



## **American Wealth Administration Group LLC**

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

**March, 2017**

This Form ADV2A (“Disclosure Brochure”) provides information about the qualifications and business practices of American Wealth Administration Group LLC (“AWAG”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (516) 833-6800.

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

Additional information about AWAG and its advisory persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD # - 282683.

## Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of AWAG.

AWAG believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. AWAG encourages 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

AWAG 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 AWAG.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD # - 282683. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (516) 833-6800.

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## **Item 4 – Advisory Services**

### **A. Firm Information**

American Wealth Administration Group LLC (“AWAG” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”), which is located in the State of New York. AWAG is organized as a Limited Liability Company (“LLC”) under the laws of the State of New York. AWAG was founded in July 2014, and is owned and operated by Kevin J. Hughes (CEO/Chairman), George K. Pappas (COO), Timothy J. Hughes (CFO) and Jonathan S. Lifschutz (President). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by AWAG.

American Wealth Administration Group LLC (“AWAG” or the “Advisor”) designates certain members (A member is a Unit owner of American Wealth Administration Group LLC “AWAG” or the “Advisor”) with specific titles in order to maximize the experience and talent of the company for the benefit of the clients of (“AWAG” or the Advisor”).

**Chief Global Strategist (CGS)-** The American Wealth Administration Group LLC (“AWAG” or the “Advisor”) Has designated Kevin J. Hughes, who is also the Chairman and CEO of American Wealth Administration Group LLC (“AWAG” or the “Advisor”) as the **Chief Global Strategist (CGS)** for American Wealth Administration Group LLC (“AWAG” or the “Advisor”). The role of the **Chief Global Strategist (CGS)** is to provide opinion and guidance to clients of the American Wealth Administration Group LLC (“AWAG” or the “Advisor”) on all matters relative to the process of Wealth Administration and that may have a material impact upon strategy for the clients of the American Wealth Administration Group LLC (“AWAG” or the “Advisor”) to include but not be limited to (Global Markets, Global Politics, Global Economics, Financial Industry news, Regulatory changes etc.). For the purposes of Asset Management and allocation the **Chief Global Strategist (CGS) shall provide at least a Bi-annual Report, each year (But more than two may be issued) on the view of the World Markets, Politics and Strategy. "THE OPINIONS OF THE CHIEF GLOBAL STRATEGIST (CGS) ARE THE EXPRESS OPINIONS OF**

**THE CHIEF GLOBAL STRATEGIST AND ARE BASED UPON HIS OR HER EXPERIENCES AND OBSERVATIONS AND NO ONE ELSE, WITHOUT EXCEPTION.**

The Chief Global Strategist (CGS)- opinions are for informational purposes only they are not designed and or intended to be used for investment decisions without the express approval, from a Wealth Administrator of the American Wealth Administration Group LLC ("AWAG" or the "Advisor"), WITHOUT EXCEPTION.

**Senior Global Strategist (SGS)-** The American Wealth Administration Group LLC ("AWAG" or the "Advisor") Has designated Jonathan S Lifschutz, who is also the President of the American Wealth Administration Group LLC ("AWAG" or the "Advisor") as the Senior Global Strategist (SGS) for American Wealth Administration Group LLC ("AWAG" or the "Advisor"). The role of the Chief Global Strategist (SGS) is to provide opinion and guidance to clients of the American Wealth Administration Group LLC ("AWAG" or the "Advisor") on all matters relative to the process of Wealth Administration and that may have a material impact upon strategy for the clients of the American Wealth Administration Group LLC ("AWAG" or the "Advisor") to include but not be limited to (Global Markets, Global Politics, Global Economics, Financial Industry news, Regulatory changes etc.). For the purposes of Asset Management and allocation the **Senior Global Strategist (SGS) shall provide at least a Bi-annual Report, each year (But more than two may be issued) on the view of the World Markets, Politics and Strategy. "THE OPINIONS OF THE SENIOR GLOBAL STRATEGIST (SGS) ARE THE EXPRESS OPINIONS OF THE SENIOR GLOBAL STRATEGIST AND ARE BASED UPON HIS OR HER EXPERIENCES AND OBSERVATIONS AND NO ONE ELSE, WITHOUT EXCEPTION.** The Senior Global Strategist (SGS)- opinions are for informational purposes only they are not designed and or intended to be used for investment decisions without the express approval, from a Wealth Administrator of the American Wealth Administration Group LLC ("AWAG" or the "Advisor"), WITHOUT EXCEPTION.

**B. Advisory Services Offered**

AWAG offers investment advisory services to individuals, high net worth individuals, families, trusts, estates, and businesses in New York and other states (each referred to as a "Client"). Wealth Management Services personal Client contact and interaction while providing discretionary investment management and planning portfolio. AWAG may recommend specific positions to increase sector or asset class weightings. The **American Wealth Administration Group LLC** may recommend employing cash positions as a benchmark strategy or asset allocation tool. AWAG works with each Client to identify their investment goals and objectives as well as risk tolerance. We may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, AWAG provides customized wealth management solutions for its Clients.

AWAG will develop a long-term asset allocation that serves as the core portfolio strategy for each client. In 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. addition, the Advisor will employ a tactical overlay for a portion of the Client's portfolio. Portfolios are primarily constructed using mutual funds, exchange-traded funds ("ETFs"), and individual equities securities. The Advisor may identify one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, education savings and other areas of a Client's financial situation.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. AWAG 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.

Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly. However, we recognize that circumstances may change such as health, travel or employment but we encourage a six to twelve month incubation period.

Financial planning recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to effect the transaction through the Advisor. Financial planning services may be included in an overall wealth management engagement or provided as a separate service, pursuant to the terms of the agreement with the Client.

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

Prior to engaging AWAG to provide advisory services, each Client is required to enter into one or more agreements with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – AWAG will work with each Client to develop a custom investment strategy designed in connection with the Client's investment goals and objectives.
- Asset Allocation – AWAG 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 – AWAG will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – AWAG will provide investment management and ongoing oversight of the Client's portfolio and overall account.

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

For some Clients, AWAG may include the securities transaction fees together with investment advisory fees to provide the Client with a single, bundled fee structure. This combination of fees is typically referred to as a "Wrap Fee Program". AWAG customizes its investment management services for Clients. This Wrap Fee Program Brochure is included as Appendix 1 to this Disclosure Brochure solely to discuss the fees and potential conflicts associated with a bundled fee. Please see Appendix I, which is always included with this Disclosure Brochure.

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

AWAG is a newly established advisor. Assets under management shall be reported following the Advisor's December 31, 2016 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 services provided by the Advisor. Each Client shall sign one or more agreements that detail the responsibilities of AWAG and the Client.

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

#### Investment Advisory Services

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are charged at an annual rate ranging from 0.50% to 2.00% depending on several factors, including the overall size of the relationship and the complexity of the services to be provided. Fees are based on the market value of assets under management at the end of the prior calendar quarter.

Investment advisory fees in the first quarter of service are prorated from the inception date of the Client's account[s] to the end of the first quarter. 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 AWAG will be independently valued by the Custodian. AWAG will not have the authority or responsibility to value portfolio securities.

#### Financial Planning Services

AWAG offers financial planning services on either an hourly basis or a fixed engagement fees. Hourly engagements are billed at a rate of up to \$150 per hour. Fixed fee engagements are negotiated based on the expected number of hours to complete the engagement at the Advisor's hourly rate. Fees may be negotiable at the sole discretion of the Advisor, depending on the nature and complexity of services to be provided. A financial planning service agreement is provided by AWAG which specifically identifies expenses and fees and whether they will be assessed by the hour or through set fees annually, semi-annually or quarterly. Financial Planning agreements enabled through a set fee program may require that the client pay the first year fee at the time the agreement is signed. The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs. The hourly fees are determined after considering many factors, such as the level and scope of the services.

### **B. Fee Billing**

#### Investment Advisory Services

Investment advisory fees will be calculated by the Advisor and automatically deducted from the Client's account[s] by the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the respective quarter-end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 12) to the total assets under management with AWAG at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. Clients provide written authorization permitting AWAG 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 Services

Financial planning fees are invoiced upon execution of the Financial Planning Services Agreement. The balance may be due in advance. The Advisor may invoice the Client for financial planning fees or arrange for the deduction of planning fees from the Client's account[s] at the Custodian. Certain Clients may have their planning fees included with their overall investment advisory fees.

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

Clients may incur certain fees or charges imposed by third parties, other than AWAG, in connection with investments made on behalf of the Client's account[s]. AWAG may include securities transactions costs as part of its overall advisory fees. Please see Item 4.D. above.

In addition, all fees paid to AWAG 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. The Client should review both the fees charged by the fund[s] and the fees charged by AWAG to fully understand the total fees to be paid.

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

#### Investment Advisory Services

AWAG is compensated for its investment advisory services in advance of the quarter in which investment advisory services are rendered. Either party may terminate the investment advisory agreement by providing advance written notice to the other party. Upon termination, the Client shall be responsible for investment advisory fees up to and including the effective date of termination. The Advisor will refund any unearned, prepaid fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is nontransferable without the Client's written approval.



### Financial Planning Services

AWAG may be fully compensated for its financial planning services upon execution of the Financial Planning Services Agreement (Please see Item 5. above.). Either party may terminate the financial planning agreement by providing advance written notice to the other party. Upon termination, the Client shall be responsible for planning fees based on the hours incurred or in the event of a fixed fee, the percentage of the engagement completed. The Advisor will refund any unearned, prepaid fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's written approval.

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

AWAG does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Advisory Persons of AWAG may also be registered representatives of Purshe Kaplan Sterling Investments, Inc. ("PKS"), a securities broker-dealer, and a member of the Financial Industry Regulatory Authority ("FINRA") and the

Securities Investor Protection Corporation ("SIPC"). In their separate capacity as registered representatives, Advisory Persons may implement securities transactions under PKS and not through AWAG. In such instances, an Advisory Person will receive commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by an Advisory Person in one's capacity as a registered representative is separate and in addition to AWAG's advisory fees. This practice presents a conflict of interest because Advisory Persons who are registered representatives may have an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on your needs. We mitigate this conflict in two ways. First, Clients are under no obligation, contractually or otherwise, to purchase securities products through one of our Advisory Persons. Second, AWAG will not charge an ongoing investment advisory fee on any assets implemented in the separate capacity of one of our Advisory Persons. Please see Item 10.

Advisory Persons may also be licensed as independent insurance professionals. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

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

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

AWAG does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

## **Item 7 – Types of Clients**

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AWAG offers investment advisory services to individuals, high net worth individuals, families, trusts, estates, and businesses in New York and other states. The relative percentage of each type of Client is available on AWAG's Form ADV Part 1. These percentages may change over time. AWAG generally does not impose a minimum account size for establishing a relationship. However, smaller accounts may be subject to different investment selection and strategies.



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

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### A. Methods of Analysis

AWAG primarily employs fundamental analysis methods in developing investment strategies for its Clients. Research and analysis from AWAG 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. AWAG does not performance benchmark.

As noted above, AWAG generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. AWAG 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, AWAG may also buy and sell positions that are more short-term in nature, depending on the financial plan 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. AWAG 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.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in "Item 13 – Review of Accounts".

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. **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 AWAG. To review any and all disclosures of its principles, managers, employees and or agents please visit [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)**

AWAG 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 with whom 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 Form ADV Part 1, select the option for "Investment Adviser Search", then selecting "Firm" and enter **282683** in the field labeled "Firm Name or CRD# or SEC#". This will provide

access to Form ADV Parts 1 and 2. Item 11 of the Form ADV Part 1 lists legal and disciplinary disclosure questions.

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

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### Broker-Dealer Affiliation

Certain Advisory Persons of AWAG may also be registered representatives of PKS. In an Advisory Person's separate capacity as a registered representative, the Advisory Person will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by an Advisory person of AWAG. Neither AWAG nor an Advisory Person will earn ongoing investment advisory fees in connection with any services implemented in the Advisory Person's separate capacity as a registered representative. Under supervision by PKS, PKS may have access to certain confidential information of the Client, including, but not limited to financial information, investment objectives, transactions and holdings information. Please see our Privacy Policy, which is included with this Disclosure Brochure.

### Insurance Agency Affiliations

Advisory Persons of AWAG may serve as insurance professionals. Implementations of insurance recommendations are separate and apart from an Advisory Person's role with AWAG. 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 the Advisor or its Advisory Persons.

### Accounting and Tax Services

Certain Advisory Persons of AWAG may also provide accounting and tax services to Clients, which may be under one's separate capacity as an accounting professional. These serves are not provided by AWAG. Clients may be offered these separate services from an Advisory Person, but are under no obligation to engage for such services.

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

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

AWAG has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with AWAG (our "Supervised Persons"). The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. AWAG and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of AWAG 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 address employee ethics and conflicts of interest. To request a copy of our Code of Ethics, please contact us at (516) 833-6800.

### **B. Personal Trading with Material Interest**

AWAG allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. AWAG does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. AWAG does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in Same Securities as Clients**

AWAG allows our Supervised Persons 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. When trading for personal accounts, employees of AWAG may have a conflict of

interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by AWAG requiring reporting of personal securities trades by its Supervised Persons for review by the CCO or delegate. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

#### **D. Personal Trading at Same Time as Client**

While AWAG allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will any associated person of AWAG, transact in any security to the detriment of any Client.**

### **Item 12 – Brokerage Practices**

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

AWAG 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 AWAG to direct trades to the Custodian as agreed in the Investment Advisory Agreement. Further, AWAG does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where AWAG does not exercise discretion over the selection of the Custodian, it may recommend the Custodian 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 AWAG. AWAG 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. AWAG 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. AWAG typically recommends that Clients establish their accounts at Fidelity Investments, Inc. ("Fidelity"), where the Advisor maintains institutional relationships. As advisory persons of AWAG are also registered representatives of PKS, AWAG may only use custodians approved by PKS, so that PKS may properly supervise trading activities. Please see Item 14.

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. AWAG does not participate in soft dollar programs sponsored or offered by any broker-dealer, but does receive economic benefits from PKS (Please see Item 14).
- 2. *Brokerage Referrals*** - AWAG 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 AWAG 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, AWAG 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 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. AWAG will execute its transactions through an affiliated broker-dealer PKS or its custodian. AWAG may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. 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**

Securities in Client accounts are monitored on a regular and continuous basis by the Chief Compliance Officer (Kevin J Hughes, 516-833-6800) of AWAG. 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 AWAG if changes occur in the Client's personal financial situation that might adversely affect the Client's 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 AWAG**

AWAG does not receive securities commissions from product sponsors, broker-dealers or any un-related third party. AWAG may refer Clients to various third parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, AWAG may receive referrals of new Clients from a third-party.

#### Participation in Institutional Advisor Platform

AWAG has established institutional relationship with Fidelity to assist the Advisor in managing Client account[s]. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets through these platforms. 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: financial start-up support; reimbursement to Clients for transfer costs to the platform/custodian; 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**

AWAG does not engage paid solicitors for Client referrals.

## **Item 15 – Custody**

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AWAG does not accept or maintain Direct custody of any Client accounts, except for the authorized deduction of the advisor's fees and the instruction by our client's to wire funds to authorized third-parties, provided by our client's on the client's behalf. All Clients must place their assets with a qualified custodian. AWAG, at present, uses one primary custodian to retain their funds and securities, but may have additional custodians as time goes on. Client's direct AWAG to utilize the Custodian for the Client's security transactions and wire transactions. AWAG encourages Clients to review statements provided by the Custodian. For more information about custodians and brokerage practices, see "Item 12 - Brokerage Practices".

The United States Securities and Exchange Commission, through its Division of Investment Management, issued a guidance memo (NO-2017-01) regarding Inadvertent Custody in February of 2017. In addition, Since the SEC does not provide legal advice or counsel, AWAG also has drawn upon the SEC response to The Assistant General Counsel for the Investment Adviser Association of America on February 21, 2017. We have enclosed an excerpt from that letter herein:

"Notwithstanding this view, staff of the Division of Investment Management would not recommend enforcement action to the Commission under Section 206(4) of, and Rule 206(4)-2 under, the Advisers Act against an investment adviser if that adviser does not obtain a surprise examination where it acts pursuant to such an arrangement under the following circumstances:

1. The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
2. The client authorizes the investment adviser, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
3. The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization, and provides a transfer of funds notice to the client promptly after each transfer.
4. The client has the ability to terminate or change the instruction to the client's qualified custodian.
5. The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.. The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.
7. The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

We understand that investment advisers, qualified custodians and their clients will require a reasonable period of time to implement the processes and procedures necessary to comply with this relief. In

addition, beginning with the next annual updating amendment after October 1, 2017, an investment adviser should include client assets that are subject to a SLOA that result in custody (see note 1 above)."

At present, it is the intent of The American Wealth Administration Group, LLC to follow these guidelines and adjust our policy to meet it and any further changes through this year. In addition to the client "Level 2" paperwork enabled by the custodian for AWAG an annual or bi-annual renewal of a specific letter of instruction from our client re-iterating that any third party recipient is so authorized to receive such wire transfers and providing updated providence of the third-party financial institution receiving any funds.

## **Item 16 – Investment Discretion**

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AWAG 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 AWAG. 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 AWAG will be in accordance with each Client's investment objectives, goals and executed financial plans.

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

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

## **Item 18 – Financial Information**

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Neither AWAG, nor its management, have any adverse financial situations that would reasonably impair the ability of AWAG to meet all obligations to its Clients. Neither AWAG, nor any of its advisory persons, has been subject to a bankruptcy. AWAG is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.



# **American Wealth Administration Group LLC**

## **Form ADV Part 2A Appendix 1 ("Wrap Fee Program Brochure")**

**March, 2017**

This Appendix 1 ("Wrap Fee Program Brochure") provides information about the qualifications and business practices of American Wealth Administration Group LLC ("AWAG") when offering services where securities transaction fee are combined with investment advisory fees into single fee (a "wrap fee program"). If you have any questions about the contents of this Wrap Fee Program Brochure, please contact us at (516) 833-6800.

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

Additional information about AWAG and its advisory persons are available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD # 282683.



## Item 2 – Material Changes

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Form ADV 2 Appendix 1 provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. In particular, this Brochure discuss the wrap fee program offered by AWAG.

### Material Changes

This is the initial version of the AWAG Wrap Fee Program Brochure.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for by our firm name or our firm CRD# 282683. You may also request a copy of this Wrap Brochure at any time, by contacting us at (516) 833-6800.

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## Item 4 – Services Fees and Compensation

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### **A. Advisory Services**

American Wealth Administration Group LLC ("AWAG" or the "Advisor") provides customized wealth advisory services for its Clients. The AWAG Wrap Fee Program (the "Wrap Fee Program") is an investment advisory program sponsored by AWAG whereby AWAG includes normal securities transaction fees with its investment advisory fees to provide Clients with a single overall fee.

The AWAG Wrap Fee Program Brochure is provided solely as a disclosure when AWAG includes securities transaction fees as part of its overall investment advisory fee (as detailed in Item 5 of the Disclosure Brochure).

Clients may be offered a fee structure that includes, as a single fee, the securities transaction costs for trading in Client accounts along with the investment advisory fees earned by AWAG. The securities regulations often refer to such a structure as a "Wrap Fee Program". While traditional Wrap Fee Programs are often rigid, pre-packaged investment programs, AWAG customizes its investment strategies individually for its Clients.

The sole purpose of this Wrap Fee Program Brochure is to provide additional disclosure relating the combination of securities transaction fees with investment advisory fees. This Wrap Fee Program Brochure will reference back to the AWAG Disclosure Brochure in which this Wrap Fee Program Brochure is an Appendix.

AWAG offers investment advisory services to individuals, high net worth individuals, families, trusts, estates, and businesses (each referred to as a "Client"). Please see Item 4 of the Disclosure Brochure for details regarding AWAG's investment management services.

## **B. Program Costs**

Advisory Services provided by AWAG pursuant to a wrap fee structure may cost the Client more or less than purchasing these types of investment management services separately. When AWAG absorbs normal securities transactions fees, AWAG may have a financial incentive to limit the transactions in Client accounts, as each trade will increase costs to AWAG. The costs of the Wrap Fee Program varies depending on services to be provided be to each Client.

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are charged at an annual rate ranging from 0.50% to 2.00% depending on several factors, including the overall the size of the relationship and the complexity of the services to be provided. Fees are based on the market value of assets under management at the end of the prior calendar quarter.

Investment advisory fees in the first quarter of service are prorated from the inception date of the Client's account[s] to the end of the first quarter. 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 AWAG will be independently valued by the Custodian. AWAG will not have the authority or responsibility to value portfolio securities.

AWAG provides this Wrap Fee Program Brochure as AWAG pays all typical securities transactions costs associates with AWAG investment strategies. Clients should only read this Wrap Fee Program Brochure in connection with AWAG's Disclosure Brochure.

## **C. Fees**

The AWAG Wrap Fee Program includes typical securities trading costs incurred in connection with the discretionary investment management services provided by AWAG. Securities transaction fees for Client directed trades may be charged to the Client. Clients engaging AWAG under this Wrap Fee Program will typically pay a higher overall investment advisory fee, but will not be responsible for securities transaction fees for their accounts. Clients should discuss the expected level of trading in the Client's account[s] to determine whether to engage AWAG under this Wrap Fee Program or pay for securities transaction fees separately. Fees may be negotiable at the sole discretion of AWAG.

Clients may also incur certain fees or charges imposed by third parties, which are not included as part of the Wrap Fee. Such other fees, which may include wire transfer fees, small account fees and other fees charged by the Custodian are not included in AWAG's Wrap Fee. AWAG does not receive any portion of such fees.

In addition, all fees paid to AWAG 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 as a shareholder in a fund. Please see Item 5.C. of the Disclosure Brochure.

#### **D. Compensation**

AWAG is the sponsor and portfolio manager of this Wrap Fee Program. AWAG receives investment advisory fees paid by Clients for investment advisory services covered under this Wrap Fee Program.

### **Item 5 – Account Requirements and Types of Clients**

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AWAG offers investment advisory services to individuals, high net worth individuals, families, trusts, estates, and businesses. Please see Item 7 of the Disclosure Brochure for additional information.

### **Item 6 – Portfolio Manager Selection and Evaluation**

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#### **A. Portfolio Manager Selection**

AWAG acts as sponsor and as portfolio manager for the AWAG Wrap Fee Program. AWAG does not select third-party advisors to manage the Wrap Fee Program.

#### **B. Related Persons**

AWAG personnel or affiliates serve as portfolio manager[s] for services under this Wrap Fee Program. AWAG only manages this wrap fee program. AWAG does not act as portfolio manager for any third-party wrap fee programs.

#### **C. Supervised persons**

AWAG Supervised Persons act as portfolio managers for the AWAG Wrap Fee Program described in this Wrap Fee Program Brochure. Please refer to the Items 4 and 8 of the Disclosure Brochure for details on the services provided by AWAG. For information related to the background of AWAG supervised persons, please see Items 9 and 11 of the Disclosure Brochure.

#### Performance-Based Fees

AWAG does not charge performance-based fees for its investment advisory services. The fees charged by AWAG are as described in "Item 5 – Fees and Compensation" above and are not based upon the capital appreciation of the funds or securities held by any Client. AWAG does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients. Please see Item 6 of the Disclosure Brochure.

#### Methods of Analysis

AWAG primarily employs fundamental analysis methods in developing investment strategies for its Clients. Research and analysis from AWAG 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. AWAG does not performance benchmark

As noted above, AWAG generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. AWAG 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, AWAG 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.

#### 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. AWAG 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. Please see Item 8.B of the Disclosure Brochure.

#### Voting Client Securities

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

### **Item 7 – Client Information Provided to Portfolio Managers**

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AWAG is required to describe the type and frequency of the information it communicates to any external managers that may be involved in managing its Clients' investment portfolios. AWAG serves as the sole portfolio manager under this Wrap Fee Program and, as such, the Advisor has no information to disclose in relation to regarding this Item.

### **Item 8 – Client Contact with Portfolio Managers**

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There is no restriction on the Client's ability to contact AWAG.

### **Item 9 – Additional Information**

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#### **A. Disciplinary Information and Other Financial industry Activities and Affiliations:**

**There are no legal, regulatory or disciplinary events involving AWAG. To review any and all disclosures of its principles, managers, employees and or agents please visit [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)**

AWAG and its supervised persons 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 with whom you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You may search by our firm name or by our CRD #282683.

#### Other Financial Activities and Affiliations

*Broker-Dealer Affiliation* - Certain Advisory Persons of AWAG may also be registered representatives of PKS. In an Advisory Person's separate capacity as a registered representative, the Advisory Person will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by an Advisory person of AWAG. Neither AWAG nor an Advisory Person will earn ongoing investment advisory fees in connection with any services implemented in the Advisory Person's separate capacity as a registered representative. Under supervision by PKS, PKS may have access to certain confidential information of the Client, including, but not limited to financial information,

investment objectives, transactions and holdings information. Please see our Privacy Policy, which is included with this Disclosure Brochure.

*Insurance Agency Affiliations* – Certain Advisory Persons of AWAG may serve as insurance professionals. Implementations of insurance recommendations are separate and apart from an Advisory Person's role with AWAG. 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 the Advisor or its Advisory Persons.

*Accounting and Tax Services* – Certain Advisory Persons of AWAG may also provide accounting and tax services to Clients, which may be under one's separate capacity as an accounting professional. These services are not provided by AWAG. Clients may be offered these separate services from an Advisory Person, but are under no obligation to engage for such services.

## **B. Code of Ethics, Review of Accounts, Client Referrals, and Financial Information Code of Ethics**

AWAG has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all Supervised Persons associated with AWAG. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. AWAG and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of AWAG Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code of Ethics, please contact us at (516) 833-6800.

### Personal Trading and Conflicts of Interest

AWAG allows our Supervised Persons 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 a Code of Ethics, which addresses insider trading (material nonpublic 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 AWAG or any Supervised Person of AWAG, transact in any security to the detriment of any Client. Please see Item 11 of the Disclosure Brochure for additional disclosures.

### Review of Accounts

Securities in Client accounts are monitored on a regular and continuous basis by the Chief Compliance Officer (Kevin J Hughes, 516-833-6800) of AWAG. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client. Financial planning engagements for ongoing planning support are reviewed at least annually, as per the terms of the financial planning agreement.

The Client is encouraged to notify AWAG 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.

### Other Compensation

As noted throughout this Disclosure Brochure, Advisory Persons of AWAG may also be registered representatives of PKS and/or licensed insurance professionals. For information on the conflicts of interest this presents, and how we address these conflicts, please refer to the Item 10 of the Disclosure Brochure.

#### Client Referrals from Solicitors

AWAG does not receive any compensation from any third party in connection with providing investment advisory services to its Clients.

#### Financial Information

Neither AWAG, nor its management, have any adverse financial situations that would reasonably impair the ability of AWAG to meet all obligations to its Clients. AWAG is not required to deliver a balance sheet along with this Disclosure Brochure, as AWAG does not collect fees of \$1,200 or more for services to be performed six months or more in advance.

## Privacy Policy

May 2, 2016

### Our Commitment to You

American Wealth Administration Group LLC ("AWAG" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. AWAG (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

AWAG does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, 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 Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

American Wealth Administration Group LLC  
50 Glen Street, Glen Cove, NY 11542  
Phone: (516) 833-6800 \* Fax: (516) 833-6969



### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, broker-dealers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting. AWAG shares Client information with PKS due to the oversight PKS has over certain supervised persons of the Advisor. You may also contact us at any time for a copy of the PKS Privacy Policy.	Yes	No
<b>Marketing Purposes</b> AWAG does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where AWAG or the Client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
<b>Information About Former Clients</b> AWAG 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.	No	Not Shared

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this 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.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (516) 833-6800. Please direct your questions to Kevin John Hughes, Chief Compliance Officer