

ACG Advisory Services, Inc.

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**FORM ADV PART 2
BROCHURE**

This brochure provides information about the qualifications and business practices of ACG Advisory Services, Inc. If you have any questions about the contents of this brochure, please contact us at (804) 323-1886. 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 ACG Advisory Services, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for ACG Advisory Services, Inc. is 106259.

ACG Advisory Services, Inc. is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

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Advisory Business

Form ADV Part 2A, Item 4

Founded in January 1991, ACG Advisory Services, Inc. ("ACG-AS"), an Investment Advisory firm registered with the Securities and Exchange Commission, provides Investment Management Consulting Services to individuals, trustees of trusts, fiduciaries in other capacities, and to institutions such as financial services firms, financial planners, banks, and other Registered Investment Advisors ("Advisors").

The Advisor is owned by the following individuals:

Joseph Saunders Wiggins, CFP®, born in 1965, University of North Carolina - Greensboro, BS, Finance 1988.

Mr. Joseph Saunders Wiggins, "Sandy", is President of the Advisor and has been in the continuous practice of investments, wealth management, and financial counseling since 1988. Since joining as an Advisory Representative, he has served in a number of responsible positions culminating in his current position as President and Chief Executive Officer. He not only directs the operation of the Advisor and heads the investment advisory and financial counseling practices he also serves as Chief Operating Officer for Actuarial Consulting Group, Inc., a sister company to the Advisor. Sandy is a graduate of the University of North Carolina Greensboro Bryant School of Business and Economics with a bachelor of science in finance; and of the Virginia Commonwealth University Center for Corporate Education at the School of Business. He is a Certified Financial Planner (CFP) and is contributing author and instructor of Continuing Education courses for CPAs.

Joseph Arthur Wiggins, Jr., born in 1939 - Southwestern Oklahoma University, BA, 1965

Mr. Wiggins, "Joseph", is Founder and Chairman of the Advisor and Founder and Chairman of Actuarial Consulting Group, Inc., a sister company to the Advisor. He has been in the continuous practice of retirement plan management, and financial counseling since 1973. Actuarial Consulting Group was established in 1982; followed by the Advisor in 1991. With over 30 years of consulting experience, Joseph is an Associated Professional Member of the American Society of Actuaries, a member of the American College of Life Underwriters, and is an author and instructor of continuing professional education courses for CPAs. He continues to serve as an Advisor Representative specializing in the Management of Retirement Plans funds and significant individual client accounts.

ACG-AS believes that its success and integrity depend upon offering objective, impartial advice. ACG-AS is focused on assisting Advisors and/or Clients to achieve established goals by providing unbiased, relevant information, advice about, and access to investment strategies offered by professional money managers. ACG-AS provides investment supervisory services and advice to individuals, banks or thrift institutions, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and business entities. ACG-AS also furnishes advice to clients on matters not involving securities.

Through dialogue and completing an investment questionnaire, potential Clients and their Advisors provide to ACG-AS information relevant to the establishment of their specific goals, objectives, and investment philosophy, all of which are suitable for their own particular circumstances. Upon consideration and review of the dialogue and submission of the investment questionnaire to ACG-AS, a determination is made as to which services are most appropriate to meet the Client's specific needs. To document ACG-AS Client relationship, a formal agreement is executed by the parties reflecting the services to be performed by ACG-AS and the relationship of the Client to ACG-AS.

Upon acceptance of a relationship with ACG-AS, the Client agrees to open an account with a custodian designated by the Client to provide custody, trades, trade confirmations, and a regular statement of position and account activity. ACG-AS, through its technology links with the selected custodian, provides Clients with periodic performance reports and other detailed information about ongoing activity within their accounts, including information about manager performance.

With regard to Investment Management Consulting Services, ACG-AS performs services in any one or more of the following capacities:

- Analysis of Client Objectives
- Interpretation of Client Risks Tolerance
- Portfolio Construction
- Drafting of Investment Policy Statement
- Recommendation of Investment Vehicles
- Ongoing Monitoring of Manager Performance
- Portfolio Rebalancing
- Manager Additions or Replacements
- Periodic Reporting Regarding Client Assets
- Tax Gain or Loss Harvesting, when applicable
- Comprehensive Financial Counseling and/or Wealth Management, when applicable

ACG-AS offers its full scope of services to other Advisors who are not employees of the firm. Using ACG-AS' infrastructure and services, such Advisors in turn will provide to their investment clients ("Clients") access to ACG-AS and its services, including research, investment consultation, reporting, portfolio design, manager selection, general wealth management, pre- and post-retirement planning, information useful in harvesting gains and/or losses for tax efficiencies, and many other such services.

For Clients developed directly by ACG-AS and its employees, direct client contact is provided by employees of ACG-AS. For Clients referred to ACG-AS by an Advisor, direct client contact is provided by an employee, agent, affiliate or other delegated person of the Advisor to which ACG-AS provides services. All Clients of Advisors will contract jointly with any intermediary Advisors and with ACG-AS for the services to be offered by ACG-AS. Assets are custodized at a custodial institution selected by the Client in each instance. All joint compensation is fully disclosed to Client.

ACG-AS will not hold custody of Client assets on any occasion. Clients can choose to grant discretionary portfolio management authority to the investment managers recommended by ACG-AS; however, all investment managers are ultimately approved by the Client.

ACG-AS prepares periodic reports showing Client's progress toward stated goals and measured against appropriate benchmarks.

The frequency of such reports varies in accordance with client preference. These reports will be provided either electronically or in bound copy form.

ACG-AS total assets under management as of 12/31/2010 was \$293,891,058. The discretionary portion of this total was \$1,185,039 and the non-discretionary portion of this total was \$292,706,019. All figures were calculated as of 12/31/2010.

Fees and Compensation

[Form ADV Part 2A, Item 5](#)

Client fees will vary depending on a number of circumstances including, but not limited to, the following: the type of services required by the client, location of the client, the selected custodian, the investment managers, mutual funds or other alternative investments selected, and the type and size of the Client account under supervision. When not charging an hourly or project fee, ACG-AS' fees are expressed as a percentage of assets in the Client's account and will vary depending upon the services provided and the volume of assets. Fees are fully explained in ACG-AS' form ADV; likewise fees for any selected custodian, separate account manager, mutual fund manager or other alternative investments will be fully disclosed in applicable government regulated publications.

Advisory fees are payable in arrears on a quarterly basis. ACG-AS is not compensated based on a share of capital gains or capital appreciation of, funds or any portion of funds or other investments in an account. Fees are negotiable depending on a number of factors, including the type and size of an account, the range of services provided to the Client and the total advisory relationship with ACG-AS. Client accounts can be househanded for fee calculation purposes.

Advisory fees assessed by ACG-AS do not include any wire transfer fees, custody costs, fees or commissions for security transactions, costs associated with temporary investment of Client funds in a money market account or special requests by the Client or any internal management or operating fees or expenses imposed or incurred by a manager of a separately managed account, a mutual fund or other pooled investment vehicle in which the Client's account may be invested. With respect to assets of the Client invested in a money market account, mutual fund or other pooled investment vehicle, the Client may be able to pay higher or lower expenses by investing directly in such investment vehicles. Each separate account manager, each mutual fund or alternative investment manager, and each custodian will advise Clients separately of their respective fee arrangements. Individual services described in this brochure can cost Clients more or less than purchasing such services separately.

ACG-AS frequently recommends that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. ACG-AS is an independently owned and operated business. ACG-AS is not affiliated with Schwab. Schwab provides ACG-AS with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's clients' assets is maintained in accounts at Schwab Institutional and is not otherwise contingent upon ACG-AS committing to Schwab any specific amount of business (assets in custody of trading).

Schwab's services include brokerage, custody, research and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

A significant number of ACG-AS clients' utilize custody services provided by Charles Schwab & Company.

For ACG-AS clients' accounts maintained in its custody, Schwab does not charge separately for custody but is compensated by account holders through commissions or other transaction-based fees for securities trades, ETF's, Institutional mutual funds shares and separately managed account that are executed through Schwab or that settle into Schwab accounts. Schwab also makes available to ACG-AS other products and services that benefit ACG-AS, but may not directly benefit its clients' accounts. Some of these other products and services assist ACG-AS in managing and administering clients' accounts.

Investment Management Consulting Services are designed to assist affluent individuals, retirement plan trustees, and other institutional fiduciaries with the efficient management of capital by public and private investment managers. Such services are designed to assist the Client with the management of a certain amount of capital or a specific portfolio and provide for the development and maintenance of a Written Investment Policy from the application of the following investment planning process:

- I. An analysis of the Client's priorities and objectives according to the Client's sensitivity to financial risk, needs for liquidity, income and growth, and investment time horizon
- II. The allocation of the Client's capital into various asset classes in order to increase the probability of achieving desired returns consistent with the established risk parameters.
- III. Assisting the Client with the selection and procurement of the services of high quality investment managers to manage the funds within each asset class.
- IV. The monitoring and reporting of portfolio results on a quarterly basis or as mutually agreed upon by the Client and the Advisor.
- V. An annual report that summarizes results for the portfolio's fiscal year, evaluates the performance of the investment manager(s), and analyzes the portfolio's present asset allocation.

Investment Management Consulting Services are performed on a negotiated fee basis as mutually agreed by the Client and the Advisor. The fee will be based on an hourly rate not to exceed \$300 per hour or a percentage of assets under management. Mutual Fund Investments charge an additional fee for fund management as described in the prospectus. Fees are based on the following fee schedule:

Assets	Cost
\$100,000-\$999,999	1.20%
\$1,000,000-\$1,499,999	1.15%
\$1,500,000-\$1,999,999	1.10%
\$2,000,000-\$4,999,999	1.00%
\$5,000,000 +	Negotiable

Such fees are billed quarterly in arrears on or about the first day of January, April, July and October and are based on the aggregate value of the portfolio at the end of the previous calendar quarter. In certain circumstances, fees will be billed adjusted within the quarter for significant cash flows.

Investment Management Consulting Services can be terminated by the Client upon 30 days written notice to the Advisor. A pro rata refund of unearned fees will be refunded to the Client upon termination.

Through a sister company, Actuarial Consulting Group, Inc., Pension Plan Consulting Services are provided to corporate and professional clients to assist clients with the design, implementation, administration and monitoring of tax qualified and non-qualified plans. The objective of the strategies is to create structures to accumulate sufficient assets to fund the retirement income needs of clients, their beneficiaries, and participating employees.

Fees for Pension Plan Consulting Services are determined on the current fee schedule of Actuarial Consulting Group, Inc. Pension Plan Consulting Services of the Advisor are reflected in the fee schedule based on an hourly rate of \$250 per hour. The Advisor's fee will be negotiated with the Client based on services to be performed by the Advisor. Fees earned from Investment Management Consulting Services do not offset Pension Plan Consulting Services, or vice versa. Fees are billed coincident with the performance of services rendered. Pension Plan Consulting Services can be terminated by the Client upon 30 days written notice to the Advisor. An appropriate refund of unearned fees will be refunded to the Client upon termination.

The Advisor will recommend and transact the purchase of securities to implement the Client's investment strategy. Such transactions normally involve the use of publicly registered mutual funds, fixed and variable annuities, and other professionally managed investments. Some funds pay a 12(b) 1 fee to the broker initiating the transaction. Applicable commissions earned by the Advisor in such transactions will be fully disclosed to the Client prior to the purchase execution both verbally and in written form in the appropriate prospectus or disclosure document.

Performance-Based Fees and Side-By-Side Management

Form ADV Part 2A, Item 6

Performance based fees and side by side management arrangements are not used by ACG-AS or its representatives.

Types of Clients

Form ADV Part 2A, Item 7

ACG-AS provides Investment Management Consulting Services to individuals, bank or thrift institutions, pension and profit sharing plans, trusts, estates, charitable organizations, corporations or business entities, fiduciaries in other capacities, institutions such as financial services firms, financial planners and other Registered Investment Advisors ("Advisors").

The applicant also provides investment supervisory services, manages investment advisory accounts and holds itself out as providing financial planning or some similarly termed services.

Applicant does not impose a minimum dollar value of assets for starting or maintaining an account.

Some accounts provided through the special programs at Charles Schwab Managed Accounts have required minimums.

The Advisor also provides advice regarding various insurance products such as life, health, group annuity, disability and long term care. In addition, the Advisor provides financial planning to certain Clients.

Methods of Analysis, Investment Strategies and Risk of Loss

Form ADV Part 2A, Item 8

To facilitate searches for the best investment services available (without regard to geography) ACG-AS relies on database information for money managers offering investment products. ACG-AS receives qualitative and quantitative information on the money manager through electronic interfaces with independent third party information sources. These databases are subject to GIPS compliance requirements to ensure accuracy and provide comprehensive representation of the money management industry. ACG-AS conducts money manager searches on a style by style basis. Each search begins by identifying the most appropriate universe of managers to screen and by following detailed search criteria.

Although investment performance is a critical measure in identifying successful money managers, ACG-AS' approach significantly expands on performance screens to capture analysis on many other factors, including the money management firm's:

- Investment Philosophy and Strategy
- Portfolio Construction Process
- Sell Discipline
- Depth of Investment Research
- Tenure of Portfolio Management Team
- Firm History
- Ownership Structure

ACG-AS' belief is that a money manager's historical performance is only one indication of its suitability for a Client's portfolio. ACG-AS seeks to determine whether the firm has the talent, investment process and organization structure in place to continue to outperform its applicable peer group and to add value to Client portfolios. Investment managers that meet ACG-AS' stringent standards for inclusion in its Separately Managed Accounts Program are recommended to Clients. Investment managers who fail to meet such criteria are eliminated from ACG-AS' recommended list.

ACG-AS conducts qualitative and quantitative research on a wide universe of investment strategies and managers available through separately managed accounts, mutual funds, exchange traded funds, structured products and various alternative investment vehicles. ACG-AS uses publicly available data, including investment managers' form ADV, as well as extensive data provided by other sources.

ACG-AS may conduct on-site visits at any investment manager's headquarters as a part of its due diligence.

ACG-AS prepares reports for both internal use and for distribution to Advisors, which can be shared with Clients.

ACG-AS reviews investment managers for investment process, personnel experience, information systems used, operational organization and ownership structure, as well as all the other factors mentioned earlier in this brochure. To receive a recommendation, ACG-AS generally requires an investment manager to be GIPS-compliant. Verification of recommended managers' performance returns by an outside audit, though preferable, is not required.

ACG-AS assists Clients who are seeking to diversify their portfolios through strategies maintained by different investment managers for the purpose of maximizing performance while potentially reducing portfolio volatility. Specific steps which are followed in setting up portfolios for a given Client are as follows:

Financial and demographic information is collected from interested Clients in order to identify appropriate investment goals and objectives for their specific investment accounts. This information is then used to formulate an asset allocation suitable for the Client. Specific investment managers are then selected and recommended in a proposal prepared for the Client. Upon reviewing the proposal, the Client will authorize each respective recommended investment manager accepted by the Client to exercise discretionary trading authority over that portion of the Client's account delegated to that specific investment manager. For certain components of the investment strategy, mutual funds, or other investment vehicles (as differentiated from separately managed accounts) will be recommended. In such case, the Client can invest in mutual funds, exchange traded funds, hedge funds, private equity and real estate as components of the overall asset allocation strategy.

Upon acceptance of the proposal prepared by ACG-AS, Clients then will instruct ACG-AS to hire and/or fire investment managers on their behalf. Investment managers hired are sent information about the Client's financial circumstances, investment goals and objectives, and any special instructions the Client wishes to share. The Client will retain the authority to terminate or change investment managers when circumstances are such that the client or ACG-AS believes a change is in the best interest of the Client. In such cases, an alternate investment manager will be recommended by ACG-AS to the Client and the Client will approve the change.

From time to time, clients seek input regarding potential alternative investments including limited partnerships.

Commingled or pooled investment portfolios of commercial banks and insurance companies can be recommended for professional asset management. Guaranteed Investment Contracts issued by major insurance companies are also recommended where appropriate.

The company performs qualitative and quantitative analysis on investment vehicles prior to making a recommendation to a client. Once included in a client portfolio, the company performs ongoing qualitative and quantitative analysis in an effort to monitor investment strategies held in client accounts.

The Advisor can recommend and transact the purchase of securities to implement the Client's investment strategy. Such transactions normally involve the use of publicly registered mutual funds, fixed and variable annuities, and other professionally managed investments. Some funds pay a 12(b) 1 fee to the broker initiating the transaction. Applicable commissions earned by the Advisor in such transactions will be fully disclosed to the Client prior to the purchase execution both verbally and in written form in the appropriate prospectus or disclosure document.

Disciplinary Information

Form ADV Part 2A, Item 9

There are no past, current, or pending legal or disciplinary events against ACG-AS, its officers, representatives or employees by any court, government agency, or industry self regulatory agency.

Other Financial Industry Activities and Affiliations

Form ADV Part 2A, Item 10

ACG-AS is an independent corporation wholly owned by one or more of its management employees. No portion of ACG-AS is owned by outside parties nor is ACG-AS via any contract or agreement under any obligation to refer any business or Client relationships to any other party. In order to provide the most desirable scope of services to its Clients, ACG-AS does maintain business relationships with certain other organizations essential in order to serve Client needs.

ACG-AS provides a number of financial services, including all the services associated with ACG-AS's Investment Management Consulting Services to Union First Market Bank of Richmond, Virginia. The relationships between ACG-AS and Union First Market Bank is contractual. Neither Union First Market Bank, nor ACG-AS, possess ownership interest in the other entity. ACG-AS provides for Union First Market Bank consulting and infrastructure services necessary for them to provide pre- and post-retirement plan services, including the design, implementation, and administration of qualified retirement plans for Union First Market Bank customers as well as all the services described in this brochure. Union First Market Bank and ACG-AS share in the revenue generated as a result of their relationship and Clients are advised of such. Client fees for any services rendered through the relationship between Union First Market Bank and ACG-AS are in no instance higher than would otherwise be applicable were the relationship not to exist.

ACG-AS reserves the right to enter into arrangements with other third parties for the provision of the services described in this brochure as well as other back office support for any number of financial services which are, or can be, offered by ACG-AS. Such services can include the monitoring of separate account managers, the monitoring of mutual funds, client billing services, client account reporting services, or other services generally described as pre- or post-retirement planning, comprehensive financial planning or wealth management services.

ACG-AS maintains relationships with various Advisors who are registered as investment advisors. Such Advisors utilize services provided by ACG-AS to assist their Clients in asset allocation modeling, asset selection, consolidated reporting, as well as gaining access to investment managers who might otherwise be unavailable to such Clients. Clients are made aware of this relationship at the time they enter into any agreement with ACG-AS and such outside Advisors. For more information on services offered by, and fees charged by, such Advisors, Clients should review all such Advisors' form ADV Part 2.

Officers of the Advisory Firm as well as Advisory Representatives of the Advisory Firm are Registered Representatives of Investors Security Company, Inc., of Suffolk, VA and can earn commissions on the sale of certain products. ACG-AS is not affiliated with any broker dealer registered with the NASD.

Nevertheless, certain of ACG-AS' management employees are registered representatives with Investors Security Company, 127 East Washington Street, Suite 101, Suffolk, Virginia 23234. No portion of the services described in this brochure has any association with Investors Security Company.

Any ACG-AS employees who are affiliated with Investors Security Company maintain such an affiliation for the purpose of exacting business beyond the scope of services described in this brochure. Investors Security Company is fully informed of the business of ACG-AS.

The Advisor is a member of the Schwab Institutional financial group of investment advisors of San Francisco, CA. The Advisor recommends the use of Schwab Institutional products and services directly to clients where appropriate as determined during the planning process.

The Advisor is a member of the SEI Advisory Group through an agreement with SEI of Wayne, PA. The Advisor recommends the use of SEI products and services directly to clients where appropriate as determined during the planning process.

The advisor receives client referrals from independent banking institutions such as Union First Market Bank.

An Advisor Representative of the Advisor owns and operates a pension consulting practice that administers pension plans established on behalf of Clients of the Advisor and others. The practice is known as Actuarial Consulting Group, Inc.

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

Form ADV Part 2A, Item 11

ACG-AS as a matter of policy and practice, and consistent with industry best practices and SEC requirements (new SEC Rule 204A-1 under the Advisers Act and Rule 17j-1 under the Investment Company Act, which is applicable if the firm acts as investment adviser to a registered investment company), has adopted a written Code of Ethics covering all supervised persons. The firm's Code of Ethics requires high standards of business conduct, compliance with federal securities laws, reporting and record keeping of personal securities transactions and holdings, reviews and sanctions. A copy of the Code of Ethics is available to any client or perspective client upon request.

The Advisor or a related person can purchase or sell the same publicly traded mutual funds or variable annuities for its own account. Since the purchase or sale of such investments does not affect its market value, the Client is not advised of these transactions.

It is further noted that the Advisor is in and shall continue to be in total compliance with The Insider Trading and Securities Fraud Enforcement Act of 1988. The Advisor has adopted a firm wide policy statement outlining insider trading compliance by the Advisor and its associated persons and other employees. A copy of this statement has been distributed to all associated persons and other employees of the Advisor and the original has been signed and dated by each person. The original statement is maintained in a master file. Further, the Advisor has adopted a written supervisory procedures statement highlighting the steps which shall be taken to implement the firm wide policy.

These materials are also distributed to all associated persons and other employees of the Advisor, are signed, dated and filed with the insider trading compliance materials.

Brokerage Practices

Form ADV Part 2A, Item 12

For certain specific types of Client needs, the Advisor will recommend the brokerage services of Investors Security Company, Inc., a duly licensed broker/dealer in Suffolk, Virginia that specializes in providing investment execution and research services for independent contractors. The officers of the Advisor are registered representatives of Investors Security Company, Inc. Commissions on investment transactions are normally established by investment product sponsors and are standard for all participating broker/dealers.

The Client will not be charged a higher commission for using the services of Investors Security Company, Inc., and is under absolutely no obligation to use the brokerage services provided by officers of the Advisor.

Investors Security Company, Inc. is not involved in or responsible for the investment planning or solicitation activities of the Advisor. Investors Security Company, Inc. shall not be liable or responsible for any matter arising from or in connection with any decision, advice or implementation of any services provided by the Advisor.

For most Clients, however, the Advisor uses the brokerage services of Schwab Institutional, a division of Charles Schwab & Company. Schwab Institutional makes available to Advisor other products and services that benefit Advisor but may not directly benefit its Clients' accounts. These include software and other technology that provide access the Client account data (such as trade confirmations and account statements; facilitate trade execution; provide research, pricing information and other market data; facilitate payment of Advisor's fees from its Clients' accounts; and assist with back-office functions, recordkeeping and Client reporting. Some of these services can be used to service Advisor's accounts, including account not maintained at Schwab Institutional.

Schwab Institutional also makes available to Advisor other services intended to help Advisor manage and further develop its business enterprise. These services include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing.

As a fiduciary, Advisor endeavors to act in the best interest of Clients. Advisor's recommendation that Clients maintain their assets in account at Schwab is based on the benefit to the Advisor of the availability of some of the foregoing products and services, as well as the nature, cost or quality of custody and brokerage services provided by Schwab.

ACG-AS does not receive commissions or markups or markdowns from Schwab Institutional. The Advisor reviews the transaction costs of Schwab Institutional to ensure they are competitive with other broker dealer custodians. No attempt is made by ACG-AS to obtain the cheapest transaction costs – the objective is to determine that they are reasonable and competitive.

Review of Accounts

Form ADV Part 2A, Item 13

Investment management consulting client accounts are reviewed monthly, quarterly and/or semi-annually depending upon the terms of the client agreement. Such reviews are performed by a single staff consultant who is limited to 100 consulting clients. The review will detail in writing the transactions in the account, a review of the financial marketplace, and a review of the overall investment performance of the account by all managers associated with the account. In response to client preference, accounts are reviewed with greater frequency and on special occasions triggered by unusual events.

Investment management consulting clients receive in writing monthly and/or quarterly progress reviews that relate manager performance to pre-determined objectives.

It is the Client's duty to inform ACG-AS of any changes in their financial circumstances or if they wish to change or impose any new special instructions regarding the management of their accounts. Quarterly, Clients are notified in writing to contact ACG-AS regarding any changes in their financial circumstances or any new special instructions for the management of their accounts. Annually, Clients are contacted to determine if there have been any changes in their financial situation or investment objectives, and whether Clients wish to change or impose any special instructions regarding the management of their accounts.

Client Referrals and Other Compensation

Form ADV Part 2A, Item 14

The Advisor has solicitor agreements which are used for the purpose of establishing relationships with other advisors who generate Client referrals. Referral fees for such relationships are determined in accordance with a written agreement and are disclosed to the Client prior to Client engagements.

With regard to all Clients who are referred to ACG-AS by an Advisor, ongoing advisory services, including Client review meetings, are expected to be provided to the Client by the Advisor. ACG-AS Client fees are not affected by the use of an outside Advisor; the Client will not be charged any additional fees in such instances.

Custody

Form ADV Part 2A, Item 15

ACG Advisory Services, Inc. does not hold custody of client funds. Clients receive reports directly from their custodian.

Custody, trade execution, including trade confirmations and regular monthly statements of position and account activity are all expected to be provided by the Client's custodian. Trading and custody services may be provided by the same or by different firms.

Investment Discretion

Form ADV Part 2A, Item 16

With regard to most Clients, the Advisor provides non-discretionary investment consulting services. The Advisory has limited discretionary authority with respect to the types of securities, separate account managers, and/or mutual funds used by Client accounts. The Advisor recommends the use of portfolio structure and methods which provides guidance for the Client and the Advisor in implementing the investment process. The Client retains sole authority to approve the recommendation.

The Advisor implements the allocation of Client funds, future cash deposits and investment income among and between the securities or managers used by the account in accordance with the Client approved allocation method. The Advisor has very limited ability to impact transaction costs charged by broker dealer firms used by Client accounts.

The Advisor provides discretionary consulting services to less than 5% of its capital Clients, and consents to do so only to accommodate client preference.

Voting Client Securities

Form ADV Part 2A, Item 17

ACG Advisory Services, Inc. does not vote Client securities. Clients retain that function and are notified directly by their broker dealer or custodian of the solicitation. Clients can contact Advisor and seek advice regarding a particular solicitation.

Financial Information

Form ADV Part 2A, Item 18

ACG-AS does not require or solicit prepayments from Clients under any circumstances; nor does it maintain custody of any Client account. Accordingly the Advisor is not required to submit a financial statement.

ACG-AS has never been the subject of a bankruptcy proceeding. The Advisor is not subject to any financial commitment or condition that will impair its ability to meet all contractual and fiduciary commitments to Clients.

Additional Information

Form ADV Part 2A, Item 18

If Advisor makes a trade error in submitting a trade order on the Clients behalf, Advisor will place a correcting trade with the broker-dealer which has custody of the Client account. If an investment gain results from the correcting trade, the gain will remain in the Client account unless the same error involved other Client account(s) that should have received the gain, it is not permissible for the Client to retain the gain. The Advisor will confer with the Client and the Client will decide to forego the gain (e.g. due to tax reasons). If the gain does not remain in Client account and Charles Schwab & Co. Inc. ("Schwab") is the custodian, Schwab will donate the amount the amount of any gain \$100 and over to charity. If a loss occurs greater than \$100, Advisor will pay for the loss. Schwab will maintain the loss or gain (if such gain is not retained in Client account) if it is under \$100 to minimize and offset its administrative time and expense. If related trade errors result in both gains and losses, they will be netted. Other custodians utilized by the Client will have similar trade correction policies.