

Item 1 Cover Page

Allen Capital Group, LLC
A Registered Investment Adviser Firm

IARD/CRD Number: 135879

SEC Number: 801-64514

ADV Part 2 Disclosure Brochure

March 20, 2020

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This brochure provides information about the qualifications and business practices of **Allen Capital Group, LLC**. If you have any questions about the contents of this brochure, please contact us at Phone: 308-385-1500 or info@allencapgroup.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.

“Registration does not imply a certain level of skill or training.”

Additional information about **Allen Capital Group, LLC** (ACG) also is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Material Changes

Allen Capital Group, LLC’s last annual Form ADV Part 2A Disclosure Brochure amendment was in March 2019. The following are the material changes to Allen Capital Group, LLC’s Form ADV Part 2A Disclosure Brochure:

ACG appointed Travis Portwood, CFP®, CFA® as Chief Investment Officer of ACG’s Investment Committee in January 2020; Shane T. Wissmann, CFP® has also been added as a member of the Investment Committee. See - Item 8 Methods of Analysis, Investment Strategies and Risk of Loss on page 7.

ACG may now bill Clients at an hourly rate of up to \$500 per hour, a fixed fee rate of up to \$20,000 or based on a percentage of specific assets under advisement up to 1.75%. - See Item 5 Fees and Compensation, Financial Planning Services on page 6.

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Item 4 Advisory Business

Allen Capital Group, LLC (ACG) is registered as an investment adviser with the Securities and Exchange Commission since July 2005. ACG is notice filed in all states where it conducts business and is required to be notice filed. ACG is a limited liability corporation. Eric "Rick" Allen and Mark Allen are the principal owners and managing members of ACG. Investment Adviser Representatives (IAR) of ACG that are responsible for giving investment advice must have a FINRA Series 7 License and NASAA Series 66, NASAA Series 65 License or an investment adviser representative's licensing equivalent, such as a CFP or CFA designation.

ACG Fiduciary Statement - ACG is a "fiduciary" under ERISA or section 4975 of the Code (to the extent applicable) with respect to any investment advice that ACG provides in connection with Retirement Accounts and holdings. When providing any such fiduciary advice to a client ACG adheres to the standards of care of "Impartial Conduct Standards". ACG also provides investment advice that is in the client's "Best Interest." Advice meeting the "Best Interest" standard is advice that reflects the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with like aims, based on your investment objectives, risk tolerance, financial circumstances, and needs, without regard to the financial or other interests of ACG. The compensation that ACG receives for their services is not excessive or unreasonable within the meaning of ERISA section 408(b)(2) or section 4975(d)(2). Statements by ACG to you about services subject to this Disclosure will not be materially misleading at the time they are made.

ACG now utilizes the back-office, portfolio management platform and client account services of Orion Advisor Services LLC, a leading securities industry back office and technology service provider.

ACG Solutions, Inc., was established by ACG for administrative, marketing and client relations purposes in January 2019. ACG Solutions, Inc. is solely owned by ACG.

Investment Management Program

ACG provides investment management program services, defined as giving continuous advice to clients based on their individual needs through ACG's Investment Management Program accounts. ACG obtains financial information on the ACG Client Investment Profile Questionnaire and other new account documents from prospective clients to determine the suitability of establishing Investment Management Program accounts and to determine the appropriate investment management strategies that are specific for each client account that is established with ACG. Clients may impose restrictions on the type of investments that may be included in their Investment Management Program accounts.

ACG has Broker-Dealer/Custodian arrangements with Charles Schwab & Co. (Schwab), a SEC registered broker/dealer, member FINRA, SIPC and TD Ameritrade, Inc. (TDA), a SEC registered broker/dealer, member FINRA, SIPC. Clients may also have accounts held directly at mutual fund company custodians, variable annuity/life insurance company custodians, 529 Plan custodians or at other qualified retirement plan custodians. All Investment Management Program accounts that are held away from Schwab and TDA will have their transactions processed through the custodians of record for their accounts.

ACG uses discretionary trading authority to buy, sell and direct investments within the client accounts, including reinvestment of proceeds from assets sold and income attributable to client accounts in cash, cash equivalents, bonds, shares of common or preferred stock, unit investment trusts, ETF's, mutual funds, options, variable annuity sub-accounts, or other alternative securities selected by ACG for client accounts.

Clients may receive periodic position/performance reports from ACG describing account performance and holdings. Clients will receive a monthly account statement from their account custodian showing the account activity as well as positions held in the account at month's end. No less than on a quarterly basis, clients will receive a statement from the Custodian for transactions and holdings.

ACG will not exercise proxy-voting authority over the securities held in client accounts where ACG provides investment management services. The obligation to vote client proxies shall at all times rest with the clients. However, clients may contact ACG for advice or information about a particular proxy vote. ACG shall not be deemed to have proxy-voting authority solely as a result of providing such advice to a client. Should ACG inadvertently receive proxy information for a security held in account, such information shall be immediately forwarded to client.

Flat Fee- Outside Account Advice – Clients that are being provided Investment Management Services under an ACG Investment Management agreement may also have ACG provide them Flat Fee- Outside Account Advice on

other accounts. These outside accounts may or may not be ERISA accounts. ACG may have the ability to trade these accounts on a discretionary basis.

Selection of Other Advisors - In some instances, the management of client accounts are delegated to other investment advisors that have sub-advisor agreements with ACG or separate agreements with clients. In such instances, the other investment advisors will have discretionary authority to manage client accounts. A complete description of each of these other investment advisor's' services is described in their Form ADV Part 2A Disclosure Brochures. When another investment advisor is used in a client account the client will be provided the other investment advisor's Form ADV Part 2A Disclosure Brochure. A client may always place limitations on the use of other investment advisors by ACG.

Referral Advisors- ACG may enter into Referral Advisor Agreements with outside Referral Advisors who refer clients to ACG. If a referred client enters into an investment advisory agreement with ACG, a cash referral fee will be paid to the Referring Advisor, which will be based on a percentage of the advisory fees that are paid by the client to ACG. The Referral Advisor Agreement entered into between ACG and Referral Advisor will at all times be in compliance with the rules and regulations under 17 CFR Section 275.206(4)-3 and corresponding state rules and regulations on investment advisor referral activities.

Financial Planning Services

ACG provides Financial Planning Services to clients. Financial Planning Services include investment related planning and non-investment related planning services. When providing financial planning services, ACG will obtain financial information and documents from clients to determine the appropriate advice to be provided to them. ACG provides the following Financial Planning Services:

- Current Plan Results Reviews
- Flat Fee - Qualified Retirement Plan Reviews
- What If Planning Scenario Comparisons
- Monte Carlo Investment Analysis Simulations
- Life Insurance/Disability Needs Analysis
- Long-Term Care Needs Analysis
- Trust and Estate Planning reviews
- Other planning services as required

ACG's Financial Planning Services are tailored to the individual needs of each client. ACG obtains financial information from prospective clients to determine the suitability of ACG's Financial Planning Services. Each client may impose limits on the type of Financial Planning Services provided to them by ACG.

The Financial Planning Services being provided by ACG do not include investment management services, nor do they include the regular review of client's investment assets. If client wants to have ACG manage their investment assets, a separate Investment Management Program agreement must be entered into with ACG for separate and additional fees.

If a Financial Planning Service client chooses to implement the advice of an ACG IAR, the client may do so through the IAR in their separate capacity as an ACG IAR, registered representative of PKS and/or an independent insurance agent. When implementing transactions in these separate capacities, the IAR may earn fees or commissions. If fees or commissions are earned, the IAR may waive or reduce the financial planning or consultation fee by the amount of the fees or commissions actually received by the IAR.

Retirement Plan Advisory and Review Program

ACG provides a Retirement Plan Advisory and Review Program which may include a Second Opinion Survey for Plan Sponsors and their Qualified Retirement Plans. The covered qualified retirement plans include 401(k) Plans, Defined Contribution Plans, Profit Sharing Plans, and Defined Benefit Plans and other qualified retirement plans (collectively referred to as Qualified Retirement Plans). Depending on the agreement with the Retirement Plan, ACG may act as an ERISA Section 3(38) Investment Manager Fiduciary that makes investment management decisions and has discretionary authority for Qualified Retirement Plan assets, or an ERISA Section 3(21) Limited Services Fiduciary that only makes recommendations to Qualified Retirement Plans.

Qualified Retirement Plans may receive position/performance reports from ACG describing Qualified Retirement Plans performance and holdings. Qualified Retirement Plans will receive a monthly Plan statement from the Custodian showing the Plan activity as well as Plan holdings.

ACG Wrap Fee Program Disclosures

ACG currently sponsors a Wrap Fee Program. ACG and ACG IARs also act as portfolio managers in the ACG Wrap Fee Program. For a more detailed description of the Wrap Fee Program please review the ACG Wrap Fee Program Brochure.

Assets Under Management and Advisement

ACG has \$ 658,217,988.44 of assets under discretionary management in its Investment Management Program as of December 31, 2019. ACG does not manage assets on a non-discretionary basis in our Investment Management Program. ACG has \$ 59,331,947.78 of assets under non-discretionary advisement in its Retirement Plan Advisory and Review Program as of December 31, 2019.

Item 5 Fees and Compensation

Investment Management Program

Clients compensate ACG for all services furnished under the Investment Management Program by the payment of fees (Management Fees) in accordance with the following Management Fee Schedule:

Management Fee Schedule

Clients compensate ACG for all services furnished under the Investment Management Program by the payment of fees (Management Fees) that is based on a percentage of the assets under management. ACG charges an annualized Management Fee that ranges up to 1.75%, depending on a number of factors including the size and complexity of the client account.

If a client account is referred from a Referral Advisor to ACG, the Referral Advisor may receive up to 50% of ACG's Management Fee.

Management Fees will be calculated at the beginning of each month. Management Fees may be charged in arrears or in advance depending on the client agreement. Management Fees will be prorated and be based on the Period Ending Balance of the client's account assets under management at the end of the previous month. Management Fees do not take into account securities that are not priced. Management Fees will be deducted from the account. A client account that is opened mid-period will be charged an initial Management Fee that includes a portion of the fee that is pro-rated for the number of days that the account is open in the first month. Management Fees will be noted on client's monthly Custodian/Broker-Dealer statements.

Clients that are being provided Investment Management Services under an ACG Investment Management agreement and have ACG provide them Flat Fee- Outside Account Advice on other accounts may have ACG assess their client Investment Management Services accounts an annual flat fee of \$150 per outside account: this annual flat fee is negotiable at the discretion of ACG.

In instances where the management of client accounts are delegated to other investment advisors that have sub-advisor agreements with ACG or separate agreements with clients the fees for these services will range up to 100 basis points (bps). Some of these other investment advisors are paid from ACG's Management Fees. Other investment advisors may charge their fees separately from ACG's Management Fees. If other investment advisor fees are deducted separately from ACG Management Fees those other fees will be noted separately from ACG Management Fees. The use of other investment advisors in the management of a client account may increase the fees that the client pays for their advisory services. A complete description of these other investment advisors' fees is described in their Form ADV Part 2A Disclosure Brochures.

Client may have Management Fees paid from other accounts or custodians or be billed directly by invoice; in such cases Management Fee deductions will be noted as zero on the client's monthly Custodian statements.

Clients may incur certain charges imposed by third parties other than ACG in connection with investments placed in the account, including but not limited to:

- IRA and Qualified Retirement Plan Fees, and other custodial fees; and

- Mutual fund and variable annuity internal expenses, commissions, sales loads, 12(b)-1 fees, trail fees and surrender charges. The purchase of mutual fund shares in client's account can result in certain processing and mailing charges that are not incurred when shares are purchased directly from the mutual fund company.

Broker-Dealer and Custodian fees, expenses, and commission charges are separate and distinct from the fee charged by ACG.

Investment Management Program accounts may be terminated by ACG or client effective upon receipt of written notice to the other party. Upon termination, client shall receive a refund of any Management Fee not already earned by the ACG. ACG will advise the Broker-Dealer and Custodian to deliver securities and funds held at the Custodian as instructed by client unless client requests that the securities and funds be liquidated. If an account is liquidated, proceeds will be payable to client upon settlement of all transactions in the account. Termination of an Investment Management Program account will not affect the liabilities or obligations of the parties arising out of transactions initiated prior to termination.

Financial Planning Services

Clients will compensate ACG for all Financial Planning Services furnished to them by the payment of fees ("Financial Planning Fees"), which are due and payable upon completion of the financial planning services provided by ACG. The Financial Planning Fees for the services being rendered do not include payment for other professional services, which may be required by clients to implement the recommendations made by ACG. Clients will be billed at an hourly rate of up to \$500 per hour, a fixed fee rate of up to \$20,000 or based on a percentage of specific assets under advisement up to 1.75%. ACG's minimum financial planning fee is \$100. However, the minimum Financial Planning Fees are negotiable. Financial Planning Fees will be determined by the IAR based upon the complexity of the client's financial situation and the services being provided and will be disclosed to the client prior to the services being provided. Certain managing members, employees, investment advisor representatives ("IARs") or agents of ACG, may maintain various business relationships which may result in these persons receiving compensation other than Financial Planning Fees. The receipt of such compensation may be considered to represent a conflict of interest.

ACG's Financial Planning Services may be terminated by either ACG or the client effective upon receipt of written notice to the other party. Upon termination, client will receive a refund of any Financial Planning Fees not already earned by the ACG. Any Financial Planning Fees owed by client are immediately due and payable at the termination of the Financial Planning Agreement.

Retirement Plan Advisory and Review Program

ACG's Investment Advisory Fee is based on a maximum of 1.0% of Plan assets, with a minimum fee of \$10,000. However, the Investment Advisory minimum is negotiable at the discretion of ACG. ACG's Investment Advisory Fees are paid quarterly or monthly in arrears or advance based upon previous period ending balance of the assets invested in the Plan.

ACG's Retirement Plan Advisory and Review Program is best suited to employers of 50 or more employees or plans with \$1,000,000 or more of assets. For Qualified Plans with fewer employees or assets of less than \$1,000,000 a negotiated fee will be considered for the scope of work to be performed.

ACG's Retirement Plan Advisory and Review Program may be terminated by ACG or Qualified Plan by giving the other party written notice. The agreement will then be terminated upon receipt of the termination notice by the other party. Any prepaid, unearned fees will be refunded to the Qualified Plan. ACG doesn't charge a termination fee.

Broker-Dealer and Insurance Compensation

Mark Allen in this capacity as registered representative of Purshe Kaplan Sterling Investments (PKS) will be paid commissions for the sale of securities or other investment products, including service (trail) fees from the sale of mutual funds and variable annuities. This presents a conflict of interest as it gives him an incentive to recommend investment products based on the compensation received, rather than on your needs. To address this conflict Mark Allen will only receive commissions for the sale of securities or other investment products when selling securities through PKS, and not for accounts advised through the ACG. You always have the option to purchase broker-dealer securities or other investment products that Mark Allen recommends through other unaffiliated brokers-dealers.

ACG is a licensed insurance agency as of February 2016. IARs of ACG may also be licensed as insurance agents under ACG. In this capacity, the IARs will be paid commission for the sales of fixed insurance products. This presents

a conflict of interest as it gives the IARs an incentive to recommend insurance products based on the compensation received, rather than on your needs. You always have the option to purchase insurance products that IAR recommends through other unaffiliated insurance agencies or companies.

ACG IARs receive less than 5% of their income from these other Broker-Dealer and Insurance activities.

ACG addresses these Compensation conflicts through the following **Compliance Oversight Policies**:

- **Conflicts of Interest** - ACG must disclose any conflicts of interest when dealing with clients.
- **ACG Obligations** - ACG and its IARs are subject to the following specific obligations when dealing with clients:
 - The duty to have a reasonable, independent basis for its investment advice;
 - The duty to ensure that investment advice is suitable to meeting the client's individual objectives, needs, and circumstances; and,
 - A duty to be loyal to clients.

Mark Allen, the Chief Compliance Officer (CCO) of ACG or his designees are responsible for supervising ACG advisory accounts and planning activities. The reports and documents the CCO reviews to supervise/review these activities may include the Client Investment Profile Questionnaire, Riskalyze reports, new account documents, trade tickets, confirmations, brokerage statements, performance reports, daily activity reports and planning documents.

Clients always have the option of purchasing recommended investment and insurance products through other broker-dealers and insurance agents that are not affiliated with ACG or PKS.

General ACG Fee Disclosure

Management Fees, Financial Planning Fees and other charges related to ACG's advisory programs and services may be more than the cost of purchasing the same services separately or similar services elsewhere.

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

ACG does not conduct any Performance-Based Fees advisory business.

Item 7 Types of Clients

ACG generally provides investment advice to the following:

- Individuals
- Profit sharing plans and participants
- Pensions and other retirement plans
- Corporations or other business entities
- Trust, estates, or other charitable organizations

Account Minimums - ACG's recommended minimum investment amount for establishing and maintaining an Investment Management Program account with ACG is \$50,000. Exceptions may be granted to this minimum at the discretion of ACG.

Planning Fee Minimum - ACG charges a minimum fee of \$100 for Financial Planning Services. Exceptions may be granted to this minimum at the discretion of ACG.

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

Methods of Analysis

ACG will obtain financial information from prospective clients on a Client Investment Profile Questionnaire and other new account documents to determine the suitability of ACG's Investment Management Program and to determine the appropriate investment objectives that are specific for each client account which is established with ACG.

Investment Strategies

Travis Portwood, CFP®, CFA®, Mark Allen, CFP®, Eric Allen, CFP®, Randal R. Korth, CPA, and Shane T. Wissmann, CFP®, are the members of ACG's Investment Committee for all ACG Investment Management Programs.

ACG appointed Travis Portwood, CFP®, CFA® as Chief Investment Officer of ACG's Investment Committee in January 2020. We implement an investment strategy which we believe is appropriate and suitable for each client's unique investment objectives and tolerance for risk. Generally, we take a long-term approach (over a year) when providing and implementing our investment advice. However, there are times when a short-term considerations and needs are warranted for a client. At such time, we will utilize a short-term strategy, with some investments being held for less than a year.

We will use what we determine to be the most effective investment vehicle for the client's situation, whether it be individual stocks & bonds, actively managed mutual funds or passively managed exchange traded funds (ETF's).

When evaluating individual positions, we primarily rely on fundamental analysis in determining which securities to include in your portfolio. Fundamental analysis involves a detailed investigation into a company's business operations and its financial statements in order to assess its prospects, understand the risks that may be embodied in its securities, and estimate the return potential that may be possible given its future prospects and its current valuation in the market.

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

In August 2018, ACG started using SP Financial Group (SPFG) of Arkadios Capital for bond portfolio management in ACG managed accounts. SPFG provides registered investment advisors with comprehensive fixed income support – from personalized advice and analytics to portfolio construction, implementation, and ongoing monitoring of accounts and holdings, with primary focuses on individual bond portfolios and closed-end funds.

Where appropriate, we will use options for clients. We use "covered calls", in which we sell an option on security you own. In this strategy, you receive a fee for making the option available, and the person purchasing the option has the right to buy the security from you at an agreed upon price. We will also use put options to "hedge" or in other words, to help limit the potential downside of a security we have purchased for your portfolio.

Reviews are conducted for all accounts on an ongoing basis. We review investment performance, suitability, appropriate asset allocation, and monitor each account for any changes or updates that are needed (among other things). Clients establishing and maintaining discretionary investment accounts may receive periodic performance reports from ACG showing the investment performance of their accounts.

Risk of Loss

Investing in securities involves a risk of loss that you should be prepared to bear, including loss of your original principal. Past performance is not indicative of future results and you should not assume that future performance of any specific investment or investment strategy will be profitable. We do not provide guarantee that your goals will be achieved. There are varying degrees of risk, depending on your investment.

- **Market Risk** – Either the market as a whole, or the value of an individual company, goes down, resulting in a decrease in the value of client investments. This is referred to as systematic risk.
- **Equity Risk** – Stocks are susceptible to market fluctuations and to volatility which results in increases and decreases in value depending on the markets confidence in or perceptions of the market change. Investors holding common stock of any issuer are generally exposed to greater risk than if they hold preferred stock or debt obligations of the issuer.
- **Company Risk** – There is generally a level of company or industry specific risk when investing in stock positions. This is referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that a company will perform poorly or that its value will be reduced based on factors specific to it or its industry.
- **Options Risk** – Options on securities can be subject to greater fluctuations in value than investing in the underlying securities. Purchasing and writing put or call options are highly specialized activities and involve

greater investment risk. Puts and calls are the right to sell or buy a specified amount of an underlying asset at a set price within a set time.

- **Fixed Income Risk** – Investing in bonds involves the risk that the issuer will default on the bond and be unable to make payments. In addition, individuals depending on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- **ETF and Mutual Fund Risk** – ETF and mutual fund investments bear additional expenses based on a pro-rata share of operating expenses, including potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities held by the ETF or mutual fund. Clients also incur brokerage costs when purchasing ETFs.
- **Alternative Investment Risk** – Alternative investments encompass a broad array of investment strategies. These investments are susceptible to many of the same risks as other securities while also having their own unique return and risk characteristics that must be considered on a case-specific basis.
- **Management Risk** – Investments also vary with the success and failure of the investment strategies, research, analysis and determination of portfolio securities. If our strategies do not produce the expected returns, the value of your investments will decrease.

Selection of other Advisors - The management of client accounts that are delegated to other investment advisors that implement investment strategies that are different from ACG's investment strategies may create different investment risks. A complete description of each sub-advisor's investment strategies and risks are described in the sub-advisor's Form ADV Part 2A Disclosure Brochure.

Item 9 Disciplinary Information

ACG has no current disciplinary information to report to the public, clients or prospective clients. ACG Advisors have no current disciplinary information to report to the public, clients or prospective clients.

Item 10 Other Financial Industry Activities and Affiliations

Broker-Dealer and other Financial Industry Activities and Affiliations

ACG is not registered as a broker-dealer, futures commission merchant, commodity pool operator or commodity trading advisor and will not become registered in any of these capacities. ACG's IARs are not associates of a futures commission merchant, commodity pool operator or commodity trading advisor. ACG's IARs will not become registered or associated in any of these capacities.

However, Mark Allen is licensed as registered representative of PKS, a registered broker-dealer with the SEC and the FINRA, and a member of the SIPC. Mark Allen encourages clients to use not only the ACG investment advisory services, but the PKS broker-dealer services as well. PKS offers a full range of investment products and services. PKS broker-dealer commissions are comparable to other full services brokers. Some advice offered by the Mark Allen in his capacity as a registered representative of PKS may involve investments in mutual funds and variable annuity products which pay 12b-1 trail fees. He may receive a portion of these 12b-1 trail fees in his separate capacity as registered representative. Clients should be aware that the payment and receipt of these commissions and fees could represent an incentive to recommend mutual funds or variable annuities that pay 12b-1 trail fees or pay higher 12b-1 trail fees over funds with no 12b-1 fees or lower fees, thus creating a conflict of interest.

Commissions may be higher or lower at PKS than at other broker/dealers. Mark Allen in his capacity as a registered representative of PKS may have a conflict of interest in having clients purchase securities and/or insurance related products through PKS in that the higher his production with PKS the greater potential for obtaining a higher pay-out on commissions earned. Further, registered representatives of PKS are restricted to only offering those brokerage products and services that have been reviewed and approved for offering to the public by PKS.

Insurance Activities and Affiliations

ACG is a licensed insurance agency as of February 2016. IARs are also licensed as an insurance agent under ACG and can provide insurance products and services to clients. As insurance agents, they will earn insurance commissions and fees while selling and servicing insurance products and services.

Tax Planning and Accounting Services

Mark Allen is a 20% owner-member of Veritas Professional Group, LLC, (Veritas), a Certified Public Accounting (CPA) firm. Veritas provides tax planning, accounting and bookkeeping services. These tax planning, accounting and bookkeeping services are non-advisory services that are separate and distinct from the Investment Management Programs and Financial Planning Services offered under Allen Capital Group, LLC and have a separate and distinct fee structure.

Conflicts Regarding Other Financial Industry Activities and Affiliations

ACG addresses these conflicts through the following **Compliance Oversight Policies**:

- **Conflicts of Interest** - ACG must disclose any conflicts of interest when dealing with clients.
- **ACG Obligations** - ACG and its IARs are subject to the following specific obligations when dealing with clients:
 - The duty to have a reasonable, independent basis for its investment advice;
 - The duty to ensure that investment advice is suitable to meeting the client's individual objectives, needs, and circumstances; and,
 - A duty to be loyal to clients.

Mark Allen, Chief Compliance Officer (CCO) of ACG and his designees are responsible for supervising ACG advisory accounts, planning activities and referrals to other investment advisors. The main reports and documents the CCO reviews to supervise/review these activities are Client Investment Profile Questionnaire, new account documents, trade tickets, confirmations, brokerage statements, performance reports, daily activity reports and planning documents. The CCO may delegate certain Broker-Dealer and advisory compliance responsibilities to a designee that will report to him.

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

ACG has established a Code of Ethics to comply with the requirements of Section 204A-1 of the Investment Advisers Act of 1940 that reflects ACG's fiduciary obligations and those of its supervised persons and requires compliance with federal securities laws. ACG's Code of Ethics covers all individuals that are classified as "supervised persons." All ACG owners and IARs are classified as supervised persons. ACG requires its supervised persons to consistently act in the ACG clients' best interest in all advisory activities. ACG imposes certain requirements on supervised persons to ensure that they meet ACG's fiduciary responsibilities to ACG clients. This standard of conduct requirement is higher than what is ordinarily required and encountered in business.

- ACG and ACG's supervised persons may buy, sell and hold securities for their personal accounts, which ACG may also recommend to clients, or buy and sell on a discretionary basis for clients. As these situations may present a conflict of interest, it is the policy of ACG that no supervised person shall prefer their own interest over the interest of ACG clients.
- No supervised person employed by ACG may buy or sell any security prior to a transaction being implemented for an advisory account.
- No supervised person employed by ACG may buy or sell securities for their personal accounts where their decision is derived from information obtained through their employment with ACG unless the information is also available to the investing public upon reasonable inquiry.
- ACG maintains a list of all securities holdings for all supervised persons, which is reviewed on a regular basis by a principal of the Advisor.

Conflicts of Interest – ACG must disclose any conflicts of interest when dealing with clients.

ACG Obligations – ACG and its IARs are subject to the following specific obligations when dealing with clients:

- The duty to have a reasonable, independent basis for its investment advice;
- The duty to ensure that investment advice is suitable to meeting the client's individual objectives, needs, and circumstances; and
- A duty to be loyal to clients.

This Code of Ethics response is only intended to provide clients and potential clients with a summary description of ACG's Code of Ethics. If current clients or potential clients want to review ACG's entire Code of Ethics, they may obtain a copy of it by calling ACG at 308-385-1500, or writing to Mark Allen at 3032 West Stolley Park Road, Suite E, Grand Island NE, 68801

Item 12 Brokerage Practices

ACG Brokerage and Custodian Relationships

ACG considers a number of factors including, without limitation, best execution, the overall direct net economic impact on account assets (including commissions which may not be the lowest available, but which will not be higher than the generally prevailing competitive range), the financial stability of the Broker-Dealer and Custodian (Broker-Dealer/Custodian), the efficiency with which the transaction is effected, the ability to effect the transaction where complicating factors are involved, the availability of the Broker-Dealer and Custodian to stand ready to execute possible difficult transactions in the future, and other matters involved in the receipt of brokerage and research services.

ACG has Broker-Dealer/Custodian arrangements with Charles Schwab & Co. (Schwab) a SEC registered broker/dealer, member FINRA, SIPC and TD Ameritrade, Inc., (TDA) a SEC registered broker/dealer, member FINRA, SIPC.

Clients may also have accounts held directly at mutual fund company custodians, variable annuity/life insurance company custodians, 529 Plan custodians or at other qualified retirement plan custodians. All Investment Management Program accounts that are held away from Schwab and TDA will have their transactions processed through the custodians of record for their accounts.

ACG will recommend Schwab and TDA to clients for custody and brokerage services. There is no direct link between ACG, these Broker-Dealer/Custodians and the investment advice ACG gives to our clients, although ACG receives economic benefits through its participation in these Broker-Dealer/Custodians' advisory accounts, custody and brokerage services that are typically not available to retail investors. These benefits include the following products and services (provided without cost or at a discount):

- Duplicate client statements and confirmations;
- Research related products and tools;
- Planning services;
- Access to a trading desk serving advisor participants;
- Access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts);
- The ability to have advisory fees deducted directly from client accounts;
- Access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to ACG by third party vendors; and
- Other client account and marketing services.

ACG has an agreement with Schwab for compensation for specific services that are paid directly to third party vendors by Schwab; ACG generally utilized this compensation for client marketing events or advisor development. ACG also has an agreement with TDA for compensation of specific services that are generally utilized for advisor development as well.

TDA has an agreement with Orion where TDA will offset Orion administrative fees for new clients for one year.

Some of the products and services made available by these Broker-Dealer/Custodians may benefit ACG but may not directly benefit client accounts. These products or services may assist ACG in managing and administering client accounts, including accounts not maintained at these Broker-Dealer/Custodians. Other services made available by these Broker-Dealer/Custodians are intended to help ACG manage and further develop its business enterprise. Clients should be aware, however, that the receipt of economic benefits by ACG or its IARs creates a conflict of

interest and may indirectly influence ACG's choice or recommendation of these Broker-Dealer/Custodians for custody and brokerage services.

Trading – ACG allocates trades to clients in a fair and equitable manner that will be applied consistently to all clients. Personal accounts of ACG, its IARs and family members will not be treated more favorably than any other client account. ACG will make every attempt to completely fill all block order trades. All variable annuities managed within the Investment Management Program by ACG will have their variable annuity sub-account transactions processed through the Custodian of record for the variable annuity.

Trading Error Corrections - It is ACG's policy to ensure clients are made whole following a trade error. Specifically, when a trade error occurs in a client account that results in a loss, ACG will reimburse the client. If the trade error was made in a client account resulting in a gain, the client will keep the gain unless the Custodian/Broker-Dealer keeps the gain. If the trade error was made in a block trading account and client funds were not at risk and the trade results in a gain, the Broker-Dealer/Custodian keeps the gain.

Reports and Statements- Clients may receive periodic performance reports from ACG describing account performance and holdings. Clients will receive a monthly account statement from the Custodian/Broker-Dealer showing the account activity as well as positions held in the account at month's end, when there is activity in the account. No less than on a quarterly basis, client will receive a statement from the Custodian/Broker-Dealer for transactions and holdings.

Additional Information on ACG's Relationship with PKS

If clients wish to have ACG's Mark Allen implement advice in his capacities as registered representative, his broker/dealer, PKS, will be used. Mark Allen is required to use the services of PKS when acting in his capacities as registered representative.

PKS has a wide range of approved securities products for which PKS performs due diligence prior to selection. PKS's registered representatives are required to adhere to these products when implementing securities transactions through PKS. Commissions charged for these products may be higher or lower than commissions clients may be able to obtain if transactions were implemented through another broker/dealer. PKS also provides Mark Allen, and therefore ACG, with back-office operations, technology, and other administrative support services. Other services may include planning, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. Such services are intended to help ACG manage and further develop its business enterprise.

PKS also makes available to ACG other products and services that benefit ACG but may not directly benefit its clients' accounts. Some of these other products and services assist ACG in managing and administering client accounts. These include:

- Software and other technology that provide access to client account data (such as trade confirmations and account statements);
- Facilitate trade execution;
- Provide research, pricing information and other market data;
- Facilitate payment of ACG's fees from its clients' accounts; and
- Assist with back-office functions; recordkeeping and client reporting.

Many of these services may be used to service ACG's accounts, including accounts not held through PKS. Broker-Dealer and Custodian fees, expenses, and commission charges are separate and distinct from the fee charged by ACG.

General Brokerage Disclosures

ACG does not permit clients to direct ACG to use other broker-dealers than the broker-dealers selected and used by ACG for Investment Management Program accounts.

Item 13 Review of Accounts

Investment Management Program

Reviews are conducted for all accounts on an ongoing basis. We review investment performance, suitability, appropriate asset allocation, and monitor each account for any changes or updates that are needed (among other things). Clients may receive periodic position/performance reports from ACG describing account performance and holdings. Clients will receive a monthly account statement from the Custodian showing the account activity as well as positions held in the account at month's end. No less than on a quarterly basis, client will receive a statement from the Custodian for transactions and holdings.

Financial Planning Services

As a general rule, clients utilizing ACG's Financial Planning Services do not receive statement or reports from ACG. In addition, ACG does not conduct follow up reviews of Financial Planning Services without a client's request.

Item 14 Client Referrals and Other Compensation

Referrals to Other Investment Advisors

Neither ACG nor ACG IARs directly or indirectly receive any compensation from any persons or entities for client referrals to other investment advisors.

Referrals from Other Investment Advisors

Referral Advisors- ACG may enter into Referral Advisor Agreements with outside Referral Advisors who refer clients to ACG. If a referred client enters into an investment advisory agreement with ACG, a cash referral fee will be paid to the Referring Advisor, which will be based on a percentage of the advisory fees that are paid by the client to ACG. The Referral Advisor Agreement entered into between ACG and Referral Advisor will at all times be in compliance with the rules and regulations under 17 CFR Section 275.206(4)-3 and corresponding state rules and regulations on investment advisor referral activities. If a client account is referred from a Referral Advisor to ACG, the Referral Advisor may receive up to 50% of ACG's fee. Therefore, a Referral Advisor may have an incentive to recommend ACG Investment Management Programs over other programs and services. This Referral Fee may increase the fee a client is charged by ACG. All Referral Fees paid by a client to a Referral Advisor will be fully disclosed to the client. Referral Advisors may be responsible for providing client with ACG's Form ADV Part 2 and may assist clients in accurately completing ACG's Asset Management Agreement documents. Referral Advisors may assist in communicating with clients on behalf of ACG. Such communication may include face to face meetings, telephone communications, e-mail communications, and mailings.

Broker-Dealer Compensation

Mark Allen is licensed as registered representative of PKS, a registered broker-dealer with the SEC and the FINRA, and a member of the SIPC. PKS broker-dealer commissions are comparable to other full services brokers. Some advice offered by the Mark Allen in his capacity as a registered representative of PKS may involve investments in mutual funds and variable annuity products which pay 12b-1 trail fees. He may receive a portion of these 12b-1 trail fees in his separate capacities as registered representative. Clients should be aware that the payment and receipt of these commissions and fees could represent an incentive to recommend mutual funds or variable annuities that pay 12b-1 trail fees or pay higher 12b-1 trail fees over funds with no 12b-1 fees or lower fees, thus creating a conflict of interest.

As disclosed under Item 12 above, ACG will recommend Schwab and TDA to clients for custody and brokerage services. There is no direct link between ACG, these Broker-Dealer/Custodians and the investment advice ACG gives to our clients, although ACG receives economic benefits through its participation in these Broker-Dealer/Custodians' advisory accounts, custody and brokerage services that are typically not available to retail investors. For more details on these Broker-Dealer/Custodians relationships please see Item 12. Brokerage Practices, ACG Brokerage and Custodian Relationships above.

Insurance Compensation

IARs of ACG may also be licensed as insurance agents. In this capacity, the IARs will be paid commission for the sales of fixed insurance products. This presents a conflict of interest as it gives the IARs an incentive to recommend insurance products based on the compensation received, rather than on your needs. You always have the option to purchase insurance products that IAR recommends through other unaffiliated insurance agencies or companies.

Item 15 Custody

ACG has custody of client assets due to our ability to deduct fees from client accounts. The Broker-Dealer/Custodian of client assets sends account statements directly to clients. Clients receive account statements from the Broker-Dealer/Custodian. Clients should carefully review those statements.

Investment advisor representatives of ACG are trustees on certain client accounts. ACG may be deemed to have custody of client securities due to the possible receipt of securities certificates. In addition, ACG may be deemed to have custody of client funds and securities due to ACG's online access to certain client qualified retirement plan accounts and bank accounts. Consequently, ACG is subject to an annual surprise examination conducted by an independent certified public accountant.

Item 16 Investment Discretion

ACG uses discretionary trading authority in its Investment Management Program to buy, sell and direct investments within the client accounts, including reinvestment of proceeds from assets sold and income attributable to client accounts, in cash, cash equivalents, bonds, shares of common or preferred stock, unit investment trusts, ETF's, mutual funds, options, variable annuity sub-accounts, or other alternative securities selected by ACG for client accounts. In addition, ACG may use discretionary trading authority in its Retirement Plan Advisory and Review Program when acting as an ERISA Section 3(38) Investment Manager Fiduciary for a qualified retirement plan.

Item 17 Voting Client Securities

ACG will not exercise proxy-voting authority over the securities held in client accounts where ACG provides investment management services. The obligation to vote client proxies shall at all times rest with the clients. However, clients may contact ACG for advice or information about a particular proxy vote. ACG shall not be deemed to have proxy-voting authority solely as a result of providing such advice to a client. Should ACG inadvertently receive proxy information for a security held in an account, such information shall be immediately forwarded to client.

Item 18 Financial Information

ACG has no financial information to report at this time and has no financial situations which may impair its ability to conduct business.

Allen Capital Group, LLC

March 20, 2020

PRIVACY POLICY NOTICE Our Promise to You

As a client of ACG, you share both personal and financial information with us. Your privacy is important to us, and we are dedicated to safeguarding your personal and financial information.

Information Provided by Clients

In the normal course of doing business, we typically obtain the following non-public personal information about our clients:

- Personal information regarding our clients' identity such as name, address and social security number;
- Information regarding securities transactions effected by us; and
- Client financial information such as net-worth, assets, income, bank account information and account balances.

How We Manage and Protect Your Personal Information

We do not sell information about current or former clients to third parties, nor is it our practice to disclose such information to third parties unless requested to do so by a client or client representative or, if necessary, in order to process a transaction, service an account or as permitted by law. Additionally, we may share information with outside companies that perform administrative services for us. However, our contractual arrangements with these service providers require them to treat your information as confidential.

In order to protect your personal information, we maintain physical, electronic and procedural safeguards to protect your personal information. Our Privacy Policy restricts the use of client information and requires that it be held in strict confidence.

Client Notifications

We are required by law to annually provide a notice describing our privacy policy. In addition, we will inform you promptly if there are changes to our policy. Please do not hesitate to contact us with questions about this notice by calling ACG at 308-385-1500 or writing to Mark Allen at 3032 West Stolley Park Road, Suite E, Grand Island NE, 68801.