



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

**Effective: September 30, 2011**

This Disclosure Brochure provides information about the qualifications and business practices of RPg Family Wealth Advisory, LLC ("RPg"). If you have any questions about the contents of this Disclosure Brochure, please contact us at (781) 547-8660.

RPg is a Registered Investment Advisor with the U.S. Securities and Exchange Commission. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission ("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).

**RPg Family Wealth Advisory, LLC**  
**CRD No: 158528**

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## Item 2 – Material Changes

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On July 28, 2010, the U.S. Securities and Exchange Commission voted unanimously to adopt amendments to Part 2 of Form ADV and related rules under the Investment Advisers Act of 1940 (the “Advisers Act”). The amendments are designed to require a Registered Investment Advisor to provide Clients with a clearly written and meaningful disclosure, in plain English, about the advisor’s business practices, conflicts of interest and advisory personnel. The new 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 an Advisor’s business practices and conflicts of interest. *Part 2B* (the “Brochure Supplement”) provides information about advisory personnel of RPg.

RPg believes that communication and transparency are the foundation of our relationship and continually strive to provide our Clients with the 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.

### Initial Filing

RPg is a new Registered Investment Advisor. This is the initial filing of the Disclosure Brochure.

### 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).

To review the firm information for RPg:

- Click **Investment Advisor Search** in the left navigation menu.
- Select the option for **Investment Advisor Firm** and enter **158528** (our firm’s CRD number) in the field labeled “Firm IARD / CRD Number”.
- This will provide access to Form ADV Part 1 and Part 2.
- Item 11 of the ADV Part 1 lists legal and disciplinary questions regarding the Advisor.
- In the left navigation menu, Form ADV Part 2 is located near the bottom.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (781) 547-8660.

## Item 3 – Table of Contents

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

RPg Family Wealth Advisory, LLC (“RPg” or the “Advisor”) is a Registered Investment Advisor with the U.S. Securities and Exchange Commission, which is organized as a Limited Liability Company (“LLC”) under the laws of the State of Delaware. RPg was founded in 2011 as a wholly-owned subsidiary of RPg Holdings, LLC. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by RPg.

### **B. Advisory Services Offered**

RPg offers investment advisory services to high net worth individuals, trusts, estates, charities, pension plans and institutional clients (each referred to as a “Client”).

Based in Boston, Massachusetts, RPg’s mission is to formulate comprehensive wealth management strategies to enable Clients to pass on the legacy of values and integrity for wealth for generations to come. We specialize in the comprehensive analysis, measurement, and application of risk management principles to diversified investment portfolios. Utilizing both quantitative and qualitative analysis methodologies, RPg provides expertise to investment portfolios requiring exposure to traditional and non-traditional asset class investments in a manner strategic to return targets, portfolio spending policies, and volatility limits or risk budgets.

We put our clients interests first, act with integrity and honesty, and strive for excellence in every facet of our practice.

RPg provides customized wealth advisory services for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and planning /consulting services. RPg works with each Client to identify their comprehensive goals as well as risk tolerance and financial situation in order initiate a strategy for supporting the Client.

### **Investment Management**

RPg will then construct a portfolio to meet the specific objectives of each Client. Portfolios are customized to the needs of each client, but are typically constructed with a combination of individual equity securities, individual fixed income securities, mutual funds, exchange-traded funds (“ETFs”), options and limited partnerships. Limited partnerships may include hedge funds, private investment pools and other limited partnerships that are appropriate to achieve the goals of the Client. The Advisor may also utilize other securities types, as appropriate, to meet the needs of its Clients.

RPg’s investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. RPg will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to the acceptance by the Advisor.

RPg evaluates and selects ETFs and mutual funds for inclusion in Client portfolios only after applying their internal due diligence process. RPg may recommend, on occasion, redistributing investment allocations to diversify the portfolio. RPg may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement, which may adversely affect the portfolio. RPg may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

**Prior to rendering investment advisory services, RPg will ascertain, in conjunction with the Client, the Client’s financial situation, risk tolerance, and investment objective[s].**

## **B. Advisory Services Offered - continued**

RPg will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will RPg accept or maintain custody of a Client's funds or securities. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client Investment Advisory Agreement.

### Selection of Other Advisors

RPg may periodically recommend and refer clients to unaffiliated money managers or investment advisors at RPg's discretion or Client's request. Through this arrangement, the Client will then enter into an advisory agreement with that sub-advisor to which that sub-advisor will assist and advise the Client in establishing investment objectives and develop an investment strategy to meet those objectives by identifying appropriate investments and monitoring such investments. In consideration for such sub-advisor services, the sub-advisor will receive an investment advisory fee, billed based on the fee schedule the Client establishes with the unaffiliated money manager[s] or investment advisor[s].

RPg will receive a portion of the investment advisory fee for the solicitation and referral of the Client to the sub-advisor, and may assist the Client in completing their Client questionnaire and account opening paperwork. RPg may also assist in the development of the initial policy recommendations and managing the ongoing Client relationship.

The Client, prior to entering into an agreement with unaffiliated money manager[s] or investment advisor[s], will be provided with the advisor's Form ADV 2 (or a brochure that makes the appropriate disclosures).

### Financial Planning and Consulting Services

As part of its comprehensive services, RPg provides its Clients with comprehensive financial planning and consulting services. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives and financial situation. RPg may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary.

## **C. Client Account Management**

Prior to engaging RPg to provide investment advisory services, each Client is required to enter into an Investment Advisory Agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Wealth Planning– RPg provides comprehensive advice and guidance relating to the financial goals of its Clients.
- Establishing an Investment Policy Statement – RPg, in connection with the Client, may develop a statement that summarizes the Client's investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives.
- Asset Allocation – RPg will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – RPg will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – RPg will provide investment management and ongoing oversight of the Client's portfolio and overall account.

## **D. Wrap Fee Programs**

RPg does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by RPg.

## **E. Assets Under Management**

RPg is a newly established advisor. Assets under management shall be reported following the Advisor's December 31, 2011 fiscal year end. Clients may request more current information at any time by contacting the Advisor.

## **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for investment management. Each Client shall sign an Investment Advisory Agreement that details the responsibilities of RPg and the Client.

### **A. Fees for Advisory Services**

#### Account Portfolio Management

Investment Advisory Fees are paid either monthly or quarterly in advance pursuant to the terms of the Investment Advisory Agreement (herein the "billing period"). Investment Advisory Fees are based on the market value of assets under management at the end of the prior billing period. Investment Advisory Fees range from 2.00% to 0.85% depending on the size and complexity of the Client relationship. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

Investment Advisory Fees in the first billing period of service are prorated to the inception date of the account to the end of the first billing period. Fees may be negotiable at the discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by RPg will be independently valued by the designated Custodian. RPg will not have the authority or responsibility to value portfolio securities. Certain Clients may be offered an alternate fee schedule pursuant to the terms of an Investment Advisory Agreement.

#### Unaffiliated Advisors

For Clients referred to an unaffiliated investment advisor, the Client's fee will be deducted from the Client's account[s] with the respective manager and a portion of the investment advisory fee will be provided to RPg. Please see Item 14 for additional details.

#### Financial Planning and Consulting Services

RPg offers financial planning or consulting services to investment management Clients of RPg. No additional fees are charged for this service.

### **B. Fee Billing**

#### Account Portfolio Management

Investment Advisory Fees will be automatically deducted from the Client Account by the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client Account at the respective billing period end. The amount due is calculated by applying the monthly or quarterly rate (annual rate divided by 12 or 4, respectively) to the total assets under management with RPg at the end of each billing period. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the Investment Advisory Fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting RPg to be paid directly from their accounts held by the Custodian as part of the Investment Advisory Agreement and separate account forms provided by the Custodian.

#### Financial Planning and Consulting Services

As noted above, financial planning and consulting fee are invoiced by the Advisor and are due upon receipt.

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than RPg, in connection with investment made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Investment Advisory Fee charged by RPg is separate and distinct from these custodian and execution fees.



### **C. Other Fees and Expenses - continued**

In addition, all fees paid to RPg for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of RPg, but would not receive the services provided by RPg which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by RPg to fully understand the total fees to be paid.

### **D. Advance Payment of Fees and Termination**

#### Account Portfolio Management

RPg is compensated for its services in advance the billing period in which investment advisory services are rendered. Clients may request to terminate their Investment Advisory Agreement with RPg, in whole or in part, by providing advance written notice. The Client shall be responsible for Investment Advisory Fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid Investment Advisory Fees from the effective date of termination to the end of the billing period. The Client's Investment Advisory Agreement with the Advisor is non-transferable without Client's written approval.

#### Unaffiliated Advisors

In the event that a Client should wish to terminate their relationship with an unaffiliated investment advisor, the terms for termination will be set forth in the respective agreements between the Client and those third parties. RPg will assist the Client with the termination and transition as appropriate.

### **E. Compensation for Sales of Securities**

RPg does not buy or sell securities to generate securities commissions and does not receive any compensation for securities transactions in any Client account, other than the Investment Advisory Fees noted above. Advisory persons of RPg may be registered representatives of a broker-dealer and may receive commissions for investment implemented in their separate capacity as registered representatives (See Item 10).

## **Item 6 – Performance-Based Fees**

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RPg may receive a Performance Fee based upon any gains obtained in the accounts of "Qualified Clients" pursuant to an Investment Advisory Agreement. Only Qualified Clients with either \$750,000 under management with the Advisor or a net worth of \$1.5 million will be charged a Performance Fee. Qualified Clients that are charged a Performance Fee will be offered a lower Investment Advisory Fee. The Performance Fee will be calculated at the close of each calendar year and deducted from Client accounts directly by the Custodian. The Performance Fee will be equal to 20% of any gains in the Client account for the year, subject to a performance hurdle rate of 6.00% for the year. The Advisor will receive the Performance Fee only to the extent that there are cumulative gains in the Client's account for the year that exceed 6.00%.

#### Who is a "Qualified Client"?

The Investment Advisers Act of 1940 (the "Advisers Act"), Rule 205-3(d)(1) defines a "Qualified Client" who is financially sophisticated and meets one or more of the following conditions:

1. Client is a natural person who or a company that immediately after entering into the contract has at least \$750,000 under the management of the Advisor;
2. Client is a natural person who or a company that immediately prior to entering into the contract, has a net worth (together, in the case of a natural person, with assets held jointly with a spouse) of more than \$1,500,000 at the time the contract is entered into.

RPg does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund). RPg is affiliated with Risk Paradigm Group, LLC, an investment advisor that manages mutual funds and private funds. The Advisor may recommend products offered by Risk Paradigm Group, LLC to its Clients.

## **Item 7 – Types of Clients**

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RPg provides investment advisory services to the following types of Clients:

- Individuals, Personal Trusts and Estates – private investors, investing their personal assets
- Pension and Profit Sharing Plans – retirement plan sponsors or company plans
- Foundations, Endowments and 501(c)(3) Organizations – non-profit organizations that manage a pool of assets, and distribute funds according to a mandate or mission
- Corporations and Businesses – taxable business entities, investing cash reserves
- Other Financial Service Firms – other investment advisors including private funds.

The relative percentage each type of Client is available on RPg's Form ADV Part 1. These percentages will change over time. RPg generally does not impose a minimum account size for establishing a relationship.

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

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

RPg primarily employs both fundamental and technical analysis methods in developing investment strategies for its Clients. Research and analysis from RPg is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

As noted above, RPg generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. RPg will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, RPg may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

### **B. 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.

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. RPg may use margin in Client accounts for to manage the timing of purchases and sales, as appropriate. The Advisor may hold long or short positions as appropriate for a particular strategy. RPg may employ options strategies to hedge or gain additional exposure to a particular asset class or sector. Following are some of the risks associated with Options, Margin, Short Sales and Limited Partnership transactions:

#### Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

#### Margin Borrowings

The use of short-term margin borrowings may result in certain additional risks to a Client. For example, if securities pledged to brokers to secure a Client's margin accounts decline in value, the Client could be subject to



a "margin call", pursuant to which it must either deposit additional funds with the broker or be the subject of mandatory liquidation of the pledged securities to compensate for the decline in value.

#### 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 (Limited Partnerships)

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. Client should only have a portion of their assets in these investments.

**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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**There are no legal, regulatory or disciplinary events involving RPg or any of its employees.** RPg and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). To review the firm information contained in ADV Part 1, select the option for Investment Adviser Firm and enter **158528** in the field labeled "Firm IARD/CRD Number". This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions.

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

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RPg provides comprehensive wealth advisor services to its Clients. RPg is a wholly-owned subsidiary of Risk Paradigm Group Holdings, LLC and affiliated with Risk Paradigm Group, LLC, an SEC registered investment advisor under common control.

#### Broker-Dealer Affiliations

Certain advisory persons of RPg are also registered representatives of a broker-dealer. Certain advisory persons are registered representatives of Purshe Kaplan Sterling Investments, Inc. ("PKS"), a registered broker-dealer (CRD No. 35747) and member FINRA, SIPC or Cent Centaurus Financial, Inc. In addition, certain other advisory persons are registered representatives of Centaurus Financial Inc. ("Centaurus"), Centaurus is a registered broker-dealer, member FINRA, SIPC, a registered representative of and a Registered Investment Adviser registered with the Securities and Exchange Commission (CRD No. 30833).

Advisory persons, in their separate capacity as a registered representatives, will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by advisory persons. Further, investment advisory fees will not be earned by RPg or the advisory person in connection with any services implemented in Mr. Reinking's separate capacity as a registered representative where commissions are earned.

PKS and Centaurus are not affiliated in any way with and RPg Family Wealth Advisory, LLC. Additional details are included in the ADV2B for each advisory person.

### Insurance Licensing

Certain advisory persons of RPg may also serve licensed insurance professionals. In their separate capacity as insurance professionals, advisory persons may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by advisory persons of the Advisor.

## Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

### **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 persons associated with RPg. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. RPg and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of RPg associates 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 trading, reportable securities, 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 (781) 547-8660.

### **B. Personal Trading and Conflicts of Interest**

RPg allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you 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. We may have an interest or position in certain securities, which may also be recommended to you. **At no time, will RPg or any associated person of RPg, transact in any security to the detriment of any Client.**

## Item 12 – Brokerage Practices

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

RPg does not have discretionary authority to select the broker-dealer / custodian for custodial and execution services or the administrator for defined contribution accounts. The Client will select the broker-dealer or custodian (herein the "custodian") to safeguard Client assets and authorize RPg to direct trades to this custodian as agreed in the Investment Advisory Agreement. Further, RPg does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where RPg does not exercise discretion over the selection of the custodian, it may recommend the custodian[s] to Clients for execution and / or custodial services. Clients are not obligated to use the recommended custodian and will not incur any extra fee or cost associated with using a broker not recommended by RPg. RPg may recommend a custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and location of the custodian's offices. RPg does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other brokers.

The Advisor will generally recommend that Clients utilize the brokerage and clearing services of Fidelity Institutional Wealth Services and its affiliates (collectively referred to as "Fidelity") for investment management accounts. RPg may only implement its investment management recommendations after the Client has arranged for and furnished the Advisor with all information and authorization[s] regarding account[s] with their financial institutions.

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

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

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **RPg does not participate in soft dollar programs sponsored or offered by any broker-dealer.**

**2. Brokerage Referrals** - RPg does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.

**3. Directed Brokerage** - All Clients are serviced on a “directed brokerage basis”, where RPg will place trades within the established account[s] at the custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor’s own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client’s account[s]). In selecting the custodian, RPg will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated custodian.

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

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. RPg will execute its transactions through an unaffiliated broker-dealer selected by the Client. RPg may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts.

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

If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

### **Item 13 – Review of Accounts**

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#### **A. Frequency of Reviews**

Accounts are monitored on a regular and continuous basis by advisory persons of RPg. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

#### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client’s request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client’s financial situation, and/or large deposits or withdrawals in the Client’s account. The Client is encouraged to notify RPg if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

#### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the trustee or custodian. These brokerage statements are sent directly from the custodian to the Client. The Client may also establish electronic access to the custodian’s website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client’s account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

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

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### **A. Compensation Received by RPg**

RPg is a fee-only advisory firm that is compensated for its services by its Client. RPg does not receive commissions or other compensation from product sponsors, broker dealers or any un-related third party.

Certain advisory persons of RPg may also receive compensation for securities and insurance commissions as noted in Item 10 above. While the Advisor and its advisory persons always act in the best interest of each Client, the receipt of additional compensation creates the potential for a conflict of interest.

#### Institutional Advisory Platform

RPg has established an institutional relationship with Fidelity to assist the Advisor in managing Client accounts. Access to the Fidelity Institutional platform is 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 at Fidelity.

#### Institutional Advisory Platform - continued

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.

Additionally, the Advisor may receive the following benefits from Fidelity: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

### **B. Client Referrals from Solicitors**

RPg may enter into referral agreements with third-party advisors under which RPg pays a fee to a third-party for client referrals as permitted by Rule 206(4)-3 of the Investment Advisers Act of 1940, as amended. RPg may pay the third parties a percentage of the revenue generated from the assets of Clients introduced to RPg by the third-party. Clients referred to RPg will never be charged a higher Investment Advisory Fee than other clients to cover the third-party's fee percentage.

## **Item 15 - Custody**

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RPg does not accept or maintain custody of any Client accounts. All Clients must place their assets with a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct RPg to utilize that custodian for the Client's security transactions. RPg encourages Clients to review statements provided by account custodian. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

## **Item 16 - Investment Discretion**

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RPg generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by RPg. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by RPg will be in accordance with each Client's investment objectives and goals.

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

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RPg will vote proxies on behalf of its Clients. RPg will vote proxies in the best interest of its Clients, consistent with the investment process and philosophy of RPg. RPg generally does not vote proxies differently on a Client-by-Client basis. RPg will vote proxies for the Advisor and its advisory persons, consistent with the voting for each Client. RPg will maintain a proxy policy and provide to Clients upon request..

## **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 collect advance 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**

**Effective: September 30, 2011**

This Brochure Supplement provides information about the background and qualifications of David M. Gatti (CRD# **2415422**) in addition to the information contained in the RPg Family Wealth Advisory, LLC ("RPg" or the "Advisor" CRD #158528) 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.

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).

**RPg Family Wealth Advisory, LLC  
CRD No: 158528**

<b>Boston Office</b>	<b>Austin Office</b>
<b>25 Burlington Mall Road, Suite 205 Burlington, MA 01803 Phone: (781) 547-8660 Fax: (781) 273-0333</b>	<b>5900 Southwest Parkway, Building 5, Suite 500 Austin, TX 78735 Phone: (512) 327-6000 Fax: (512) 327-6044</b>



## Item 2 – Educational Background and Business Experience

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David M. Gatti is the Chief Executive Officer and Chief Investment Officer of RPg Family Wealth Advisory, LLC. Mr Gatti, born in 1969 is dedicated to serving the Clients of RPg Family Wealth Advisory, LLC.

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, Chief Investment Officer and Partner RPg Family Wealth Advisory, LLC	09/2011 to Present
Chief Executive Officer and Partner, Risk Paradigm Group Holdings, LLC (parent to RPg Family Wealth Advisory, LLC)	09/2011 to Present
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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*There are no legal, civil or disciplinary events to disclose regarding Mr. Gatti.*

Mr. Gatti 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. Gatti.

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. Gatti.*

However, we do encourage you to 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 Investment Adviser Representative and enter **2415422** in the field labeled "Individual CRD Number".

## Item 4 – Other Business Activities

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### Insurance Agency Affiliations

Mr. Gatti is also a licensed insurance professional. This business activity is done separate and apart from his role with RPg. As an insurance agent, Mr. Gatti may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset financial planning fees paid to RPg.

This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Gatti or the Advisor. Mr. Gatti spends less than 10% of his business time on this activity.

## Item 5 – Additional Compensation

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### Insurance Agency Affiliations

Mr. Gatti may serve as sales agent for various insurance companies. As an insurance agent, Mr. Gatti may receive customary commissions and other related revenues from the various insurance companies whose products are sold.

## **Item 6 – Supervision**

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Mr. Gatti serves as a Principal of RPg and is supervised by Christopher Jensen, the Chief Compliance Officer. Mr. Jensen can be reached at (781) 547-8656.

RPg has implemented a Code of Ethics and internal compliance that guide each employee 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 employees. 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**

**Hugh Maginnis  
Managing Director**

**Effective: September 30, 2011**

This Brochure Supplement provides information about the background and qualifications of Hugh Maginnis (CRD# 2971733) in addition to the information contained in the RPg Family Wealth Advisory, LLC ("RPg" or the "Advisor" CRD #158528) 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.

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

**RPg Family Wealth Advisory, LLC  
CRD No: 158528**

<b>Boston Office</b>	<b>Austin Office</b>
25 Burlington Mall Road, Suite 205 Burlington, MA 01803 Phone: (781) 547-8660 Fax: (781) 273-0333	5900 Southwest Parkway, Building 5, Suite 500 Austin, TX 78735 Phone: (512) 327-6000 Fax: (512) 327-6044

## Item 2 – Educational Background and Business Experience

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Hugh Maginnis is a Managing Director of RPg Family Wealth Advisory, LLC. Mr. Maginnis, born in 1970, is dedicated to serving the Clients of RPg Family Wealth Advisory, LLC.

Mr. Maginnis earned a B.S. in Finance from Villanova University in 1992.

Additional information regarding Mr. Maginnis's employment history is included below.

### Employment History:

Manging Director, RPg Family Wealth Advisory, LLC	09/2011 to Present
Partner, Risk Paradigm Group Holdings, LLC (parent to RPg Family Wealth Advisory, LLC)	09/2011 to Present
Registered Representative, Purshe Kaplan Sterling Investments	09/2011 to Present
Financial Advisor, Morgan Stanley Smith Barney	06/2009 to 09/2011
Financial Advisor, Citigroup Global Markets Inc.	08/2007 to 06/2009
Financial Advisor, Bay State Financial	04/2003 to 08/2007
New England Securities	04/2003 to 08/2007
Linsco/Private Ledger Corp.	04/1999 to 04/2003

## Item 3 – Disciplinary Information

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*There are no legal, civil or disciplinary events to disclose regarding Mr. Maginnis.*

Mr. Maginnis 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. Maginnis.

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. Maginnis.*

However, we do encourage you to independently view the background of Mr. Maginnis 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 2971733 in the field labeled "Individual CRD Number".

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Maginnis is also a registered representative of Purshe Kaplan and Sterling Investments ("PKS") of Albany, New York. PKS is a registered broker-dealer (CRD No. 35747), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Maginnis will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Maginnis. Neither the Advisor nor Mr. Maginnis will earn investment advisory fees in connection with any services implemented in Mr. Maginnis' separate capacity as a registered representative where commissions are earned.

### Insurance Agency Affiliations

Mr. Maginnis is also a licensed insurance professional. This business activity is done separate and apart from his role with RPg. As an insurance agent, Mr. Maginnis may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset financial planning fees paid to RPg.

This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Maginnis or the Advisor. Mr. Maginnis spends less than 10% of his business time on this activity.

## **Item 5 – Additional Compensation**

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### **Broker-Dealer Affiliation**

Mr. Maginnis is also a registered representative of PKS. In his separate capacity as a registered representative, Mr. Maginnis will typically receive commissions for the implementation of recommendations for commissionable transactions.

### **Insurance Agency Affiliations**

Mr. Maginnis may serve as sales agent for various insurance companies. As an insurance agent, Mr. Maginnis may receive customary commissions and other related revenues from the various insurance companies whose products are sold.

## **Item 6 – Supervision**

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Mr. Maginnis serves as a Principal of RPg and is supervised by Christopher Jensen, the Chief Compliance Officer. Mr. Jensen can be reached at (781) 547-8656.

RPg has implemented a Code of Ethics and internal compliance that guide each employee 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 employees. 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**

**Mark B. Reinking  
Managing Director**

**Effective: September 30, 2011**

This Brochure Supplement provides information about the background and qualifications of Mark B. Reinking (CRD# 1602957) in addition to the information contained in the RPg Family Wealth Advisory, LLC ("RPg" or the "Advisor" CRD #158528) 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.

Additional information about Mark B. Reinking is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**RPg Family Wealth Advisory, LLC  
CRD No: 158528**

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## Item 2 – Educational Background and Business Experience

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Mark B. Reinking is a Managing Director of RPg Family Wealth Advisory, LLC. Mr. Reinking, born in 1953, is dedicated to serving the Clients of RPg Family Wealth Advisory, LLC.

Mr. Reinking attended college from 1971 to 1975, majoring in Business. In 1975, when Mr. Reinking left the University of Texas, he started his own business serving investors, which he has been actively running ever since. Additional information regarding Mr. Reinking's employment history is included below.

### Employment History:

Managing Director, RPg Family Wealth Advisory, LLC	09/2011 to Present
Partner, Risk Paradigm Group Holdings, LLC (parent to RPg Family Wealth Advisory, LLC)	09/2011 to Present
Registered Representative, Centaurus Financial, Inc.	06/2010 to Present
President, Reinking Asset Management	04/1974 to Present
President, RAM Financial Group	01/1987 to Present

## 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.

After 37 years of working with investors, and approximately three thousand-six hundred (3,600) transactions or advisory relationships with individuals, there have been no disciplinary actions regarding Mr. Reinking, whatsoever.

Mr. Reinking does disclose that there have been two (2) confused clients that with the aid of perhaps less than exemplary legal counsel have made client complaints, which were frivolous and without merit. The complaints alleged a breach of duty, which was vehemently denied by Mr. Reinking. Mr. Reinking was not found at fault in any way. On the advice of counsel, Mr. Reinking made a business decision to settle both nuisance suits for a small sum, much less than even the cost to complete arbitration of the baseless claims. An arbitration panel has recommended expungement, and both of these events are in the latter stages of the lengthy process of being permanently expunged from Mr. Reinking's permanent FINRA record. Importantly, both clients making the unfounded claims have consented to the expungements in sworn and notarized affidavits.

You may independently view the background of Mr. Reinking 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 1602957 in the field labeled "Individual CRD Number".

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Reinking is also a registered representative of Centaurus Financial, Inc. ("Centaurus"). Centaurus is a registered broker-dealer, member FINRA, SIPC and a Registered Investment Adviser registered with the Securities and Exchange Commission (CRD No. 30833). In his separate capacity as a registered representative, Mr. Reinking will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Reinking. Neither Centaurus, the RPg nor Mr. Reinking will earn investment advisory fees in connection with any services implemented in Mr. Reinking's separate capacity as a registered representative where commissions are earned.

Centaurus and RPg Family Wealth Advisory, LLC are not affiliated in anyway. Under no circumstances will a client of RPg Family Wealth Advisory, LLC be deemed to be a client of Centaurus, nor will Centaurus assume any liability for Mr. Reinking's actions unless client has an executed Centaurus Client Agreement which has

been accepted by Centaurus and client's claim is the result of those services agreed to in writing by and between Centaurus and client.

#### Insurance Agency Affiliations

A very important element of Mr. Reinking's Family Wealth Advisory activity is his advanced estate planning services. Mr. Reinking is also a licensed insurance professional, and crafts insurance plans for the purpose of providing liquidity for the payment estate tax, asset protection, and income and wealth replacement vehicles. This business activity is done separate and apart from his role with RPg. As an insurance professional, Mr. Reinking may receive customary commissions and other related revenues from the various insurance companies whose products are utilized. Commissions generated by insurance products do not offset financial planning fees paid to RPg. Clients are under no obligation to implement any recommendations made by Mr. Reinking or the Advisor.

### **Item 5 – Additional Compensation**

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#### Broker-Dealer Affiliation

Mr. Reinking is also a registered representative of Centaurus. In his separate capacity as a registered representative, Mr. Reinking will typically receive commissions for the implementation of recommendations for commissionable transactions.

#### Insurance Agency Affiliations

Mr. Reinking may serve as an agent for various insurance companies. As an insurance agent, Mr. Reinking may receive customary commissions and other related revenues from the various insurance companies whose products are utilized.

### **Item 6 – Supervision**

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Mr. Reinking serves as a Partner and Investment Advisor Representative of RPg, which is under the supervision of Christopher Jensen, the Chief Compliance Officer. Mr. Jensen can be reached at (866) 726-5150.

RPg has implemented a Code of Ethics and internal compliance that guide each employee 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 employees. 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**

**Adam B. Reinking**  
**Partner and Investment Advisor Representative**

**Effective: September 30, 2011**

This Brochure Supplement provides information about the background and qualifications of Adam B. Reinking (CRD# **5441139**) in addition to the information contained in the RPg Family Wealth Advisory, LLC ("RPg" or the "Advisor" CRD #158528) 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.

Additional information about Adam B. Reinking is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**RPg Family Wealth Advisory, LLC**  
**CRD No: 158528**

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## Item 2 – Educational Background and Business Experience

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Adam B. Reinking is a Partner and Investment Advisor Representative of RPg Family Wealth Advisory, LLC. Mr. Reinking, born in 1984, is dedicated to serving the Clients of RPg Family Wealth Advisory, LLC. Mr. Reinking earned a Bachelor of Science in Business Administration at Hawaii Pacific University. He also attended UC San Diego, where he majored in Economics. Additional information regarding Mr. Reinking's employment history is included below.

### Employment History:

Partner and Investment Advisor Representative, RPg Family Wealth Advisory, LLC	09/2011 to Present
Partner, Risk Paradigm Group Holdings, LLC (parent to RPg Family Wealth Advisory, LLC)	09/2011 to Present
Registered Representative, Centaurus Financial, Inc.	12/2009 to Present
Manager, RAM Financial Group	05/2007 to Present
Registered Representative, Sunset Financial Services	10/2007 to 12/2009

## 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. There are no legal, civil or disciplinary events to disclose regarding Mr. Reinking.

You may independently view the background of Mr. Reinking 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 5441139 in the field labeled "Individual CRD Number".

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Reinking is also a registered representative of Centaurus Financial, Inc. ("Centaurus"). Centaurus is a registered broker-dealer, member FINRA, SIPC and a Registered Investment Adviser registered with the Securities and Exchange Commission (CRD No. 30833). In his separate capacity as a registered representative, Mr. Reinking will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Reinking. Neither Centaurus, the RPg nor Mr. Reinking will earn investment advisory fees in connection with any services implemented in Mr. Reinking's separate capacity as a registered representative where commissions are earned.

Centaurus and RPg Family Wealth Advisory, LLC are not affiliated in anyway. Under no circumstances will a client of RPg Family Wealth Advisory, LLC be deemed to be a client of Centaurus, nor will Centaurus assume any liability for Mr. Reinking's actions unless client has an executed Centaurus Client Agreement which has been accepted by Centaurus and client's claim is the result of those services agreed to in writing by and between Centaurus and client.

### Insurance Agency Affiliations

Mr. Reinking is also a licensed insurance professional, and crafts insurance plans for the purpose of providing liquidity for the payment estate tax, asset protection, and income and wealth replacement vehicles. This business activity is done separate and apart from his role with RPg. As an insurance professional, Mr. Reinking may receive customary commissions and other related revenues from the various insurance companies whose products are utilized. Commissions generated by insurance products do not offset financial planning fees paid to RPg. Clients are under no obligation to implement any recommendations made by Mr. Reinking or the Advisor.

## **Item 5 – Additional Compensation**

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### **Broker-Dealer Affiliation**

Mr. Reinking is also a registered representative of Centaurus. In his separate capacity as a registered representative, Mr. Reinking will typically receive commissions for the implementation of recommendations for commissionable transactions.

### **Insurance Agency Affiliations**

Mr. Reinking may serve as an agent for various insurance companies. As an insurance agent, Mr. Reinking may receive customary commissions and other related revenues from the various insurance companies whose products are utilized.

## **Item 6 – Supervision**

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Mr. Reinking serves as a Partner and Investment Advisor Representative of RPg, which is under the supervision of Christopher Jensen, the Chief Compliance Officer. Mr. Jensen can be reached at (866) 726-5150.

RPg has implemented a Code of Ethics and internal compliance that guide each employee 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 employees. 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.



## Privacy Policy

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Effective: September 30, 2011

### Our Commitment to You

RPg Family Wealth Advisory, LLC ("RPg") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. RPg (referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell your non-public personal information to anyone. Nor does RPg provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this privacy policy.

### The Information We Collect About You

You typically provide personal information when you complete the paperwork required to become our Client. This information may include your:

• Name and address	• Assets
• E-mail address	• Income
• Phone number	• Account balance
• Social security or taxpayer identification number	• Investment activity
	• Accounts at other institutions

In addition, we may collect non-public information about you from the following sources:

- Information we receive on Brokerage Agreements, Managed Account Agreements and other Subscription and Account Opening Documents;
- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires;
- Information about your transactions with us or others



**Information About You That RPg Shares**

RPg works to provide products and services that benefit our customers. We may share non-public personal information with our affiliated business entities (Risk Paradigm Group Holdings, LLC, our parent company and Risk Paradigm Group, LLC, an affiliated registered investment advisor that provides services to RPg. We may share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account. In addition, your non-public personal information may also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy RPg's regulatory obligations, and is otherwise required or permitted by law. Lastly, we may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

**To repeat, we do not sell your non-public personal information to anyone.**

**Information About Former Clients**

RPg does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.

**Confidentiality and Security**

Our employees are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. Additionally, we maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

**We'll Keep You Informed**

We will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy policy, and will provide you with a revised policy if the changes materially alter the previous privacy policy. We will not, however, revise our privacy policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing. You may obtain a copy of our current privacy policy by contacting us at (781) 547-8660.