts may be managed in a similar manner as client accounts. NG Wealth has established procedures to help ensure it does not have access to each sub-adviser's security recommendations.

Mr. Massart, the President of NG Wealth, serves as a trustee of the Managed Portfolio Series Trust and the ETF Series Solution Trust (the "Trust"), a Delaware statutory trust that is registered with the SEC as an open-end management investment company, and as a director for each series fund in the Trust (each a "Fund"), (and received trustee/director fees associated with that service). The Trust and the Funds are related persons of NG Wealth based on the fact that Mr. Massart serves as the President of NG Wealth, as a trustee of the Trust, and as a director for each Fund. NG Wealth may, if appropriate and suitable for a client account, purchase shares of the funds for a client account.

You may request a copy of the firm's Code of Ethics, free of charge, by contacting Jeffrey W. Kralovec at: (414) 257-4248 or e-mail at: [jkralovec@ngwealth.com](mailto:jkralovec@ngwealth.com).

## **Item 12      Brokerage Practices**

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### **Selection of Brokers**

To efficiently service our clients' accounts, NG Wealth has established our primary custodial and brokerage relationships with the following organizations: Schwab Institutional, a division of Charles Schwab & Co. and TD Ameritrade Institutional. We do not generally have any direct investment or brokerage discretion with respect to client accounts. The outside investment manager employed by NG Wealth determines in most cases which securities are bought or sold, the broker-dealer through which the securities are to be traded and the commission rates at which transactions are effected.

NG Wealth generally expects outside investment managers to obtain best execution in placing our client trades. In order to obtain best execution, they may place trades through outside brokers, which may result in additional trading costs to the client. In addition, outside investment managers may pay a broker a commission in excess of that which another broker might have charged for effecting the same transaction, in recognition of the value of research services provided by the broker (known as a "soft dollar arrangement"). NG Wealth expects its outside investment managers to ensure that all soft dollar arrangements comply with applicable law.

Clients with assets managed by outside investment managers are strongly encouraged to read their Firm Brochure (part 2A of Form ADV), disclosure statement for information regarding the trading and brokerage practices.

As part of an overall asset allocation strategy, NG Wealth may, pursuant to a limited power of attorney granted to it, invest all or a portion of a client's portfolio in various no-load or load waived mutual funds.

### **Research and Other Soft Dollar Benefits**

We do not accept soft dollar benefits. Schwab Institutional and TD Ameritrade Institutional provide NG Wealth standard technology and research services to service client accounts, including trading software and general economic commentary and analyses. All services provided by Schwab Institutional and TD Ameritrade Institutional are available to all participating advisors and may be used to service all of NG Wealth's accounts.

### **Trade Aggregation**

Due to the nature of the securities in which we actively trade (specifically, mutual funds and ETFs) and the firm's investment philosophy to consider each client's needs and objectives rather than managing client accounts to specific investment strategies, securities held in client accounts are generally traded on an individual basis and are not "bunched" or "blocked" with other client trades.

From time to time, we may decide it is in its clients' best interest to block an ETF trade. This will generally occur when we determine to buy or sell the ETF across all applicable client accounts. When executing block trades at more than one broker-dealer/custodian, we will rotate the trade order to ensure the clients are being treated fairly. If a block order is filled (full or partial fill) at several prices through multiple trades, an average price will be calculated for all trades executed by the broker for the block, and all participants in the block trade will receive the average price. Only trades executed within the block on the single day may be combined for purposes of calculating the average price. On the rare occasion where the firm receives a partial fill, the partial fill may be allocated on a pro rata basis, subject to rounding and reasonable efforts to minimize trading costs.

## **Item 13      Review of Accounts**

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### **Nature and Frequency of Reviews**

NG Wealth provides an initial investment review for all new clients. The initial review provides the basis for the scope of the advisory relationship and services provided. Typically the initial

investment review covers investment goals and objectives, risk tolerance, cash flow needs, time horizon and other factors deemed relevant to the establishment of the client's investment portfolio. NG Wealth and the client may establish an investment policy statement to memorialize the strategy to be used to manage the client's account in a written statement of investment policies and objectives.

Client accounts are reviewed regularly by senior management of NG Wealth and ongoing client reviews are done at least annually. The meeting frequency can be determined by the client or other factors such as; significant market / economic events, changes in individual client circumstances, requests by our clients or other important events which may cause more frequent reviews.

We generally consider rebalancing client portfolios on a quarterly basis. We review the outside investment managers' role in managing a client portfolio on a regular basis, but no less frequently than quarterly.

### **Client Reports**

Below is a list of reports clients may receive with a brief description.

### **Account Statements**

Clients receive regular account statements directly from the client's custodian on no less than a quarterly basis. Such statements provide details of account holdings and investment activity.

### **Performance Reports** ("Portfolio Overview")

We provide a portfolio performance summary to clients ("Portfolio Overview") on a quarterly basis generated from our portfolio management / performance reporting software. All performance data calculated incorporates security prices provided by the client's custodian or third party pricing services.

### **Net Worth Statements**

Depending on the scope of the advisory services relationship, clients may receive a net worth statement generated from our client relationship management system annually, at a minimum. Net worth statements contain approximations of bank account balances provided by the client, as well as the value of primary residence and other hard to price real estate. The net worth statements are used for long-term financial planning where the precise values of assets are not material to the financial planning tasks.

## **Market Commentary**

We also send general market commentary and commentary on specific events affecting the market and economy.

## **Item 14 Client Referrals and Other Compensation**

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Next Generation Wealth Management, Inc. may pay referral fees to independent persons or firms (“Solicitors”) for introducing clients to us. Whenever we pay a referral fee, we require the Solicitor to provide the prospective client with a copy of this document (our Firm Brochure) and a separate disclosure statement that includes the following information:

- The Solicitor’s name and relationship with our firm;
- The fact that the Solicitor is being paid a referral fee;
- The amount of the fee;
- Whether the fee paid by the client will be greater than our stated fee to compensate the Solicitor; and
- The client must acknowledge in writing this arrangement.

It is Next Generation Wealth Management Inc.’s policy not to accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

## **Item 15 Custody**

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NG Wealth does not maintain custody of client assets, except as a consequence of our ability to withdraw our advisory fee directly from client accounts and our ability to direct transactions to third parties contingent upon a signed standing letter of authorization from a client and certain other requirements being met. We have written authority from these clients to engage in these transactions and comply with the appropriate regulatory guidance. In addition, all transactions are fully disclosed on quarterly client account statements sent by the qualified custodian. We encourage you to carefully review these statements and compare such official custodial records to the account statements that we provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. We also maintain policies and procedures designed to provide reasonable assurance our client’s qualified custodian is sending monthly and quarterly statements to our

clients and that we do not inadvertently obtain further custody over client assets. We have no affiliated qualified custodians.

## **Item 16      Investment Discretion**

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### **Discretionary Authority for Trading**

NG Wealth accepts discretionary authority to manage securities accounts and to hire and fire outside investment managers on behalf of clients. NG Wealth has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

The client approves the custodian to be used and the commission rates paid to the custodian. NG Wealth does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement your investment policy.

Investment guidelines and restrictions must be provided to NG Wealth in writing, unless otherwise agreed upon.

### **Limited Power of Attorney**

A limited power of attorney is a trading authorization for this purpose and you sign a limited power of attorney prior to any trades being placed.

## **Item 17      Voting Client Securities**

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### **Proxy Voting**

NG Wealth has adopted proxy voting policies and guidelines as part of its authority to manage investments and votes all proxies for its investment advisory clients, unless a client gives written notification otherwise.

These policies are designed to reasonably ensure that we vote proxies in the best interest of clients and not in a way that places our interests above the clients.

As a general matter, we maintain a consistent voting position to similar proxy proposals made by various issuers and on the same matter when securities are held by multiple client accounts. We generally support routine business matters unless such support is not in the best interests of the



client. In such instances, issues will be reviewed on a case-by-case basis and voted in the best interests of the client.

NG Wealth is responsible for identifying potential conflicts of interest between a proxy vote and a relationship that NG Wealth has with a company. As a matter of policy, NG Wealth will not be influenced by outside sources whose interests conflict with the interest of clients. Any material conflict of interest will be resolved in the best interest of our clients. Any such conflicts and actions taken will be documented. We retain a record of all proxies voted on behalf of clients. A copy of our Proxy Voting Guidelines and Procedures is available upon request. NG Wealth will also provide clients with voting information on proxies voted on behalf of their account by contacting us at (414) 257-4248.

### **Class Action Claims**

NG Wealth does not participate in class action lawsuits for clients. Rather, such decisions remain with the client or an entity designated by the client. We may assist in determining whether the client should pursue a particular class action lawsuit; however the final determination of whether to participate and the completion of any related documents are the client's responsibility.

## **Item 18      Financial Information**

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NG Wealth does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because NG Wealth does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$1,200 per client, six months or more in advance.

## **Item 19      Business Continuity Plan**

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### **General**

NG Wealth has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

### **Disasters**

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water

pressure, fire, bomb threat, communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

### **Alternate Offices**

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

## **Item 20      Information Security Program**

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### **Information Security**

NG Wealth maintains an information security program to reduce the risk that your personal and confidential information may be breached.

### **Privacy Notice**

NG Wealth is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your custodian and brokerage firm in order to service your account and execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal

and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this Privacy Notice to you annually, in writing.