



Dream. Plan. Prosper. We're listening.

Disclosure Brochure
(Part 2A of Form ADV)

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This Disclosure Brochure provides information about the qualifications and business practices of DRR Partners LLC d/b/a Financial Management Group (FMG OR THE FIRM). If you have any questions about the contents of this brochure, please contact us at: 513-984-6696, or by email at: INFO@FMGTEAM.COM. The information in this Disclosure Brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority. Being registered with the SEC alone does not imply any level of skill or training. Please see industry specific certifications listed in the Brochure Supplement (Part 2B).

Additional information about FMG is available on the SEC's website at www.adviserinfo.sec.gov

May 26, 2015

Material Changes

Annual Update

The Material Changes section of this Disclosure Brochure will be updated annually when material changes occur since the previous release of the Disclosure Brochure.

Material Changes since the Last Update

- DRR now accepts custody of client funds and securities in order to provide certain custody-related support to clients engaged for advisory services such as employer sponsored 401k management. Please see the topic Custody on page 15 for more details about FMG's custody status.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 513-984-6696 or by email at: info@fmgteam.com.

Table of Contents

Material Changes	i
Advisory Business	1
Fees and Compensation	5
Performance-Based Fees	7
Types of Clients.....	7
Methods of Analysis, Investment Strategies and Risk of Loss	8
Disciplinary Information	10
Other Financial Industry Activities and Affiliations	10
Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	11
Brokerage Practices	12
Review of Accounts	13
Client Referrals.....	14
Custody	15
Investment Discretion.....	16
Voting Client Securities	16
Financial Information	17
Business Continuity Plan	17
Information Security Program.....	18
Brochure Supplement (Part 2B of Form ADV).....	19

Advisory Business

DRR Partners LLC d/b/a Financial Management Group, ("FMG" or the "Firm") is an independent, Securities & Exchange Commission ("SEC") registered investment advisor formed in January 2015.

FMG is acquiring the investment management process and client relationships of Financial Management Group, Inc., an SEC registered investment advisor (CRD# 106068). FMG will assume the advisory role over the former clients of Financial Management Group, Inc. FMG will help clients deal with their financial concerns, and provide them with answers about how to reach their lifetime goals. Our approach combines comprehensive financial planning with investment advisory services in order to fulfill all your financial management needs.

Since FMG is focused on investment management, this means the firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. No commissions or finder's fees in any form are accepted.

Investment advice is an integral part of financial planning and is tailored to the specific needs of all clients. FMG does not act as a custodian of client assets. The client always maintains asset distribution control. FMG places trades for clients under a limited power of attorney.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client as recommended by FMG or as-needed by the client. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial management services may be beneficial to the client.

Principal Owners

FMG is owned by Robert Siegman, Robert Lemmons, and David Wilder.

Types of Advisory Services

FMG provides comprehensive financial planning services to clients on matters not involving securities, such as cash flow and net worth analysis, tax planning and projections, retirement goal setting and roadmap development, independent and

objective insurance needs analysis and policy reviews, comprehensive college planning and selection services, and multigenerational estate planning strategies.

FMG also provides investment supervisory services, also known as asset management services utilizing a time tested, Nobel-Prize winning investment philosophy.

As of May 26, 2015, FMG manages the following assets for its clients:

Discretionary Assets:	Non-Discretionary Assets:	Total Assets:
\$62,337,000	\$320,104,000	\$382,441,000

Tailored Relationships

The goals and objectives for each client are documented in each client's individual Financial Management Review document, that is updated annually for wealth management clients. Portfolio asset allocation policy statements are created that reflect the stated goals and objectives, and consider the individual client risk tolerance and age. Clients may impose restrictions on divesting or investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

Types of Agreements

FMG offers clients and prospective clients three distinct levels of services as described below:

Millionaire In-The-Making is an investment management focused service offering for clients who have embraced a focus on accumulating wealth for achieving a lifetime of security & independence.

Millionaire Program is a comprehensive service offering for clients who have achieved Millionaire status and desire a professionally managed investment experience alongside a proactive and comprehensive financial planning relationship.

Millionaire CFO is a service offering for Millionaire clients, primarily business owners and corporate executives, who have accumulated substantial wealth, and require a coordinated, experienced team of wealth management professionals functioning as their full-time CFO, in order to ensure continued asset growth and prudent preservation.

Millionaire In-The-Making Overview

FMG provides three levels of client engagements necessary to meet the individual client needs. Each of the engagements will provide a professionally managed investment experience utilizing a low cost, institutional investment toolkit designed to deliver a competitive risk adjusted return.

The Millionaire-in-the-Making service offering (In-The-Making) is focused on preserving and building the client's investment portfolio value while also providing the essential financial planning components such as setting goals for college and retirement. Once these goals are set, FMG will offer periodic updates on where the client stands relative to meeting these goals and also suggesting what actions are necessary to stay on track. Services included as part of the In-The-Making offering are:

- Safe custody of investment assets with monthly account statements.
- Investment risk tolerance assessment, portfolio asset allocation design, implementation and monitoring.
- Quarterly consolidated investment reporting, including current and historical performance results.
- Net Worth financial statements prepared and reviewed annually (if data is provided).
- Providing clients with recommendation for what types of accounts should be used for meeting college and retirement goals such as IRA's, 401k, Roth IRAs, State 529 plans, or non-qualified accounts.
- Assisting the client with the selection of other financial professionals to assist with insurance needs, estate planning, tax planning and preparation, and mortgage and lending needs.
- Consolidating and simplifying the client's investment portfolio and tax reporting process.

Assets are invested primarily in low cost, institutional and no-load mutual funds and exchange-traded funds. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Discount brokerages such as Charles Schwab may charge a transaction fee for the purchase of some institutional class mutual funds. FMG does not receive any compensation, in any form, from fund companies.

Investments may also include: equities (stocks), corporate debt securities, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S.

government securities, options contracts, and interests in partnerships. Initial public offerings (IPOs) are not available through FMG.

FMG may work with clients on an hourly basis on specific one-time issues outside the scope of the In-The-Making service offering. The fee is a maximum \$250/hour plus out of pocket expenses. FMG will provide the client with an estimated project fee before work is initiated. The project fee may be prepaid, at the election of the client, or paid as services are provided. FMG agrees to refund the total amount of all fees paid if the client is not satisfied with the services performed.

Clients and prospects may request a complete list of services offered under the In-The-Making agreement.

Millionaire Program Overview

The Millionaire Program (Program) offers all services included in the In-The-Making service offering, and further combines FMG's proactive investment management and integrated financial planning services. Most clients choose to have FMG manage all aspects of their financial affairs. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work for the Program includes: investment management (including performance reporting); retirement planning; tax planning; education planning; estate planning; cash flow management; insurance review; as well as the implementation or guidance of recommendations within each area.

The Program also extends the depth and complexity of portfolio design and investment tools utilized to accommodate the larger portfolio's need for risk reduction and additional tax efficiency.

Clients and prospects may request a complete list of services offered under the Program agreement.

Millionaire CFO Overview

The Millionaire CFO (CFO) offers all services included in the In-The-Making and Program service offerings, and further extends the level of support, guidance and access to specialized FMG experts in the areas of business planning, executive compensation, college planning and negotiations, and multi-generational estate planning. Clients will also have full access to the FMG team to deliver concierge type services for financial organization, financial technology assistance, and meetings to the client's preferred location. CFO clients are also offered "Family Office" type services via a third party for bill paying, tax preparation and document scanning and warehousing.

Clients and prospects may request a complete list of services offered under the CFO agreement.

Termination of Agreement

Each service offering is an ongoing agreement with proactive and constant adjustments. The length of service to the client is at the client's discretion. The client or FMG may terminate an Agreement by written notice to the other party at any point and for any reason without penalty. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The portfolio value at the time of termination will be used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

Fees and Compensation

Description

FMG bases fees on a percentage of assets under management, subject to a minimum fee for each of the three service offerings.

The fee schedule is as follows:

- First \$750,000 of Investment Assets assessed at 1.25% per annum
- Next \$1,250,000 of Investment Assets assessed at 0.90% per annum
- Next \$3,000,000 of Investment Assets assessed at 0.70% per annum
- Next \$3,000,000 of Investment Assets assessed at 0.50% per annum
- Over \$8,000,000 of Investment Assets assessed at 0.35% per annum

Subject to a Minimum Quarterly Fee by Service Offering:

- Millionaire In-The-Making \$750 per quarter
- Millionaire Program \$2,250 per quarter
- Millionaire CFO \$5,000 per quarter

Fees are negotiable in circumstances when multiple client relationships result from the same immediate family.

Existing clients may be grandfathered under previous fee agreements not listed in this brochure.

Fee Billing

Wealth Management Advisory Fees are billed quarterly based on a set month of each calendar quarter. This means that one-third of clients are billed the first month of each quarter (Jan-Apr-Jul-Oct) and are invoiced as the quarter begins. Another one-third of clients are billed in the second month of each calendar quarter (Feb-May-Aug-Nov) and are invoiced in the middle of each quarter. The final one-third of clients are billed the third month of each calendar quarter (Mar-Jun-Sep-Dec) and are invoiced toward the end of each quarter. The last day of the prior month's portfolio value is used for fee calculation purposes. Clients may choose to request a change in what month they are invoiced for any reason by writing or calling FMG. Payment in full is expected within 30 days of invoice presentation. Fees are deducted proportionally across client investment accounts with few exceptions. The client must consent in advance to direct debiting of their investment account.

Fees for financial plans are billed 50% in advance, with the balance due after 6 months and upon the client's satisfaction of the financial planning process.

Other Fees

Custodians such as Charles Schwab may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

FMG, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

Expense Ratios

Mutual funds generally charge a management fee for their services as investment managers. This management fee is called an expense ratio and is disclosed in the fund's prospectus or by reviewing the fund's profile on any popular finance website. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted. These

fees are in addition to the fees paid by you to FMG. FMG places high emphasis on using low internal cost investments for client portfolios.

Past Due Accounts and Termination of Agreement

FMG reserves the right to stop work on any account that is more than 90 days overdue. In addition, FMG reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in FMG's judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 30 days.

Performance-Based Fees

Sharing of Capital Gains

All financial planning and investment management fees are NOT based on a share of the capital gains or capital appreciation of managed securities.

FMG does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for an adviser to recommend an investment that may carry a higher degree of risk to the client.

Types of Clients

Description

FMG provides comprehensive wealth management including investment advice to individual families. A typical client of FMG is one that chooses to hire an experienced and trusted advisor to guide their family through changing complexities in investment, tax and many other financial areas of life. Based on the value and depth of advice, FMG naturally attracts good wealth accumulators who live rewarding lives unpretentiously within their means, and tend to give back some of their financial success in order to help others have more meaningful lives.

Client relationships vary in scope and length of service.

Account Minimums

In order to serve our clients in the most effective manner, FMG requires a minimum quarterly fee for each level of service offering. All service offerings are available to clients who do not meet the suggested investable assets, but who are willing to pay the minimum quarterly fee.

The Millionaire In-The-Making service offering requires a minimum quarterly fee of \$750 and is suggested as an appropriate offering for prospective clients with greater than \$250,000 in investable assets, including employer based retirement plans.

The Millionaire Program service offering requires a minimum quarterly fee of \$2,250 and is suggested as an appropriate offering for prospective clients with greater than \$750,000 in investable assets, including employer based retirement plans.

The Millionaire CFO service offering requires a minimum quarterly fee of \$5,000 and is suggested as an appropriate offering for prospective clients with greater than \$2,000,000 in investable assets, including employer based retirement plans.

Depending upon circumstances, FMG will make suggestions to shift to a more appropriate service offering to ensure adequate value is being added for the fee charged.

FMG has the discretion to waive the account minimum or fee when the client and the advisor anticipate adding additional funds to the accounts within a reasonable time to meet stated minimums. Other exceptions may apply for direct family members of existing clients.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Security analysis methods include fundamental, technical, and cyclical analysis. Most investment analysis emphasis is on macroeconomic factors on a worldwide basis.

The main sources of information include economic data provided by the Federal Reserve System, Bureau of Labor Statistics, and other government databases.

Other sources of information that FMG may use include J.P. Morgan quarterly guide to the markets, Bloomberg, Morningstar mutual fund information, Fritz Meyer Financial economist, Charles Schwab & Company's Equity Ratings service, and other credible and objective resources from publications and the World Wide Web.

Investment Strategies

The primary investment strategy used on client accounts is strategic and tactical asset allocation utilizing a core and satellite approach. This means that we use primarily passively-managed index and exchange-traded funds as the core investments, and then complement with actively-managed funds where there are greater opportunities to provide risk reduction through additional diversification and active security selection. Portfolios are globally diversified to control the risk associated with traditional markets.

The investment strategy for a specific client is based upon the objectives stated by the client during ongoing discussions and responses on frequent risk tolerance assessments. The client may revise and update these objectives at any time. Each client approves a strategic portfolio asset allocation plan that FMG uses as an investment policy statement.

Risk of Loss

All investment programs have certain risks that are borne by the investor, including risk of loss. FMG's investment approach constantly looks to keep the risk of loss in mind and mitigate through means of dynamic diversification. All investors face the following investment risks:

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

depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like. Diversification is the cornerstone of FMG's investment philosophy with the goal to minimize the diversifiable business risk.

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

Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients. FMG takes great care to conduct extensive legal, disciplinary and personal background checks on all current and future employees.

Other Financial Industry Activities and Affiliations

Financial Industry Activities

FMG is registered with the SEC as an independent investment advisor, and has no affiliation with any securities broker dealers.

Affiliations

FMG is affiliated and a registered corporate member of the National Association of Personal Financial Advisors (NAPFA). NAPFA members adhere to the highest level of fiduciary standards and the fee-only model seeks to minimize any conflicts of interest and objectivity.

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

Code of Ethics

The employees of FMG have committed to a Code of Ethics that is available for review by clients and prospective clients. FMG and its personnel owe a duty of loyalty, fairness and good faith towards clients, and the obligation to adhere not only to the specific provisions of the Code but to the general principles that guide the Code.

The Code covers a range of topics including: general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, reporting ethical violations, distribution of the Code, review and enforcement processes. FMG will provide a copy of the Code to any client or prospective client upon request.

Insider Trading

Part of FMG's code of ethics policy addresses the concerns of using non-public information discussed with clients for profit. It is the policy of FMG that employees are NOT to trade stocks of companies where the firm has a client relationship with a high level manager or executive of any publicly traded stock who may potentially provide us with inside information. A watch list of applicable stocks is maintained and updated as new clients meeting this criteria engage the firm. A review of all employee transactions are compared with this list on a semi-annual basis for all Schwab and non-Schwab investment accounts.

Personal Trading

The Chief Compliance Officer of FMG is Robert Siegmann, who is responsible for reviewing all employee personal trades. His personal trades are monitored and reviewed by someone other than Robert Siegmann. The personal trading reviews ensure that employees adhere to FMG trading policies and that clients of the firm are not negatively affected in any way. Since most employee trades are small mutual fund trades or exchange-traded fund trades, FMG has low risk in this area.

Participation or Interest in Client Transactions

FMG and its employees are permitted to buy or sell mutual funds or other securities that are recommended to clients. Firm employees typically invest their own money in the same strategy and mutual funds that are recommended to clients. Employees are not permitted to purchase any non-mutual fund securities for their own accounts ahead of client trades to avoid any conflicts that may arise. Employees comply with the provisions of the FMG *Compliance Manual*.

Brokerage Practices

Selecting Brokerage Firms

FMG may recommend that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although FMG may recommend that clients establish accounts at Schwab, it is the client's decision to custody assets with Schwab. FMG is independently owned and operated and not affiliated with Schwab, and does not receive fees or commissions from Schwab or any other source.

FMG is not committed to Schwab for any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, 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.

Schwab client services provide internet access to all client accounts, and also provides ongoing servicing issues for some clients.

Best Execution

FMG reviews the execution of trades, trading fees charged by Schwab and their competitors, and any other custodian related costs on an annual basis and is documented in the FMG *Compliance Manual*. FMG does not receive any portion of the trading fees.

Soft Dollars

Schwab provides FMG 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.

Schwab also makes other products and services available that benefit FMG in terms of online software and technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) provide research, pricing and other market data; (iii) facilitate payment of Advisor's fees from its clients' accounts; and (iv) assist with back-office functions, trade execution, recordkeeping and client reporting.

Schwab also offers other services intended to help FMG manage and further develop its business enterprise. These services may include: (i) compliance, legal and business consulting; (ii) educational publications and conferences on practice management and business succession; and (iii) access to employee benefits providers, human capital consultants and insurance providers. Schwab may make available, arrange, discount and/or pay third-party vendors for these types of services rendered to FMG.

The selection of Charles Schwab & Company as a custodian for clients is not materially affected by these services provided.

Order Aggregation

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

Review of Accounts

Review of Comprehensive Financial Plans

Client financial plans are comprehensive and personalized by design. Clients engaged using the comprehensive wealth management services will be offered written updates to their financial plan at least annually in person. Many clients with urgent or other complex financial planning matters are offered more frequent updates in person, by telephone and by email. Reviews involve updating all aspects of client's personal net worth and cash flow, employment and benefits, tax reduction strategies, comprehensive college selection and funding planning, insurance coverage and multigenerational estate planning. Financial plans are reviewed by all client advisors as listed in part 2B of this document.

Review of Client Investment Accounts

Investment account reviews are performed quarterly by FMG's investment advisor staff. Investment advisors perform reviews of all investment advisory accounts no less than quarterly. Accounts are reviewed for consistency with the firm's current investment strategy, the global economic conditions, and client stated goals and

objectives. Account reviews are performed more frequently when market conditions dictate.

Review Triggers

Investment accounts are reviewed no less than quarterly on a planned review schedule. Reviews may also be triggered by changes in an account holder's personal, tax, or financial status. Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in macroeconomic factors and country specific events.

Regular Investment Reports

Investment account reviewers are members of the firm's Investment Committee. They are instructed to consider the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client.

Brokerage statements are generated no less than quarterly, and are sent directly from the account custodian. These reports list the account positions, activity in the account over the covered period, and other related information. Clients are also sent confirmations following each brokerage account transaction either by mail or email based on client preference.

FMG will provide consolidated investment reports of all managed assets, including performance results, and may include updates to our internal economic forecast and any changes to investment strategy. Financial planning and Wealth management clients will receive quarterly investment updates on all managed investment accounts. Investment Management only clients will receive semi-annual investment updates.

Client Referrals

Incoming Referrals

FMG has been fortunate to receive many client referrals over the years from satisfied clients, estate planning attorneys, accountants, and family and friends of employees. The firm does not compensate any party for these referrals or introductions.

Outgoing Referrals

FMG does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them. We only ask for expert and valued advice for mutual clients.

Custody

Account Statements

All assets are held at qualified custodians, meaning the custodian is responsible to provide account statements directly to clients at their address of record at least quarterly. Clients are urged to carefully compare the account statements received directly from their custodians to the performance report statements provided by FMG.

Advisory Fees

Most clients prefer to pay advisory fees direct from their managed investment accounts with Charles Schwab, allowing investment reports to reflect current positions and growth, net after fees. After providing account reviews and reports to clients on quarterly or semi-annual schedules, FMG waits 3-5 business days to provide Schwab a methodology and breakdown of client fees submitted for payment. Schwab monitors the fee amounts and discloses the amounts to client both online and on monthly statements. FMG does accept and keep custody of client funds, typically for management of employer sponsored retirement plans and providing client services such as investment account depositing and handling security certificates. FMG's custody status also includes the authorized deduction of client fees from a qualified custodian.

Bank Account Access

Clients are frequently provided net worth statements that contain approximations of bank account balances provided by the client, as well as the value of land and hard-to-price real estate. FMG is not permitted to maintain access to these accounts due to bill payment features allowing potential unauthorized withdraw of funds. The net worth statements are used for long-term financial planning where the exact values of assets are not material to the financial planning tasks.

Investment Discretion

Discretionary Authority for Trading

FMG accepts discretionary authority to manage investment accounts on behalf of clients. FMG has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. When requested by new or existing clients, FMG will provide written recommendations to the client prior to each trade to obtain approval if a discretionary trading authorization has not been given.

The client initially approves the custodian (i.e. Charles Schwab Institutional) to be used and the individual trading fees paid to the custodian for certain institutional trades. FMG does not receive any portion of the transaction fees or commissions paid by the client to the custodian.

Discretionary trading authority facilitates placing trades in accounts on behalf of clients so that FMG can promptly implement and rebalance the asset allocation strategy previously approved in writing.

Clients may suggest or place restrictions on selling or buying certain securities held in accounts for personal, political, or sentimental reasons. This is common with large concentrated company or inherited stock positions.

Procedures Prior to Investment Discretion

A signed limited power of attorney (LPOA) on file with each custodian provides trading authorization for implementing recommendations on behalf of clients. This LPOA is typically contained in the initial account opening language and is a condition of opening the account.

Prior to FMG selling or buying any securities on behalf of new clients, a risk tolerance assessment and discussion are held to design a personalized portfolio asset allocation plan. The asset allocation plan represents the strategic, or long term, portfolio weightings and act as the basis for most profit taking and portfolio rebalancing decisions.

Voting Client Securities

Proxy Votes

Even when FMG has the written authority to act on or make proxy voting instructions, it is the policy of FMG to NOT vote proxies for client securities. Unless otherwise instructed by FMG, clients are expected to vote their own proxies. The

custodian holding the security will provide pertinent details of each proxy to clients by mail or email.

When assistance on voting proxies is requested, FMG will provide recommendations to the client. In the rare case when a conflict of interest may arise, it will be disclosed to the client.

Financial Information

Financial Condition

FMG does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients. Additionally, FMG does not publish its financial statements because of non-custody status. In other words, FMG does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.

Business Continuity Plan

General

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

Disasters

The Business Continuity Plan covers natural disasters such as snow storms, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, fire, biological event, Internet outage, and aircraft accident. Electronic files are backed up daily and archived offsite with company principals.

Alternate Workspace

Alternate workspaces are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location. In the event of a disaster when telephone and email communications are unavailable, but the internet is functional, alternate contact information will be posted on our company website with two days.

Information Security Program

Information Security

FMG maintains and updates annually an information security policy and program to reduce the risk that client personal and confidential information may be breached. FMG employees receive on-going training in order to protect the integrity of physical and electronic client information.

Privacy Notice

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

The categories of non-public information that we collect may include information about personal finances, client health information to the extent needed for the financial planning process, and information from consumer reporting agencies, e.g., credit reports. We use this information to help clients specifically state their goals, comprehensively plan to meet those goals, and adjust each client's financial plan along the way.

With client permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom the client has established a relationship. Clients may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. Based on the initial account opening process, a limited amount of information is shared with Charles Schwab in order to legally maintain a securities account and execute securities transactions.

We maintain a secure office to ensure that client information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment. We do not house your personal information outside our office except on backup media.

We do not provide personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to client information, including technology consultants, and auditors. However, properly identified federal and state securities regulators may review our company records and personal records of clients as permitted by law.

Personally identifiable information will be maintained for all active clients, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify each client in advance if our privacy policy is expected to change. We are also required by law to deliver a *Privacy Notice* annually to clients, in writing.

Brochure Supplement (Part 2B of Form ADV)

Education and Business Standards

FMG requires that advisors who render investment and financial planning advice are required to have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning. Examples of acceptable coursework include: CFP®, CFA, MBA, ChFC, JD, CTFA, EA or CPA. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

Professional Certifications

Employees have earned certifications and credentials listed below:

Certified Financial Planner (CFP®):

Certified Financial Planners™ are licensed by the CFP Board to use the CFP mark by meeting these requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board (www.cfp.net).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.
- 30 hours of related continuing education every 2 years.

Certified Public Accountant (CPA):

A Certified Public Accountant is an individual who has passed the uniform CPA examination administered by the American Institute Of Certified Public Accountants, and who has received state certification to practice accounting by meeting the following requirements:

- Bachelor's degree with a minimum of 24 hours of accounting courses. Additionally, there must be at least 18 hours of related classes such as business law and management.
- Two years of general accounting experience under the direction of an actively licensed CPA.
- Pass the four sections of the comprehensive uniform CPA examination.
- Pass the American Institute of CPAs professional ethics exam with a score of 90 percent.
- Abide by the uniform code of ethics and complete 120 hours of Continuing Professional Education every three years.

Certified Trust Financial Advisor (CTFA):

The Certified Trust Financial Advisor recognizes a standard of knowledge and competence for the trust and wealth advisory field. Professionals holding the CTFA designation obtain excellent knowledge in the areas of fiduciary and trust activities, financial planning, tax law and planning, investment management, and ethics. A CTFA designee has met the following requirements:

- Minimum of 5 years' experience in wealth management and a bachelor's degree from an accredited college or university, or
- A letter of recommendation from the advisor's manager attesting to the advisor's qualifications and ethical character.
- Candidate must sign and adhere to ICB's Professional Code of Ethics statement.
- Complete 45 credit hours of continuing education courses every three years in specified knowledge areas.

Certified Exit Planning Advisor (CEPA):

The Certified Exit Planning Advisor (CEPA) program was created by the Exit Planning Institute (EPI) and is the most widely accepted and endorsed professional exit planning credential in the world. The EPI is the premier international membership organization serving the educational needs of the exit planning profession, and to bring together financial advisors, business brokers, attorneys, and other business advisors to draw upon their combined expertise to better serve the needs of small and mid-sized business owners worldwide. The common thread uniting these different professionals is their commitment to helping clients exit their companies successfully. To earn the CEPA designation, a professional must

- Attend a 5 day executive MBA style program held twice per year in Chicago.
- Successfully pass the 3.5 hour proctored exam.
- The CEPA must be renewed every 3 years and requires 40 hours of exit-planning related continued education.

Accredited Investment Fiduciary® (AIF):

The Accredited Investment Fiduciary® professional designation is the industry's first and only designation that demonstrates knowledge and competency in the area of fiduciary responsibility and communicates a commitment to standards of investment fiduciary excellence.

- Holders of the AIF® mark have successfully completed a specialized program on investment fiduciary standards and subsequently passed a comprehensive examination.
- Demonstrate the focus on all the components of a comprehensive investment process, related fiduciary standards of care, and commitment to excellence.

- Represents a thorough knowledge of and ability to apply the fiduciary Practices.
- Designees must sign and agree to abide by a code of ethics and complete a continuing education requirement annually.

DAVID WILDER, CFP®, CTFA, MST, CEPA



Educational Background:

- Date of birth: May 1967
- Villanova University, 1989, Bachelor of Science in Accounting,
- Villanova University, 2001, Master of Science in Taxation
- College for Financial Planning and the Cannon Financial Institute

Business Experience:

- DRR Partners LLC d/b/a Financial Management Group (2015 – Present)
- Financial Management Group (2000 - 2015)
- The Vanguard Group (1990-2000)

No Disciplinary Information on record.

Other Business Activities:

Dave serves as an elected volunteer on the board of Cincinnati Association for the Blind.

Supervision:

Dave Wilder holds the position of Chief Investment Officer and Senior Advisor, and is supervised by Robert Siegmann, CCO. He reviews Jonathan Andre's work through frequent office interactions as well as remote interactions.

Robert Siegmann's contact information:

513-984-6696 Rob@fmgteam.com

ROBERT LEMMONS, CFP®, CPA, AIF™, CEPA



Educational Background:

- Date of birth: February 1969
- Northern Kentucky University, 1994, Bachelor of Science in Business,
- College for Financial Planning

Business Experience:

- DRR Partners LLC d/b/a Financial Management Group

(2015 – Present)

- Financial Management Group (2010 - 2015)
- Wealth Dimensions Group (2000-2010)
- Kunimura, Mitchell & Co. CPA's (1996-2000)
- Barnes, Dennig & Co., CPA's (1990-1996)

No Disciplinary Information on record.

No Other Outside Business Activities.

Supervision:

Rob Lemmons holds the position of Director of Financial Planning and Senior Advisor and is supervised by Robert Siegmann, CCO. He reviews the work of Chris Allen, Financial Planner Associate, Kristy O'Brien, Relationship Manager, and Kristin Wiechert, Financial Planning Administrator, through personal meetings and email discussions.

Robert Siegmann's contact information:

513-984-6696 Rob@fmgteam.com

ROBERT SIEGMANN, MBA



Educational Background:

- Date of birth: September 1976
- Xavier University, 2012, MBA
- Xavier University, 2008, BSBA in Finance
- University of Cincinnati, 2003, Associate of Arts
- FINRA Series 65 Investment Advisor Representative

Business Experience:

- DRR Partners LLC d/b/a Financial Management Group (2015 to Present)
- Financial Management Group (1994 - Present)
- M.L. Roberts & Co. CPA (1993-1995)

No Disciplinary Information on record.

No Other Outside Business Activities.

Supervision:

Rob Siegmann holds the position of Chief Operating Officer, Chief Compliance Officer, and Senior Advisor and is supervised by David Wilder, CIO. He reviews the work of Chrissie Smith, Operations Manager, and Kelly Boone, Client Service Associate, through personal meetings, office interactions, and review of procedures.

David Wilder's contact information:

513-984-6696 Dave@fmgteam.com

JONATHAN ANDRE, CFP®



Educational Background:

- Date of birth: November 1981
- Xavier University, 2004, BSBA in Finance

Business Experience:

- DRR Partners LLC d/b/a Financial Management Group (2015 to Present)
- Financial Management Group (2002 - Present)

No Disciplinary Information on record.

No Other Outside Business Activities.

Supervision:

Jon Andre holds the position of Investment Advisor and is supervised by David Wilder, CIO.

David Wilder's contact information:

513-984-6696 Dave@fmgteam.com

CHRISSIE A. SMITH, MBA



Educational Background:

- Date of birth: May 1980
- Indiana Wesleyan University, 2010, MBA
- Indiana Wesleyan University, 2008, BSBA in Management
- FINRA Series 65 Investment Advisor Representative

Business Experience:

- DRR Partners LLC d/b/a Financial Management Group (2015 to Present)
- Financial Management Group (1998 - 2015)

No Disciplinary Information on record.

No Other Outside Business Activities.

Supervision:

Chrissie holds the position of Operations Manager and is supervised by Rob Siegmann. Ms. Smith reviews the work of Administrative Assistants Natalie Pham and Joanne Askren.

Rob Siegmann contact information:

513-984-6696 rob@fmgteam.com