



ACG Advisory Services, Inc.

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**FORM ADV PART 2
BROCHURE**

This brochure provides information about the qualifications and business practices of ACG Advisory Services, Inc. If you have any questions about the contents of this brochure, please contact us at (804) 323-1886. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about ACG Advisory Services, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for ACG Advisory Services, Inc. is 106259.

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

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ACG Advisory Services, Inc. ("ACG-AS") last updated its Form ADV on March 27, 2019. Since that time, the firm has made non-material changes to its Brochure at Items 4, 5, and 12 below regarding advisory fees, portfolio activity, and brokerage transactions/practices.

Any Questions: ACG-AS' Chief Compliance Officer, J. Saunders Wiggins, CFP, AIF, remains available to address any questions regarding this Part 2A Brochure.

Our Firm

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

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

Mr. Joseph Saunders Wiggins, "Sandy", is President of the Advisor and has been in the continuous practice of investments, wealth management, and financial counseling since 1988. Since joining as an Advisory Representative, he has served in a number of positions culminating in his current position as President and Chief Executive Officer. He not only directs the operation of the Advisor, he also serves as President for Actuarial Consulting Group, Inc., a sister company to the Advisor. Sandy is a graduate of the University of North Carolina-Greensboro Bryant School of Business and Economics, with a Bachelor of Science in Finance; and of the Virginia Commonwealth University Center for Corporate Education at the School of Business. He is a Certified Financial Planner®, an Accredited Investment Fiduciary® and a contributing author and instructor of Continuing Education seminars for CPAs.

Service Approach

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

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

To document ACG-AS Client relationships, a formal agreement is executed by the parties reflecting the services to be performed by ACG-AS, the fees for such, and the relationship of the Client to ACG-AS.

Upon acceptance of a relationship with ACG-AS, the Client agrees to open an account with a custodian designated by the Client to provide custody, trades, trade confirmations, and a regular statement of position and account activity. ACG-AS, through its technology links with the selected custodian, provides Clients with

periodic performance reports and other detailed information about ongoing activity within their accounts, including information about manager performance.

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

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

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

ACG-AS offers its full scope of services to other Advisors who are not employees of the firm. Using ACG-AS' infrastructure and services, such Advisors in turn, will provide to their investment clients ("Clients") access to ACG-AS and its services, including research, investment consultation, reporting, portfolio design, manager selection, general wealth management, pre- and post-retirement planning, information useful in harvesting gains and/or losses for tax efficiencies, and many other such services. Under this arrangement, non-employed advisors may receive compensation from ACG-AS, such as a referral fee. This compensation is discussed in the investment advisory agreement signed by the applicable client.

Referral Fees. If a client is introduced to ACG-AS by either an unaffiliated or an affiliated solicitor, ACG-AS may pay that solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, and any corresponding state securities law requirements. Any such referral fee shall be

paid solely from ACG-AS investment management fee, and shall not result in any additional charge to the client. If the client is introduced to ACG-AS by an unaffiliated solicitor, the solicitor, at the time of the solicitation, shall disclose the nature of his/her/its solicitor relationship, and shall provide each prospective client with a copy of ACG-AS' written Brochure with a copy of the written disclosure statement from the solicitor to the client disclosing the terms of the solicitation arrangement between ACG-AS and the solicitor, including the compensation to be received by solicitor from the ACG-AS.

Financial Planning and Non-Investment Consulting/Implementation Services. To the extent requested and separately engaged by a client to do so, ACG-AS can provide consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance, etc. ACG-AS does not serve as an attorney or accountant and no portion of ACG-AS's services should be construed as same. To the extent requested by a client, ACG-AS may recommend the services of other professionals for certain non-investment implementation purposes (i.e. attorneys, accountants, insurance, etc.), including representatives of ACG-AS in their separate individual capacities as licensed insurance agents. No client is under obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from ACG-AS and/or its representatives. **Please Note:** If the client engages any such recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. At all times, the engaged unaffiliated licensed professional[s] (i.e. attorney, accountant, insurance agent, etc.), and **not** ACG-AS, shall be responsible for the quality and competency of the services provided.

Conflict of Interest. The recommendation by an ACG-AS representative that a client purchase an insurance commission product from that representative in his/her separate individual capacity as an insurance agent, presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from ACG-AS representatives. Clients are reminded that they may purchase insurance products recommended by ACG-AS through non-affiliated insurance agents. **ACG-AS' Chief Compliance Officer, J. Saunders Wiggins, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest. He can be reached at (804) 323-1886.**

ACG-AS provides discretionary and non-discretionary investment advisory services. In addition, clients may elect to grant discretion to managers of separately managed accounts recommended by ACG-AS.

Non-Discretionary Service Limitations. Clients that determine to engage ACG-AS Advisory Services, Inc. on a non-discretionary investment advisory basis must be willing to accept that ACG-AS cannot effect any account transactions without obtaining prior verbal consent to any such transaction(s) from the client with the exception of placing trades when advisory fees are due. Thus, in the event that ACG-AS would like to make a transaction for a client's account, and client is unavailable, ACG-AS will be unable to effect the account transaction (as it would for its discretionary clients) without first obtaining the client's consent.

Client Obligations. In performing its services, ACG-AS shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover,

each client is advised that it remains his/her/its responsibility to promptly notify ACG-AS if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising ACG-AS's previous recommendations and/or services.

Retirement Rollovers-No Obligation/Conflict of Interest: A client or prospective client is under absolutely no obligation to engage ACG-AS as the investment adviser for his/her employer sponsored retirement account. Rather, a client can continue to self-direct his/her retirement account at his/her employer. If the client determines that he/she would like ACG-AS's assistance, ACG-AS shall charge a separate and additional advisory fee for its ongoing advisory services. The client will not incur this separate and additional advisory fee if he/she determines to continue to self-direct his/her account. As a result, any recommendation by ACG-AS that a client engage ACG-AS to manage his/her retirement account presents a conflict of interest since ACG-AS shall derive an economic benefit from such engagement. Again, a client is under absolutely no obligation to engage ACG-AS as the investment adviser for his/her retirement account. **ANY QUESTIONS: ACG-AS' Chief Compliance Officer, J. Saunders Wiggins, remains available to address any questions that a client may have regarding its prospective engagement and the corresponding conflict of interest presented by such engagement.**

Use of Mutual Funds: Most mutual funds are available directly to the public. Thus, a prospective client can obtain many of the mutual funds that may be recommended and/or utilized by ACG-AS independent of engaging ACG-AS as an investment advisor. However, if a prospective client determines to do so, he/she will not receive ACG-AS' initial and ongoing investment advisory services.

Please Note-Use of DFA Mutual Funds: ACG-AS utilizes the mutual funds issued by Dimensional Fund Advisors ("DFA"). DFA funds are generally only available through registered investment advisers approved by DFA. Thus, if the client was to terminate ACG-AS' services, and transition to another adviser who has not been approved by DFA to utilize DFA funds, restrictions regarding additional purchases of, or reallocation among other DFA funds, will generally apply. **Please Also Note:** In addition to ACG-AS' investment advisory fee described below, and transaction and/or custodial fees discussed below, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses). **ANY QUESTIONS: ACG-AS' Chief Compliance Officer, J. Saunders Wiggins, CFP, AIF, remains available to address any questions that a client or prospective client may have regarding the above, including DFA.**

Portfolio Activity. ACG-AS has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, ACG-AS will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including, but not limited to, investment performance, market conditions, fund manager tenure, style drift, account additions/withdrawals, and/or a change in the client's investment objective. Based upon these factors, there may be extended periods of time when ACG-AS determines that changes to a client's portfolio are neither necessary, nor prudent. Clients remain subject to the fees described in Item 5 below during periods of account inactivity.

DP Grow-ACG-AS shall serve as sub-adviser to DP Grow, LLC ("DP"), an affiliated SEC registered investment adviser (SEC registration pending). DP will share the same principal place of business as ACG-AS.

Use of Interval Funds - When consistent with a client's investment objectives, ACG Advisory Services may allocate investment assets to Interval Funds. Investment companies structured as interval funds are generally designed for long-term investors that do not require daily liquidity. Shares in interval funds typically do not trade on the secondary market. Instead, their shares are subject to periodic redemption offers by the fund at a price based on net asset value. Accordingly, interval funds are subject to liquidity constraints. Interval funds investing in securities of companies with smaller market capitalizations, derivatives, or securities with substantial market and/or credit risk tend to have the greatest exposure to liquidity risk. Generally, the interval funds recommended by ACG Advisory Services offer a two to three-week period, on a quarterly basis, during which the client may seek the redemption of previously purchased interval funds. Thus, if we determined that the fund is no longer performing or if a client was ever to wish to their account, the Interval Fund could not be sold or transferred immediately. Rather, sale or transfer would need to await the quarterly permitted sale date. Moreover, the eventual net asset value for the Interval Fund could be substantially different (positive or negative) than the Interval Fund value on the date that the sale was requested. There can be no assurance that any such strategy will prove profitable or successful **ANY QUESTIONS: ACG-AS' Chief Compliance Officer, J. Saunders Wiggins, remains available to address any questions that a client may have regarding these funds.**

Investment Risk. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by ACG-AS) will be profitable or equal any specific performance level(s).

Depending on the client's aggregate assets under ACG-AS management, ACG-AS may prepare periodic reports showing the Client's account activity. These reports will be provided either electronically or in bound copy form.

ACG-AS's total assets under management as of 12/31/2019 was \$763,202,281. The discretionary portion of this total was \$232,756,318 and the non-discretionary portion of this total was \$530,445,963. All figures were calculated as of 12/31/2019.

Fees and Compensation

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

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

will be fully disclosed in applicable government regulated publications.

Fee Dispersion: ACG-AS, in its sole discretion, may charge a lesser investment advisory fee, charge a flat fee, or waive its fee entirely based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, complexity of the engagement, grandfathered fee schedules, ACG-AS employees and family members, courtesy accounts, competition, negotiations with client, etc.). **Please Note:** As result of the above, similarly situated clients could pay different fees. In addition, similar advisory services may be available from other investment advisers for similar or lower fees. **ANY QUESTIONS:** ACG-AS' Chief Compliance Officer, J. Saunders Wiggins, remains available to address any questions that a client or prospective client may have regarding advisory fees.

Advisory fees are payable in arrears on a quarterly basis. ACG-AS is not compensated based on a share of capital gains or capital appreciation of funds or any portion of funds or other investments in an account. Fees are negotiable depending on a number of factors as outlined above. Accounts within a common household can be combined for fee calculation purposes.

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

Transaction Fees: Unless the client directs otherwise or an individual client's circumstances require, ACG-AS shall generally recommend that Charles Schwab & Co. Inc. ("Schwab") and/or TD Ameritrade ("TD") serve as the broker-dealer/custodian for client investment management assets. Broker-dealers such as Schwab and/or TD charge transaction fees for effecting certain types of securities transactions (including transaction fees for certain mutual funds, and mark-ups and mark-downs charged for fixed income transactions, etc.). The types of securities for which transaction fees, commissions, and/or other type fees (as well as the amount of those fees) shall differ depending upon the broker-dealer/custodian (while certain custodians do not currently charge fees on individual equity transactions, others do). In addition to ACG-AS' investment management fee, brokerage commissions and/or transaction fees, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses).

The Advisor will recommend and transact the purchase of securities to implement the Client's investment strategy. Such transactions normally involve the use of publicly registered mutual funds, exchange traded funds, fixed and fee-only variable annuities, and other professionally managed investments

ACG-AS frequently assists clients in the establishment of brokerage accounts with the Schwab Advisor

Services division of Charles Schwab & Co., Inc. (Schwab) and TD Ameritrade, and other custodians, all registered broker-dealers and members SIPC to maintain custody of clients' assets and to effect trades for their accounts. ACG-AS is an independently owned and operated business. ACG-AS is not affiliated with any custodian. These custodians provide ACG-AS with access to its institutional trading and custody services, which are typically not available to Retail investors.

These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's clients' assets is maintained in accounts at the custodial level and is not otherwise contingent upon ACG-AS committing to any custodian any specific amount of business (assets in custody or trading).

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

Accounts maintained by these custodians may be charged commissions or other transaction-based fees. These custodians also make available to ACG-AS other products and services that benefit ACG-AS, but may not directly benefit its clients' accounts. Some of these other products and services assist ACG-AS in managing and administering clients' accounts.

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

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

Investment Management Consulting Services are performed on a negotiated fee basis as mutually agreed by the Client and the Advisor. The fee will be based on an hourly rate not to exceed \$250 per hour or a percentage of assets under management. Mutual Fund Investments charge an additional fee for fund management as described in the prospectus.

Fees are based on the following fee schedule:

<u>Assets</u>	<u>Annual Cost</u>
\$0 - \$1,000,000	1.0 -1.20%
\$1,000,000 - \$5,000,000	0.60 - 1.0%
\$5,000,000 - \$10,000,000	0.50 - 0.70%
\$10,000,000 - \$25,000,000	0.30 – 0.55%
\$25,000,000 +	Negotiable

Such fees are billed quarterly in arrears on or about the first day of January, April, July and October and are based on the aggregate value of the portfolio on the last Market day of the previous calendar quarter. In certain circumstances, fees will be adjusted within the quarter for significant cash flows. Generally, fees are extracted from client accounts; however, clients may elect to be billed directly.

Financial Planning Services are subject to additional fees.

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

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

Fees for Pension Plan Consulting Services are determined on the current fee schedule of Actuarial Consulting Group, Inc. Fees earned from Investment Management Consulting Services do not offset Pension Plan Consulting Services, or vice versa. Fees are billed coincident with the performance of services rendered. Pension Plan Consulting Services can be terminated by the Client upon 30 days written notice to the Advisor. An appropriate refund of unearned fees will be refunded to the Client upon termination.

Performance-Based Fees and Side-By-Side Management

Form ADV Part 2A, Item 6

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

Types of Clients

Form ADV Part 2A, Item 7

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

ACG-AS also provides investment supervisory services, manages investment advisory accounts and holds itself out as providing retirement consulting, financial planning, wealth management or some similarly termed services.

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

Some accounts provided through the special programs at Charles Schwab Advisor Services and TD Ameritrade have required minimums.

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

Methods of Analysis, Investment Strategies and Risk of Loss

Form ADV Part 2A, Item 8

To facilitate searches for the best investment services available (without regard to geography), ACG-AS relies on database information for money managers offering investment products. ACG-AS receives qualitative and quantitative information on the money manager through electronic interfaces with independent third-party information sources. These databases are subject to Global Investment Performance Standards (GIPS) compliance requirements to ensure accuracy and provide comprehensive representation of the money management industry and ACG-AS accepts this data without further verification.

ACG-AS conducts money manager searches on a style-by-style basis. Each search begins by identifying the most appropriate universe of managers to screen and by following detailed search criteria.

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

- Investment Philosophy and Strategy

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

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

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

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

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

ACG-AS reviews investment managers of separately managed accounts for investment process, personnel experience, information systems used, operational organization and ownership structure, as well as all the other factors mentioned earlier in this brochure.

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

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

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

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

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

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

The Advisor can recommend and transact the purchase of securities to implement the Client's investment strategy. Such transactions normally involve the use of publicly registered mutual funds, fixed and variable annuities, and other professionally managed investments.

Disciplinary Information

Form ADV Part 2A, Item 9

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

Other Financial Industry Activities and Affiliations

Form ADV Part 2A, Item 10

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

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

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

ACG-AS maintains relationships with various Advisors who are registered as investment advisors. Such Advisors utilize services provided by ACG-AS to assist their Clients in asset allocation modeling, asset selection, consolidated reporting, as well as gaining access to investment managers who might otherwise be unavailable to such Clients. Clients are made aware of this relationship at the time they enter into any agreement with ACG-AS and such outside Advisors.

For more information on services offered by, and fees charged by such Advisors, Clients should review all such Advisors' form ADV Part 2.

The Advisor is a member of the Schwab Advisor Services Financial Group of Investment Advisors of San Francisco, CA. The Advisor recommends the use of Schwab Advisor Services products and services directly to clients where appropriate as determined during the planning process.

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

The Advisor is a member of the TD Ameritrade Institutional Advisor Group through an agreement with TD Ameritrade, Inc. of Bellevue, NE. The Advisor recommends the use of TD Ameritrade Institutional products and services directly to clients where appropriate as determined during the planning process.

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

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

Conflict of Interest: As indicated above, representatives of ACG-AS, in their separate individual capacities, serve as licensed insurance agents. The recommendation by an ACG-AS representative that a client purchase an insurance commission product from that representative in his/her separate individual capacity as an insurance agent (or from an unaffiliated insurance agency or agent in return for a portion of the commission), presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from ACG-AS representatives. Clients are reminded that they may purchase insurance products recommended by ACG-AS through non-affiliated insurance agents.

ACG-AS' Chief Compliance Officer, J. Saunders Wiggins, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest. He can be reached at (804) 323-1886.

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

Form ADV Part 2A, Item 11

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

The Advisor, or a related person, can purchase or sell the same publicly traded mutual funds or variable annuities for its own account.

Since the purchase or sale of such investments does not affect its market value, the Client is not advised of these transactions.

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

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

Brokerage Practices

Form ADV Part 2A, Item 12

ACG-AS does not maintain custody of your assets. Your assets must be maintained in an account at a “qualified custodian”, generally a broker-dealer or bank. In the event that the client requests that the ACG-AS recommend a broker-dealer/custodian for execution and/or custodial services (exclusive of those clients that may direct ACG-AS to use a specific broker-dealer/custodian), ACG-AS generally recommends that investment management accounts generally be maintained at Schwab or TD Ameritrade. We are independently owned and operated and not affiliated with Schwab, TD Ameritrade or any broker-dealer. Prior to engaging ACG-AS to provide investment management services, the client will be required to enter into a formal Investment Advisory Agreement with ACG-AS setting forth the terms and conditions under which ACG-AS shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.

Factors that the ACG-AS considers in recommending Schwab (or any other broker-dealer/custodian to clients) include historical relationship with the ACG-AS, financial strength, reputation, execution capabilities, pricing, research, and service. Although the commissions and/or transaction fees paid by ACG-AS's clients shall comply with the ACG-AS's duty to obtain best execution, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where the ACG-AS determines, in good faith, that the commission/transaction fee is reasonable. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although ACG-AS will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. The brokerage commissions or transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, ACG-AS's investment management fee. The ACG-AS's best execution responsibility is qualified if securities that it purchases for client accounts are mutual funds that trade at net asset value as determined at the daily market close.

Research and Additional Benefits. Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, ACG-AS may receive from Schwab and/or TD Ameritrade (or another broker-dealer/custodian, investment manager, platform or fund sponsor or vendor) without cost (and/or at a discount) support services and/or products, certain of which assist the ACG-AS to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by the ACG-AS may be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by ACG-AS in furtherance of its investment advisory business operations.

As indicated above, certain of the support services and/or products that may be received may assist the ACG-AS in managing and administering client accounts. Others do not directly provide such assistance, but rather assist the ACG-AS to manage and further develop its business enterprise.

ACG-AS's clients do not pay more for investment transactions effected and/or assets maintained at Schwab and/or TD Ameritrade as a result of this arrangement. There is no corresponding commitment made by the ACG-AS to Schwab and/or TD Ameritrade or any other any entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangement.

ACG-AS's Chief Compliance Officer, J. Saunders Wiggins, remains available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding conflict of interests presented by such arrangements. He can be reached at (804) 323-1886.

Directed Brokerage. ACG-AS recommends that its clients utilize the brokerage and custodial services provided by Schwab and/or TD Ameritrade. The Firm generally does not accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer/custodian). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and Firm will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by ACG-AS. As a result, a client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. **Please Note:** In the event that the client directs ACG-AS to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through ACG-AS. Higher transaction costs adversely impact account performance. **Please Also Note:** Transactions for directed accounts will generally be executed following the execution of portfolio transactions for non-directed accounts.

Order Aggregation. Transactions for each client account generally will be effected independently, unless Firm decides to purchase or sell the same securities for several clients at approximately the same time. Firm may (but is not obligated to) combine or "bunch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among Firm's clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. Firm shall not receive any additional compensation or remuneration as the result of such aggregation.

Review of Accounts

Form ADV Part 2A, Item 13

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

Depending upon the term of the client agreement, certain clients receive in writing monthly and/or quarterly progress reviews that relate manager performance to pre-determined objectives.

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

Client Referrals and Other Compensation

Form ADV Part 2A, Item 14

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

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

The Advisor receives an economic benefit from the Custodians in the form of support and services they make available to the Advisor and other independent investment advisors that have their clients maintain accounts with them. These resources, how they benefit the Advisor, and the related conflicts of interest are described above (*see Item 12 – Brokerage practices*). The availability of these benefits is not based on the Advisor giving particular investment advice, such as buying particular securities for clients.

Custody

Form ADV Part 2A, Item 15

ACG Advisory Services, Inc. does not hold custody of client funds. However, under government regulation, we are deemed to have custody of your assets if you authorize us to instruct the custodian to deduct our advisory fees directly from your account. The custodian maintains actual custody of your assets, Clients receive reports directly from their custodian at least quarterly. They will be sent to the email or postal mailing address you provided to the custodian. You should carefully review all statements promptly when you receive them. We also urge you to compare the custodian's statements to the periodic reports you might receive from ACG-AS. The custodian does not verify the accuracy of the ACG-AS fee calculation.

Investment Discretion

Form ADV Part 2A, Item 16

ACG-AS provides both discretionary and non-discretionary investment consulting services. In both instances, the client executes a written agreement specifying the scope of services to be provided. Clients may revoke this authority at any time or place restrictions on specific securities/industries to be bought or sold.

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

Voting Client Securities

Form ADV Part 2A, Item 17

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

Financial Information

Form ADV Part 2A, Item 18

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

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

Additional Information

Form ADV Part 2A, Item 18

If Advisor makes a trade error in submitting a trade order on the Clients behalf, Advisor will place a correcting trade with the broker-dealer which has custody of the Client account. If an investment gain results from the correcting trade, the gain will remain in the Client account unless the same error involved other Client account(s) that should have received the gain, it is not permissible for the Client to retain the gain. The Advisor will confer with the Client and the Client will decide to forego the gain (e.g. due to tax reasons). If the gain does not remain in Client account and Charles Schwab & Co. Inc. ("Schwab") is the custodian, Schwab will donate the amount of any gain \$100 and over to charity.

If a loss occurs greater than \$100, Advisor will pay for the loss. Schwab will maintain the loss or gain (if such gain is not retained in Client account) if it is under \$100 to minimize and offset its administrative time and expense. If related trade errors result in both gains and losses, they will be netted. Other custodians utilized by the Client will have similar trade correction policies.

ACG-AS's Chief Compliance Officer, J. Saunders Wiggins, remains available to address any questions regarding this Part 2A. He can be reached at (804) 323-1886.

Summary of Material Changes

ACG Advisory Services Inc.'s Brochure has had no material changes since the last annual update of our brochure on 03/27/2019.

Privacy Policy

ACG Advisory Services, Inc. (referred to as “ACG”) maintains physical, electronic, and procedural safeguards that comply with federal standards to protect its clients’ nonpublic personal information (“information”). Through this policy and its underlying procedures, ACG attempts to secure the confidentiality of customer records and information and protect against anticipated threats or hazards to the security or integrity of customer records and information.

It is the policy of ACG to restrict access to all current and former clients’ information (i.e., information and records pertaining to personal background, investment objectives, financial situation, tax information/returns, investment holdings, account numbers, account balances, etc.) to those employees and affiliated/nonaffiliated entities who need to know that information in order to provide products or services in furtherance of the client’s engagement of ACG. In that regard, ACG may disclose the client’s information: (1) to individuals and/or entities not affiliated with ACG, including, but not limited to the client’s other professional advisors and/or certain service providers that may be recommended or engaged by ACG in furtherance of the client’s engagement of ACG (i.e., attorney, accountant, insurance agent, broker-dealer, investment adviser, account custodian, record keeper, etc.); (2) required to do so by judicial or regulatory process; or (3) otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations. The disclosure of information contained in any document completed by the client for processing and/or transmittal by ACG to facilitate the commencement/continuation/termination of a business relationship between the client and/or between ACG and a nonaffiliated third party service provider (i.e., broker-dealer, investment adviser, account custodian, record keeper, insurance company, etc.), including, but not limited to, information contained in any document completed and/or executed by the client in furtherance of the client’s engagement of ACG (i.e., advisory agreement, client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding nonaffiliated third party service provider.

ACG shares office space with the law firm of Obenshain Hinnant, LLC and Hunter Michael Investment Advisors, Inc. both of which provide services to certain ACG clients. Safeguards have been implemented to protect the client information and files that are not common to either of these firms.

ACG permits only authorized employees and affiliates who have signed a copy of ACG’s Privacy Policy to have access to client information. Employees violating ACG’s Privacy Policy will be subject to ACG’s disciplinary process. Additionally, whenever ACG hires other organizations to provide services to ACG’s clients, ACG will require them to sign confidentiality agreements and/or the Privacy Policy.

Should you have any questions regarding the above, please contact J. Saunders Wiggins, Chief Compliance Officer, at (804) 323-1886.

PART 2B of Form ADV: Brochure Supplement

Item 1 – Cover Page Part 2B of Form ADV: Brochure Supplement

ACG ADVISORY SERVICES, INC.
1640 Huguenot Road, Midlothian, VA 23113
(804) 323-1886
www.acgworldwide.com



☐ ~ Joseph Saunders Wiggins, CFP®, AIF®

☐ Robert M. Moyer, CFA, CAIA, CFP®

☐ James D. Pickert, CFA, CRPS®

Joné E. Liuzza

Faron S. Miller, Sr., CFP®

☐ (Investment Committee Member of ACG Advisory Services, Inc.)

~ (Managing Member)

This brochure supplement provides information on our personnel listed above and supplements the ADV Brochure. You should have also received a copy of the ADV Brochure.

Additionally, a Summary of Professional Designations is included with the Part 2B Brochure Supplement. The list is provided to assist you in evaluating the professional designations our investment professionals hold.

If you have not received our firm's ADV Brochure, have any questions about the professional designations or the content of the supplement, please contact ACG Advisory Services, Inc. at (804) 323-1886.

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



Joseph Saunders Wiggins, CFP®, AIF®

President

Chief Executive Officer

Item 2 – Educational Background and Business Experience

Year of Birth: 1965

Designations:

- CFP® (Certified Financial Planner)
- AIF® (Accredited Investment Fiduciary)
- Contributing author and instructor of Continuing Education seminars for CPAs

Education:

- University of North Carolina-Greensboro Bryant School of Business and Economics, BS Finance, 1988
- Virginia Commonwealth University Center for Corporate Education at the School of Business, as well as the Center of Fiduciary Studies in association with the University of Pittsburgh-Katz Graduate School of Business

Business Background:

- ACG Advisory Services, Inc., President and CEO, 01/1998 to present
- Actuarial Consulting Group, Inc., President, 01/1998 to present
- Actuarial Consulting Group, Inc., Consultant, 06/1988 to present

Item 3 – Disciplinary Information

There are no past, current, or pending legal or disciplinary events against Joseph Saunders Wiggins by any court, government agency or industry self-regulatory agency. Clients and prospective clients can view the CRD Record (registration records) for Joseph Saunders Wiggins through the SEC's Investment Adviser Public Disclosure (IAPD) website at www.adviserinfo.sec.gov, or FINRA's Broker Check database online at www.finra.org/brokercheck. The CRD number for Joseph Saunders Wiggins is #1883058.

Item 4 – Other Business Activity

Joseph Saunders Wiggins is a shareholder of both Actuarial Consulting Group, Inc. and ACG Advisory Services, Inc. and has been President of both firms since 1998. He leads the management team for both firms and provides comprehensive wealth management, investment advisory and qualified plan consulting services for ACG Advisory Services and Actuarial Consulting Group, Inc. These services are investment related activities and are performed during trading hours. Joseph Saunders Wiggins is a board member of the Cameron Gallagher Foundation. He joined the foundation in January 2014. The Cameron Gallagher

Foundation is a non-profit 501c(3) organization that promotes the awareness of teen depression and anxiety. This is not an investment related activity and is not performed during trading hours and takes approximately 2 hours of time per month.

Item 5 – Additional Compensation

Joseph Saunders Wiggins is an Investment Advisor (IA) Representative of the firm. He also provides Group Annuity consulting and sales for Qualified Retirement Plans. He has held a Life and Health Insurance License since 1988 and develops and manages client insurance strategies. As an IA Representative and independent insurance consultant and agent, he is permitted to sell these products to Advisory Clients. When such recommendations or sales are made, a conflict of interest exists as Joseph Saunders Wiggins may earn commissions for the sale of those products, which may create an incentive to recommend such products. He is required to disclose this conflict of interest when such recommendations are made and also to disclose that advisory clients may purchase recommended insurance products from other insurance agents not affiliated with ACG Advisory Services, Inc.

Item 6 – Supervision

Joseph Saunders Wiggins is the Managing Member of ACG Advisory Services, Inc. as disclosed on the cover page. You may contact the Managing Member at 804-323-1886.



Robert M. Moyer, CFA, CAIA, CFP®

Chief Investment Officer

Item 2 – Educational Background and Business Experience

Year of Birth: 1981

Designations:

- CFP® (Certified Financial Planner)
- CFA (Chartered Financial Analyst)
- CAIA (Chartered Alternative Investment Analyst)

Education:

- James Madison University, BS in Kinesiology with a concentration in Sports Management and a Minor in Business, 2004
- Virginia Commonwealth University Center for Corporate Education at the School of Business, 2008

Business Background:

- ACG Advisory Services, Inc., Senior Portfolio Manager and Director of Research, 01/2007 to present
- First Market Bank, Financial Service Advisor, 03/2006 to 01/2007

Item 3 – Disciplinary Information

There are no past, current, or pending legal or disciplinary events against Robert M. Moyer by any court, government agency or industry self-regulatory agency. Clients and prospective clients can view the CRD Record (registration records) for Robert M. Moyer through the SEC's Investment Adviser Public Disclosure (IAPD) website at www.adviserinfo.sec.gov, or FINRA's Broker Check database online at www.finra.org/brokercheck. The CRD number for Robert M. Moyer is #5339178.

Item 4 – Other Business Activity

Robert M. Moyer is currently not actively engaged in any other investment related business or occupation.

Item 5 – Additional Compensation

Robert M. Moyer is an Investment Advisor (IA) Representative of the firm. He receives compensation for providing advisory services solely from his responsibilities at ACG Advisory Services, Inc. and from no other source.

Item 6 – Supervision

Robert M. Moyer reports directly to the ACG Advisory Services, Inc. Managing Member as disclosed on the cover page. You may contact the Managing Member at 804-323-1886.



James D. Pickert, CFA, CRPS®

Portfolio Manager

Item 2 – Educational Background and Business Experience

Year of Birth: 1990

Designations:

- CFA (Chartered Financial Analyst)
- CRPS® (Certified Retirement Plan Specialist)

Education:

- Wake Forest University School of Business, M.S. in Management, 2013
- Furman University, B.A. in Political Science, 2012

Business Background:

- ACG Advisory Services, Inc., Portfolio Manager, 12/2016 to present
- ACG Advisory Services, Inc., Junior Investment Analyst, 12/2014 to 12/2016
- Merrill Lynch, Inc., Financial Advisor, 03/2014 to 11/2014
- CNL Financial Group, Inc., Financial Analyst, 05/2013 to 12/2013

Item 3 – Disciplinary Information

There are no past, current, or pending legal or disciplinary events against James D. Pickert by any court, government agency or industry self-regulatory agency. Clients and prospective clients can view the CRD Record (registration records) for James D. Pickert through the SEC's Investment Adviser Public Disclosure (IAPD) website at www.adviserinfo.sec.gov, or FINRA's Broker Check database online at www.finra.org/brokercheck. The CRD number for James D. Pickert is #6315960.

Item 4 – Other Business Activity

James D. Pickert is not currently engaged in any other investment related business or occupation.

Item 5 – Additional Compensation

James Pickert is an Investment Advisor (IA) Representative of the firm. He receives compensation for providing advisory services solely from his responsibilities at ACG Advisory Services, Inc. and from no other source.

Item 6 – Supervision

James D. Pickert reports directly to Robert Moyer, who may be reached at 804-323-1886.



Faron S. Miller, Sr., CFP®

Retirement Plan Advisor

Item 2 – Educational Background and Business Experience

Year of Birth: 1970

Designations:

- CFP® (Certified Financial Planner)

Education:

- Virginia Commonwealth University, BS in Business with a concentration in Small Business Management, 1995

Business Background:

- ACG Advisory Services, Inc., Retirement Plan Consultant, 11/2019 to present
- TD Ameritrade/Scottrade, Senior Financial Consultant, 05/2014 to 11/2019
- Infinex Investments, Inc., Financial Advisor, 04/2013 to 05/2014
- Amerivest Investment Management, LLC, Senior Financial Consultant, 01/2011 to 02/2013
- Edward Jones, Financial Advisor, 08/2009 to 01/2011

Item 3 – Disciplinary Information

There are no past, current, or pending legal or disciplinary events against Faron S. Miller, Sr. by any court, government agency or industry self-regulatory agency. Clients and prospective clients can view the CRD Record (registration records) for Faron S. Miller, Sr. through the SEC's Investment Adviser Public Disclosure (IAPD) website at www.adviserinfo.sec.gov, or FINRA's Broker Check database online at www.finra.org/brokercheck. The CRD number for Faron S. Miller, Sr. is #4078974.

Item 4 – Other Business Activity

Faron S. Miller, Sr. is not actively engaged in any other investment related business or occupation.

Item 5 – Additional Compensation

Faron S. Miller, Sr. is an Investment Advisor (IA) Representative of the firm. He receives compensation for providing advisory services solely from his responsibilities at ACG Advisory Services, Inc. and from no other source.

Item 6 – Supervision

Faron S. Miller reports directly to Robert Moyer, who may be reached at 804-323-1886.



Joné E. Liuzza, ERPA, QPA, QKA

Consultant

Item 2 – Educational Background and Business Experience

Year of Birth: 1970

Designations:

- Qualified 401(k) Administrator (QKA)
- Qualified Pension Administrator (QPA)
- Enrolled Retirement Plan Agent (ERPA)

Education:

- Loyola University New Orleans, BS in Organizational Development 2004

Business Background:

- Actuarial Consulting Group, Inc. 4/4/2011 to present
- Becker, Suffern & McLanahan, 05/01/2000 to 11/30/2010

Item 3 – Disciplinary Information

There are no past, current, or pending legal or disciplinary events against Joné E. Liuzza by any court, government agency or industry self-regulatory agency. Clients and prospective clients can view the CRD Record (registration records) for Joné Liuzza. through the SEC's Investment Adviser Public Disclosure (IAPD) website at www.adviserinfo.sec.gov, or FINRA's Broker Check database online at www.finra.org/brokercheck . The CRD number for Joné Liuzza is #7021327.

Item 4 – Other Business Activity

Joné E. Liuzza is currently not actively engaged in any other investment related business or occupation

Item 5 – Additional Compensation

Joné E. Liuzza receives compensation for providing retirement plan consulting for ACG Advisory Services, Inc., Actuarial Consulting Group, Inc. and from no other source. She is also an Investment Advisor (IA) Representative of ACG Advisory Services, Inc and provides retirement plan consulting for Actuarial Consulting Group.

Item 6 – Supervision

Joné E. Liuzza reports directly to the ACG Advisory Services, Inc. Managing Member as disclosed on the cover page. You may contact the Managing Member at 804-323-1886.

SUMMARY OF PROFESSIONAL DESIGNATIONS

This summary of Professional Designations is provided to assist you to evaluate the professional designations and minimum requirements of our investment professionals to hold these designations.

“Professional Designations” may also be helpful and can be found on the FINRA website at:

<http://www.finra.org/investors/professional-designations>.

AIF® - Accredited Investment Fiduciary

This designation is issued by the Center for Fiduciary Studies in association with The University of Pittsburgh Graduate School of Business and is granted to individuals who complete an AIF® Certification Exam and attest to compliance of the Code of Ethics. Once issued, the candidate is required to complete 6 hours of continuing education annually.

CAP® - Chartered Advisor in Philanthropy

This designation is accredited by the Middle States Commission on Higher Education and is issued by The American College. Candidates must meet all of the following requirements:

- Candidates must be engaged in the following professional activities three of the five years immediately preceding the application.
 - Advising individuals or charitable organizations in wealth and estate planning, financial planning, charitable planning, planned giving, nonprofit or foundation management or services, investment management of charitable assets or account; or
 - Employed in the nonprofit sector in a capacity related to nonprofit management, development, planned giving or fundraising.

They must also complete three graduate level courses, equivalent of 9 semester credit hours. Final closed-book, proctored exam for each course is required. Once issued, the candidate is to complete 15 hours every 2 years of continuing education.

CFA® - Chartered Financial Analyst

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals. There are currently more than 107,000 CFA charterholders working in 135 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards - The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:

- Place their clients’ interests ahead of their own

- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition - Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders—often making the charter a prerequisite for employment. Additionally, regulatory bodies in 23 countries/territories recognize the CFA charter as a proxy for meeting certain licensing requirements, 3135 and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge - The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning. The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit www.cfainstitute.org.

CFP® - Certified Financial Planner

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 68,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally

accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

CAIA® - Chartered Alternative Investment Analyst

The CAIA Charter, recognized globally, is administered by the Chartered Alternative Investment Analyst Association and requires a comprehensive understanding of core and advanced concepts regarding alternative investments, structures, and ethical obligations. To qualify for the CAIA Charter, finance professionals must complete a self-directed, comprehensive course of study on risk-return attributes of institutional quality alternative assets; pass both the Level I and Level II CAIA examinations at global, proctored testing centers; attest annually to the terms of the Member Agreement; and hold a US bachelor's degree (or equivalent) plus have at least one year of professional experience or have four years of professional experience. Professional experience includes full-time employment in a professional capacity within the regulatory, banking, financial, or related fields. Once a qualified candidate completes the CAIA program, he or she may apply for CAIA membership and the right to use the CAIA designation, providing an opportunity to access ongoing educational opportunities.

CRPS® - Certified Retirement Plan Specialist

Individuals who hold the CRPS® designation have completed a course of study encompassing design, installation, maintenance, and administration of retirement plans. The program is designed for

approximately 120-150 hours of self-study. The program is self-paced and must be completed within one year from enrollment.

QKA - Qualified 401(k) Administrator

The QKA credential is the national standard for all professionals working with 401(k) retirement plans. Attaining the QKA credential illustrates commitment to the profession and competence in DC plan administration.

QPA - Qualified Pension Administrator

The QPA credential expands on conceptual retirement knowledge and encompasses technical administration, compliance, and reporting functions for all types of qualified plans. With the QPA credential you will master both defined contribution and defined benefit retirement plans.

ERPA – Enrolled Retirement Plan Agent

The Enrolled Retirement Plan Agent (ERPA) is a classification of professionals allowed to practice before the IRS. The IRS recognizes that retirement plan professionals are highly competent in their field and play an active, critical role in representing employers before the IRS on retirement plan matters. The ERPA designation is issued and maintained by the IRS through the IRS Office of Professional Responsibility. To earn the ERPA designation, individuals must successfully complete a two-part ERPA Special Enrollment Examination as well as tax compliance and background checks.