



## **Risk Paradigm Group, LLC**

### **Form ADV Part 2A – Disclosure Brochure**

**Effective: May 26, 2017**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Risk Paradigm Group, LLC (“RPg” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (866) 726-5150 or by email at [info@riskparadigmgroup.com](mailto:info@riskparadigmgroup.com).

RPg is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about RPg to assist you in determining whether to retain the Advisor.

Additional information about RPg and its Advisory Persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD number 155870.

#### **Risk Paradigm Group, LLC**

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<b>7509 Manchaca Road Suite 101 Austin, TX 78745 Phone: (866) 726-5150 Fax: (512) 327-6044</b>	<b>25 Burlington Mall Rd Suite 307 Burlington, MA 01803 Phone: (781) 547-8660 Fax: (781) 273-0333</b>	<b>255 East Brown Street Suite 101 Birmingham, MI 48009 Phone: (866) 726-5150 Fax: (781) 273-0333</b>

## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A* and *Part 2B*. *Part 2A* (the “Disclosure Brochure”) provides information about a variety of topics relating to the Advisor’s business practices and conflicts of interest. *Part 2B* (the “Brochure Supplement”) provides information about Advisory Persons of RPg.

RPg believes that communication and transparency are the foundation of our relationship and continually strive to provide our Clients with the most complete and accurate information at all times. We encourage all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### **Material Changes**

RPg has made the following updates to its Disclosure Brochure (Form ADV 2A):

- RPg is adding 2 new strategies; RPg Alternative Correlation Model and RPg Direct Lending Model. See Item 8 for further detail on the strategies.

### **Future Changes**

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of RPg.

At any time, you may view the current Disclosure Brochure on-line at the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD number 155870. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (866) 726-5150 or by email at [info@riskparadigmgroup.com](mailto:info@riskparadigmgroup.com).

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## Item 4 – Advisory Services

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### A. Firm Information and Background

Risk Paradigm Group, LLC (“RPg” or the “Advisor”) is an investment management firm specializing in the design, delivery, and management of tactical investment strategies that primarily use Exchange Traded Funds (“ETFs”) for their underlying holdings. These strategies are commonly referred to as “Managed ETF Strategies” or “Tactical ETF Strategies” and are powered by policy based, quantitatively driven methodologies (the “Model Methodology[ies]” or “Model[s]”).

We primarily serve Financial Intermediaries (the “Intermediary[ies]”) and their End Client (the “End Client[s]”), as well as individuals and institutions seeking portfolios that provide exposure to a variety of different market segments, including: US equities, US fixed income, International equities, and alternative asset classes. More specifically, RPg focuses on downside protection using a quantitative, repeatable investment process. Financial Intermediaries include: broker-dealers, registered investment advisors (“RIAs”), and other Advisory Persons serving both institutional and individual End Clients and qualified & non-qualified plans.

RPg was founded in October 2010 to bring together a team of professionals in an independent, client-centered, fiduciary standard environment who are dedicated to providing investment solutions that help investors seek to protect and grow their wealth. RPg is a wholly-owned subsidiary of Risk Paradigm Group Holdings, LLC, a privately held Limited Liability Company (“LLC”) that is organized under the laws of the State of Delaware. RPg is a Registered Investment Advisor with the U.S. Securities and Exchange Commission (“SEC”) and is organized under the laws of the State of Texas.

This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by RPg.

Please contact Brandon Lamb, RPg’s Chief Compliance Officer (“CCO”), with any questions regarding this Disclosure Brochure.

### B. Advisory Services Offered

#### Tactical Investment Strategy Products

The most prominent expression of RPg’s expertise is through Tactical Investment Strategy Products (“Tactical Strategy[ies]” or “Product[s]”), that are selected and/or otherwise recommended in conjunction with an Intermediary dispensing advice to an End Client.

For each of the RPg Tactical Strategies selected, an investment exposure is identified for which the quantitative Model Methodology will be administered. Each of the TAG strategies use tactical asset allocation, a dynamic investment management style, adjusting asset allocations to our forward view of the relative risk and returns of various asset classes. An example of an RPg Tactical Strategy is the RPg Tactical U.S. Equity Strategy (“TUS”), which seeks to provide approximate upside market performance of the S&P 500® Index with reduced downside market participation. TUS invests in the nine (9) major sectors of the US equity markets through domestic sector ETFs while using our proprietary quantitative ActiveParadigm (“ActiveParadigm”) Model Methodology to adhere to explicit risk controls that allow the portfolio to move to cash equivalents during periods of extreme market drawdown. In this example, both the Intermediary & the End Client are seeking a specific exposure & desired outcome from the Tactical Strategy that is administered by RPg.

The Tactical Strategies currently offered by RPg, which are managed through two respective Model Methodologies, include the following:

**RPg ActiveParadigm Strategy Products**

RPg Tactical U.S. Equity Strategy  
RPg Tactical U.S. Equity FT Strategy  
RPg Tactical U.S. Long/Short Equity Strategy  
RPg Tactical Global Balanced Strategy  
RPg Core Domestic Equity Strategy

**TAG Tactical Strategies**

TAG Tactical Income  
TAG Tactical Conservative  
TAG Tactical Moderate  
TAG Tactical Growth  
TAG Tactical Equity

**RPg Alternative Strategy Offerings**

RPg Alternative Correlation Model  
RPg Direct Lending Model

For a detailed description of these Products and Strategies, please see Item 8 below.

RPg does not typically have an advisory relationship with the Intermediary's End Client and does not provide tailored advice to the End Client nor assist the End Client in determining if any Product is suitable to meet their goals and objectives. The Intermediary is solely responsible for understanding and evaluating each End Client's identity, circumstances, financial condition, portfolio holdings, tax situation, regulatory status, financial needs and goals, and for making determinations as to whether a Tactical Strategy provided by RPg is appropriate for each potential End Client. The Intermediary is responsible for reporting and communicating with the End Clients as to the status and performance of their individual investments. At no time will RPg accept or maintain custody of an End Client's funds or securities.

The Tactical Strategies offered to Intermediaries for their End Clients are made available through individual separately managed accounts ("SMAs"), or through agreements of RPg products administered through Model Manager Accounts or Unified Managed Accounts ("MMAs" or "UMAs") Sponsored by third parties ("Sponsor Platform[s]").

**Delivery through Separately Managed Accounts:** Our Products are typically selected and/or otherwise recommended for End Clients through Financial Intermediaries such as broker-dealers and RIAs, and their respective Advisory Personnel. To administer the Tactical Strategies listed above, RPg will manage the selected Product through the SMA on a discretionary basis. At no time will RPg accept or maintain custody of an End Client's funds or securities. All End Client assets will be managed within their designated brokerage account[s] or pension account[s] pursuant to the RPg Investment Management Agreement ("Investment Management Agreement" or "IMA") executed by the Intermediary's End Client. One recurring example of this would be an Intermediary recommending RPg Tactical U.S. Equity Strategy to their End Client, with that Client then opening a discretionary account at Fidelity, or other independent custodian, in conjunction with entering into an Investment Management Agreement to have RPg serve as the discretionary manager for that account.

**Delivery through Platform Agreements in Model Manager Accounts, including Unified Managed Accounts:** For Intermediaries who utilize MMAs and UMAs, RPg provides its Tactical Strategies to RIA firms, Turnkey Asset Management Programs (commonly referred to as “TAMPs”), and UMA Platform Sponsors (“Sponsor[s]”) through platform level licensing agreements (“Platform Agreements”). Typically, in such agreements, RPg is responsible for the management of the Tactical Strategy, and then for delivering any corresponding Model or Tactical Strategy updates to the Sponsor in a timely manner. The Sponsor has sole authority and responsibility for administering the Strategy within the End Client account, including adherence to the Product and any updates, discretionary trading of the Tactical Strategy for the benefit of the End Client, and End Client reporting. With respect to the management and delivery of RPg Tactical Strategies, the Models and the recommendations implicit in the Models, generally are not tailored to the individual needs or circumstances of an Intermediary’s End Client.

### **Customized Investment Management Services**

RPg may provide customized investment management services (“Customized Strategies”) to individuals, institutions such as endowments or foundations, and qualified & non-qualified plans through separately managed accounts (“SMAs”) or through Platform Agreements as described above. With respect to any Customized Strategy managed by RPg, the investment guidelines will be administered in accordance with a documented investment mandate provided by the End Client’s Intermediary or Platform Sponsor and delivered to RPg. At no time will RPg accept or maintain custody of an End Client’s funds or securities, except for the authorized deduction of RPg’s investment management fees. All End Client assets will be managed within their designated brokerage account[s] or pension account[s] pursuant to the RPg Investment Management Agreement, executed by the End Client. Please see Item 5 below for more details.

### **Sub-Advisory Relationships**

At this time, RPg is not engaged in any sub-advisory agreements with unaffiliated parties. RPg reserves the right to enter into sub-advisory relationships in the future.

### **C. Client Account Management**

Pursuant to the delivery of investment management services associated with RPg’s Products, the Methodologies and Tactical Strategies generally are not administered to the specific needs or circumstances of an Intermediary or their End Client. RPg does not typically have the direct advisory relationship with the End Client, but may at times. RPg does not typically tailor its investment services for the Intermediary’s End Client, or for determining if any RPg Product is appropriate for the End Client. The Intermediary is solely responsible for understanding and evaluating each End Client’s identity, circumstances, financial condition, portfolio holdings, tax situation, regulatory status, financial needs and goals, and for making determinations as to whether a Product provided by RPg is appropriate for each potential End Client. The Intermediary is responsible for reporting and communicating with the End Clients as to the status and performance of their individual investments.

In certain circumstances, an RPg contract is utilized working with the End Client’s Financial Intermediary. The Financial Intermediary will work directly with the Client to understand the identity, circumstances, financial condition, portfolio holdings, tax situation, regulatory status, financial needs and goals, and for making determinations as to whether a Product provided by RPg is appropriate for the Client.

At no time will RPg accept or maintain custody of an End Client’s funds or securities, except for the authorized deduction of RPg’s investment management fees. All End Client assets will be managed within their designated brokerage account[s] or pension account[s] pursuant to the RPg Investment Management Agreement, executed by the End Client.

#### **D. Wrap Fee Programs**

RPg does not currently participate in any wrap fee programs. The firm reserves the right to participate in wrap fee programs in the future. Investment management services are provided directly by RPg.

#### **E. Assets Under Management**

As of December 31, 2016, RPg manages the following assets:

Discretionary Assets	\$150,333,498
Non-Discretionary Assets	\$50,458,899
<b>Total Assets Under Management</b>	<b>\$200,792,397</b>

Clients may request more current information at any time by contacting the Advisor.

## **Item 5 – Fees and Compensation**

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#### **General Account Characteristics**

The Investment Management Agreement executed between RPg and the End Client shall define the pricing, terms and conditions of the Tactical Strategy or other investment advisory service selected/recommended to an End Client thru their Financial Intermediary, and the roles & responsibilities of the End Client, Financial Intermediary and RPg as Investment Manager.

#### **Payment of Fees**

In general, for Products, RPg will charge a management fee of up to 1.25% per annum based upon the assets under management in each End Client account. Fees are based on the market value of assets under management at the end of the prior calendar quarter. Investment management fees in the first quarter of service are prorated to the inception date of the account to the end of the first quarter. Fees do not cover any execution-related expenses, commissions and margin interest, if any, securities exchange fees, or other fees required by law or charged by the broker-dealer with custody of the End Client accounts.

Assets will be held in custody and administered by a third-party custodian (examples include Schwab and Fidelity). The custodian will also be responsible for valuing securities in the End Client accounts. Both our Investment Management Agreement and the custodial/clearing agreement may authorize the End Client's custodian to debit the End Client's account[s] for the amount of our investment management fee and to directly remit that investment management fee to RPg in compliance with regulatory procedures. End Clients will be provided with a statement from the account custodian at least quarterly, reflecting deduction of RPg's investment management fee.

Fees for RPg Tactical Strategies offered by Model Manager and Unified Managed Account platform sponsors are determined by the Platform Sponsor.

For Tactical Strategies, RPg generally requires a minimum account size of \$100,000 to effectively implement its strategies. Account minimums may be waived at RPg's sole discretion.

#### **Additional Information Concerning Fees**

In certain circumstances, investment management fees may be negotiable based upon specific requirements. The fees charged are calculated as described above. All fees paid to RPg for investment management services are



separate from the fees and expenses charged by mutual funds and exchange traded funds to their shareholders. These fees and expenses are described in each fund's prospectus.

### **Termination of Contracts**

Upon written notice, either party may terminate the Investment Management Agreement at any time. For fees paid in advance, fees will be prorated to the date of termination and any unearned portion of the fee will be refunded to the End Client within ninety (90) days. The Custodian will deliver securities and funds held at custodian as instructed by the End Client, unless the End Client requests that the securities and funds be liquidated.

Termination of an Investment Management Agreement will not affect the liabilities or obligations of the parties arising out of any transaction initiated prior to termination. An Investment Management Agreement will not terminate in the event of your death, disability, or incompetence. However, in the event of the End Client's death, disability, or incompetence, the End Client's executor, guardian, attorney-in fact or other authorized representative may terminate an Investment Management Agreement by providing written notice to RPg with such termination being effective upon our receipt of such notice.

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

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RPg does not charge performance-based fees for its investment advisory services. The fees charged by RPg are as described in "Item 5 – Fees and Compensation" above and are not based upon the capital appreciation of the funds or securities held by any End Client.

RPg does not typically offer any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) to Financial Intermediaries or their End Clients.

## **Item 7 – Types of Clients**

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RPg is an investment management firm that mainly manages Tactical Investment Strategies. We primarily serve Financial Intermediaries who select and/or otherwise recommend our Tactical Strategies for the benefit of their End Clients, although some strategies may be offered directly to End Clients. Financial Intermediaries include: broker-dealers, registered investment advisors ("RIAs"), and other Advisory Persons serving both institutional and individual End Clients and qualified & non-qualified plans.

For Tactical Strategies, RPg generally requires a minimum account size of \$100,000 to effectively implement its strategies. Account minimums may be waived at RPg's sole discretion.

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

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### **A. Methods of Analysis**

All Model Methodologies used to provide investment advisory services and to manage RPg Tactical Investment Strategy Products are policy based and quantitatively and qualitatively driven. The intellectual property deployed in the Models is proprietary (all research and development is conducted internally by RPg's Investment Committee).

Each Tactical Investment Strategy and corresponding Model Methodology has explicit rules, maintained by RPg, to identify and define the universe, class and type of securities to buy or sell, the frequency and timing of investment decisions or rebalancing, the weightings or amounts of a security to hold, and procedures regarding



how to acquire or dispose of the security. RPg utilizes intellectual property for the investment strategy construction and the analysis to support Model Methodologies for the Tactical Strategies. Investing in securities involves risk of loss that clients should be prepared to bear.

As previously referenced in Item 4 above, the RPg Tactical Investment Strategy Products are as follows:

The RPg Model Methodologies below use a proprietary quantitative algorithm that is momentum and volatility based and is run on a weekly basis to determine which sectors and/or which ETFs within each Sleeve are forecasted for positive trends and which sectors are forecasted to lose money. All sectors allocated within in the portfolio are equal weighted at the time of the rebalance with a maximum exposure limit for any individual sector ETF at that time. Once maximum exposure limits are reached, the portfolio then begins to build a cash position using cash equivalents. The strategies seek to achieve their investment objectives while using our proprietary quantitative Model Methodology, ActiveParadigm, to adhere to explicit risk controls that allow the portfolios to move to cash equivalents during periods of extreme market drawdown.

**RPg Tactical U.S. Equity Strategy (“Tactical U.S.” or “TUS”):** The Tactical U.S. Strategy has an investment objective of long-term capital appreciation that strives to approximate upside market performance of the S&P 500® Index with reduced downside market participation. TUS invests in the major sectors of the US equity markets through domestic sector ETFs.

**RPg Tactical U.S. Equity FT Strategy (“FT” or “TUSFT”):** The Tactical U.S. Equity FT Strategy has an investment objective of long-term capital appreciation that strives to approximate upside market performance of the S&P 500® Index with reduced downside market participation. TUSFT invests in the 9 major sectors of the US equity markets through the First Trust AlphaDEX® domestic sector ETFs.

**RPg Tactical U.S. Long/Short Equity Strategy (“U.S. Long/Short” or “TUSLS”):** The Tactical U.S. Long/Short Strategy has an investment objective of long-term capital appreciation that strives to approximate and enhance upside market performance of U.S. equities with reduced downside market participation. TUSLS invests in the major sectors of the U.S. Equity markets through domestic sector ETFs. The strategy uses levered ETFs for its long positions, and levered inverse ETFs for its short positions.

**RPg Tactical Global Balanced Strategy (“Global Balanced” or “TGB”):** The Tactical Global Balanced Strategy has an investment objective of long-term capital appreciation that strives to approximate and enhance upside global market performance encompassed by four broad asset classes (“Sleeves”) of: U.S. Equity, International Equity, Fixed Income, and Alternatives (including Gold, Real Estate, and MLP ETFs) with reduced downside market participation. TGB seeks to achieve its investment objective by allocating across ETFs within the four Sleeves.

**RPg Core Domestic Equity Strategy (“Core Domestic Equity” or “CDE”):** The Core Domestic Equity Strategy, has an investment objective of long-term capital appreciation and strives to approximate upside market performance of the S&P 500® Index with reduced downside market participation. CDE invests in the major sectors of the US equity markets through domestic sector ETFs.

The TAG strategies below use tactical asset allocation, a dynamic investment management style, adjusting asset allocations to our forward view of the relative risk and returns of various asset classes. The portfolios utilize a “fund of funds” strategy, investing exclusively with asset class specific ETFs and ETNs versus investing directly in individual stocks and bonds. We construct our core portfolios using the following five integrated levels of risk management: *Target Allocation* - seeking to establish Equity Risk; *Wide Diversification* - seeking to protect Allocation Risk; *Position Limits* - seeking to reduce Concentration Risk; *Passive Indexes* - seeking to minimize

Security Risk; and *Tactical Overlay* - seeking to manage Event Risk. We use a proactive investment management process globally across multiple asset classes in our portfolios.

**TAG Tactical Income ("TI"):** The TAG Tactical Income is a global, unconstrained income portfolio. With a proactive investment style across a broad global asset class universe, it can seek the best income opportunities in any economic and interest rate environment. As such, it has the potential to earn high income while still providing prudent risk management.

**TAG Tactical Conservative ("TC"):** The TAG Tactical Conservative is designed around a targeted time horizon between 1-3 years, and a risk tolerance targeted to be 20% equity and 80% fixed income. This is delivered by investing in ETF's representing various asset classes globally versus the more traditional use of stocks and bonds.

**TAG Tactical Moderate ("TM"):** The TAG Tactical Moderate is designed around a targeted time horizon between 4-9 years, and a risk tolerance targeted to be 60% equity and 40% fixed income. This is delivered by investing in ETF's representing various asset classes globally versus the more traditional use of stocks and bonds.

**TAG Tactical Growth ("TG"):** The TAG Tactical Growth is designed around a targeted time horizon of 10 plus years, and a risk tolerance targeted to be 80% equity and 20% fixed income. This is delivered by investing in ETF's representing various asset classes globally versus the more traditional use of stocks and bonds.

**TAG Tactical Equity ("TE"):** TAG Tactical Equity is a global, unconstrained equity portfolio. With a proactive investment style across a broad global asset class universe, it can seek the best equity opportunities in any economic environment, while still providing prudent risk management.

RPg also offers two new additional strategies as follows:

**RPg Alternative Correlation Model ("ACM"):** RPg's Alternative Correlation Model's purpose is to protect and grow investors assets with alternative solutions designed to maintain a low correlation to traditional assets while seeking a relevant level of cash flow.

**RPg Direct Lending Model ("DLM"):** RPg's Direct Lending Model's purpose is to protect and grow investors assets with alternative solutions designed to generate a relevant level of cash flow.

#### Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. RPg will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in "Item 13 – Review of Accounts".

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client

participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Additionally, the following are some of the risks associated with the potential speculative components of the Advisor's strategy:

#### Short Sales

A short sale involves the sale of a security that the Client does not own in the hope of purchasing the same security at a later date at a lower price. To make delivery to the buyer, the Client must borrow the security and is obligated to return the security to the lender, which is accomplished by a later purchase of the security. The Client realizes a profit or a loss as a result of a short sale if the price of the security decreases or increases respectively between the date of the short sale and the date on which the Client covers its short position, i.e., purchases the security to replace the borrowed security. A short sale involves the theoretically unlimited risk of an increase in the market price of the security that would result in a theoretically unlimited loss.

#### Alternative Investments

When considering alternative investments, including hedge funds, you should consider various risks including the fact that some alternative investment products: often engage in leveraging and other speculative investment practices that may increase the risk of investment loss, can be illiquid, are not required to provide periodic pricing or valuation information to investors, may involve complex tax structures and delays in distributing important tax information, are not subject to the same regulatory requirements as other registered products, can charge high fees, and in many cases the underlying investments are not transparent and are known only to the investment manager.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

## **Item 9 – Disciplinary Information**

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RPg and its Advisory Persons value the trust you place in us. As we advise all Intermediaries and End Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with which you partner. On August 25, 2016, RPg Asset Management entered into a settlement with the SEC regarding an administrative proceeding involving the use of performance in advertisements, resulting from the Advisor's reliance on information provided by their sub-advisor. RPg no longer has a relationship with that sub-advisor and has taken measures internally to prevent such an issue in the future. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD #155870.

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

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#### Affiliated Entities

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Risk Paradigm Group, LLC

Phone: (866) 726-5150 | [www.rpgassetmanagement.com](http://www.rpgassetmanagement.com)

**Affiliation with Risk Paradigm Group Holdings, LLC:** RPg is a wholly-owned subsidiary of Risk Paradigm Group Holdings, LLC, a Delaware limited liability holding company. Risk Paradigm Group Holdings, LLC is a privately held partnership consisting of seven managing partners and two passive, non-managing investors. Risk Paradigm Group Holdings, LLC is also the parent to RPg Family Wealth Advisory, LLC (CRD# 158528), an affiliated registered investment advisor that provides comprehensive investment advisory and wealth management services. Certain Advisory Persons of RPg are also Managing Members and/or Advisory Persons of RPg Family Wealth Advisory, LLC.

**Affiliation with RPg Family Wealth Advisory, LLC:** RPg provides certain investment management services to an affiliated registered investment advisor, RPg Family Wealth Advisory, LLC (referred to as “FWA”), including portfolio management and the creation, implementation, and management of RPg investment Models used with their End Clients. In this relationship, RPg typically provides investment management and trade execution services in a sub-advisory capacity, or else at the recommendation of FWA will directly enter into an RPg Investment Management Agreement with their End Client for individually customized services. At no time will RPg accept or maintain custody of an FWA Client’s funds or securities. All End Client assets will be managed within their designated brokerage account[s] or pension account[s], pursuant to the Investment Management Agreement executed by the End Client. Please note that RPg manages assets for many End Clients of its affiliated registered investment advisor, FWA. These clients pay separate fees to RPg and FWA for the management and advisory services provided by each firm respectively.

#### **Lending Relationships**

RPg and its affiliated entities have received capitalization through both debt and equity investments from certain End Clients of RPg. Further, End Clients of RPg, some of whom participated in the initial capitalization of RPg, have loaned money to Risk Paradigm Group Holdings, LLC, and/or to RPg Advisor Financing Services, LLC (“RAFS”), both affiliates of RPg.

Neither RPg nor its Supervised Persons are registered (except as stated above), or have an application pending to register as a broker-dealer, futures commission merchant, commodity trading advisor (“CTA”) or an associated person (or registered representative) of the foregoing entities.

#### **Affiliation with Dynasty Financial Partners**

RPg maintains a business relationship with Dynasty Financial Partners, LLC (“Dynasty”). Dynasty offers operational and back office core service support to independent registered investment advisors either directly or through its network of third-party service providers, including: trading technology, reporting, custody, brokerage, investment research, compliance, marketing support and other related consulting services.

While RPg believes that this open architecture structure for both operational and investment services best serves the interests of its advisory Clients, this relationship presents certain conflicts of interest due to the fact that Dynasty charges a tiered asset based fee that lowers the fee percentage as assets increase. RPg receives the benefit of asset-based breakpoints with Dynasty. The fee for these services is included in the fees paid by the Client (See Item 5. Fees and Compensation).

## **Item 11 – Code of Ethics and Personal Trading**

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### **A. Code of Ethics**

RPg has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all personnel of RPg (our “Supervised Persons”). The Code describes the standard of conduct we require of our Supervised Persons and sets forth certain restrictions on activities, such as personal trading and

gifts and entertainment as well as reporting of ethical violations. Compliance with the Code is a condition of affiliation for all Supervised Persons and a serious violation of the Code or related policies can result in dismissal.

The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. RPg and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of RPg Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include; general ethical principles, reporting personal securities transactions, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. RPg has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at (866) 726-5150 or via email at [info@riskparadigmgroup.com](mailto:info@riskparadigmgroup.com).

#### **B. Personal Trading in Same Securities or at Same Time as Clients**

RPg allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased or sold on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you, or trading in similar securities, presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

While trading in similar securities may pose a potential for a conflict of interest, Supervised Persons of RPg will only place trades concurrently with or after Client orders have been placed and filled. At no time will RPg, or any Supervised Person of RPg, transact in any security to the detriment of any Client. RPg does not act as principal in any transactions.

In addition, the Code of Ethics governs Gifts and Entertainment given by and provided to the Advisor, outside business activities of Supervised Persons, employee securities reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

## **Item 12 – Brokerage Practices**

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#### **A. Recommendation of Custodian[s]**

RPg generally does not accept discretionary authority to select the broker-dealer/custodian for accounts, but may recommend a custodian, as appropriate. All assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or a custodian bank (the “Custodian”). The Intermediary and/or the End Client will typically select the Custodian for safekeeping of the accounts.

Where RPg does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Intermediaries and/or End Clients for trade execution and/or custody services. End Clients are not obligated to use the Custodian recommended by RPg and will not incur any extra fees or cost by RPg if a broker-dealer/custodian not recommended by RPg is utilized. However, the End Client may incur additional costs, such as trade-away fees and other transaction costs. RPg may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the End Client, services made available to the Intermediary and/or End Client, speed and likelihood of execution and/or the reputation of Custodian. RPg often recommends that Clients establish accounts at Fidelity Investments, Inc. and its affiliated companies (collectively



“Fidelity”). RPg maintains this institutional relationship with Fidelity and other institutional platforms and may receive certain economic benefits (Please see Item 14.).

RPg will execute securities transactions within the designated brokerage account[s], unless the End Client has established prime brokerage capabilities for the account[s] to authorize RPg to direct trading to other broker-dealers. The Custodian is designated in the Investment Management Agreement executed by the End Client and other forms/agreements provided by the various broker-dealers/custodians.

Following are additional details regarding the brokerage practices of the Advisor:

- 1. *Soft Dollars*** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. On a limited basis, RPg obtains third-party research products and services that are paid for by allocating a portion of RPg’s trading activity to a broker-dealer that provides soft dollar payments. While RPg uses these research products and services to benefit their Tactical Strategies and all End Clients, certain Intermediaries or End Clients may receive the benefits of these services where their trading activity did not pay for such services. In addition, RPg maintains institutional relationships with certain Custodians, as described in Item 14 below.
- 2. *Brokerage Referrals*** - RPg does not receive any compensation from any third party in connection with the recommendation for establishing an account.
- 3. *Brokerage Transactions*** - RPg will direct and place all orders for the execution of transactions through a qualified independent broker/dealer or the Custodian, under the Client’s independent, exclusive agreement with these parties. RPg will arrange for the execution of securities transactions for the Tactical Strategy and End Client Account through a broker/dealer/custodian that RPg reasonably believes will provide best execution. In seeking best execution, RPg may consider, among other things, the execution capabilities of the broker-dealer/custodian, its reputation and its access to the markets for the securities being traded. The End Client shall be responsible for such brokerage expense as billed directly by the Custodian and/or any broker-dealer. Under certain circumstances, RPg may engage in securities cross-trades, whereby an End Client account that is selling a particular security may be advantageous to the account[s] of one or more other End Clients. In such instances, RPg will only engage in a cross trade that is in the best interests of each End Client and will never engage in any transaction that favors one End Client over another. RPg does not serve in the capacity as broker or agent in such transactions and does not receive any commission or compensation (aside from its investment management fees).

#### **B. Aggregating and Allocating Trades**

RPg may or may not aggregate security trades with other accounts managed by RPg. RPg is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and other transactions in the same or similar securities or instruments of the same issuer or counterpart for other Tactical Strategies and End Client accounts of RPg or with affiliates of RPg. When transactions are so aggregated, the actual prices applicable to the aggregated transactions will be averaged, and the accounts will be deemed to have purchased or sold its proportionate share of the instruments involved at the average price so obtained.

## **Item 13 – Review of Accounts**

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As part of adherence to the fiduciary standard described in Item 11 of this Disclosure Brochure, RPg conducts recurring periodic account reviews to ensure consistent and accurate reporting by the custodian. Furthermore, the firm’s Investment Committee provides ongoing monitoring and oversight of the Tactical Strategies being

Risk Paradigm Group, LLC

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managed within the End Client accounts. Suitability for Client accounts established through financial intermediaries are the responsibility of the respective financial intermediary.

RPg may provide additional information to Intermediaries for their End Clients upon request.

With respect to the management and delivery of RPg Tactical Strategies through Model Management and UMA platforms, the Models and the recommendations implicit in the Models, generally are not administered to the specific needs or circumstances of the Intermediary's End Clients. RPg does not typically have the advisory relationship with the End Client. As between RPg and the Intermediary, RPg is not responsible for making investment decisions for the End Client, or for determining if adherence to any RPg Tactical Strategy is appropriate for the individual End Client. RPg does not conduct account reviews specifically on behalf of the End Client when RPg does not have the advisory relationship with the End Client and the account is established through a financial intermediary.

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

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### **Participation in Institutional Advisor Platform**

RPg-AM has established an institutional relationship with certain custodians to assist the Advisor in managing Client account[s]. Access to these institutional platforms are provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets through the institutional platform. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this Custodian over one that does not furnish similar software, systems support, or services.

### **Compensation to Solicitors**

Certain unaffiliated firms have entered into an agreement with RPg for the purposes of introducing and directing investors to RPg. The End Client will not be charged a higher fee resulting from any solicitor relationship. Any End Client resulting from the agreement between RPg and the Solicitor will receive disclosures in accordance with SEC Rule 206(4)-3 under the Investment Advisers Act of 1940, and any corresponding state securities law requirements.

## **Item 15 – Custody**

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At no time will RPg accept or maintain custody of any End Client's funds or securities, except for the authorized deduction of RPg's investment management fees. All End Client assets will be managed within their designated brokerage account[s] pursuant to terms of the RPg Investment Management Agreement, executed by the End Client. End Clients are required to engage the Custodian to retain their funds and securities and direct RPg to utilize the Custodian for security transactions. Clients should receive account statements quarterly at a minimum from the qualified custodian and Clients should carefully review those statements.

We will seek to safeguard Client assets against unauthorized access by maintaining access controls around the systems used by trading and other RPg personnel to ensure that trades are authorized. We also periodically reconcile records of Client funds and securities to the Custodian records.



For more information about custody and brokerage practices, see Item 12 - Brokerage Practices.

## **Item 16 – Investment Discretion**

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RPg typically has discretion over the selection and amount of securities to be bought or sold on behalf of End Client accounts without obtaining prior consent or approval from the End Client. The granting of discretionary authority will typically be evidenced by the End Client's execution of an Investment Management Agreement containing all applicable limitations to such authority. All discretionary trades made by RPg will be in accordance with each Tactical Strategy's written investment guidelines, objectives and goals.

RPg manages End Client portfolios on a discretionary basis based on the RPg strategies described herein. We will experience limitations placed on us by the specific investment policies and mandates as defined in the documentation of each specific strategy even though we do not have limitations placed on us regarding security selection, amount, instrument used, which broker dealer and/or custodian chosen to manage the investment strategies.

For the delivery of RPg Tactical Strategies in Model Manager Accounts, including Unified Managed Accounts, RPg does not make any investment decisions or exercise investment discretion. In these situations, RPg provides Model Methodology data, Strategy allocation changes, and/or recommendations to the Sponsor platform, where the Sponsors have the responsibility for implementing these recommendations.

## **Item 17 – Voting Client Securities**

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RPg does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

## **Item 18 – Financial Information**

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Neither RPg, nor its management has any adverse financial situations that would reasonably impair the ability of RPg to meet all obligations to its Clients. Neither RPg, nor any of its Advisory Persons, has been subject to a bankruptcy or financial compromise. RPg is not required to deliver a balance sheet along with this Disclosure Brochure as the firm does not require prepayment of fees for services to be performed six months or more in advance.



## Form ADV Part 2B – Individual Disclosure Brochure

for

**David M. Gatti**  
**Chief Executive Officer, Chief Investment Officer**  
**Founding Partner**

**Effective: May 26, 2017**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of David M. Gatti (CRD# **2415422**) in addition to the information contained in the Risk Paradigm Group, LLC (“RPg” or the “Advisor” CRD #155870) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or RPg’s Disclosure Brochure, please contact us at (866) 726-5150 or by email at [info@riskparadigmgroup.com](mailto:info@riskparadigmgroup.com).

Additional information about David M. Gatti is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Risk Paradigm Group, LLC**  
**CRD No: 155870**

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7509 Manchaca Road Suite 101 Austin, TX 78745 Phone: (866) 726-5150 Fax: (512) 327-6044	25 Burlington Mall Rd Suite 307 Burlington, MA 01803 Phone: (781) 547-8660 Fax: (781) 273-0333	255 East Brown Street Suite 101 Birmingham, MI 48009 Phone: (866) 726-5150 Fax: (781) 273-0333

## Item 2 – Educational Background and Business Experience

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David M. Gatti is the Chief Executive Officer (“CEO”) and Chief Investment Officer (“CIO”) of Risk Paradigm Group, LLC. A Founding Partner of the firm, Mr. Gatti is dedicated to serving the Clients of RPg and its affiliated entities. Mr. Gatti earned a B.S. in Business Administration from University of Massachusetts at Lowell in 1992. Additional information regarding Mr. Gatti’s employment history is included below.

### Employment History:

Chief Executive Officer and Chief Investment Officer and Founding Partner Risk Paradigm Group, LLC	09/2011 to Present
Chief Executive Officer and Managing Partner, Risk Paradigm Group Holdings, LLC (parent to RPg Family Wealth Advisory, LLC and Risk Paradigm Group, LLC)	09/2011 to Present
Chief Executive Officer and Chief Investment Officer and Managing Partner RPg Family Wealth Advisory, LLC	09/2011 to Present
Registered Representative, Race Rock Capital LLC	09/2013 to 12/2014
Senior Investment Management Specialist, Morgan Stanley Smith Barney	01/1996 to 09/2011
Registered Representative, Citigroup Global Markets Inc.	06/1994 to 01/1996

## Item 3 – Disciplinary Information

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Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

Mr. Gatti’s U4 includes two events to disclose that were lodged against Morgan Stanley Smith Barney or predecessor entities (collectively “MSSB”) by former clients of MSSB and Mr. Gatti as a registered representative of MSSB. The disputes did not include Mr. Gatti as a named party and MSSB settled both disputes prior to any formal hearings, which had been commenced as arbitration proceedings and had referenced conduct by Mr. Gatti. As these matters were lodged against MSSB and did not include Mr. Gatti as a party, all settlement proceeds were paid by MSSB with no monetary contribution from or findings of wrongdoing by Mr. Gatti.

You may independently view the background of Mr. Gatti on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select “Investment Adviser Search” from the left navigation menu. Then select the option for “Individual” and enter **2415422** in the field labeled “Individual Name or CRD#”.

## Item 4 – Other Business Activities

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### Affiliated Entities

Mr. Gatti also serves as the Chief Executive Officer and Founding Partner of Risk Paradigm Group Holdings, LLC, the parent company to RPg and its affiliated entities. In addition, Mr. Gatti is the CEO, CIO and Founding Partner of RPg Family Wealth Advisory, LLC (“FWA”). In his role with FWA, Mr. Gatti is responsible for overseeing the investment policy and asset management services provided by FWA as well as overall firm strategy.

## **Item 5 – Additional Compensation**

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### **Affiliated Entities**

Mr. Gatti is also a Founding Partner of Risk Paradigm Group Holdings, LLC, the parent to RPg. Mr. Gatti is compensated directly by Risk Paradigm Group Holdings, LLC for his role with RPg and its affiliated entities.

## **Item 6 – Supervision**

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Mr. Gatti is supervised by Brandon Lamb, the Chief Compliance Officer. Mr. Lamb can be reached at (781) 916-8176.

RPg has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of RPg. Further, RPg is subject to regulatory oversight by various agencies. These agencies require registration by RPg and its Supervised Persons. As a registered entity, RPg is subject to examinations by regulators, which may be announced or unannounced. RPg is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## Form ADV Part 2B – Individual Disclosure Brochure

for

**Jason McGinty**  
**Senior Portfolio Manager**  
**Founding Partner**

**Effective: May 26, 2017**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Jason McGinty (CRD# **4499263**) in addition to the information contained in the Risk Paradigm Group, LLC (“RPg” or the “Advisor” CRD #155870) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you any questions about the contents of this Brochure Supplement or RPg’s Disclosure Brochure, please contact us at (866) 726-5150 or by email at [info@riskparadigmgroup.com](mailto:info@riskparadigmgroup.com).

Additional information about Jason McGinty is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Risk Paradigm Group, LLC**  
**CRD No: 155870**

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## Item 2 – Educational Background and Business Experience

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Jason McGinty is the Senior Portfolio Manager and a Founding Partner of Risk Paradigm Group, LLC. His current responsibilities for RPg include research, analysis, and performing extensive due diligence—both on prospective capital with low correlation to the stock market. These include Oil & Gas, Alternative Energy Sources, Real Estate, Venture Capital Lending Programs, and Lease Equity Programs. Mr. McGinty, born in 1978, is dedicated to serving the Clients of RPg. Mr. McGinty earned a Degree in Finance from Texas State University's McCoy School of Business in 2001 as a member of the Honors Program. Additional information regarding Mr. McGinty's employment history is included below.

### Employment History:

Senior Portfolio Manager and Founding Partner, Risk Paradigm Group, LLC	05/2011 to Present
Founding Partner, RPg Family Wealth Advisory, LLC	05/2011 to Present
Founding Partner, Risk Paradigm Group Holdings, LLC	05/2011 to Present
Financial Advisor, RAM Financial Group	01/2002 to 05/2011

## Item 3 – Disciplinary Information

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*There are no legal, civil or disciplinary events to disclose regarding Mr. McGinty.* Mr. McGinty has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. McGinty.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. McGinty.*

However, we do encourage you to independently view the background of Mr. McGinty on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **4499263** in the field labeled "Individual CRD Number".

## Item 4 – Other Business Activities

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Mr. McGinty is dedicated to the portfolio management activities of RPg, including the administration of the firm's Model Methodologies and Direct Investment Strategy Offerings available to Financial Intermediaries and their End Clients.

Mr. McGinty also holds a real estate license in the state of Texas, which he maintains for personal use.

### Affiliated Entities

Mr. McGinty also serves as a Founding Partner of Risk Paradigm Group Holdings, LLC, the parent company to RPg and its affiliated entities. Mr. McGinty does not have any other business activities, aside from supporting the related RPg business entities.

## **Item 5 – Additional Compensation**

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Mr. McGinty is also a Partner of Risk Paradigm Group Holdings, LLC, the parent to RPg. Mr. McGinty is compensated directly by Risk Paradigm Group Holdings, LLC for his role with RPg and its affiliated entities.

## **Item 6 – Supervision**

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Mr. McGinty serves as the Senior Portfolio Manager and Managing Partner of RPg and is supervised by Brandon Lamb, the Chief Compliance Officer. Mr. Lamb can be reached at (781) 916-8176.

RPg has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of RPg. Further, RPg is subject to regulatory oversight by various agencies. These agencies require registration by RPg and its Supervised Persons. As a registered entity, RPg is subject to examinations by regulators, which may be announced or unannounced. RPg is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.





## Form ADV Part 2B – Individual Disclosure Brochure

for

**Brandon Lamb**  
**Chief Compliance Officer**

**Effective: May 26, 2017**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Brandon Lamb (CRD# 2778236) in addition to the information contained in the Risk Paradigm Group, LLC (“RPG” or the “Advisor” CRD #155870) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you any questions about the contents of this Brochure Supplement or RPG’s Disclosure Brochure, please contact us at (866) 726-5150 or by email at [info@riskparadigmgroup.com](mailto:info@riskparadigmgroup.com).

Additional information about Brandon Lamb is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Risk Paradigm Group, LLC**  
**CRD No: 155870**

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## Item 2 – Educational Background and Business Experience

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Brandon Lamb serves as Chief Compliance Officer of Risk Paradigm Group, LLC. Mr. Lamb earned a B.S. from Arizona State University in 1996. Additional information regarding Mr. Lamb’s employment history is included below.

### Employment History:

Chief Compliance Officer, Risk Paradigm Group, LLC	03/2015 to Present
Chief Compliance Officer, RPg Family Wealth Advisory, LLC	03/2015 to Present
Chief Compliance Officer, Risk Paradigm Group Holdings, LLC	03/2015 to Present
Regulatory Analyst, Wellington Management Company, LLP	04/2007 to 02/2015
Compliance Manager, Morgan Stanley & Co	11/2005 to 02/2007
Brokerage Representative, JPMorgan Chase & Co.	09/2004 to 06/2005
Brokerage Representative, SunAmerica Securities, Inc.	04/2003 to 12/2003
Brokerage Representative, Charles Schwab Corporation	04/1999 to 01/2002
Brokerage Representative, The Vanguard Group	05/1997 to 03/1999

## Item 3 – Disciplinary Information

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*There are no legal, civil or disciplinary events to disclose regarding Mr. Lamb.* Mr. Lamb has never been involved in any regulatory, civil or criminal action. There have been no Client disputes, lawsuits, arbitration claims or administrative proceedings against Mr. Lamb.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Lamb.*

You may independently view the background of Mr. Lamb on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **2778236** in the field labeled “Individual CRD Number”.

## Item 4 – Other Business Activities

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Mr. Lamb is a dedicated to the investment advisory activities of RPg’s Clients. Mr. Lamb does not have any other business activities aside from supporting the related RPg business entities. Mr. Lamb also serves as the Chief Compliance Officer for RPg Family Wealth Advisory, LLC as well as the Chief Compliance Officer of Risk Paradigm Group Holdings, LLC.

## Item 5 – Additional Compensation

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Mr. Lamb is compensated solely for his duties and responsibilities on behalf of RPg.

## Item 6 – Supervision

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Mr. Lamb serves as the Chief Compliance Officer of RPg. Mr. Lamb can be reached at (781) 916-8176.

RPg has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of RPg. Further, RPg is subject to regulatory oversight by various agencies. These agencies require registration by RPg and its Supervised Persons. As a registered entity, RPg is subject to examinations by regulators, which may be announced or unannounced. RPg is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## Form ADV Part 2B – Individual Disclosure Brochure

for

**James F. Peters, Jr.  
Managing Director**

**Effective: May 26, 2017**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of James F. Peters, Jr. (CRD# **1543053**) in addition to the information contained in the Risk Paradigm Group, LLC (“RPg” or the “Advisor” CRD #155870) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you any questions about the contents of this Brochure Supplement or RPg’s Disclosure Brochure, please contact us at (866) 726-5150 or by email at [info@riskparadigmgroup.com](mailto:info@riskparadigmgroup.com).

Additional information about James F. Peters, Jr. is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Risk Paradigm Group, LLC  
CRD No: 155870**

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## Item 2 – Educational Background and Business Experience

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James F. Peters, Jr. is a Managing Director for Risk Paradigm Group, LLC. Mr. Peters has over 40 years of financial services experience. Mr. Peters is dedicated to serving the Clients of RPg and its affiliated entities. Mr. Peters graduated from St. Louis University with a BS in Accounting, minors in Economics and Philosophy and a Master of Science in Taxation (MST) from Walsh College. He is a Certified Public Accountant and a member of the American and Michigan Association of CPAs. Additional information regarding Mr. Peters's employment history is included below.

### Employment History:

Managing Director, Risk Paradigm Group, LLC	07/2016 to Present
Managing Director Wealth Management, RPg Family Wealth Advisory, LLC	07/2016 to Present
Chief Executive Officer, Tactical Allocation Group, LLC	03/2004 to Present
Investment Advisor and Registered Representative, Leonard & Company	03/2004 to 10/2006
SVP, UBS Financial Services Inc.	01/1995 to 04/2004

## Item 3 – Disciplinary Information

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Securities laws require an advisor to disclose any instances where the advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

Mr. Peters's U4 includes three events to disclose that were lodged against Morgan Stanley Smith Barney or predecessor entities and Shearson by former clients of the firms and Mr. Peters as a registered representative of the firms. The disputes did not include Mr. Peters as a named party and the firms settled the disputes prior to any formal hearings, which had been commenced as arbitration proceedings and had referenced conduct by Mr. Peters. As these matters were lodged against the firms and did not include Mr. Peters as a party, all settlement proceeds were paid by the firms with no monetary contribution from or findings of wrongdoing by Mr. Peters.

However, we do encourage you to independently view the background of Mr. Peters on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter 1543053 in the field labeled "Individual CRD Number".

## Item 4 – Other Business Activities

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### Affiliated Entities

Mr. Peters also serves as a Managing Director Wealth Management for RPg Family Wealth Advisory, LLC, an affiliated registered investment advisor. In his role as Managing Director Wealth Management, Mr. Peters is dedicated to the servicing of his Clients.

## Item 5 – Additional Compensation

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Mr. Peters is compensated solely for his duties and responsibilities on behalf of RPg.

## Item 6 – Supervision

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Mr. Peters is supervised by Brandon Lamb, the Chief Compliance Officer. Mr. Lamb can be reached at (781) 916-8176.

RPg has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of RPg. Further, RPg is subject to regulatory oversight by various agencies. These agencies require registration by RPg and its Supervised Persons. As a registered entity, RPg is subject to examinations by regulators, which may be announced or unannounced. RPg is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## Form ADV Part 2B – Individual Disclosure Brochure

for

**Paul C. Wharf**  
**Senior Director – Head of Distribution**

**Effective: May 26, 2017**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Paul C. Wharf (CRD# **2140507**) in addition to the information contained in the Risk Paradigm Group, LLC (“RPg” or the “Advisor” CRD #155870) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you any questions about the contents of this Brochure Supplement or RPg’s Disclosure Brochure, please contact us at (866) 726-5150 or by email at [info@riskparadigmgroup.com](mailto:info@riskparadigmgroup.com).

Additional information about Paul C. Wharf is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Risk Paradigm Group, LLC**  
**CRD No: 155870**

Austin Office	Boston Office	Detroit Office
7509 Manchaca Road Suite 101 Austin, TX 78745 Phone: (866) 726-5150 Fax: (512) 327-6044	25 Burlington Mall Rd Suite 307 Burlington, MA 01803 Phone: (781) 547-8660 Fax: (781) 273-0333	255 East Brown Street Suite 101 Birmingham, MI 48009 Phone: (866) 726-5150 Fax: (781) 273-0333

### Item 2 – Educational Background and Business Experience



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Paul C. Wharf is a Senior Director – Head of Distribution for Risk Paradigm Group, LLC. Mr. Wharf has over 26 years in sales and management experience in the financial services industry. Mr. Wharf is dedicated to serving the Clients of RPg. Mr. Wharf attended Merrimack College Girard School of Business as well as Suffolk University Sawyer School of Business. He holds the 6 and 63 licenses and graduated from Babson College Executive Management program. Additional information regarding Mr. Wharf’s employment history is included below.

**Employment History:**

Senior Director – Head of Distribution, Risk Paradigm Group, LLC	07/2016 to Present
Nexbank Securities Inc, Regional Manager	02/2015 to 03/2016
Highland Capital, Regional Manager	12/2013 to 03/2016
Tactical Allocation Group, Director-Regional Manager	03/2012 to 12/2013
CCO Investment Services Corp., Head of Managed Accounts	02/2010 to 02/2012
AllianceBernstein, SVP Regional Manager	02/2000 to 10/2008
Fidelity Investments, VP Regional Director	01/1996 to 02/2000

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### Item 3 – Disciplinary Information

*There are no legal, civil or disciplinary events to disclose regarding Mr. Wharf.* Mr. Wharf has never been involved in any regulatory, civil or criminal action. There have been no Client disputes, lawsuits, arbitration claims or administrative proceedings against Mr. Wharf.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Wharf.*

You may independently view the background of Mr. Wharf on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **2140507** in the field labeled “Individual CRD Number”.

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### Item 4 – Other Business Activities

Mr. Wharf’s professional activities are entirely dedicated to the service of his Clients and RPg.

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### Item 5 – Additional Compensation

Mr. Wharf is compensated solely for his duties and responsibilities on behalf of RPg.

## Item 6 – Supervision

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Mr. Wharf is supervised by Brandon Lamb, the Chief Compliance Officer. Mr. Lamb can be reached at (781) 916-8176.

RPg has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of RPg. Further, RPg is subject to regulatory oversight by various agencies. These agencies require registration by RPg and its Supervised Persons. As a registered entity, RPg is subject to examinations by regulators, which may be announced or unannounced. RPg is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.