



Domus Capital Group, LLC

Firm Brochure- FORM ADV Part 2A

Version Date March 31, 2020

Item 1 Cover Page

This brochure provides information about the qualifications and business practices of Domus Capital Group, LLC. If you have any questions about the contents of this brochure, please contact us by telephone at (805) 476-7999 or email admin@domuscapgroup.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Additional information about Domus Capital Group, LLC also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number 165076 or SEC registration number 801-76991.

Please note that the use of the term "registered investment adviser" and description of Domus Capital Group, LLC and/or our associates as "registered" does not imply a certain level of skill or training. You are encouraged to review this brochure and brochure supplements for our firm's associates who advise you for more information on the qualifications of our firm and our employees.

6639 Bay Laurel Drive, Suite B
Avila Beach, CA 93424
Telephone: 805-476-7999
admin@domuscapgroup.com
www.domuscapgroup.com

Item 2 Material Changes

This item discusses only specific material changes made to our previous FORM ADV 2A Brochure dated March 2019

- Christopher Bleuher has taken on the responsibility of Chief Compliance Officer

Pursuant to new SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent Form ADV 2A Brochures within 120 days of the close of our business fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

Item 3 Table of Contents

Contents

Item 2 Material Changes	2
Item 3 Table of Contents.....	3
Item 4 Advisory Business.....	5
A. Description of the Advisory Firm:.....	5
B. Types of Advisory Services:.....	6
C. Restrictions on Investments for Clients:.....	8
D. Participation in Wrap Fee Programs.	9
E. Discretionary and Nondiscretionary Assets:.....	10
F. Type of Clients:	10
G. Internet Presence:	11
H. Physical Office Locations:.....	11
Item 5 Fees and Compensation.....	12
A. Investment Advisory Fees and Compensation:.....	12
B. Forms of Billing:	13
C. Additional Fees and Expenses:.....	14
D. Reimbursement of Fees:	15
E. Compensation for the Sale of Securities or Other Investment Products:	15
Item 6: Performance-Based Fees and Side-By-Side Management	16
Item 7: Types of Clients & Account Requirements	16
Item 8: Methods of Analysis, Investment Strategies & Risk of Loss	17
A. Methods of Analysis:.....	17
(i) Fundamental Analysis:	17
(ii) Technical Analysis:	17
(iii) Cyclical Analysis:	17
(iv) Asset Allocation:	18
(v) Mutual Fund and/or ETF Analysis:	18
(vi) Third-Party Money Manager Analysis:	18
(vii) Accurate Information:	19
B. Investment Strategies We May Use:.....	19
C. Risk of Loss:.....	19

D. Market Risks:.....	19
E. Regulatory Risks:	22
F. Security Specific Risks:.....	22
Item 9: Disciplinary Information.....	23
Item 10: Other Financial Industry Activities & Affiliations.....	24
A. Other Affiliations:	24
Item 11: Code of Ethics, Participation or Interest in Client Transactions & Personal Trading.....	25
A. Code of Ethics:.....	25
B. Employee Transactions:.....	25
C. Aggregation of Client Transactions:.....	26
Item 12: Brokerage Practices	27
A. Broker Selection Factors:	27
B. Research and Other Soft Dollar Benefits:.....	27
C. Other Non-Soft Dollar Benefits:	28
D. Brokerage Commissions and Transaction Fees:.....	30
E. Concurrent Authorizations:.....	31
Item 13: Review of Accounts or Financial Plans.....	32
Item 14: Client Referrals & Other Compensation.....	33
Item 15: Custody.....	34
Item 16: Investment Discretion.....	35
Item 17: Voting Client Securities.....	35
Item 18: Financial Information	36

Item 4 Advisory Business

A. Description of the Advisory Firm:

Domus Capital Group LLC (referred to hereinafter as "DCG") provides individuals and other types of Clients with a variety of investment advisory services. The Firm is a limited liability company formed in the State of Delaware. The Firm has been in business as an investment adviser since November 9, 2012.

Christopher J. Bleuher is DCG's sole principal owner (i.e., those individuals owning 25% or more of the Firm) and serves as the firm's Managing Member.

As discussed in more detail below, DCG adheres to an investment approach that focuses on long- term strategic asset allocation versus short-term tactical asset allocation and market timing.

Generally, DCG employs a more passive buy and hold approach, versus an active trading approach. DCG generally invests in broad-based, passively-oriented mutual fund, exchange-traded fund ("ETF"), and alternative investment vehicles, versus investing directly in individual stocks and bonds. DCG may recommend "no-load" funds to Clients from time-to-time.

All clients, regardless of investment strategy, can impose reasonable restrictions, at any time, on the types of investments to be held in their portfolios. Restrictions may be based on a company, security, industry sector, asset class, or any other restriction you request.

You must, however, notify us in writing of any such investment restrictions or changes to such restrictions.

DCG conducts an annual account review with each Client; however, Clients are advised that it is your responsibility to promptly notify DCG in writing if there are ever any changes to your financial situation, goals, needs or investment objectives, so that DCG may review, evaluate and/or revise its previous recommendations and/or the services currently provided.

In performing our services, DCG is not required to verify independently any information received from the Client or the Client's other professionals, and your engagement of DCG's services constitutes your express authorization for DCG to rely on such information without verification.

Clients have the option to purchase investment products recommended by DCG through other brokers or agents not affiliated with DCG.

B. Types of Advisory Services:

(i) Comprehensive Portfolio Management:

Our comprehensive portfolio management service encompasses asset management as well as providing financial planning/financial consulting to Clients. It is designed to assist Clients in meeting their financial goals through the use of financial investments. During the account opening process, we conduct at least one, but sometimes more than one meeting (in person if possible, otherwise via telephone or video conference) with Clients in order to understand their current financial situation, existing resources, financial, goals, and tolerance for risk. Based on what we learn; we propose an investment approach to the Client. We may propose an investment portfolio consisting of exchange traded funds (“ETFs”), mutual funds, individual stocks or bonds, hedge funds, private equity, or other securities. Upon the Client’s agreement to the proposed investment plan, we work with the Client to establish or transfer existing investment accounts (if any) so that we can manage the Client’s portfolio. Once the relevant accounts are under our management, we request reviews with the clients on a regular basis, at least quarterly. These meetings maybe be in person, by video conference, or by telephone. At a minimum client receive quarterly reports through the client portal. We may periodically rebalance or adjust Client accounts under our management. If the Client experiences any significant changes to his/her financial or personal circumstances, the Client must notify us in writing so that we can consider such information in managing the Client’s investments.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. The ETFs in which DCG invests may not be able to replicate exactly the performance of the indices they track due to transactions costs and other expenses of the ETFs. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

We may utilize independent money managers, where we may design an investment portfolio and provide ongoing corresponding comprehensive portfolio management services on a fee-only basis for a percentage of assets in conjunction with another investment advisory firm. Before selecting other advisers, we make sure that the other advisers are properly licensed or registered.

(ii) Financial Planning & Consulting:

We provide a variety of financial planning and consulting services to individuals, families and other Clients regarding the management of their financial resources based upon an analysis of the Client’s current situation, goals, and objectives. Generally, such financial planning services

will involve preparing a financial plan or rendering a financial consultation for Clients based on the Client's financial goals and objectives.

Our written financial plans or financial consultations rendered to Clients usually include general recommendations for a course of activity or specific actions to be taken by the Clients. For example, recommendations may be made that the Clients begin or revise investment programs, create or update wills or trusts, obtain or update insurance coverage, commence or alter retirement savings, or establish education or charitable giving programs. Any legal or tax suggestions provided to Client will be for informational purposes only. Each Client should consult with the Client's third-party legal and tax professionals to determine whether any referenced legal or tax suggestions may be applicable to his or her situation. We will refer Clients to an accountant, attorney or other specialist, as necessary for all legal and/or tax advisory related services. For written financial planning engagements, we provide our Clients with a written summary of their financial situation, observations, and recommendations. For financial consulting engagements, we usually do not provide our Clients with a written summary of our observations and recommendations as the process is less formal than our planning service. Plans or consultations are typically completed within sixty (60) days of the Client signing a contract with us, assuming that all the information and documents we request from the Client are provided to us promptly. Implementation of the recommendations will be at the discretion of the Client.

Financial planning may be the only service provided to the Client and does not require that the Client use or purchase the investment advisory services offered by the Firm or any of the insurance products or other products and services offered by the associated persons of the Firm. There is an inherent conflict of interest for the Firm whenever a financial plan recommends use of professional investment management services, or the purchase of insurance products or other financial products or services.

Representatives of the Firm are insurance agents. The Firm or its associated persons may receive compensation for financial planning and the provision of investment management services and/or the sale of insurance and other products and services. The Firm does not make any representation that these products and services are offered at the lowest available cost and the Client may be able to obtain the same products or services at a lower cost from other providers. However, the Client is under no obligation to accept any of the recommendations of the Firm or use the services of the Firm in particular.

(iii) Pension Consulting:

We provide pension consulting services to employer plan sponsors on an ongoing basis. Generally, such pension consulting services consist of assisting employer plan sponsors in establishing, monitoring and reviewing their company's participant-directed retirement plan. As the needs of the plan sponsor dictate, areas of advising could include investment options, plan structure and participant education.

DCG does not have the discretion over the plan assets; advice is provided to the plan in the form of recommendations to the trustees or plan sponsor. DCG's role may be as an advisor or consultant to the plan trustees. The consulting services provided are limited to those assets specifically identified in the Client agreement.

All pension consulting services shall follow the applicable state law(s) regulating pension consulting services. This applies to Client accounts that are pension or other employee benefit plans (a "Plan") governed by the Employee Retirement Income Security Act of 1974, as amended ("ERISA").

(iv) Separately Managed Accounts via Third Party Advisor:

In certain circumstances, we provide Clients with a list of investment advisory services of third-party professional portfolio management firms for the individual management of all or a portion of a Client's accounts. As part of this process, we assist Clients in identifying an appropriate third-party money manager. We provide initial due diligence on third party money managers and ongoing reviews of their management of your account, if applicable.

In order to assist Clients in the selection of a third-party money manager, we typically gather information from the Client about their financial situation, investment objectives, and reasonable restrictions they can impose on the management of the account, which are often very limited. It is important to note that we do not offer advice on any specific securities or other investments in connection with this service. Investment advice and trading of securities for separately managed portions of a Client's portfolio is offered only by or through the third-party money manager(s) to Clients.

We periodically review third party money managers' reports provided to the Client, but no less often than on an annual basis. Our associates contact the Client from time to time, as agreed to with the Client, in order to review their financial situation and objectives; communicate information to third party money managers as warranted; and, assist the Client in understanding and evaluating the services provided by any third-party money manager. The Client will be expected to notify us of any changes in his/her financial situation, investment objectives, or account restrictions that could affect their account. The Client may also directly contact the third-party money manager managing the account or sponsoring the program.

C. Restrictions on Investments for Clients:

(i) Individual Tailoring of Advice to Clients:

We offer individualized investment advice to Clients utilizing the comprehensive portfolio management services offered by DCG. Additionally, we offer general investment advice to Clients utilizing additional services, including financial planning and consulting, pension consulting, and referrals to third party money managers.

(ii) Ability of Clients to Impose Restrictions on Investing in Certain Securities or Types of Securities:

Each Client can place reasonable restrictions on the types of investments to be made on their behalf. Restrictions on investments in certain securities or types of securities may not be possible due to the level of difficulty this would entail in managing the account. DCG reserves the right to not accept, or to terminate an account, if DCG believes the restrictions imposed are not reasonable or prohibit effective

management of the account. DCG is not obligated to implement other investment selections if it believes such investments are inconsistent with a Client's risk tolerance or DCG's management approach and criteria.

D. Participation in Wrap Fee Programs.

We do not offer wrap fee programs.

E. Discretionary and Nondiscretionary Assets:

DCG has the following assets under management as of March 26, 2019

Assets Under Management:	U.S. Dollar Amount	Total Number of Accounts
Discretionary	\$91,403,696	105
Non-Discretionary	\$0	\$0
Total	\$91,403,696	105

F. Type of Clients:

Type of Client	Number of Client(s)	Fewer than 5 Clients	Amount of Regulatory Assets under Management
(a) Individuals (other than high net worth individuals)	17		\$4,570,184
(b) High net worth individuals	26		\$86,833,512
(c) Banking or thrift institutions			
(d) Investment companies			
(e) Business development companies			
(f) Pooled investment vehicles (other than investment companies and business development companies)			
(g) Pension and profit-sharing plan (but not the plan participants or government pension plans)			
(h) Charitable Organizations			
(i) State or municipal government entities (including government pension plans)			
(j) Other investment advisors			
(k) Insurance companies			
(l) Sovereign wealth funds and foreign official institutions			
(m) Corporations or other businesses not listed above			
(n) Other			

G. Internet Presence:

DCG confines its internet presence to the following site:

www.domuscapitalgroup.com

H. Physical Office Locations:

DCG has a main office and a satellite office. The main office is located at 6639 Bay Laurel Drive, Suite B Avila Beach, CA 93424. The office is staffed with 3 people. 2 Advisors and 1 clerical employee. All investment decisions, account management and account servicing is conducted within the main office.

The firm's outsourced CCO is located at 52 King Road, Etna NH 03750. This office houses the firm's Chief Compliance Officer. No other functions are conducted in this office.

Item 5 Fees and Compensation

A. Investment Advisory Fees and Compensation:

(i) Comprehensive Portfolio Management:

Regulatory Assets under Management:

Defined as all assets invested for Clients on a discretionary basis.

Annual Percentage of Assets Charge

From 0.75% to 1.50% of Assets under Management

Our fees are billed quarterly, in advance, at the beginning of each calendar quarter based upon the value (market value or fair market value in the absence of market value), of the Client's account on the last business day of the previous quarter or on the first business day of the inception of the account. Fees will be debited from the account in accordance with the Client authorization in the Client Services Agreement.

Although DCG has established the fee schedule(s), we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs are considered in determining the fee schedule. These include the complexity of the Client, assets to be placed under management; anticipated future additional assets; related accounts; portfolio style; account composition; and reports, among other factors. The specific annual fee schedule is identified in the contract between the Firm and each Client.

Discounts, not generally available to our advisory Clients, may be offered to family members and friends of associated persons of the Firm.

(ii) Financial Planning & Consulting:

We generally charge on an hourly or flat fee basis for financial planning and consulting services. The total estimated fee, as well as the ultimate fee that we charge you, is based on the scope and complexity of our engagement with you. Our hourly fees are \$350 for financial advisors and \$100 for administrative time. Flat fees generally range from \$1,500 to \$10,000.

(iii) Pension Consulting:

We charge on an hourly or flat fee basis for pension consulting services. The total estimated fee, as well as the ultimate fee that we charge you, is based on the scope and complexity of our engagement with you. Our hourly fee is \$350. Our flat fees generally range from \$750 to \$10,000. Flat fees will be charged annually for ongoing pension consulting services.

(iv) Separately Managed Account Fees:

Clients participating in separately managed account programs may be charged various program fees in addition to the advisory fee charged by DCG. Such fees may include the investment advisory fees of the independent advisers. We will review with Clients any separate program fees that may be charged to Clients.

(v) Similar Advisory Services:

Clients should note that similar advisory services may (or may not) be available from other registered (or non-registered) investment advisors.

B. Forms of Billing:

(i) Comprehensive Portfolio Management:

The Firm's fees are billed on a pro-rata annualized basis each quarter, in advance, based on the value (market value or fair market value in the absence of market value) of your managed account on the last business day of the previous quarter. Fees will generally be automatically deducted from your managed account. As part of this process, you understand and acknowledge the following:

- a) Your independent custodian sends statements at least quarterly to you showing the market values for each security included in your account(s) and all disbursements in your account(s), including the amount of the advisory fees paid to us; and
- b) You provide authorization permitting us to be directly paid by these terms. In rare cases, we will agree to direct bill Clients.

(ii) Financial Planning & Consulting:

We require a retainer of fifty-percent (50%) of the ultimate financial planning or consulting fee, with the remainder of the fee directly billed to you and due to us within thirty (30) days of your financial plan being delivered or consultation rendered to you. In all cases, we will not require a retainer exceeding \$1,200 when services cannot be rendered within six months.

(iii) Pension Consulting:

The fee-paying arrangements for pension consulting service will be determined on a case-by-case basis and will be detailed in the signed Pension Consulting Agreement. The Client will be invoiced directly for the fees.

(iv) Separately Managed Accounts:

Third party money managers establish and maintain their own separate billing processes over which we have no control. In general, they will directly bill you and describe how this works in their separate written disclosure documents. (See Item 5. A (iv) above).

C. Additional Fees and Expenses:

All fees paid to DCG for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a Client may pay an initial or deferred sales charge. A Client may invest in a mutual fund directly, without our services. In that case, the Client would not receive the services provided by the Firm which are designed, among other things, to assist the Client in determining which mutual fund or funds are most appropriate to each Client's financial condition and objectives. Accordingly, the Client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the Client and to thereby evaluate the advisory services being provided.

In addition to our advisory fees, Clients may be responsible for the fees and expenses charged by custodians and imposed by broker-dealers and any governmental agency, including, but not limited to, any transaction charges or taxes imposed by a broker-dealer with which an independent investment manager effects transaction for the Client's account. DCG's investment advisory fees are exclusive of bank service fees, interest on loans and debit balances, wire transfer and electronic fund transfer fees, interest on margin accounts, borrowing charges on securities sold short, odd-lot differential fees, transfer taxes, and other fees and taxes on brokerage accounts and securities transactions, as applicable to any Client.

D. Reimbursement of Fees:

We charge our advisory fees quarterly, in advance. (See Item 5. B (i) of this Brochure above). If you wish to terminate our services, you may do so at any time, with written notice. We will refund the unearned portion of our advisory fee to you. You need to contact us in writing and state that you wish to terminate our services. Upon receipt of your letter of termination, we will proceed to close out your account and process a pro-rata refund of unearned advisory fees, based upon the number of business days left in the quarterly billing period.

The Firm may terminate any Client agreements at any time by notifying the Client in writing. If the Client made an advance payment, the Firm will refund any unearned portion of the advance payment. We will pro rate the reimbursement based on the number of business days left in the quarterly billing period.

When a Client's assets are invested in a particular investment vehicle, the withdrawal of such assets is subject to the provisions of the investment vehicle's governing documents. Although DCG expects that Clients will be primarily invested in mutual funds and ETFs, which by their nature generally provide daily liquidity, in certain limited circumstances a Client may not be able to withdraw investment vehicle assets at the time the engagement with DCG is terminated. In such circumstances, DCG will liquidate the investment vehicle(s) as quickly as possible and no additional DCG advisory fees will be paid after the termination date of the Client engagement, even if the Client assets have not yet been liquidated.

E. Compensation for the Sale of Securities or Other Investment Products:

Neither DCG nor any of its supervised persons accept commissions or other forms of compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds. However, Carol Bates is licensed to sell specific types of insurance (see Part 2B of Form ADV). Mrs. Bates may offer insurance products to DCG Clients and receive normal and customary fees as a result of any such sale (see Item 10 of this Brochure below).

- 1) The receipt of a fee for the sale of an insurance product presents a conflict of interest and gives a licensed supervised person an incentive to recommend certain insurance products based on the compensation received, rather than on the Client's needs. DCG's Code of Ethics prohibits any Firm principal or employee from putting their personal interests before the interests of Clients. Any violation of this standard may result in the termination of the individual found to have violated this standard. If there is the sale of an insurance product to a Client, any and all compensation to be paid to any licensed DCG principal or employee will be disclosed in writing to the Client.
- 2) Mr. Panagrossi holds a Commercial Liability license and does not provide this service to DCG clients.
- 3) Clients should note that similar insurance products may (or may not) be available from other licensed (or non-licensed) agents that are not affiliated with DCG.

Item 6: Performance-Based Fees and Side-By-Side Management

Domus Capital Group, LLC does not charge performance-based fees or side-by-side management fees. If we should ever do so, we will amend this Brochure to specify those fees.

Item 7: Types of Clients & Account Requirements

We may have the following types of Clients:

- 1) Individuals;
- 2) High Net-Worth Individuals;
- 3) Trusts, Estates or Charitable Organizations;
- 4) Pension and Profit-Sharing Plans; and
- 5) Corporations, Limited Liability Companies or other business entities not listed above.

Item 8: Methods of Analysis, Investment Strategies & Risk of Loss

A. Methods of Analysis:

DCG may use one or a combination of the following methods of securities analysis, directly or indirectly, as part of its overall investment management approach:

(i) Fundamental Analysis:

This is a technique that attempts to determine a security's value by focusing on the underlying factors that affect a company's actual business and its prospects. Fundamental analysis is about using real data to evaluate a security's value. It refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements. One of the primary assumptions of the fundamental analysis is that the market price for a security does not fully reflect the security's "real" value. DCG therefore uses a combination of qualitative and quantitative factors to identify undervalued securities, based on both macroeconomic factors, such as the overall economy and industry conditions, and company-specific factors such as financial condition and management.

The main sources of information include financial publications, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases. Other sources of information that the Firm may use include Morningstar Advisor work station, Advisor Intelligence, Fidelity, Advisory World, Lipper, Zephyr, research from third party money managers and the World Wide Web.

(ii) Technical Analysis:

This is a technique that attempts to determine a security's value by developing models and trading rules based on price and volume information. Technical analysis assumes that market prices reflect all relevant information, so the analysis focuses on the history of a security's trading behavior rather than external drivers such as economic, fundamental and news events. The practice of technical analysis incorporates the importance of understanding how market participants perceive and act on relevant information rather than focusing on the information itself. Ultimately, technical analysts develop trading models and rules by evaluating factors such as market trends, market participant behaviors, supply and demand and pricing patterns and correlations.

(iii) Cyclical Analysis:

This is a technique that analyzes historical relationships between price and market trends, to forecast the direction of prices. DCG may use cyclical analysis in conjunction with other strategies to help determine if shifts are required for its Clients' investment strategies depending on long and short-term trends in financial markets and the performance of the overall national and global economy.

We use the following additional methods of analysis in formulating our investment advice and/or managing Client assets:

(iv) Asset Allocation:

Rather than focusing primarily on securities selection, we attempt to identify an appropriate ratio of equities, fixed income, and cash suitable to the Client's investment goals and risk tolerance.

A risk of asset allocation is that the Client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and will no longer be appropriate for the Client's goals.

(v) Mutual Fund and/or ETF Analysis:

We review the experience and track record of the mutual fund manager or ETF to determine if that manager has demonstrated an ability to invest over a period and in different economic conditions. We also look at a mutual fund or ETF to determine if there is overlap in the underlying investments held in other fund(s) in the Client's portfolio. We also monitor the funds or ETFs to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investment, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the Client may purchase the same security, increasing the risk to the Client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the Client's portfolio.

(vi) Third-Party Money Manager Analysis:

We examine the experience, expertise, investment philosophies, and past performance of independent third-party investment managers to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's performance as part of our overall periodic process.

A risk of investing with a third-party manager who has been successful in the past is that he/she may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a third-party manager's portfolio, there is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our Clients. Moreover, as we do not control the manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

(vii) Accurate Information:

Our analysis methods rely on the assumption that the securities we purchase and sell, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

B. Investment Strategies We May Use:

- 1) Long-Term Purchases (Securities Held at Least a Year);
- 2) Short-Term Purchases (Securities Sold Within a Year);
- 3) Trading (Securities Sold Within 30 Days);
- 4) Short Sales;
- 5) Margin Transactions;
- 6) Option Writing, including Covered Options, Uncovered Options or Spreading Strategies.

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time upon written notice to DCG.

C. Risk of Loss:

Please Note: Investing in securities involves risk of loss that Clients should be prepared to bear. While the stock market (and other forms of investments) may increase and your account(s) could enjoy a gain, it is also possible that the stock market (and other forms of investments) may decrease and your account(s) could suffer a loss. It is important that you understand the risks associated with investing in the stock market (and other forms of investments), are appropriately diversified in your investments, and ask us any questions you may have.

D. Market Risks:

(i) Competition:

The securities industry and the varied strategies and techniques to be engaged in by the Firm are extremely competitive and each involves a degree of risk. The Firm will compete with other firms, including many of the larger securities and investment banking firms, which have substantially greater financial resources and research staffs.

(ii) Market Volatility:

The profitability of the Firm's investment programs depends substantially upon it correctly assessing the future price movements of stocks, bonds, options on stocks, and other securities and the movements of interest rates. The Firm cannot guarantee that it will be successful in accurately predicting price and interest rate movements.

(iii) Options and Other Derivative Instruments:

The Client may invest, from time to time, in options and other derivative instruments, including, but not limited to, the buying and selling of puts and calls on some of the securities held by the Client. The prices of many derivative instruments, including many options and swaps, are highly volatile. The values of options and swap agreements depend primarily upon the price of the securities, indexes, commodities, currencies or other instruments underlying them. Price movements of options contracts and payments pursuant to swap agreements are also influenced by, among other things, interest rates, changing supply and demand relationships, trade, fiscal, monetary and exchange control programs and policies of governments, and national and international political and economic events and policies. Options on highly volatile securities, currencies or other assets may be more expensive than options on other investments.

(iv) Hedging Transactions:

Investments in financial instruments such as forward contracts, options, commodities and interest rate swaps, caps and floors, other derivatives, and other investment techniques are commonly utilized by investment funds to hedge against fluctuations in the relative values of its portfolio positions as a result of changes in currency exchange rates, interest rates and/or the equity markets or sectors thereof. Any hedging against a decline in the value of portfolio positions does not eliminate fluctuations in the values of portfolio positions or prevent losses if the values of such positions decline, but establishes other positions designed to gain from those same developments, thus moderating the decline in the portfolio positions' value. Such hedging transactions also limit the opportunity for gain if the value of the portfolio positions should increase. The Client is not obligated to establish hedges for portfolio positions and may not do so.

(v) Market or Interest Rate Risk:

The price of most fixed income securities moves in the opposite direction of the change in interest rates. For example, as interest rates rise, the price of fixed income securities falls. If the Client holds a fixed income security to maturity, the change in its price before maturity may have little impact on the Client's performance; however, if the Client has to sell the fixed income security before the maturity date, an increase in interest rates could result in a loss to the Client.

(vi) Fixed Income Call Option Risk:

Many bonds, including agency, corporate and municipal bonds, and all mortgage-backed securities, contain a provision that allows the issuer to "call" all or part of the issue before the bond's maturity date. The issuer usually retains this right to refinance the bond in the future if market interest rates decline below the coupon rate. There are three disadvantages to the call provision. First, the cash flow pattern of a callable bond is not known with certainty. Second, because the issuer will call the bonds when interest rates have dropped, the Client is exposed to reinvestment rate risk – the Client will have to reinvest the proceeds received when the bond is called at lower interest rates. Finally, the capital appreciation potential of a bond will be reduced because the price of a callable bond may not rise much above the price at which the issuer may call the bond.

(vii) Inflation Risk:

Inflation risk results from the variation in the value of cash flows from a security due to inflation, as measured in terms of purchasing power. For example, if the Client purchases a 5-year bond in which it can realize a coupon rate of 5%, but the rate of inflation is 6%, then the purchasing power of the cash flow has declined. For all but inflation-linked bonds, adjustable bonds or floating rate bonds, the Client is exposed to inflation risk because the interest rates the issuer promises to make is fixed for the life of the security.

(viii) Investments in Non-U.S. Investments:

From time to time, the Client may invest and trade a portion of its assets in non-U.S. securities and other assets, which will give rise to risks relating to political, social and economic developments abroad, as well as risks resulting from the differences between the regulations to which U.S. and foreign issuers and markets are subject. Such risks may include:

- a) Political or social instability, the seizure by foreign governments of company assets, acts of war or terrorism, withholding taxes on dividends and interest, high or confiscatory tax levels, and limitations on the use or transfer of portfolio assets.
- b) Enforcing legal rights in some foreign countries is difficult, costly and slow, and there are sometimes special problems enforcing claims against foreign governments.
- c) Foreign securities and other assets often trade in currencies other than the U.S. dollar, and the Client may directly hold foreign currencies and purchase and sell foreign currencies through forward exchange contracts. Changes in currency exchange rates will affect the Client's net asset value, the value of dividends and interest earned, and gains and losses realized on the sale of investments. An increase in the strength of the U.S. dollar relative to these other currencies may cause the value of the Client's investments to decline. Some foreign currencies are particularly volatile. Foreign governments may intervene in the currency markets, causing a decline in value or liquidity of the Client's foreign currency holdings. If the Client enters into forward foreign currency exchange contracts for hedging purposes, it may lose the benefits of advantageous changes in exchange rates. On the other hand, if the Client enters forward contracts for the purpose of increasing return, it may sustain losses.
- d) Non-U.S. securities, commodities and other markets may be less liquid, more volatile and less closely supervised by the government than in the United States. Foreign countries often lack uniform accounting, auditing and financial reporting standards, and there may be less public information about the operations of issuers in such markets.

(ix) Risk of Default or Bankruptcy of Third Parties:

The Client may engage in transactions in securities, commodities, other financial instruments and other assets that involve counterparties. Under certain conditions, the Client could suffer losses if a counterparty to a transaction were to default or if the market for certain securities, commodities, other financial instruments and/or other assets were to become illiquid.

E. Regulatory Risks:

(i) Strategy Restrictions:

Certain institutions may be restricted from directly utilizing investment strategies of the type in which the Firm may engage. Such institutions, including entities subject to ERISA, should consult their own advisors, counsel and accountants to determine what restrictions may apply.

(ii) Trading Limitations:

For all securities, instruments and/or assets listed on an exchange, including options listed on a public exchange, the exchange generally has the right to suspend or limit trading under certain circumstances. Such suspensions or limits could render certain strategies difficult to complete or continue and subject the Client to loss. Also, such a suspension could render it impossible for the Client to liquidate positions and thereby expose the Client to potential losses.

(iii) Conflicts of Interest:

In the administration of Client accounts, portfolios and financial reporting, the Firm faces inherent conflicts of interest which are described in this brochure. Generally, the Firm mitigates these conflicts through its Code of Ethics which provides that the Client's interest is always held above that of the Firm and its associated persons.

(iv) Supervision of Trading Operations:

The Firm, with assistance from its brokerage and clearing firms, intends to supervise and monitor trading activity in the portfolio accounts to ensure compliance with Firm and Client objectives. Despite the Firm's efforts, however, there is a risk that unauthorized or otherwise inappropriate trading activity may occur in portfolio accounts.

F. Security Specific Risks:

Depending on the nature of the investment management service selected by a Client and the securities used to implement the investment strategy, Clients will be exposed to risks that are specific to the securities in their particular investment portfolio. These risks include:

(i) Liquidity:

Liquidity is the ability to readily convert an investment into cash. Securities where there is a ready market that is traded through an exchange are generally more liquid. Securities traded over the counter or that do not have a ready market or are thinly traded are less liquid and may face material discounts in price level in a liquidation situation.

(ii) Currency:

Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

(iii) Limited Liquidity of Interests:

An investment in a partnership usually involves substantial restrictions on liquidity and its interests are not freely transferable. There is no market for these interests and no market should be expected to develop. Additionally, transfers are usually subject to the consent of the general partner at the general partner's sole discretion.

(iv) Lack of Registration:

Funds or limited partnership interests have neither been registered under the Securities Act nor under the securities or "blue sky" laws of any state and, therefore, are subject to transfer restrictions.

(v) Withdrawal of Capital:

The ability to withdraw funds from the funds or limited partnership interests is usually restricted in accordance with the withdrawal provisions contained in an offering memorandum. In addition, substantial withdrawals by investors within a short period of time could require a fund to liquidate securities positions and other investments more rapidly than would otherwise be desirable, possibly reducing the value of the fund's assets and/or disrupting the fund's investment strategy.

Item 9: Disciplinary Information

Neither DCG, its principal (Christopher J. Bleuher) nor any of its employees have been involved in legal or disciplinary events related to past or present investment clients.

Item 10: Other Financial Industry Activities & Affiliations

A. Other Affiliations:

(i) David M. Panagrossi

Is the owner of SROservices, LLC located in Etna, New Hampshire. The firm provides compliance & cyber security services to Broker Dealers, Investment Advisors and Private Equity firms. Additionally, the firm acts as an agent providing insurance policies such as Cyber Security, E&O and D&O insurance policies through a relationship with Ferguson and McGuire based in Wallingford, Connecticut.

David M. Panagrossi is registered with Rareview Capital LLC located in Stamford, Connecticut as the firm's Chief Compliance Officer. Mr. Panagrossi does not provide investment related advice.

David M Panagrossi is employed by CMG Securities located in San Francisco CA as the firm's Chief Executive Officer and Chief Compliance officer. In his current role/roles, Mr. Panagrossi does not act as an Investment Advisor.

Our Related Persons or any advisory affiliates and any person that is under common control with our firm. Advisory Affiliate: Our advisory affiliates are (1) all of our officers, partners, or directors (or any person performing similar functions); (2) all persons directly or indirectly controlling or controlled by us; and (3) all of our current employees (other than employees performing only clerical, administrative, support or similar functions). Person: A natural person (an individual) or a company. A company includes any partnership, corporation, trust, limited liability company ("LLC"), limited liability partnership ("LLP"), sole proprietorship, or other organization.

Item 11: Code of Ethics, Participation or Interest in Client

Transactions & Personal Trading

A. Code of Ethics:

DCG has adopted a Code of Ethics (the “Code”) which sets forth high ethical standards of business conduct that we require of our principals and employees, including compliance with applicable federal securities laws. As a Client or proposed client, you are entitled to a copy of our Code of Ethics upon request. You may request a copy of our Code of Ethics by calling (805) 476- 7999 or emailing Admin@domuscapgroup.com.

DCG and its personnel owe a duty of loyalty, fairness and good faith towards our Clients, and have an obligation to adhere not only to the specific provisions of the Code but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the Firm’s access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our Code also provides for oversight, enforcement and recordkeeping provisions.

DCG’s Code of Ethics further includes the Firm’s policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

The Code is designed to assure that the personal securities transactions, activities and interests of our employees and principals will not interfere with (i) making decisions in the best interest of Clients; and (ii) implementing such decisions while, at the same time, allowing employees and principals to invest for their own accounts.

B. Employee Transactions:

The Firm and/or individuals associated with the Firm may buy or sell for their personal account’s securities identical to or different from those recommended to our Clients. In addition, any related person(s) may have an interest or position in a certain security which may also be recommended to a Client.

It is the expressed policy of the Firm that no principal or person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such principal or employee(s) from benefiting from transactions placed on behalf of advisory accounts.

C. Aggregation of Client Transactions:

We may aggregate Client transactions where possible and when compliant with our fiduciary duty. In these instances, participating Clients will receive an average share price and transaction costs will be shared equally and on a pro-rata basis. In the instances where there is a partial fill of a batched order, we will allocate all purchases pro-rata, with each account paying the average price.

As these situations represent actual or potential conflicts of interest to our Clients, we have established certain policies and procedures for implementing the Firm's Code of Ethics, to ensure the Firm complies with its regulatory obligations and provides our Clients and potential clients with full and fair disclosure of such conflicts of interest. These policies and procedures are summarized below:

- 1) No principal or employee of the Firm may put his or her own interest above the interest of a Client.
- 2) No principal or employee of the Firm may buy or sell securities for their personal portfolio(s) where their decision is a result of information received as a result of his or her employment unless the information is also available to the investing public.
- 3) It is the expressed policy of the Firm that no principal or person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account. This prevents such principals or employees from benefiting from transactions placed on behalf of advisory accounts.
- 4) The Firm requires prior approval for any IPO or private placement investments by Related Persons of the Firm.
- 5) We maintain a list of all reportable securities holdings for the Firm and anyone associated with this advisory practice that has access to advisory recommendations ("access person"). These holdings are reviewed on a regular basis by the Firm's Chief Compliance Officer or his/her designee.
- 6) We have established procedures for the maintenance of all required books and records.
- 7) Clients can decline to implement any advice rendered, except in situations where the Firm is granted discretionary authority.
- 8) All of our principals and employees must act in accordance with all applicable Federal and state regulations governing registered investment advisory practices.
- 9) We require delivery and acknowledgement of the Code of Ethics by each supervised person of the Firm.
- 10) We have established policies requiring the reporting of Code of Ethics violations to our senior management.
- 11) Any individual who violates any of the above restrictions may be subject to termination.

See Item 11A of this Brochure. Related Persons of the Firm may buy or sell securities for themselves at or about the same time they buy or sell the same securities for Client accounts. In order to minimize this conflict of interest, our Related Persons will place Client interests ahead of their own interests and adhere to the Firm's Code of Ethics, a copy of which is available upon request. If Related Persons' accounts are included in a block trade, our Related Persons will always trade personal accounts last.

Clients and prospective clients may contact DCG to request a copy of its Code of Ethics.

Item 12: Brokerage Practices

We seek to recommend a custodian/broker who will hold your assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services.

A. Broker Selection Factors:

- 1) Ability to maintain the confidentiality of trading intentions
- 2) Timeliness of execution
- 3) Timeliness and accuracy of trade confirmations
- 4) Liquidity of the securities traded
- 5) Willingness to commit capital
- 6) Ability to place trades in difficult market environments
- 7) Research services provided
- 8) Ability to provide investment ideas
- 9) Execution facilitation services provided
- 10) Record keeping services provided
- 11) Custody services provided
- 12) Frequency and correction of trading errors
- 13) Ability to access a variety of market venues
- 14) Expertise as it relates to specific securities
- 15) Financial condition
- 16) Business reputation

We currently recommend clients custody their assets at Fidelity Institutional Wealth Services Group based upon the 16 factors listed above.

B. Research and Other Soft Dollar Benefits:

Fidelity may make certain research and brokerage services available at no additional cost to the Firm. These services are known as “soft dollar services” and fall under a Client Commission Arrangement (CCA). Not all transactions are included in the CCA, only those transactions known as qualified transactions as defined under SEC Rule 28(e).

Soft dollar services may be directly from independent research companies, as selected by the Firm (within specific parameters) or Research products and services provided by Fidelity, which may include:

- 1) Research reports on recommendations or other information about, companies or industries;
- 2) Economic surveys, data and analyses; financial publications; portfolio evaluation services; financial database software and services;
- 3) Computerized news and pricing services;
- 4) Other products or services that provide lawful and appropriate assistance by Fidelity to the Firm in the performance of our investment decision-making responsibilities.

Clients should understand there is a conflict of interest in using soft dollar services. While DCG consistently attempts to find a balance between pricing and services, Client Commission agreements are based off higher commission rates. The services received from these higher commission rates are used to lower the operation cost of DCG. Not every client of DCG will gain a direct benefit from these specific services.

To eliminate the soft dollar conflict of interest, per DCG's Client agreement, the annual management fee includes commission costs for secondary market transactions while maintaining or rebalancing the client's portfolio. This allows all our clients to benefit from our soft dollar services arrangements, albeit not equally.

All soft dollar services arrangements must be approved in writing by our Chief Compliance Officer. A brief description of the purpose of the soft dollar services arrangement outlining the benefits received by our firm and Clients, along with any noted concerns about increased costs to our Clients and how such concerns were alleviated will be maintained on file. Our Chief Compliance Officer undertakes a review of parties which propose to provide the Firm soft dollar services pay our firm in soft dollars and analyzes a number of criteria. When deciding whether to approve or disapprove of a soft dollar services relationship, the following criteria are considered:

- 1) The broker-dealer's business reputation and financial position, and our ability to consistently execute orders professionally and on a cost-effective basis;
- 2) The ability to provide prompt and accurate execution reports, prepare timely and accurate confirms, and to deliver securities or cash proceeds promptly; and
- 3) The ability to and provide meaningful research services that are useful to us in investment decision-making or other desired and appropriate services.

Our Chief Compliance Officer also annually reviews all our soft dollar services relationships for appropriateness, benefits to our Clients and other relevant factors.

As a fiduciary, we have an obligation to obtain "best execution" of Clients' transactions under the circumstances of the particular transaction. Consequently, notwithstanding the safe harbor provided under Section 28(e) of the Securities Exchange Act of 1934, no allocation for soft dollar services payments shall be made unless best execution of the transaction is reasonably expected to be obtained.

C. Other Non-Soft Dollar Benefits:

DCG may receive from Fidelity, without cost to us, computer software and related systems support, which allow us to better monitor Client accounts maintained at Fidelity. We may receive the software and related support without cost because the Firm renders investment management services to Clients that maintain assets at Fidelity. The Firm endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that our receipt of economic benefits from a broker-dealer creates a conflict of interest since these benefits may influence our choice of a broker-dealer over another broker-dealer that does not furnish similar

support, or services, which may conflict with our Clients' interest in receiving most favorable execution.

(i) Benefits:

The Firm may receive the following benefits from through the Fidelity Institutional Wealth Services Group ("Fidelity"):

- 1) Receipt of duplicate client confirmations and bundled duplicate statements;
- 2) Access to a trading desk that exclusively services its Institutional Wealth Services Group participants;
- 3) Access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and
- 4) Access to an electronic communication network for Client order entry and account information.

The aforementioned research and brokerage services are used by the Firm to manage accounts for which we have investment discretion.

(ii) Non-Soft Dollar Services:

The Firm has an arrangement with Fidelity Institutional Wealth Services ("Fidelity"). Fidelity offers to independent investment advisers "non-soft dollar services," which include custody of securities, trade execution, clearance and settlement of transactions what is this if the clients are paying custodial fees.

Fidelity may also make available to the Firm at times certain other products and services that benefit us, but may not benefit our Clients' accounts. These benefits may include national, regional or investment adviser specific educational events organized and/or sponsored by Fidelity. Other potential benefits may include occasional business entertainment of personnel of the Firm by Fidelity personnel, including meals, invitations to sporting events, and other forms of entertainment, some of which may accompany educational opportunities. Some of these products and services assist the Firm in managing and administering Clients' accounts. These include software and other technology (and related technological training) that provide access to Client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple Client accounts), provide research, pricing information and other market data, facilitate payment of our fees from Clients' accounts and assist with back-office training and support functions, recordkeeping and Client reporting. Many of these services generally may be used to service all or some substantial number of our accounts, including accounts not maintained at Fidelity. Fidelity also makes available to the Firm other services intended to help the Firm manage and further develop our business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits

providers, human capital consultants, insurance, and marketing. In addition, Fidelity may make available, arrange and/or pay vendors for these types of services rendered to the Firm by independent third parties. Fidelity may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to the Firm. While, as a fiduciary, the Firm endeavors to act in our Clients' best interests at all times, our recommendations or requirements that Clients maintain their assets in accounts at Fidelity may be based in part on the benefit to the Firm of the availability of some of the foregoing products and services and not solely on the nature, cost, or quality of custody and brokerage services provided by Fidelity, which may create a potential conflict of interest.

We would have to obtain the services and products for cash if we did not have soft dollars available to pay for them. As a result of receiving such non-soft dollar products and services for reduced or no cost, we may have an incentive to continue to place Client trades through broker-dealers that offer soft dollar arrangements and the services and products. This interest conflicts with our Clients' interest of obtaining the lowest commission rate available. Therefore, we must determine in good faith, based on the best execution policy stated above that such commissions are reasonable in relation to the value of the services provided by such executing broker-dealers.

We receive some non-soft dollar benefits from Fidelity through our participation in its programs. (Please see the disclosure under Item 14 of this Brochure.)

As a result of receiving certain services of Fidelity (discussed above) for no additional cost, we may have an incentive to continue to use or expand the use of Fidelity services. The Firm examined this potential conflict of interest when we chose to enter the relationship with Fidelity and we have determined that the relationship is in the best interest of the Firm's Clients and satisfies our Client obligations, including our duty to seek best execution.

D. Brokerage Commissions and Transaction Fees:

Fidelity charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Fidelity enables DCG to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. Fidelity commission rates are generally discounted from customary retail commission rates. DCG pays such commissions. **All transaction fees charged by a National Exchange or Regulatory Agency are charged directly to the client account.** For alternative investments, other custodial charges may apply.

Commission and transaction fees charged by Fidelity may be higher or lower than those charged by other custodians and broker-dealers.

DCG may pay a commission to Fidelity that is higher than another qualified broker dealer might charge to affect the same transaction where we determine in good faith that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents an appropriate qualitative execution, taking into consideration the full

range of a broker- dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although we will seek competitive rates, to the benefit of all Clients, we may not necessarily obtain the lowest possible commission rates for specific Client account transactions.

The Firm does not use Client brokerage for Client referrals.

The Firm does not allow Client-directed brokerage.

E. Concurrent Authorizations:

We perform investment management services for various Clients. There are occasions on which portfolio transactions may be executed as part of concurrent authorizations to purchase or sell the same security for numerous accounts served by the Firm, which involve accounts with similar investment objectives. Although such concurrent authorizations potentially could be either advantageous or disadvantageous to any one or more particular accounts, they are affected only when we believe that to do so will be in the best interest of the effected accounts. When such concurrent authorizations occur, the objective is to allocate the executions in a manner which is deemed equitable to the accounts involved. In any given situation, we attempt to allocate trade executions in the most equitable manner possible, taking into consideration Client objectives, current asset allocation and availability of funds using price averaging, proration and consistently non-arbitrary methods of allocation.

Item 13: Review of Accounts or Financial Plans

For those Clients for whom DCG provides investment advisory services, account reviews are conducted on an ongoing basis by the DCG registered investment advisor(s) assigned to the Client, at least quarterly, but more frequently if agreed to between DCG and the Client.

Clients are advised that it is your responsibility to promptly notify DCG if there are ever any changes to your financial situation, goals, needs or investment objectives.

Clients are provided with written quarterly performance reports that contain holdings information, beginning and ending market values, asset allocation, and performance return information. DCG relies on information and data provided by the account custodian(s) and certain reporting services which is believed by DCG to be reliable; however, no representations are made as to its accuracy or completeness. Written quarterly performance reports should not be relied on for tax purposes.

The nature of these reviews is to learn whether Clients' accounts are in line with their investment objectives, appropriately positioned based on market conditions and investment policies, if applicable.

Pension consulting Clients receive reviews of their pension plans for the duration of the pension consulting service. We also provide ongoing services to pension consulting Clients where we meet with such Clients upon their request to discuss updates to their plans, changes in their circumstances, and related items.

Financial planning Clients do not receive reviews of their written plans unless they take action to schedule a financial consultation with us. We do not provide ongoing services to financial planning Clients but are willing to meet with such Clients upon their request to discuss updates to their plans, changes in their circumstances, and related items.

We may review Client accounts more frequently than described above. Among the factors which may trigger an off-cycle review are major market or economic events, the Client's life events, requests by the Client, and unforeseen items.

All accounts will be reviewed by Christopher J. Bleuher, Principal and David M Panagrossi CCO.

Item 14: Client Referrals & Other Compensation

We receive from Fidelity certain additional economic benefits that may or may not be offered to any other independent investment advisors (the “Additional Services”). Specifically, the Additional Services include access to Tamarac Envestnet, a provider of independent investment research. Except for the arrangements outlined in Item 12 (Brokerage Practices) of this Brochure, we have no additional arrangements to disclose.

It is DCG’s policy not to engage solicitors or to pay Related or non-Related Persons for referring potential clients to the Firm.

Under certain circumstances, DCG may or may not receive compensation for providing referral arrangements to Clients for services rendered by Firm approved third-party vendors. The referral arrangement between the third-party vendor and DCG must be in writing, and include provisions related to the following: (a) the scope of the third-party’s activities; (b) covenant by the third-party to perform such activities consistent with instructions of DCG and in compliance with the Advisors Act of 1940 and associated rules; and (c) a covenant by the third-party vendor to provide the Client with a separate written disclosure. DCG will require a separate written service agreement to be signed by both the Client and third-party vendor to establish this referral arrangement. In these situations, any such agreement will require a separate written disclosure statement from the third-party vendor to the Client, disclosing the nature of the relationship with DCG and the amount of any referral fees paid or to be paid.

Item 15: Custody

We previously disclosed in Item 5 (Fees and Compensation) of this Brochure that the Firm directly debits advisory fees from Client accounts.

As part of this billing process, the Client's custodian is advised of the amount of the fee to be deducted from the Client's account. On at least a quarterly basis, the custodian is required to send to the Client a statement showing all transactions within the account during the reporting period.

A third-party vendor provides the custodian with the fee calculation, the custodian does not calculate the amount of the fee to be deducted, it is important for Clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact DCG directly and promptly if they believe that there may be an error in their statement.

- 1) Our Firm does not have actual or constructive custody of Client accounts.
- 2) Our Firm works with Fidelity (as well as other custodians) to custody Clients' assets.

Item 16: Investment Discretion

Clients may hire us to provide discretionary asset management services, in which case we place trades in a Client's account without contacting the Client prior to each trade to obtain the Client's permission. Our discretionary authority includes the ability to do the following without contacting the Client:

1. Determine the security to buy or sell; and/or
2. Determine the amount of the security to buy or sell.

Clients give us discretionary authority if they approve discretionary trading in their Investment Management Agreement with the Firm, and Clients may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

The Firm has the authority to determine, without obtaining specific, prior Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. The Firm's discretionary authority regarding investments may however be subject to certain limitations. These limitations are recognized as the restrictions and prohibitions placed by the Client on transactions in certain types of business or industries. All such restrictions are to be agreed upon in writing at the account's inception, and as subsequently amended in writing by the Client. We do not take or exercise discretion with respect to our other Clients.

Item 17: Voting Client Securities

As a matter of Firm policy, we do not vote proxies on behalf of Clients. Therefore, although the Firm may provide investment advisory services relative to Client investment assets, Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the Client shall be voted; and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the Client's investment assets. Clients are responsible for instructing each custodian of the assets to forward directly to the Client copies of all proxies and shareholder communications relating to the Client's investment assets.

We **do not** offer any consulting assistance regarding proxy issues to Clients.

Item 18: Financial Information

We do not require, nor do we solicit prepayment of more than \$1,200 in fees per Client, six months or more in advance. Therefore, we are not required to, and have not included a financial statement (including a balance sheet) for our most recent fiscal year.

DCG currently has no financial condition that would likely impair our ability to meet contractual commitments to Clients, nor have we been the subject of a bankruptcy petition at any time during the past ten years.