

## **ADV Part 2a – Firm Brochure**

**35 Mason Street, 4<sup>th</sup> Floor  
Greenwich, CT 06830**

**(203) 742-5450**

**[www.raylign.com](http://www.raylign.com)**

**Dated March 25, 2015**

**For further information, please contact either:**

- **Gregory Rogers – Founder & President or**
- **Damon Hart – Chief Compliance Officer**

**This ADV Part 2A brochure provides information about the qualifications and business practices of RayLign Advisory LLC. If you have any questions about the contents of this brochure, please contact us at (203) 742-5450. 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 RayLign Advisory LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**RayLign Advisory LLC is an SEC-registered investment adviser. This registration does not imply any level of skill or training.**

## **Material Changes**

The previous update to this brochure was on March 20, 2014. There are no material changes in the current update.

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## **Item 4: Advisory Business**

- A. RayLign Advisory LLC is an independently owned, SEC-registered advisor. RayLign maintains its sole office in Greenwich, CT. The firm was founded in 2004 by Gregory T. Rogers. RayLign provides consultative services to a select number of financially complex families that want to be proactive about “perpetuating well-being through the generations.”
- B. The primary activities for RayLign relate to client engagements to provide consulting services (“Consulting Clients”). RayLign’s consulting-based, client-driven approach begins with a “systems” view of the family that includes: an understanding of the family structure, history and member relationships; structural entities that include operating business, LLCs, and trusts; financial profile that includes assets, liabilities, insurance, income and spending; advisory relationships; governance and decision-making processes, as well as philanthropic initiatives. Through our facilitation, clients come to explicitly understand how to organize the family system to achieve its long-term goals: personal, family, estate, tax and accounting, investments, insurance, legal, financial literacy, philanthropy and governance. Together, we take inventory of the current dynamics, clarify future goals, and evaluate the bottlenecks that prevent well-being from being achieved. On an ongoing basis we address new conditions by recalibrating the many variables. The timing and duration of our approach is determined by each client’s unique situation. So too is the entry point as well as the ability to consider several components simultaneously. Our aim is to correlate with our client’s dynamics to develop solutions that work.

Additionally, upon client written approval, certain clients (“Investment Clients”) may assign RayLign discretionary accounts to RayLign’s asset management affiliate, Raylor Asset Management Group LLC, and/or non-discretionary (client driven investment decisions) authority to allocate capital to client selected securities and investment managers. In the non-discretionary capacity, RayLign issues instructions to brokers to effect or settle equity and/or bond securities trades on behalf of clients. **See Raylor Investments LLC’s ADV for a further description of RayLign’s “discretionary” investment services.**

It is not an expectation for RayLign’s “Consulting clients” to become “Investment clients”. RayLign’s clients can be Consulting-only or Consulting/Investment Clients.

- C. A Consulting Client begins by engaging in an Alignment Plan development project and concludes with a set of defined initiatives that include such things as developing estate planning documentation, creating family foundations, educating family beneficiaries, initiating succession planning, and/or restructuring wealth advisory relationships. This project typically takes three to twelve months to complete depending on the client's situational complexity regarding number of family branches, geographic dispersion and type of relational facilitation, as well as desired pace and availability of participants. Multi-year follow-on projects support the client’s initiatives toward long term well being

goals.

For Investment Clients, RayLign reviews a given client's capital needs, evaluates the client's current investments, and may help provide input into an appropriate asset allocation policy for meeting financial objectives. RayLign will comment on client's current investment managers (but not perform full and comprehensive due diligence on such managers), portfolios (separate account, mutual fund, partnerships and other vehicles) and securities holdings. This evaluation may result in recommendations for rebalancing across current vehicles and portfolio managers, recommendations to seek advice to select new managers, and/or reducing exposure to specific, directly held securities.

- D. RayLign charges most consulting clients a fixed service/project fee, which is negotiated on a project-by-project basis based upon estimates of time and resources required. Some clients are billed according to fixed hourly rates. On some occasions, RayLign gets paid annual basis points on non-discretionary accounts in support of Consulting relationships. The firm does not participate in any broad wrap fee programs.
- E. As of December 31, 2014, RayLign Advisory, LLC managed \$86.2M of client assets on a non-discretionary basis and \$154.5M on a discretionary basis (\$20.3M of which is managed through its affiliate, Raylor Asset Management Group, LLC).

## **Item 5: Fees & Compensation**

- A. RayLign charges either a fixed service/project fee or annual retainer, which is negotiated on a project-by-project basis based upon estimates of time and resources required. Once this initial project is completed, clients may choose to continue to utilize the firm to support implementation of the Alignment Plan, either on a project or annual retainer basis. In some cases where clients have non-discretionary assets held with the firm, an equivalent asset based fee arrangement may be put in place. Ongoing project and retainer relationships are similarly charged on estimates of time and resources required. Fees may be payable monthly or quarterly and can be paid partially in advance. Investment clients that utilize our asset management affiliate, Raylor Asset Management Group LLC, pay assets under management based fees for assets in Raylor products.
- B. RayLign Advisory has letter agreements with clients that specify fees and services, and invoices clients for mutually agreed upon project fees. Some relationships pay fees based on assets, in which case a client may opt to have RayLign Advisory debit such fees directly from custodial accounts, typically on a quarterly basis.
- C. As part of the negotiated fee, Consulting Clients may agree to cover reasonable travel and related expenses. Investment clients will need to have an account with a custodian, who also may charge a custodial or related fee. Each custodial trading platform may charge additional trading costs and commissions from the buying and selling of investments within the portfolios. In the event a client invests with a third party investment manager

(including Raylor) the investment manager typically charges a management fee. These costs are borne by the client.

- D. RayLign's fees are charged in installments. The first installment payment is due at agreement/contract signing. Agreements for RayLign's services may be terminated upon 30 days' prior written notice. In the event of termination, fees paid in advance by the client are refunded by RayLign on a pro rata basis.
- E. Supervised persons of RayLign do not receive compensation such as asset-based sales charges or service fees related to sales of securities or other investment products.

## **Item 6: Performance Based Fees and Side by Side Management**

RayLign Advisory LLC does not charge performance-based fees.

## **Item 7: Types of Clients**

RayLign Advisory's Consulting clients are primarily couples and multi-generational families who own an operating business or have a substantial family office or financial resources representing over \$50mm in assets.

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

- A. RayLign's process on behalf of its Investment Clients is to facilitate a conversation about an appropriate allocation to the following categories (1) safe "reserve", 2) "growth/risk", 3) "less correlated", diversifying assets, and 4) "opportunistic" investments. If the client chooses to allocate assets to RayLign's affiliate, Raylor Asset Management Group, LLC, a dialogue with the client will determine which of the firm's strategies will be appropriate for the client's needs.

Investing in securities, especially equity-based securities, involve certain risks, including the risk of loss of principal. Clients should only allocate those monies that can bear these potential risks.

- B. RayLign may direct clients to invest in securities that involve certain risks, including the risk of loss of principal. We are very mindful of the impact frequent trading can have on costs and taxes borne by our clients. As a result, we attempt to manage the rebalancing process to limit the transaction costs and tax impact on the investor's portfolio, although we will run our allocation procedure more frequently if market conditions warrant it. Clients should only allocate those monies that can bear these potential risks. A full performance disclosure presentation detailing historical investment results is available upon request.

- C. RayLign makes recommendations to clients to invest in a variety of securities, primarily equity-based ETF securities and liquid alternative mutual funds. As a result, these investments may involve certain risks, including the risk of loss of principal. Additional risks involved include interest rate risk, liquidity risk, counterparty risk, and possible tax implications. Where RayLign recommends investing in managed futures strategies via Raylor Managed Futures Strategy Fund (a registered mutual fund) or private limited partnership handled by Xplor, a client will receive appropriate further documentation via prospectus or private placement memorandum, respectively. These describe in additional detail the relevant risks of investing in these products.

## **Item 9: Disciplinary Information**

- A. Neither RayLign Advisory LLC, nor any of our employees, has had any civil or criminal actions brought against them.
- B. Neither RayLign Advisory LLC, nor any of our employees, has had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.
- C. Neither RayLign Advisory LLC, nor any of our employees, has had any proceedings before a self-regulatory organization.

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

- A. We affirm that RayLign is not registered, nor has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.
- B. RayLign's affiliate, Xplor Capital Management LLC is a registered commodity pool operator and commodity trading advisor. Gregory Rogers and Damon Hart are associated persons of Xplor.
- C. RayLign's affiliate, Raylor Asset Management Group, LLC, owns Xplor Capital Management LLC, a National Futures Association (NFA) member registered with the Commodity Futures Trading Commission (CFTC) as CTA and CPO. Xplor provides managed futures research and investment management services. Raylor Asset Management Group, LLC also owns Raylor Investments LLC, a registered investment advisor (RIA) that provides research, investment advisory and allocation services. Raylor Investments LLC is also a National Futures Association (NFA) member registered with the Commodity Futures Trading Commission (CFTC) as CTA and CPO. Where RayLign recommends investment in products and services provided by Xplor or Raylor Investments, the firm discloses to clients the potential conflicts of interest that investing in an affiliate presents, including potential fee charges at different levels (e.g. to RayLign as investment advisor and also to Xplor as asset manager) and preference for these affiliate products and services over third-party offerings. Clients are advised as to these

potential conflicts and their endorsement sought as to which, if any, affiliated products and services to use and in what proportion of the client portfolio.

- D. RayLign receives compensation primarily from its family clients. The firm has created a “think tank” called RayLign Family Frontiers to extend RayLign’s reach in support of our purpose of “perpetuating well-being for families”. This forum includes a group of wealth advisors who wish to enhance their capacity to work with complex financial families. By design, each member organization represents a mix of roles and perspectives, including financial planning and training, investment management, accounting, estate law, insurance consulting and philanthropic advisory. Our goal is to provide strategic guidance and custom relationship management training services to family advisors to address a number of business demands, including: 1) defining extended family needs and objectives, 2) clarifying advisor team roles and working relationships, 3) understanding the system of the client family, 4) delivering financial education to family members, as well as 5) navigating family behavioral dynamics. A listing of RayLign Family Frontiers relationships can be provided upon request.

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

- A. RayLign holds itself and its employees to the highest standards of lawful and ethical conducts. While the employee manual is intended to provide general guidance with respect to acceptable and unacceptable employee activities, it is also intended to be supplemented by good judgment and common sense to avoid even the appearance of impropriety. RayLign’s Compliance Manual and Code of Ethics cover our policies on confidentiality of information, outside activities, restrictions or securities transactions and conflicts of interest. Any questions concerning these policies should be directed to RayLign’s Chief Compliance Officer. RayLign will provide a complete copy of our Code of Ethics upon request.
- B. RayLign may recommend, buy and sell the Raylor Managed Futures Strategy Mutual Fund for client accounts. Please see the discussion of affiliated firm products in Item 10 above.
- C. RayLign does not buy securities for its own account, therefore no conflict of interest exists at the firm level. We do not believe that our investment management process create any conflicts of interest. Where employees have accounts managed by RayLign/Raylor, the accounts are managed alongside and consistent with client accounts. Our internal controls, including our Code of Ethics, prevent our staff from buying and/or selling securities contemporaneously with client transactions.

## **Item 12: Brokerage Practices**

- A. When a client does not have a relationship with a bank or broker-dealer of their own, we recommend they open an account at Schwab, Fidelity, Pershing, Envestnet, Folio



Institutional, Placemark or TD Ameritrade. We find that trading and related commission rates at these firms are competitive.

1. Research and other soft dollar benefits. RayLign's sole focus when selecting an executing broker for clients is best execution. Any research or other related services RayLign may receive in limited instances from our custodial and trading relationships is not dependent on commission rates paid. Third party information has minimal value and weight in our process. RayLign does not neither seek nor receive any research or soft dollar benefits.
  - i. We do not use client brokerage commissions for the purpose of obtaining research or other services. Trade execution is done on a best execution basis.
  - ii. We do not cause clients to pay commissions higher than those charged by other broker-dealers in return for soft dollar benefits.
  - iii. RayLign does not pay for any products, research or services with client brokerage. However, even trading on a best execution basis results in access to some general economic, factual company-specific information and/or regulatory and compliance information regardless of commissions paid, which RayLign does receive in limited instances. The information received is not dependent on commission rates paid.
2. Brokerage for Client Referrals: RayLign does not consider referrals when we select or recommend custodial and related trading platforms.
3. Directed Brokerage:
  - i. RayLign recommends clients that do not have a custodial relationship to custody their account(s) with Schwab, Fidelity, Pershing, Envestnet, Folio Institutional, Placemark or TD Ameritrade. We do not receive compensation from these custodians for accounts our clients open with them. Not all advisors require their clients to direct brokerage. These organizations are our recommended brokers for clients because of their low commission structure, effective trade execution platform and the ability to aggregate client trades.
- B. RayLign will aggregate the purchase or sale of securities for client accounts at custodians with aggregating abilities when the timing of orders or rebalancing allows it. The benefit to clients is a decrease in potential differences in client returns among similarly managed accounts.

## **Item 13: Review of Accounts**

- A. RayLign reviews client accounts and consulting plans annually. Greg Rogers, President, performs these reviews with the respective client relationship manager.

- B. Client account reports are reviewed on a periodic basis and on an ad hoc basis at the request of the client or financial advisor.
- C. For Consulting Clients, RayLign delivers a variety of regular reports, including meeting agendas, meeting follow-up notes, objectives and needs survey results and facilitations materials, initial, intermediary and final findings summaries. For those accounts that RayLign's affiliate Raylor Asset Management Group LLC advises, quarterly written fact sheets are produced with market commentary and updated performance, holding and other attribution and related portfolio analysis. We disseminate these reports within 15 days after quarter end. Custodians also deliver monthly statements and annual tax summaries to clients.

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

- A. Neither RayLign, nor any of our employees, receives any economic benefits from others to provide investment advice or related advisory services to our clients.

## **Item 15: Custody**

RayLign is deemed to have custody of client assets solely based on its authority, in certain client relationships, to debit fees directly from client accounts. RayLign does not otherwise have custody of client assets and all client assets are held at qualified custodians. Clients receive account statements from their custodian at least quarterly. These statements should be reviewed carefully

## **Item 16: Investment Discretion**

RayLign clients complete a confidential client profile. This confidential client profile provides us with information to assess each client's unique needs. Raylign discusses proposed investment allocations with clients and clients may establish guidelines or limitations on asset allocation in consultation with RayLign.

RayLign's affiliate Raylor Asset Management Group, LLC has discretionary investment authority over some of the accounts we manage. Prior to assuming discretionary authority, clients are provided with an Agreement and Raylor Investments LLC's Form ADV. By signing the Agreement, clients grant Raylor discretionary investment authority over accounts managed by Raylor.

## **Item 17: Voting Client Securities**

RayLign does accept proxy authority and it is our custom to vote with the relevant Board's recommendation. We do not let clients direct our votes in any particular solicitation. However,



in the unlikely event that a conflict of interest arose with respect to voting client securities, RayLign would consult with the affected clients prior to voting. For more information on our proxy voting process, including the option of obtaining a copy of our proxy voting policies and procedures and information regarding how proxies were voted, please contact Damon Hart, Chief Compliance Officer, at 203.742.5464.

**Item 18: Financial Information**

RayLign does not require or solicit prepayment of more than \$1,200 in fees per client six months or more in advance. Additionally, RayLign does not have any debt currently, nor has the firm carried any debt since inception. We do not plan on borrowing any money in the future. The firm holds excess cash in case of emergency.

1. In certain cases, we do require prepayment of a portion of our consulting fees, but do not request more than 6 months in advance.
2. In certain cases, we have discretionary authority over client accounts. We hold insurance coverage to consider Directors, omissions and errors liabilities. There are no financial conditions that are likely to impair our ability to meet our contractual commitments to clients.
3. RayLign has not been the subject of a bankruptcy petition.



**RayLign Advisory, LLC**  
**ADV Part 2B – Firm Brochure**

**Gregory T. Rogers**  
**35 Mason Street, 4<sup>th</sup> Floor**  
**Greenwich, CT 06830**

**(203) 742-5450**

**[www.raylign.com](http://www.raylign.com)**

**Dated March 25, 2015**

**For further information, please contact either:**

- **Gregory Rogers – Founder & President or**
- **Damon Hart – Chief Compliance Officer**

**This brochure supplement provides information about Gregory T. Rogers that supplements the RayLign Advisory LLC brochure. You should have received a copy of that brochure. Please contact us at (203) 742-5450 if you did not receive RayLign Advisory LLC’s brochure or if you have any questions about the contents of this supplement.**

**Additional information about Gregory T. Rogers is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## Item 2: Educational Background and Business Experience

### **Gregory T. Rogers**

DOB: 12/11/1965

New York University, Stern School  
New York City, NY 1995 -- M.B.A.

Brown University 1988 -- B.A.  
Providence, RI  
Economics & Organizational Behavior

### Business Background

RayLign Advisory LLC  
President 2004 - present

Raylor Asset Management Group LLC  
Managing Partner 2011 - present

Mr. Rogers is a member of the National Futures Association (NFA) and is registered with the NFA as a Principal and Associated Person of Raylor Investments LLC and Xplor Capital Management LLC, including successfully completing the National Commodity Futures Examination (NCFE or Series 3).

## Item 3: Disciplinary Information

Mr. Rogers has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Mr. Rogers or of RayLign.

## Item 4: Other Business Activities

Mr. Rogers is engaged in the following other affiliated investment related businesses; Raylor Asset Management Group LLC, Raylor Investments LLC, and Xplor Capital Management LLC. Mr. Rogers may recommend products and services provided by affiliated entities, which may present certain conflicts of interest, including potential fee charges at different levels (e.g. to RayLign as investment advisor and also to Xplor as asset manager) and preference for these affiliate products and services over third-party offerings. Clients are advised as to these potential conflicts and their endorsement sought as to which, if any, affiliated products and services to use and in what proportion of the client portfolio.

## Item 5: Additional Compensation

Mr. Rogers does not receive economic benefits from any person or entity other than RayLign and its affiliate, Raylor Asset Management Group LLC in connection with the provision of investment advice to clients.



Item 6: Supervision

Mr. Rogers does not have a supervisor with respect to his investment recommendations, but his activities are generally overseen by RayLign's Chief Compliance Officer, Damon Hart. Damon can be reached directly by calling 203.742.5464.



**RayLign Advisory, LLC**  
**ADV Part 2B – Firm Brochure**

**G. Scott Budge**  
**35 Mason Street, 4<sup>th</sup> Floor**  
**Greenwich, CT 06830**

**(203) 742-5450**

**[www.raylign.com](http://www.raylign.com)**

**Dated March 25, 2015**

**For further information, please contact either:**

- **Gregory Rogers – Founder & President or**
- **Damon Hart – Chief Compliance Officer**

**This brochure supplement provides information about G. Scott Budge that supplements the RayLign Advisory LLC brochure. You should have received a copy of that brochure. Please contact us at (203) 742-5450 if you did not receive RayLign Advisory LLC's brochure or if you have any questions about the contents of this supplement.**

**Additional information about G. Scott Budge is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## Item 2: Educational Background and Business Experience

### **G. Scott Budge**

Date of Birth: 12/14/1956

Utah State University, B.A. Logan, Utah	1978
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New York University, M.A. New York City, New York	1980
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New York University, Ph.D. New York City, New York	1988
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### Business Background

RayLign Advisory, LLC

Managing Director	2008 – present
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Calder Service Systems

Co-Founder, Managing Director	2002 – 2007
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## Item 3: Disciplinary Information

Scott Budge has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Mr. Budge or of RayLign Advisory LLC.

## Item 4: Other Business Activities

Scott Budge is not engaged in any other investment related business, and does not receive compensation in connection with any business activity outside of RayLign.

## Item 5: Additional Compensation

Scott Budge does not receive economic benefits from any person or entity other than RayLign in connection with the provision of investment advice to clients.

## Item 6: Supervision

Scott Budge does not make investment recommendations. Scott Budge is supervised by Gregory Rogers, Founder & President of RayLign. He can be reached directly by calling 203.742.5451.





**RayLign Advisory, LLC  
ADV Part 2B – Firm Brochure**

**Lauris Lamberg  
35 Mason Street, 4<sup>th</sup> Floor  
Greenwich, CT 06830**

**(203) 742-5450**

**[www.raylign.com](http://www.raylign.com)**

**Dated March 25, 2015**

**For further information, please contact either:**

- **Gregory Rogers – Founder & President or**
- **Damon Hart – Chief Compliance Officer**

**This brochure supplement provides information about Lauris Lamberg that supplements the RayLign Advisory LLC brochure. You should have received a copy of that brochure. Please contact us at (203) 742-5450 if you did not receive RayLign Advisory LLC's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Lauris Lamberg is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## Item 2: Educational Background and Business Experience

### **Lauris Lamberg**

DOB: 3/5/1973

Riga Business School, MBA Riga, Latvia	1998
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Duke University, BA Durham, NC French & Political Science	1995
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### Business Background

Raylor Asset Management Group, LLC Principal, Business Development	2011 – present
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Raylor Investments, LLC Business Development and Sales	2009 - present
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StrategicPoint Investment Advisors Director	2009
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AllianceBernstein Vice President	2006 - 2008
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Mr. Lamberg is a Certified Investment Management Analyst (CIMA) designee. The CIMA designation is issued by the Investment Management Consultants Association (IMCA). In order to earn a CIMA designee, Mr. Lamberg met IMCA's requirements, including having 3 years of verifiable financial services experience, as well as answering 'no' to all disclosure questions on Form U-4 that cover criminal and regulatory violations, civil judicial actions and customer complaints or else satisfactorily justify a 'yes' answer. Additionally, Mr. Lamberg completed a self-study education component as well as a one-week classroom education program by an AACSB accredited university business school. Mr. Lamberg is required to complete 40 hours of continuing education requirements every 2 years.

Mr. Lamberg is a member of the National Futures Association (NFA) and is registered with the NFA as an Associated Person of Raylor Investments LLC and Xplor Capital Management LLC, including successfully completing the National Commodity Futures Examination (NCFE or Series 3).

## Item 3: Disciplinary Information

Mr. Lamberg has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Mr. Lamberg or of RayLign Advisory.

## Item 4: Other Business Activities



Mr. Lambergs is not engaged in any other investment related business, and does not receive compensation in connection with any business activity outside of RayLign Advisory's affiliated company Raylor Asset Management Group LLC.

Item 5: Additional Compensation

Mr. Lambergs does not receive economic benefits from any person or entity other than RayLign Advisory's affiliated company Raylor Asset Management Group LLC in connection with the provision of investment advice to clients.

Item 6: Supervision

Mr. Lambergs' activities are overseen by RayLign Advisory's Founder and President, Gregory Rogers. Greg can be reached by calling 203.742.5451.