



## Form ADV Part 2A Investment Adviser Brochure

March 2020

This brochure provides information about the qualifications and business practices of Benedetti and Gucer, Inc. If you have any questions about the contents of this brochure, please contact Bob Gucer, Chief Financial Officer and Chief Compliance Officer, at (404) 602-0034. 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. Registration as an investment advisor does not imply any level of skill or training.

Additional information about Benedetti and Gucer, Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You may look up Benedetti and Gucer, Inc. using the unique identifying number, CRD # 166911.

7000 Peachtree Dunwoody Rd NE  
Building 6 Suite 100  
Atlanta, GA 30328  
(404) 602-0034

3301 Buckeye Road  
Buckeye Plaza Suite 402  
Atlanta, GA 30341  
(470) 428-8363

[bgucer@bgawealth.com](mailto:bgucer@bgawealth.com)

## **Item 2: Summary of Material Changes**

---

### **Annual Update and Material Changes**

In this Item of Benedetti and Gucer, Inc. dba Benedetti, Gucer & Associates' (BGA) Form ADV 2, the Firm is required to discuss any material changes that have been made to Form ADV since the last Annual Amendment, dated March 28, 2019.

### **Material Changes since the Last Update**

Since the last Annual Amendment filing, the Firm has no material changes to report.

- Russell Clarke joined the Firm in August 2019 as a Financial Planner.

### **Full Brochure Available**

BGA's Form ADV may be requested at any time, without charge by contacting Bob Gucer, Chief Financial Officer and Chief Compliance Officer, at (404) 602-0034 or at [bgucer@bgawealth.com](mailto:bgucer@bgawealth.com).

## **Item 3: Table of Contents**

---

<b>Item 1: Cover Page</b>	<b>1</b>
<b>Item 2: Summary of Material Changes</b>	<b>2</b>
<b>Item 3: Table of Contents</b>	<b>3</b>
<b>Item 4: Advisory Business</b>	<b>4</b>
<b>Item 5: Fees and Compensation</b>	<b>7</b>
<b>Item 6: Performance-Based Fees and Side-by-Side Management</b>	<b>10</b>
<b>Item 7: Types of Clients</b>	<b>11</b>
<b>Item 8: Methods of Analysis, Investment Strategies and Risk of Loss</b>	<b>12</b>
<b>Item 9: Disciplinary Information</b>	<b>14</b>
<b>Item 10: Other Financial Industry Activities and Affiliations</b>	<b>15</b>
<b>Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</b>	<b>16</b>
<b>Item 12: Brokerage Practices</b>	<b>18</b>
<b>Item 13: Review of Accounts</b>	<b>20</b>
<b>Item 14: Client Referrals and Other Compensation</b>	<b>21</b>
<b>Item 15: Custody</b>	<b>22</b>
<b>Item 16: Investment Discretion</b>	<b>24</b>
<b>Item 17: Voting Client Securities</b>	<b>25</b>
<b>Item 18: Financial Information</b>	<b>26</b>
<b>Form ADV Part 2B – Investment Adviser Brochure Supplement</b>	<b>28</b>

## **Item 4: Advisory Business**

---

### **Firm Description**

BGA is an investment adviser providing wealth management services and financial planning services to individuals, high net-worth individuals, trusts, and estates. BGA was founded in 2013.

### **Principal Owners**

BGA is owned equally by Jaime Benedetti and Bob Gucer.

### **Types of Advisory Services**

BGA offers the following types of advisory services: Wealth management and financial planning for individuals and/or small businesses.

### **Wealth Management**

BGA continuously advises its clients regarding investing their funds to meet their individual needs. During detailed personal discussions, BGA helps its clients identify and establish their goals and objectives based on their particular circumstances. BGA then develops the client's personal investment policy reflecting the client's goals and objectives and creates and manages a portfolio following that policy. BGA manages advisory accounts on a discretionary and non-discretionary basis. The client's stated objectives guide BGA's account supervision (e.g., maximum capital appreciation, growth, income, growth and income, etc.).

BGA will create a portfolio consisting of one or all of the following: individual equities, bonds, no-load or load-waived mutual funds, Exchange Traded Funds (ETFs), including managed futures, non-traded REITS, and private equity funds. BGA may also recommend other alternative investments. BGA will allocate the client's assets among various investments considering the overall management style selected by the client. Mutual funds will be selected considering any or all of the following criteria: the fund's performance history; the industry sector in which the fund invests; the fund manager's track record; the fund's investment objectives; the fund's management style and philosophy; and the fund's management fee structure. Portfolio weighting between funds and market sectors will be determined by each client's individual needs and circumstances.

### **Financial Planning**

BGA offers financial planning services, which may include a review of all aspects of a client's current financial situation, including the following components: cash management, risk management, insurance, education funding, goal setting, retirement planning, estate and charitable giving planning, tax planning, and capital needs planning. BGA meets with the client to review risk tolerance, financial goals and objectives, and time horizons. Additional meetings may include a review of additional financial information; sources of income, assets owned, existing insurance, liabilities, wills, trusts, business agreements, tax returns, investments, and personal and family obligations.

Financial planning services may be comprehensive or may focus on certain components. A client should understand that when BGA is engaged to address only certain components, the client's overall financial and investment issues may not be taken into consideration.

Financial planning services create a potential conflict of interest. The client is under no obligation to utilize additional services of BGA and its representatives and is under no obligation to implement the advice or plan. Clients may choose all or certain components of advice and recommendations and can implement the recommendations through the service providers of their choice.

### **Consulting Services – 401(k) Plan Review**

BGA offers clients a 401(k) Plan Review. This service includes:

- A personal and independent review by an investment professional
- Professional research on your current 401(k) investment choices
- Suggested fund allocations based on your stated goals, age, and risk assessment

The 401(k) Plan Review is not intended to be a comprehensive financial planning tool. It assumes a long-term strategy.

### **Consulting Services - ERISA/ Plan Sponsor Consulting**

BGA offers ERISA Plan Sponsor Consulting Services. These services include:

- Plan Design Consulting and Review;
- Fiduciary Review;
- Fee Review;
- Investment Review; and
- Educational Planning.

### **Tailored Relationships**

BGA tailors advisory services to the individual needs of the client. BGA clients are allowed to impose restrictions on the investments in their account. All limitations and restrictions placed on accounts must be presented to BGA in writing.

### **Fiduciary Statement**

BGA and our employees are fiduciaries who must take into consideration the best interests of our clients. BGA will act with competence, dignity, integrity, and in an ethical manner, when dealing with clients. BGA will use reasonable care and exercise independent professional judgement when conducting investment analysis, making investment recommendations, trading, promoting our services, and engaging in other professional activities.

As a fiduciary, BGA has the obligation to deal fairly with our clients. BGA has the following responsibilities when working with a client:

- To render impartial advice;
- To make appropriate recommendations based on the client's needs, financial circumstances and investment objectives;
- To exercise a high degree of care and diligence to ensure that information is presented in an accurate manner and not in a way to mislead;
- To have reasonable basis, information, and understanding of the facts in order to provide appropriate recommendations and representations;
- Disclose any material conflict of interest in writing; and
- Treat clients fairly and equitably.

#### **Wrap Fee Programs**

BGA does not refer clients to wrap fee programs.

#### **Conflicts of Interest**

All material conflicts of interest regarding BGA, its Investment Advisor Representatives and any of BGA's employees which could reasonably expect to impair the rendering of unbiased and objective advice have been disclosed.

#### **Client Assets**

As of February 1, 2020, BGA manages \$293,976,873 million in assets; \$265,998,853 million on a discretionary basis and \$27,978,020 million on a non-discretionary basis.

## Item 5: Fees and Compensation

---

### **Compensation**

BGA bases its fees on a percentage of assets under management, fixed fees and hourly charges. BGA's fee schedules are described below.

### **Compensation – Wealth Management Services**

Fees for Wealth Management Services are as follows:

<b><u>Assets</u></b>	<b><u>Annual Fees</u></b>
Up to \$500,000	1.30%
\$500,001 to \$1,000,000	1.10%
Over \$1,000,001	1.00%

Clients will be invoiced in arrears at the end of each month based upon the value (market value or fair market value in the absence of market value) of the client's account at the end of the previous month.

Non-traded REITs are purchased on the secondary markets at a discount to their Net Asset Value. Because of this, the value of the shares will immediately exceed the amount of money invested. Wealth Management fees for non-traded REITS are based upon the Net Asset Value of shares, not on the amount initially invested. The asset value clients are charged on Non-traded REITS is typically more than the amount initially invested.

### **Compensation – Financial Planning Services**

Fees for Financial Planning provided on a standalone basis are computed on a fixed fee ranging from \$1,000 to \$9,000 depending upon the complexity of the client's situation. Financial planning fees are billed quarterly in advance.

In certain circumstances, Financial Planning Services may be billed on an hourly basis. Hourly fees are charged at \$250 per hour. All hourly fees are billed in arrears.

### **Compensation – Consulting Services – 401(k) Plan Review**

Fees for BGA's 401(k) Plan Review are charged at a flat fee of \$350. Fees are charged in advance.

### **Compensation – Consulting Services - ERISA/ Plan Sponsor Consulting**

Fees for ERISA/ Plan Sponsor Consulting Services are as follows:

<b><u>Assets</u></b>	<b><u>Annual Fees</u></b>
Under \$1,000,000	Flat Fee
\$1,000,000 to \$3,000,000	0.5%
\$3,000,001 to \$6,000,000	0.4%

\$6,000,001 to \$9,000,000	0.3%
\$9,000,000 to \$20,000,000	0.25%
Over \$20,000,000	Flat Fee

Clients will be invoiced in arrears at the end of each month based upon the value (market value or fair market value in the absence of market value) of the client's account at the end of the previous month.

### **Other Fees**

In certain circumstances, fees, account minimums and payment terms are negotiable depending on client's unique situation – such as the size of the aggregate related party portfolio size, family holdings, low cost basis securities, or certain passively advised investments and pre-existing relationships with clients. Certain clients may pay more or less than others depending on the amount of assets, type of portfolio, or the time involved, the degree of responsibility assumed, complexity of the engagement, special skills needed to solve problems, the application of experience and knowledge of the client's situation.

Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties. These include fees charged by managers, IRA custodial fees, deferred sales charges, odd-lot differentials, transfer fees and taxes, wire transfer and electronic fund fees, safekeeping fees, interest charges on margin loans, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus.

Such charges, fees and commissions are exclusive of and in addition to BGA's fee, and BGA shall not receive any portion of these commissions, fees, and costs.

### **Termination of Agreement**

Investment Advisory Agreements may be canceled at any time by either party, for any reason upon receipt of written notice.

### **General Information on Compensation**

In certain circumstances, fees, account minimums and payment terms are negotiable depending on client's unique situation – such as the size of the aggregate related party portfolio size, family holdings, low cost basis securities, or certain passively advised investments and pre-existing relationships with clients. Certain clients may pay more or less than others depending on the amount of assets, type of portfolio, or the time involved, the degree of responsibility assumed, complexity of the engagement, special skills needed to solve problems, the application of experience and knowledge of the client's situation. Lower fees for comparable services may be available from other sources.

Related accounts may be linked for purposes of fee calculation if all parties agree; meaning certain accounts, approved by BGA may be grouped for fee calculations.



Fees are calculated as described above and are not charged on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of the funds of a client.

As described above, all fees paid to BGA for asset management services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees will generally include a management fee, other fund expenses and a possible distribution (12b-1) fee. The broker/dealer may receive these fees in connection with the placement of client funds into mutual funds. BGA does not receive any portion of 12b-1 or similar fees. These fees are rebated by the broker/dealer to the client. Mutual funds purchased by BGA for a client account will be executed at NAV. The client should review both the fees charged by mutual funds and the fees charged by BGA to fully understand the total amount of fees to be paid and to evaluate the advisory services being provided.

The same or similar portfolio management services may be available from other investment advisers for a lower fee. Investment advisory fees, which include investment advisory and transaction costs may be more or less costly than paying for the services separately, depending upon the investment advisory fees charged, the number of transactions for the account, the level of brokerage and other fees that would be payable if client obtained the services individually.

## **Item 6: Performance-Based Fees and Side-by-Side Management**

---

Neither BGA nor any of its Supervised Persons (employees) accepts performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

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

## **Item 7: Types of Clients**

---

### **Types of Clients**

As described in Item 4, BGA's clients include individuals, high net-worth individuals, trusts, and estates.

### **Account Minimums**

BGA requires a minimum account of \$100,000 for Wealth Management services. Waivers or exceptions from the minimum may be granted at the exclusive discretion of BGA.

BGA may group certain related client accounts for the purposes of achieving the minimum account size.

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

---

### Methods of Analysis

**Fundamental Analysis.** BGA attempts to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

### Investment 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.

Other strategies may include long-term purchases, short-term purchases, trading, and margin transactions.

### Risk of Loss

**Investing in securities involves risk of loss that clients should be prepared to bear.** All investment programs have certain risks that are borne by the investor. BGA's investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

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

oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties (i.e. Non-traded REITs and other alternative investments) are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

BGA reserves the right to advise clients on any other type of investment that it deems appropriate based on the client's stated goals and objectives. BGA may also provide advice on any type of investment held in a client's portfolio at the inception of the advisory relationship or on any investment on which the client requests advice.

## **Item 9: Disciplinary Information**

---

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of BGA or the integrity of BGA's management. BGA has no information to disclose applicable to this Item.

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

---

### **Financial Industry Activities – Broker-Dealers**

BGA is not registered as a broker-dealer. Several of its management persons are Registered Representatives of a broker-dealer, Purshe Kaplan Sterling (PKS) member FINRA/SIPC, as described below.

### **Financial Industry Activities – Futures and Commodities**

Neither BGA nor any of its management persons is registered as (or associated with) a futures commissions merchant, commodity pool operator, or a commodity trading advisor.

### **Broker-Dealer Registered Representatives**

In addition to its investment advisory activities, BGA offers retail brokerage services through its Registered Representatives who are affiliated with PKS. BGA generally conducts its investment advisory activities separate and apart from the advisory activities of PKS.

### **Insurance Company or Agency**

IARs of BGA may be appointed with several insurance companies and may be able to receive separate compensation for transactions implemented through various insurance companies. Clients are not obligated to use any company for insurance product purchases and may work with any insurance agent they choose. Insurance compensation will be separate and distinct from financial planning fees charged by BGA.

### **Other Investment Advisors**

BGA does not recommend or select other investment advisors for its clients.

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

---

### **Code of Ethics**

BGA's employees must comply with a Code of Ethics and Statement for Insider Trading. The Code describes the Firms' high standard of business conduct, and fiduciary duty to its clients. The Code's key provisions include:

- Statement of General Principles
- Policy on and reporting of Personal Securities Transactions
- A prohibition on Insider Trading
- Restrictions on the acceptance of significant gifts
- Procedures to detect and deter misconduct and violations
- Requirement to maintain confidentiality of client information

Bob Gucer, Chief Financial Officer and Chief Compliance Officer, reviews all employee trades each quarter. These reviews ensure that personal trading does not affect the market. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

BGA's employees must acknowledge the terms of the Code of Ethics at least annually. Any individual not in compliance with the Code of Ethics may be subject to termination.

Clients and prospective clients can obtain a copy of BGA's Code of Ethics by contacting BGA.

### **Participation or Interest in Client Transactions – Financial Interest and Principal/Agency Cross**

BGA and its employees do not recommend to clients, or buy or sell for client accounts, securities in which they have a material financial interest.

BGA does not affect any principal or agency cross securities transactions for client accounts. BGA will also not cross trades between client accounts.

### **Participation or Interest in Client Transactions – Personal Securities Transactions**

BGA and its employees may buy or sell securities identical to those recommended to clients for their personal accounts. These trades may not occur ahead of client trades. The Code of Ethics, described above, is designed to assure that the personal securities transactions, activities and interests of the employees of BGA will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of BGA's clients. In addition, the Code requires pre-clearance of many transactions. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by



an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between BGA and its clients.

## **Item 12: Brokerage Practices**

---

### **Research and Other Soft Dollar Benefits**

BGA does not receive formal soft dollar benefits other than execution from broker/dealers in connection with client securities transactions. See disclosure below in “Directed Brokerage – Other Economic Benefits”.

### **Brokerage for Client Referrals**

BGA does not receive client referrals from broker/dealers.

### **Directed Brokerage**

BGA generally has limited power of attorney to act on a discretionary basis on behalf of clients. When such limited powers exist between the client and BGA, BGA may choose both the amount and type of publicly traded securities to be bought to satisfy account objectives. This is the case with most of BGA's clients. Additionally, BGA accepts any reasonable limitation or restriction to such authority on the account placed by the client. All limitations and restrictions placed on account must be presented to BGA in writing.

### **Directed Brokerage – Other Economic Benefits**

Custodians may also provide general access to research and perhaps discounts on research products. Any research received is used for the benefit of all clients. BGA has no written or verbal arrangements whereby it receives soft dollars. From time to time, the custodian may offer BGA employees the ability to attend industry-related conferences or other benefits; however, BGA does not believe that such incentives impair BGA's independence.

BGA may have the opportunity to receive traditional “non-cash benefits” from the custodian, such as customized statements; receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk servicing the custodians advisors exclusively; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; ability to have investment advisory fees deducted directly from client accounts; access to an electronic communication network for client order entry and account information; access to mutual funds which generally require significantly high minimum initial investments or those that are otherwise only generally available to institutional investors; reporting features; receipt of industry communications; and perhaps discounts on business-related products.

Custodians may also provide general access to research and perhaps discounts on research products. Any research received is used for the benefit of all clients. While BGA endeavors at all times to put the interest of the clients first as part of its fiduciary duty, clients should be aware that the receipt of any additional compensation itself creates a conflict of interest and may affect the judgment of these individuals when making recommendations.

Other third-party service providers may provide non-cash benefits to BGA and/or its employees from time to time. These economic benefits may include, but are not limited to, waivers or reductions of conference registration fees, meals, entertainment and promotional premium items that have nominal value. BGA believes these economic benefits do not, either individually or collectively, impair BGA's independence. Prior to the acceptance of any consideration, employees must obtain authorization and approval from Bob Gucer, Chief Financial Officer and Chief Compliance Officer.

### **Trade Aggregation**

BGA typically aggregates trades for multiple accounts. Orders for the same security entered on behalf of more than one client will generally be aggregated (i.e., blocked or bunched) subject to the aggregation being in the best interests of all participating clients. If the order is filled at different prices during the day, the prices are averaged for the day so that all participating accounts receive the same price. If an order has not been filled completely so that there are not enough shares to allocate among all the clients equally, shares will be allocated in good faith, based on the following considerations: amount of cash in the account, existing asset allocation and industry exposure, risk profile, and type of security. All clients participating in each aggregated order shall receive the average price and subject to minimum ticket charges, pay a pro-rata portion of commissions.

BGA's allocation procedure seeks to be fair and equitable to all clients with no particular group or client(s) being favored or disfavored over any other clients.

Accounts for BGA or its employees may be included in a block trade with client accounts.

## **Item 13: Review of Accounts**

---

### **Reviews**

Wealth Management accounts are generally reviewed each quarter; accounts are continually monitored. Accounts are reviewed regularly, either in person or by telephone, in order to determine if the positions held are consistent with the investment objectives of the client.

Accounts are reviewed by Jaime Benedetti, Chief Executive Officer and Financial Advisor; Bob Gucer, Chief Financial Officer and Chief Compliance Officer; Charles R. Ambroselli, Investment Advisor Representative; Cher Scout, Investment Advisor Representative; Erik T. Anhaus, Investment Advisor Representative and Russell Clarke, Investment Advisor Representative .

Additional reviews may also be triggered changes in interest rates, market, political or economic conditions, tax laws, new investment information, changes in a client's own situation, at BGA's discretion, or as often as the client may direct.

BGA encourages frequent client contact; clients are obligated to promptly notify BGA of any changes in the client's financial status to ensure that investment strategies continue to meet the client's changing needs.

Financial planning services are offered on fixed fee or hourly basis, and do not include ongoing services or ongoing reviews of the client's portfolio, although BGA may recommend a review be performed at least annually. It would be the client's responsibility to update his or her financial goals and secure additional services offered by BGA, as desired. Investment adviser representatives serve as primary reviewers for client accounts while administrative personnel assist with general client communication and services.

### **Reporting**

Clients receive monthly statements from qualified custodians which include account activity, beginning and ending balances, and current values. In addition, the custodian provides clients with trade confirmations for each position bought and sold.

Client meetings are encouraged and are scheduled quarterly, or less frequently as specific situations dictate. Supplemental written reports, with more detailed information including investment performance, are provided to many clients.

### **Financial Planning – Reviews and Reporting**

The initial financial plan is included as a component of the financial planning service. Financial planning reports are dependent upon individual client needs.

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

---

### **Other Compensation**

BGA does not receive any formal economic benefits (other than normal compensation, and benefits described in Item 12 from any firm or individual for providing investment advice.

### **Other Compensation – Brokerage Arrangements**

As disclosed in Item 12, BGA may receive economic benefits from the custodian in connection with giving advice to clients.

### **Compensation – Client Referrals**

BGA does not make or accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

## Item 15: Custody

---

### **Custody – Fee Debiting**

Clients may authorize BGA (in the client agreement) to debit fees directly from the client's account at the broker dealer, bank or other qualified custodian (custodian). Client investment assets will be held with a custodian agreed upon by the client and BGA. The custodian is advised in writing of the limitation of BGA's access to the account. The custodian sends a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to BGA.

### **Custody – First Party Money Transfers**

Clients may provide BGA with written ongoing authorization to wire money between the client's accounts held with the qualified custodian directly to an outside financial institution (i.e. a client's bank account). A copy of this authorization is provided to the qualified custodian. The authorization includes the client's account number(s) at the outside financial institution(s) as required.

### **Custody – Third Party Money Transfers**

Clients may provide BGA with a standing letter of authorization (or similar asset transfer authorization) which allows BGA to disburse funds on behalf of clients to third parties. BGA ensures the following conditions are in place when deemed to have custody via third party money movement:

1. The client provides a Written Authorization to the custodian that includes all appropriate information as to how the transfer should be directed;
2. The Written Authorization includes instruction to direct transfers to the third party either on a specified schedule or from time to time;
3. Appropriate verification is performed by the custodian, along with a transfer of funds notice to the client promptly after each transfer;
4. The client may terminate or change the instruction to the custodian;
5. BGA has no authority or ability to designate or change any information about the third party contained in the instruction;
6. BGA maintains records showing that the third party is not a related party of the Firm or located at the same address as BGA; and
7. The custodian sends the client a written initial notice confirming the instruction and an annual written confirmation thereafter.

### **Custody – Account Statements**

As described in Item 13, clients receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets indicating all amounts disbursed from the account including the amount of advisory fees paid directly to BGA. Clients are urged to carefully review such statements and compare such official custodial records to the account statements or other reports that BGA provides. BGA statements may

vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## **Item 16: Investment Discretion**

---

Through the investment management agreement, BGA may accept limited power of attorney to act on a discretionary basis on behalf of clients. A limited power of attorney allows BGA to execute trades on behalf of clients.

When such limited powers exist between the BGA and the client, BGA has the authority to determine, without obtaining specific client consent, both the amount and type of securities to be bought to satisfy client account objectives. Additionally, BGA may accept any reasonable limitation or restriction to such authority on the account placed by the client. All limitations and restrictions placed on accounts must be presented to BGA in writing.

However, BGA consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.



## **Item 17: Voting Client Securities**

---

BGA does not have any authority to and does not vote proxies on behalf of clients. Clients retain the responsibility for receiving and voting proxies and receive proxies directly from either custodians or transfer agents.

If requested, BGA may provide advice to clients regarding proxy votes. If any conflict of interest exists, it will be disclosed to the client. Clients may contact Bob Gucer at (404) 602-0034 for information about proxy voting.

## **Item 18: Financial Information**

---

BGA has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

BGA is not required to provide a balance sheet; BGA does not serve as a custodian for client funds or securities and does not require prepayment of fees of both more than \$1,200 per client, and more than six months in advance.

This page is intentionally left blank.



Form ADV Part 2B  
Investment Adviser Brochure Supplement

**Supervisor:** Bob Gucer

**Supervisor of:**

Jaime Benedetti

Erik Anhaus

Carl Rosenthal

Casey Johnson

Charles Ambroselli

Cher Scout

Russell Clarke

Lawrence Donroe-Wells

Christopher A. Cristallo

March 2020

This brochure supplement provides information about the Firm's Supervised Persons that supplements the Benedetti and Gucer, Inc.'s brochure. You should have received a copy of that brochure. Please contact Bob Gucer, Chief Financial Officer and Chief Compliance Officer, if you did not receive Benedetti and Gucer, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about the Firm's Supervised Persons is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You may look up Benedetti and Gucer, Inc. using the unique identifying number, CRD # 166911.

7000 Peachtree Dunwoody Rd NE  
Building 6 Suite 100  
Atlanta, GA 30328  
(404) 602-0034

3301 Buckeye Road  
Buckeye Plaza Suite 402  
Atlanta, GA 30341  
(470) 428 8363

[bgucer@bgawealth.com](mailto:bgucer@bgawealth.com)

## Educational Background and Business Experience

---

BGA requires a college degree and/or extensive experience in providing advisory services as a minimum standard for professionals.

### **Supervised Persons**

***Jaime Benedetti***

Born 1978

**CRD# 4524413**

### **Employment History:**

Benedetti and Gucer, Inc.

2013 to Present

Chief Executive Officer and Investment Adviser Representative

Purshe Kaplan Sterling

2013 to Present

Registered Representative

### **Education:**

University of Dayton, Georgia State University

Bachelor of Science in Computer Science

### **Professional Designations:**

Accredited Investment Fiduciary (AIF®)

Certified Financial Planner™ (CFP®)

Chartered Retirement Planning Counselor (CRPC)

---

***Bob Gucer***

Born 1972

**CRD# 3207431**

### **Employment History:**

Benedetti and Gucer, Inc.

2013 to Present

Chief Financial Officer, Chief Compliance Officer  
and Investment Adviser Representative

Purshe Kaplan Sterling

2013 to Present

Registered Representative

### **Education:**

University of Orleans, France

Bachelor of Science in Finance and Economics

Master of Science in Finance and Economics

### **Professional Designations:**

Accredited Investment Fiduciary (AIF®)  
Certified Financial Planner™ (CFP®)  
Chartered Financial Consultant (ChFC®)  
Chartered Retirement Planning Counselor (CRPC)

---

**Erik T. Anhaus**  
**CRD# 4601461**

Born 1976

**Employment History:**

Benedetti and Gucer, Inc.  
Investment Adviser Representative

2013 to Present

Purshe Kaplan Sterling  
Registered Representative

2013 to Present

**Education:**

Valdosta State University, Valdosta, GA  
Bachelor of Science in Business Administration

---

**Carl Rosenthal**  
**CRD# 2936461**

Born 1938

**Employment History:**

Benedetti and Gucer, Inc.  
Wealth Advisor

2018 to Present

Rosenthal & Kaplin P.C.  
Partner

1982 to 2018

Perimeter Wealth Advisors, Inc.  
Personal Financial Specialist

2013 to 2018

Fox and Company, CPA's  
Partner

1975 to 1982

**Education:**

Old Dominion University, Norfolk, VA  
Bachelor of Science in Business Administration

**Professional Designations:**

Certified Public Accountant (CPA)

---

**Casey Johnson**

Born 1984

**CRD# 5437601**

**Employment History:**

Benedetti and Gucer, Inc.  
Paraplanner

2008 to Present

Purshe Kaplan Sterling  
Registered Representative

2013 to Present

**Education:**

Emory University, Atlanta, GA  
Bachelor of Science in Biology

**Professional Designations:**

Certified Financial Planner™ (CFP®)

---

***Charles R. Ambroselli***  
**CRD# 5288928**

Born 1977

**Employment History:**

Benedetti and Gucer, Inc.  
Investment Advisor Representative

2016 to Present

Ronald Blue & Company  
Senior Manager of Financial Planning

2010 to 2016

**Education:**

Saint Bonaventure University  
Master of Business Administration in Accounting and Finance  
Bachelor of Business Administration in Accounting and Finance

**Professional Designations:**

Certified Financial Planner™ (CFP®)  
Certified Public Accountant (CPA)

---

***Cher Scout***  
**CRD# 4423245**

Born 1969

**Employment History:**

Benedetti and Gucer, Inc.  
Wealth Advisor

2018 to Present

Wells Fargo Advisors

2011 to 2018

Financial Advisor

JPMorgan Chase  
Financial Advisor

2005 to 2010

Morgan Stanley  
Financial Advisor

2001 to 2005

**Education:**

Saint Bonaventure University  
Associates Degree in Hospitality Management

**Professional Certifications**

Certified Divorce Financial Analyst (CDFA)

---

***Russell Clarke***  
**CRD# 1422335**

Born 1955

**Employment History:**

Benedetti and Gucer, Inc.  
Financial Planner

2019 to Present

Ameriprise Financial Services, Inc.  
Financial Planner

1997 to 2019

**Education:**

Georgia State University  
Master of Business Administration in Finance

University of North Carolina  
Bachelor of Arts in English

**Professional Designations:**

Certified Financial Planner™ (CFP®)  
Chartered Life Underwriter (CLU)  
Chartered Advisor for Senior Living (CASL)  
Certified Long-Term Care (CLTC)

---

***Lawrence M. Donroe-Wells***  
**CRD# 1348744**

Born 1959

**Employment History:**



Benedetti and Gucer, Inc. Associate Financial Advisor	2019 to Present
--	-----------------

Ameriprise Financial Services Associate Financial Advisor	2014 to 2019
--	--------------

Donroe-Wells & Associates Marketing Consultant	2005 to 2019
---	--------------

**Education:**

University of Georgia-Terry School of Business  
Master of Business Administration in Risk Management  
Bachelor of Business Administration in Risk Management

---

<b>Christopher A. Cristallo</b> <b>CRD# 6649156</b>	Born 1986
--	-----------

**Employment History:**

Benedetti and Gucer, Inc. Investment Consultant	2019 to Present
--	-----------------

Alliant Retirement Consulting Investment Consultant	2016 to 2019
--	--------------

**Education:**

Mercer University – Stetson School of Business and Economics  
Master of Business Administration

Sacred Heart University  
Bachelor of Science in History

**Professional Designations:**

Certified Financial Planner™ (CFP®)

---

**AIF® – Accredited Investment Fiduciary**

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

**Issued by:** Center for Fiduciary Studies

**Prerequisites/Experience Required:** must accrue a minimum of three points as defined by the prerequisites valuation framework in order to be eligible for candidacy

**Educational Requirements/Examination:** Holders of the AIF® mark have successfully completed a specialized program on investment fiduciary standards and subsequently passed a comprehensive examination. The Accredited Investment Fiduciary® (AIF®) designation represents a thorough knowledge of and ability to apply the fiduciary practices.

**Continuing Education/Experience Requirements:**

AIF designees must accrue six hours of continuing professional education annually and attest to a Code of Ethics.

**CFP® - Certified Financial Planner™**

**Issued by:** Certified Financial Planner Board of Standards, Inc.

**Prerequisites/Experience Required:** Candidate must meet the following requirements:

- A bachelor's degree (or higher) from an accredited college or university, and
- 3 years of full-time personal financial planning experience

**Educational Requirements:** Candidate must complete a CFP-board registered program, or hold one of the following:

- CPA
- ChFC
- Chartered Life Underwriter (CLU)
- CFA
- Ph.D. in business or economics
- Doctor of Business Administration
- Attorney's License

**Examination Type:** CFP Certification Examination

**Continuing Education/Experience Requirements:** 30 hours every 2 years

**ChFC - Chartered Financial Consultant**

**Issued by:** The American College

**Prerequisites/Experience Required:** Candidate must meet the following requirements:

- 3 years of full-time business experience within the five years preceding the awarding of the designation

**Educational Requirements:** 6 core and 2 elective courses

**Examination Type:** Final proctored exam for each course

**Continuing Education/Experience Requirements:** 30 CE credits every 2 years

**CRPC - Chartered Retirement Planning Counselor**

**Issued by:** Certified Financial Planner Board of Standards, Inc.

**Prerequisites/Experience Required:** None

**Educational Requirements:** Candidate must complete the CFP-board registered Chartered Retirement Planning Counselor (CRPC<sup>SM</sup>) program

**Examination Type:** Multiple Choice Certification Examination

**Continuing Education/Experience Requirements:** 16 hours every 2 years

**CPA – Certified Public Accountant**

**Issued by:** State Boards of Accountancy

**Prerequisites/Experience Required:** Candidate must meet the following requirements:

- Minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA);
- Successful passing of the Uniform CPA Examination

**Educational Requirements:**

- At minimum, a college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting);

**Examination Type:** Uniform CPA Examination

**Continuing Education/Experience Requirements:** Completion of 40 hours of continuing professional education each year (or 80 hours over a two-year period) in order to maintain a CPA license

**CDFA – Certified Divorce Financial Analyst**

**Issued by:** Institute for Divorce Financial Analysts

**Prerequisites/Experience Required:** Candidate must meet the following requirements:

- Minimum experience levels of three years professional experience in finance or divorce
- Successful passing of the Uniform CPA Examination

**Educational Requirements:**

- At minimum, a Bachelor's degree
- Optional independent study

**Examination Type:** Four certification exams (online, proctored, closed book)

**Continuing Education/Experience Requirements:** Completion of 15 divorce-related hours every two years in order to maintain a CDFA designation

**CLU – Chartered Life Underwriter**

**Prerequisites/Experience Required:** Candidate must meet the following requirements:

- A combination of education and/or experience working with seniors
- Agree to be bound by the American College's Code of Ethics

**Educational Requirements:** Candidate must complete the following:

- Self-study or classroom coursework
  - 8 courses: 5 required, 3 electives

**Examination Type:** None

**Continuing Education/Experience Requirements:** 30 CE credits every 2 years

**CASL - Chartered Advisor for Senior Living**

**Prerequisites/Experience Required:** Candidate must meet the following requirements:

- Three years of business experience immediately preceding the date of use of the designation (Undergraduate or graduate degree from an accredited institution qualifies as one year of business experience)
- Meet ethical standards requirement

**Educational Requirements:** Candidate must complete the following:

- 15 semester credit hours with 5 proctored exams

**Examination Type:** (5) 100 questions, 2 hours (each), computer-administered exam(s)

**Continuing Education/Experience Requirements:** 15 CE credits every 2 years, with the additional condition that at least 10 of these hours should be in course work directly related to the course work required to obtain this designation.

**CLTC - Certified Long-Term Care**

**Prerequisites/Experience Required:** None

**Educational Requirements:** Candidate must complete the following:

- 2-day class or online course

**Examination Type:** Final course exam

**Continuing Education/Experience Requirements:** 1 ethics course every 2 years

## **Disciplinary Information**

---

Neither BGA nor any Supervised Persons have been involved in any activities resulting in a disciplinary disclosure.

## **Other Business Activities**

---

Disclosure on Outside Business Activities is provided in Form ADV Part 2A Item 10 – Other Financial Industry Activities and Affiliations. These Outside Business Activities do not create a material conflict of interest with clients.

As disclosed in Form ADV Part 2A Item 5, Fees and Compensation, neither BGA nor any supervised persons receive commissions, bonuses or other compensation based on the sale of securities or other investment products.

Jaime Benedetti, Bob Gucer, Erik T. Anhaus and Casey Johnson are Registered Representatives of PKS and receive commissions, bonuses or other compensation based on the sale of securities or other investment products. This practice gives the supervised persons an incentive to recommend investment products based on the compensation received, rather than on the client's needs. The Firm has policies and procedures in place to mitigate any incentives.

Jaime Benedetti, Bob Gucer and Erik T. Anhaus are licensed insurance agents and may be able to receive separate compensation for transactions implemented through various insurance companies. Clients are not obligated to use any company for insurance product purchases and may work with any insurance agent they choose. Insurance compensation will be separate and distinct from financial planning fees charged by BGA.

Jaime Benedetti and Bob Gucer are co-owners of Benedetti and Gucer Properties, LLC. This entity provides real estate management services for the office space that is owned and occupied by BGA.

Jaime Benedetti and Bob Gucer are co-owners of Benedetti & Gucer Timber, LLC. This entity an agricultural company that will plant trees.

## **Additional Compensation**

---

No Supervised Person receives any economic benefit outside of regular salaries or bonuses related to amount of sales, client referrals or new accounts, except as described in Form ADV Part 2A, Item 12.

## **Supervision**

---

Bob Gucer, Chief Financial Officer and Chief Compliance Officer, supervises all persons named in this Form ADV Part 2B Investment Adviser Brochure Supplement. Bob Gucer supervises these persons by holding regular staff, investment and other ad hoc meetings. In addition, Bob Gucer regularly reviews client reports, emails, and trading, as well as employees' personal securities transaction and holdings reports. Bob Gucer may be reached at (404) 602-0034.