

Item 1: Cover Page

Quadrant Capital Group, LLC dba Constellation Wealth Advisors DBA Quadrant Family Wealth Advisors

Part 2A of Form ADV

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Cincinnati, OH 45202

www.quadrantwealth.com

www.constellation-wealth.com

Updated: March 23, 2020

This brochure provides information about the qualifications and business practices of Quadrant Capital Group, LLC dba Constellation Wealth Advisors (“Constellation”) and Quadrant Family Wealth Advisors (“Quadrant”). If you have any questions about the contents of this brochure, please contact us at (513) 871-5500. 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.

Quadrant Capital Group, LLC is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training.

Additional information about Quadrant Capital Group, LLC is also available on the SEC’s website at: www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Quadrant Capital Group’s CRD number is 147253.

Item 2: Summary of Material Changes

There have been no material changes since the February 7, 2020 Form ADV filed on the IARD system.

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Item 4: Advisory Business

Quadrant Capital Group, LLC (“We”, “Us”, or “Our”) and a doing business name of Constellation Wealth Advisors (“Constellation”) is a registered investment adviser. We primarily provide customized investment advisory services to high-net-worth individuals and associated trusts, estates, and other legal entities. We generally invest client assets in domestic and international stocks, bonds, mutual funds, and exchange traded funds (“ETFs”), separately managed accounts, and alternative investments. We are a fiduciary and are required to act in a client’s best interest at all times.

We work with each client to establish an appropriate investment profile based upon the client’s goals. Clients choose from growth, balanced, and conservative strategies, and can impose reasonable restrictions on our management of their accounts.

We were founded in 2009 and are owned by Patrick A. Lafley, J. Patrick Rogers, John M. Williams, and T. Michael Veith. As of December 31, 2019, we managed \$741,384,323 on a discretionary basis and \$734,682,711 on a non-discretionary basis for a total asset under management of \$1,476,067,034

Private Investment Funds

We also provide investment advisory services to private investment funds, the Quadrant Partners Real Estate Navigator Fund LP, Quadrant Private Capital Solutions LP, Blue Water Quadrant LLC, Tulco Quadrant, LLC (“Funds”) as investment adviser. We are the single member of Quadrant GP LLC, which is the general partner for each of the Funds. The Fund assets are held at qualified custodians which provide quarterly statements to the Fund investors. Quadrant Private Capital Solutions LP, Blue Water Quadrant LLC, Tulco Quadrant, LLC each have an annual audit performed by an independent public accountant while Quadrant Partners Real Estate Navigator Fund LP has a surprise custody audit completed by an independent public accountant.

The Funds offer securities to investors only through private placements of such securities. Please refer to the offering documents for the Quadrant Partners Real Estate Navigator Fund LP, Quadrant Private Capital Solutions LP, Blue Water Quadrant LLC, and Tulco Quadrant LLC for information related to the risks, suitability requirements, investment objectives, fee charges and expenses for the Fund.

Item 5: Fees and Compensation

We provide fee options to clients which are both assets under management based (not to exceed 1.00% annually) and flat fee based (not to exceed \$500,000 annually). Constellation also offers financial planning services for a monthly fee of \$199 and an initial plan fee of \$1,199. The initial plan is completed in six months or less. Depending on circumstances, we may negotiate fees for clients and treat each client in a customized way depending upon their unique situation.

We usually charge fees quarterly in advance based on the account value at the beginning of the calendar quarter. In any partial calendar quarter, the advisory fee will be pro-rated based upon the number of days that the Account was open during the quarter. The fee applicable to assets deposited to the Account shall be prorated from the date of deposit. Most clients authorize us to deduct fees automatically from their taxable brokerage accounts, but clients may request that we send quarterly invoices to be paid by check or ACH.

In addition to our investment management fees, clients bear trading costs and custodial fees. To the extent that clients' accounts are invested in mutual funds, these funds pay a separate layer of management, trading, and administrative expenses.

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

None of our employees receives Performance-Based fees.

Item 7: Types of Clients

We primarily provide customized investment management and wealth advisory services to high-net-worth individuals and associated trusts, estates, and other legal entities. Quadrant's minimum client relationship size is generally \$10,000,000, Constellation's minimum client relationship is generally \$1,000,000, but these amounts are negotiable.

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

Money managers considered for our clients will be subjected to a rigorous due diligence process. Factors considered will include, but not be limited to: reputation, performance record, assets under management, philosophy, continuity of management, service to clients, awareness of after-tax performance objectives, minimum dollar investment requirements and fees. Information with respect to money managers (e.g., performance figures, investment style, etc.) will be obtained from tracking organizations, business publications, business contacts, other money managers, personal interviews and other sources which we believe are reliable. We may also consider other criteria, including, but not limited to, the administration, recordkeeping and reporting services provided by a manager. From time to time, we may retain outside consultants to assist in preparing money manager search lists. In the event that we retain an outside consultant, we will make the final determination regarding which money managers we will make available to our clients.

Our Investment Committee generally meets weekly to discuss existing and prospective investments. Investments are evaluated independently, as well as in the context of clients' existing holdings and sector exposures.

We retain the services of Fund Evaluation Group ("FEG") to assist in identifying qualified money manager candidates. However, we make the final determination regarding which money managers are made available to our clients and why. We have contracted with FEG to provide research and due diligence. Through our engagement with FEG, we utilize FEG's services, including a comprehensive investment platform with particular expertise in alternative investments.

We also retain a third-party vendor that provides client portfolio reporting, data aggregation, billing services, and a contact relationship management system. All investing involves a risk of loss.

Recommending Securities

We, in certain situations may recommend investments in selected private placements or hedge funds. These types of investments may present unique risks due to the use of leverage and potential lack of liquidity. In addition, such recommendations may be limited only to those clients that are termed as "Accredited Investors" as defined in Rule 205-3 of the Investment Advisors

Act of 1940. These types of investments also have varied and unique fee structures of their own. In the event we receive a portion of the fee charged from a third-party manager, the value of a client's assets invested with that manager will be removed from the asset based upon which our fees are calculated and billed. Due to the unique and complex nature of these investments, clients will receive a separate disclosure prior to any investments being made.

Item 9: Disciplinary Information

We or our employees have not been involved in any legal or disciplinary events that would be material to a client's evaluation of the company or its personnel.

Item 10: Other Financial Industry Activities and Affiliations

We are **not** and do **not** have a related person that is a broker/dealer, municipal securities dealer, government securities dealer or broker, a futures commission merchant, commodity pool operator, or commodity trading advisor, a banking or thrift institution, an accountant or accounting firm, a lawyer or law firm, an insurance company or agency, a pension consultant, a real estate broker or dealer.

We are the single member of Quadrant GP LLC, which is the general partner for the Quadrant Partners Real Estate Navigator Fund LP, Quadrant Private Capital Solutions LP, Blue Water Quadrant LLC, and Tulco Quadrant LLC. Please refer to Item 4 for more information related to this activity.

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

Our employees may, on a limited basis, purchase for their personal accounts the same securities that may be recommended to clients. To support our desire for complete transparency and to avoid any potential conflicts of interest including personal trades, we have adopted a Code of Ethics (the "Code") which includes formal personal securities transaction and insider trading policies and procedures. Our Code requires, among other things, that employees:

- Act with integrity, competence, diligence, respect, and in an ethical manner with the public, clients, prospective clients, employers, employees, colleagues in the investment profession, and other participants in the global capital markets;
- Place the integrity of the investment profession, the interests of clients, and our interests above one's own personal interests;
- Adhere to the fundamental standard that you should not take inappropriate advantage of your position;
- Avoid any actual or potential conflict of interest;
- Conduct all personal securities transactions in a manner consistent with this policy;
- Use reasonable care and exercise independent professional judgment when conducting investment analysis, making investment recommendations, taking investment actions, and engaging in other professional activities;
- Practice and encourage others to practice in a professional and ethical manner that will reflect credit on yourself and the profession;

- Promote the integrity of, and uphold the rules governing, capital markets;
- Maintain and improve your professional competence and strive to maintain and improve the competence of other investment professionals.
- Comply with applicable provisions of the federal and state securities laws.

Our Code also requires employees to: 1) pre-clear certain personal securities transactions, 2) report personal securities transactions on at least a quarterly basis, and 3) provide a detailed summary of certain holdings (both initially upon commencement of employment and annually thereafter) over which such employees have a direct or indirect beneficial interest.

Item 12: Brokerage Practices

We do not maintain physical custody of client assets. We have limited trading authority over client account(s). We may determine both the amount and the type of securities to be bought or sold. The client signs a limited power of attorney to allow us this trading authority (See Item 4). We have no preferences with respect to where clients' custody assets or the brokers that are selected for trading purposes.

We utilize the services provided by FEG, including, but not limited to, investment manager search and selection, performance monitoring and reporting.

We will make recommendations based on the needs of the client and the services provided by the various broker/dealers. Except as provided for in any applicable wrap fee program, the brokerage commissions and/or transaction fees charged by the Custodians or any other designated broker-dealer are exclusive of and in addition to our fee. Factors which we consider in recommending the Custodians or any other broker-dealer, to its clients include their respective financial strength, reputation, execution, pricing, research, and service. The Custodians enable us to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. The commissions and/or transaction fees charged by the Custodians may be higher or lower than those charged by other broker-dealers. The commissions paid by our clients shall comply with our duty to obtain "best execution." However, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where we determine, in good faith, that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. Consistent with the foregoing, while we will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client transactions.

If the client requests us to arrange for the execution of securities brokerage transactions for the client's account, we shall direct such transactions through broker-dealers that we reasonably believe will provide best execution. We shall periodically and systematically review our policies and procedures regarding recommending broker-dealers to our client in light of our duty to obtain best execution.

The client may direct us in writing to use a particular broker-dealer to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the

account with that broker-dealer, and we will not seek better execution services or prices from other broker-dealer or be able to "aggregate" client transactions for execution through other broker-dealers with orders for other accounts managed by us (as described below). As a result, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty of best execution, we may decline a client's request to direct brokerage if, in our sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

Consistent with obtaining best execution, brokerage transactions may be directed to certain broker-dealers in return for investment research products and/or services which assist us in our investment decision-making process. Such research generally will be used to service all of our clients, but brokerage commissions paid by one client may be used to pay for research that is not used in managing that client's portfolio. The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a conflict of interest.

We may receive from the Custodians or any other broker-dealer, without cost to us, computer software and related systems support, which allows us to better monitor client accounts maintained at the Custodians. We may receive the software and related support without cost because we render investment management services to clients that maintain assets at the Custodians. The software and related systems support may benefit us, but not its clients directly. In fulfilling its duties to its clients, we endeavor at all times to put the interests of its clients first. Clients should be aware, however, that our receipt of economic benefits from a broker-dealer creates a conflict of interest since these benefits may influence our choice of one broker-dealer over another broker-dealer that does not furnish similar software, systems support, or services.

Additionally, we may receive the following benefits from the Custodians, or any other broker-dealer: receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its Registered Investment Adviser participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate share to client accounts; and access to an electronic communication network for client order entry and account information.

In the event of trading errors caused by our employees, it is our policy to make its clients whole, communicate errors to its clients, and to document errors in its trade error file. Gains arising out of errors will be donated to a charity of the custodian's choice while losses will be reimbursed by us to the client. Losses to non-qualified accounts are reimbursed immediately upon discovery via a transfer from our account to the client, while losses to qualified accounts are reimbursed through an offset of management fees at the next due date for payment of such fees.

On occasions when we deem the purchase and sale of a security to be in the best interests of more than one of its clients, we may aggregate multiple contemporaneous client purchases or sell orders into a block order for execution. Executed orders are allocated among participating accounts according to each account's pre-determined participation in the transaction. Clients' accounts for which orders are aggregated receive the averaged price of such transaction, which could be higher or lower than the price that would otherwise be paid by a client absent the aggregation. Any transaction

costs incurred in the transaction will be shared pro rata based on each client's level of participation in the transaction.

We do not regularly purchase initial public offerings for our clients and do not intend to change that practice.

Item 13: Review of Accounts

Accounts under our management are monitored on an ongoing basis by the Advisor assigned to that Client. The Advisor reviews each account in detail on at least a quarterly basis, as well as in connection with each client meeting. In addition, on at least a quarterly basis the Investment Committee members and the Chief Compliance Officer review a number of reports that are designed to identify accounts that are outside the expected ranges for returns, and exposure to asset classes. Reviews of client accounts will also be triggered if a client changes his or her investment objectives, or if the market, political, or economic environment changes materially.

Clients receive account statements directly from their chosen custodian on at least a quarterly basis, but typically monthly. We may supplement these custodial statements with reports provided during periodic client meetings or as requested. Please compare this account statement with the custodian statement(s) for the same period. Nominal differences may occur in the total dollar amount due to the recording of dividend or interest payments after custodian statement deadlines.

Item 14: Client Referrals and Other Compensation

We currently pay no portion of our advisory fees to any other investment adviser in exchange for referrals of clients to us. We do not receive any other economic benefits from non-clients in connection with the provision of investment advice to clients except as described in Item 12.

Item 15: Custody

All clients' accounts are held in custody by unaffiliated broker/dealers or banks, however we can access certain clients' accounts through our ability to debit advisory fees. We are considered to have custody of client assets due to the relationship with the Private Funds. Account custodians send statements directly to the account owners on at least a quarterly basis. Each Private Fund has an annual audit performed by an independent public accountant. Clients should routinely review these statements and should compare these statements to any account information or reports provided by us. Clients may have standing letters of authorization on their accounts. We have reviewed those relationships and determined that they meet the IAA no action letter seven conditions and do not trigger the surprise custody audit.

Item 16: Investment Discretion

We have discretionary and non-discretionary relationships with clients. Clients grant us trading discretion through the execution of a limited power of attorney included in our advisory contract.

Clients can place reasonable restrictions on our investment discretion. For example, some clients have asked us not to buy securities issued by companies in certain industries, or not to sell certain securities where the client has a particularly low tax basis.

Item 17: Voting Client Securities

Typically, we will not vote proxies on behalf of client accounts. Although we may, on rare occasions and only at the client's request, offer clients advice regarding corporate actions and the exercise of proxy voting rights.

Class Action Lawsuits

From time to time, securities held in the accounts of clients will be the subject of class action lawsuits. We have no obligation to determine if securities held by the client are subject to a pending or resolved class action lawsuit. We also have no duty to evaluate a client's eligibility or to submit a claim to participate in the proceeds of a securities class action settlement or verdict. Furthermore, we have no obligation or responsibility to initiate litigation to recover damages on behalf of clients who may have been injured as a result of actions, misconduct or negligence by corporate management of issuers whose securities are held by clients.

When we receive written or electronic notice of a class action lawsuit, settlement or verdict affecting securities owned by a client, it will forward all notices, proof of claim forms and other materials, to the client. Electronic mail is acceptable where appropriate, and the client has authorized contact in this manner.

Item 18: Financial Information

We do not have any adverse financial condition that is expected to affect our ability to manage client accounts. We do not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance.

Confidentiality

Protecting client privacy is very important to us. We view protecting our clients' private information as a top priority. Pursuant to the requirements of the Gramm-Leach-Bliley Act, we have instituted policies and procedures to ensure that customer information is kept private and secure. We do not disclose any non-public personal information about our clients or former clients to any nonaffiliated third parties, except as permitted by law. In the course of servicing a client account, we may share some information with its service providers, such as, but not limited to, transfer agents, custodians, broker/dealers, accountants, and lawyers.

We restrict internal access to non-public personal information about clients to those employees who need to know that information in order to provide products or services to the client. We maintain physical and procedural safeguards that comply with federal standards to guard a client's non-public personal information and ensure its integrity and confidentiality. As emphasized above, it has always been and will always be our policy never to sell information about current or former customers or their accounts to anyone. It is also our policy not to share information unless required to process a transaction, at the request of a customer, or as required by law.

A copy of our privacy policy notice will be provided to each client prior to, or contemporaneously with, the execution of the advisory agreement. Thereafter, we will deliver a copy of the current privacy policy notice to its clients prior to changing its sharing practices.

**Quadrant Capital Group, LLC
dba Constellation Wealth Advisors
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Part 2B of Form ADV

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Updated: March 23, 2020

This brochure supplement provides information about Jacob Michael Geglein, Patrick Alan Lafley, Adam James Niestrad, Anna Kathryn Pfaehler, Nicholas Connor Reilly, James Patrick Rogers, Cheryl Nicole Rose, Emily Butterworth Rose, Kyle Wayne Rudduck, Donna Sturgeon Sterwerf, Kevin Byrne Thomas, Terrence Michael Veith, and John Marshall Williams. It supplements Quadrant Capital Group, LLC's accompanying Form ADV brochure. Please contact Patrick Lafley at (513) 871-5504 if you have any questions about the Form ADV brochure or this supplement, or if you would like to request additional or updated copies of either document.

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

Jacob M. Geglein Biographical Information

Item 2: Educational Background and Business Experience

Jacob M. Geglein was born in 1986. He received a BBA degree in Finance, Marketing, and Management from University of Cincinnati in 2009 and a Master of Business Administration from Xavier University in 2010. He has passed the General Securities Representative Examination, Series 7 (02/2011) and the Uniform Combined State Law Examination, Series 66 (04/2011).

Mr. Geglein has been an employee of Constellation Wealth Advisors since 2017 and also Quadrant Capital Group, LLC. Prior to joining Quadrant Capital Group, LLC, Mr. Geglein spent 6 years at Merrill Lynch, Pierce, Fenner & Smith Inc.

Item 3: Disciplinary Information

Mr. Geglein has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Mr. Geglein or of Quadrant Capital Group, LLC. Mr. Geglein's CRD number is 5494455.

Item 4: Other Business Activities

Mr. Geglein is not engaged in any other investment related business.

Item 5: Additional Compensation

Mr. Geglein does not receive economic benefits from any person or entity other than Quadrant Capital Group, LLC in connection with the provision of investment advice to clients.

Item 6: Supervision

At Quadrant Capital Group, LLC, Mr. Lafley maintains primary responsibility for the company's administration and operations, and services client relationships. Mr. Lafley also serves as Chief Compliance Officer and may be reached directly by calling (513) 871-5504. All employees with client responsibility meet with members of the Investment Committee as frequently as necessary to discuss current market conditions and client accounts. All employees also receive Quadrant Capital Group, LLC's Investment Adviser Supervisory Manual and Code of Ethics and are asked to annually certify their understanding of the material.

Patrick A. Lafley Biographical Information

Item 2: Educational Background and Business Experience

Patrick A. Lafley was born in 1972. He received a Bachelor of Arts degree from Tulane University in 1994 and a Master of Business Administration from Thunderbird, Garvin School of Management in 1998. He has passed the Uniform Investment Adviser Law Examination, Series 65 (04/2011).

Mr. Lafley has been a member of Quadrant Capital Group, LLC since 2008 and a member of Constellation Wealth Advisors, LLC since 2017. Prior to founding Quadrant Capital Group, LLC, Mr. Lafley was a Vice President of Fifth Third Bank from 2002 to 2008.

Item 3: Disciplinary Information

Mr. Lafley has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Mr. Lafley or of Quadrant Capital Group, LLC. Mr. Lafley's CRD number is 5529414.

Item 4: Other Business Activities

Mr. Lafley is not engaged in any other investment related business other than Quadrant Capital Group, LLC, and does not receive compensation in connection with any business activity outside of Quadrant Capital Group, LLC. As noted in Form ADV Part 2, Item 4, Quadrant Capital Group, LLC has private funds that are managed by an affiliate.

Item 5: Additional Compensation

Mr. Lafley does not receive economic benefits from any person or entity other than Quadrant Capital Group, LLC and its affiliates in connection with the provision of investment advice to clients.

Item 6: Supervision

At Quadrant Capital Group, LLC, Mr. Lafley maintains primary responsibility for the company's administration and operations, and services client relationships. Mr. Lafley also serves as Chief Compliance Officer and may be reached directly by calling (513) 871-5504. All employees with client responsibility meet with members of the Investment Committee as frequently as necessary to discuss current market conditions and client accounts. All employees also receive Quadrant Capital Group, LLC's Investment Adviser Supervisory Manual and Code of Ethics and are asked to annually certify their understanding of the material.

Adam J. Niestradt Biographical Information

Item 2: Educational Background and Business Experience:

Adam J. Niestradt was born in 1984. He received a Bachelor of Arts degree with a major in Finance from Miami University in 2007.

Mr. Niestradt received the Chartered Financial Analyst ("CFA") designation in 2013.

CFA Charter Financial Advisor Statement for SEC Form ADV

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute – the largest global association of investment professionals.

There are currently more than 90,000 CFA charterholders working in 135 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

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

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders—often making the charter a prerequisite for employment.

Additionally, regulatory bodies in 19 countries recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

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

Mr. Niestradt has been an employee of Quadrant Capital Group, LLC since 2015. Prior to joining Quadrant Capital Group, LLC, Mr. Niestradt held 2 positions including Associate Portfolio Manager and External Manager Research Analyst and was an Officer at Fifth Third Bank from 2011-2015. Prior to Fifth Third Bank Mr. Niestradt was a Financial Analyst for Great Traditions Land & Development Co. 2009-2011.

Item 3: Disciplinary Information

Mr. Niestradt has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Mr. Niestradt or of Quadrant Capital Group, LLC. Mr. Niestradt's CRD number is 6466950.

Item 4: Other Business Activities

Mr. Niestradt is not engaged in any other investment related business and does not receive compensation in connection with any business activity outside of Quadrant Capital Group, LLC.

Item 5: Additional Compensation

Mr. Niestradt does not receive economic benefits from any person or entity other than Quadrant Capital Group, LLC or its affiliates in connection with the provision of investment advice to clients.

Item 6: Supervision:

At Quadrant Capital Group, LLC, Mr. Lafley maintains primary responsibility for the company's administration and operations, and services client relationships. Mr. Lafley also serves as Chief Compliance Officer and may be reached directly by calling (513) 871-5504. All employees with client responsibility meet with members of the Investment Committee as frequently as necessary to discuss current market conditions and client accounts. All employees also receive Quadrant Capital Group, LLC's Investment Adviser Supervisory Manual and Code of Ethics and are asked to annually certify their understanding of the material.

Anna Kathryn Pfahler Biographical Information

Item 2: Educational Background and Business Experience:

Anna K. Pfahler was born in 1986. She received a degree in Economics from Vassar College in 2006. Anna K. Pfahler has earned and maintains the following professional designations with the qualification requirements listed:

Ms. Pfahler earned a CERTIFIED FINANCIAL PLANNER™ certification (CFP®) in September 2009.

In order to achieve and maintain certification, CFP® professionals must: 1) pass the comprehensive CFP® Certification Examination, 2) pass the CFP Board's Fitness Standards for Candidates and Registrants, 3) agree to abide by CFP Board's Code of Ethics and Professional Responsibility and Rules of Conduct which put clients' interests first, 4) comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement, and 5) complete 30 hours of continuing education (including 2 hours of approved Ethics CE) every two years. See more at: <http://www.cfp.net/become-a-cfp-professional/cfp-certification-requirements#sthash.qwXJz3yF.dpuf>.

Ms. Pfahler earned an Accredited Estate Planner® (AEP®) designation in August 2018. The Accredited Estate Planner® (AEP®) designation is a graduate level specialization in estate planning, obtained in addition to already recognized professional credentials within the various disciplines of estate planning. It is awarded by the National Association of Estate Planners and Councils (NAEPC) to recognize estate planning professionals who meet stringent requirements of experience, knowledge, education, professional reputation, and character.

An ACCREDITED ESTATE PLANNER® applicant must meet ALL of the following requirements as established by the National Association of Estate Planners & Councils:

1. Credential requirement. To be eligible to be considered for the AEP® designation, the applicant must provide documentation of being licensed to practice law as an Attorney (JD) or to practice as a Certified Public Accountant (CPA), or of being currently designated as a Chartered Life Underwriter® (CLU®), Chartered Financial Consultant® (ChFC®), Certified Financial Planner (CFP®), or Certified Trust & Financial Advisor (CTFA), in any jurisdiction of the United States of America.
2. Professional discipline engaged in estate planning requirement. The applicant must be presently and significantly engaged in "estate planning activities" as an attorney, an accountant, an insurance professional and

financial planner, or a trust officer. Estate planning encompasses the accumulation, conservation, preservation, and transfer of an estate through planning and implementation of an estate plan. The overall purpose of the estate planning process is to develop a plan that will maintain the financial security of individuals and their families. Estate planning has come to include lifetime planning that leads to conservation and transfer of assets. Estate planning should also facilitate the intended and orderly transfer of property at death, taking into consideration the family unit and the potential costs of different methods.

Ms. Pfaehler has been an employee of Constellation Wealth Advisors since 2020 and also Quadrant Capital Group, LLC. Prior to joining Quadrant Capital Group, LLC, Ms. Pfaehler spent almost 6 years with Horan Securities Inc. as Director of Financial Planning.

Item 3: Disciplinary Information

Ms. Pfaehler has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Ms. Pfaehler or of Quadrant Capital Group, LLC. Ms. Pfaehler's CRD number is 6103483.

Item 4: Other Business Activities

Ms. Pfaehler is not engaged in any other investment related business and does not receive compensation in connection with any business activity outside of Quadrant Capital Group, LLC.

Item 5: Additional Compensation

Ms. Pfaehler does not receive economic benefits from any person or entity other than Quadrant Capital Group, LLC or its affiliates in connection with the provision of investment advice to clients.

Item 6: Supervision:

At Quadrant Capital Group, LLC, Mr. Lafley maintains primary responsibility for the company's administration and operations, and services client relationships. Mr. Lafley also serves as Chief Compliance Officer and may be reached directly by calling (513) 871-5504. All employees with client responsibility meet with members of the Investment Committee as frequently as necessary to discuss current market conditions and client accounts. All employees also receive Quadrant Capital Group, LLC's Investment Adviser Supervisory Manual and Code of Ethics and are asked to annually certify their understanding of the material.

Nicholas C. Reilly Biographical Information

Item 2: Educational Background and Business Experience

Nicholas C. Reilly was born in 1976. He received a BA degree from Miami University, Oxford, Ohio in 1999. Mr. Reilly has passed Securities Licenses Series 7 (10/2006), 63 (04/2007), and 65 (02/2019).

Mr. Reilly has been an employee of Constellation Wealth Advisors since February 2019 and also Quadrant Capital Group, LLC. Prior to joining Quadrant Capital Group, LLC, Mr. Reilly spent more than 8 years at Horan Capital Advisors, LLC and more than 2 years at Horan Securities, Inc. in Cincinnati, Ohio.

Item 3: Disciplinary Information

Mr. Reilly has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Mr. Reilly or of Quadrant Capital Group, LLC. Mr. Reilly's CRD number is 5082712.

Item 4: Other Outside Business Activities

Mr. Reilly is not engaged in any other investment related business and does not receive compensation in connection with any business activity outside of Quadrant Capital Group, LLC.

Item 5: Additional Compensation

Mr. Reilly does not receive economic benefits from any person or entity other than Quadrant Capital Group, LLC in connection with the provision of investment advice to clients.

Item 6: Supervision

At Quadrant Capital Group, LLC, Mr. Lafley maintains primary responsibility for the company's administration and operations, and services client relationships. Mr. Lafley also serves as Chief Compliance Officer and may be reached directly by calling (513) 871-5504. All employees with client responsibility meet with members of the Investment Committee as frequently as necessary to discuss current market conditions and client accounts. All employees also receive Quadrant Capital Group, LLC's Investment Adviser Supervisory Manual and Code of Ethics and are asked to annually certify their understanding of the material.

J. Patrick Rogers Biographical Information

Item 2: Educational Background and Business Experience

J. Patrick Rogers was born in 1964. He received a BBA undergraduate degree in Finance from the University of Notre Dame in 1986 and an MBA from Xavier University in 1994.

Mr. Rogers received the Chartered Financial Analyst ("CFA") designation in 1994.

CFA Charter Financial Advisor Statement for SEC Form ADV

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute – the largest global association of investment professionals.

There are currently more than 90,000 CFA charterholders working in 135 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

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

- Place their clients' interests ahead of their own

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

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders—often making the charter a prerequisite for employment.

Additionally, regulatory bodies in 19 countries recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

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

Mr. Rogers has been a member of Quadrant Capital Group, LLC since 2014. Prior to joining Quadrant Capital Group, LLC, Mr. Rogers is a private investor through his solely owned firm from April 2013 to present; President/CEO of Gateway Investment Advisers, LLC from February 2008 to March 2013; and its predecessor, Gateway Investment Advisers, LP since May 1989.

Item 3: Disciplinary Information

Mr. Rogers has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Mr. Rogers or of Quadrant Capital Group, LLC. Mr. Rogers' CRD number is 1873563.

Item 4: Other Business Activities

Mr. Rogers is not engaged in any other investment related business other than Quadrant Capital Group, LLC, and does not receive compensation in connection with any business activity outside of Quadrant Capital Group, LLC. As noted in Form ADV Part 2, Item 4, Quadrant Capital Group, LLC has private funds that are managed by an affiliate.

Item 5: Additional Compensation

Mr. Rogers does not receive economic benefits from any person or entity other than Quadrant Capital Group, LLC and its affiliates in connection with the provision of investment advice to clients.

Item 6: Supervision

At Quadrant Capital Group, LLC, Mr. Lafley maintains primary responsibility for the company's administration and operations, and services client relationships. Mr. Lafley also serves as Chief Compliance Officer and may be reached directly by calling (513) 871-5504. All employees with client responsibility meet with members of the Investment Committee as frequently as necessary to discuss current market conditions and client accounts. All employees also receive Quadrant Capital Group, LLC's Investment Adviser Supervisory Manual and Code of Ethics and are asked to annually certify their understanding of the material.

Cheryl Rose Biographical Information

Item 2: Educational Background and Business Experience

Cheryl Rose was born in 1969. She received a BA degree in Investment Management from Capital University, Columbus, Ohio in 2002. She has passed the General Securities Representative Examination, Series 7 (07/1992) and the Uniform Securities Agent State Law Examination, Series 63 (03/1996).

Ms. Cheryl Rose earned a CERTIFIED FINANCIAL PLANNER™ certification (CFP®) in 1998. In order to achieve and maintain certification, CFP® professionals must: 1) pass the comprehensive CFP® Certification Examination, 2) pass the CFP Board's Fitness Standards for Candidates and Registrants, 3) agree to abide by CFP Board's Code of Ethics and Professional Responsibility and Rules of Conduct which put clients' interests first, 4) comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement, and 5) complete 30 hours of continuing education (including 2 hours of approved Ethics CE) every two years. See more at: <http://www.cfp.net/become-a-cfp-professional/cfp-certification-requirements#sthash.qwXJz3yF.dpuf>.

Ms. Cheryl Rose received the Chartered Financial Analyst ("CFA") designation in 2008.

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High Ethical Standards

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Global Recognition

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

Ms. Cheryl Rose has been an employee of Constellation Wealth Advisors since 2018 and also Quadrant Capital Group, LLC. Prior to joining Quadrant Capital Group, LLC, Ms. Cheryl Rose spent over 6 years at PNC Bank, Cincinnati, Ohio and more recently 3 months of unemployment.

Item 3: Disciplinary Information

Ms. Cheryl Rose has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Ms. Cheryl Rose or of Quadrant Capital Group, LLC. Ms. Cheryl Rose's CRD number is 2215094.

Item 4: Other Outside Business Activities

Ms. Cheryl Rose is not engaged in any other investment related business that is 10% of her time or revenue. Quadrant Capital Group, LLC does not supervise and does not receive any compensation

from these Other Outside Business Activities.

Item 5: Additional Compensation

Ms. Cheryl Rose does not receive economic benefits from any person or entity other than Constellation in connection with the provision of investment advice to clients.

Item 6: Supervision

At Quadrant Capital Group, LLC, Mr. Lafley maintains primary responsibility for the company's administration and operations, and services client relationships. Mr. Lafley also serves as Chief Compliance Officer and may be reached directly by calling (513) 871-5504. All employees with client responsibility meet with members of the Investment Committee as frequently as necessary to discuss current market conditions and client accounts. All employees also receive Quadrant Capital Group, LLC's Investment Adviser Supervisory Manual and Code of Ethics and are asked to annually certify their understanding of the material.

Emily B. Rose Biographical Information

Item 2: Educational Background and Business Experience:

Emily B. Rose was born in 1985. She received a Bachelor of Arts degree from Miami University (Oxford, Ohio) in 2007 and an executive certificate in financial planning from Xavier University Leadership Center (Cincinnati, Ohio) in 2013.

Ms. Rose earned a CERTIFIED FINANCIAL PLANNER™ certification (CFP®) in June 2014. In order to achieve and maintain certification, CFP® professionals must: 1) pass the comprehensive CFP® Certification Examination, 2) pass the CFP Board's Fitness Standards for Candidates and Registrants, 3) agree to abide by CFP Board's Code of Ethics and Professional Responsibility and Rules of Conduct which put clients' interests first, 4) comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement, and 5) complete 30 hours of continuing education (including 2 hours of approved Ethics CE) every two years. See more at: <http://www.cfp.net/become-a-cfp-professional/cfp-certification-requirements#sthash.qwXJz3yF.dpuf>.

She has been an employee of Quadrant Capital Group, LLC since 2011. Prior to joining Quadrant Capital Group, LLC, Ms. Rose held various positions in the higher education, service, and non-profit sectors from 2003 – 2011.

Item 3: Disciplinary Information:

Ms. Rose has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Ms. Rose or of Quadrant Capital Group, LLC. Ms. Rose's CRD number is 6435633.

Item 4: Other Business Activities:

Ms. Rose is not engaged in any other investment related business and does not receive compensation in connection with any business activity outside of Quadrant Capital Group, LLC.

Item 5: Additional Compensation:

Ms. Rose does not receive economic benefits from any person or entity other than Quadrant Capital Group, LLC or its affiliates in connection with the provision of investment advice to clients.

Item 6: Supervision:

At Quadrant Capital Group, LLC, Mr. Lafley maintains primary responsibility for the company's administration and operations, and services client relationships. Mr. Lafley also serves as Chief Compliance Officer and may be reached directly by calling (513) 871-5504. All employees with client responsibility meet with members of the Investment Committee as frequently as necessary to discuss current market conditions and client accounts. All employees also receive Quadrant Capital Group, LLC's Investment Adviser Supervisory Manual and Code of Ethics and are asked to annually certify their understanding of the material.

Kyle W. Rudduck Biographical Information

Item 2: Educational Background and Business Experience

Kyle W. Rudduck was born in 1984. He received a BA degree in Economics from Capital University, Columbus, Ohio in 2007.

Mr. Rudduck earned a CERTIFIED FINANCIAL PLANNER™ certification (CFP®) in April, 2015. In order to achieve and maintain certification, CFP® professionals must: 1) pass the comprehensive CFP® Certification Examination, 2) pass the CFP Board's Fitness Standards for Candidates and Registrants, 3) agree to abide by CFP Board's Code of Ethics and Professional Responsibility and Rules of Conduct which put clients' interests first, 4) comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement, and 5) complete 30 hours of continuing education (including 2 hours of approved Ethics CE) every two years. See more at: <http://www.cfp.net/become-a-cfp-professional/cfp-certification-requirements#sthash.qwXJz3yF.dpuf>.

Mr. Rudduck received the Chartered Financial Analyst ("CFA") designation in September 2011.

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High Ethical Standards

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Global Recognition

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Additionally, regulatory bodies in 19 countries recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

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The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

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

Mr. Rudduck has been an employee of Constellation Wealth Advisors since October 2018 and also Quadrant Capital Group, LLC. Prior to joining Quadrant Capital Group, LLC, Mr. Rudduck spent almost 2 years at Creative Planning, Wilmington, Ohio and previously 2 years and 4 months at Truepoint, Inc., Cincinnati, Ohio.

Item 3: Disciplinary Information

Mr. Rudduck has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Mr. Rudduck or of Quadrant Capital Group, LLC. Mr. Rudduck's CRD number is 6640725.

Item 4: Other Outside Business Activities

Mr. Rudduck is not engaged in any other investment related business other than Quadrant Capital Group, LLC, and does not receive compensation in connection with any business activity outside of Quadrant Capital Group, LLC. As noted in Form ADV Part 2, Item 4, Quadrant Capital Group, LLC has private funds that are managed by an affiliate.

Item 5: Additional Compensation

Mr. Rudduck does not receive economic benefits from any person or entity other than Quadrant Capital Group, LLC in connection with the provision of investment advice to clients.

Item 6: Supervision

At Quadrant Capital Group, LLC, Mr. Lafley maintains primary responsibility for the company's administration and operations, and services client relationships. Mr. Lafley also serves as Chief Compliance Officer and may be reached directly by calling (513) 871-5504. All employees with client responsibility meet with members of the Investment Committee as frequently as necessary to discuss current market conditions and client accounts. All employees also receive Quadrant Capital Group, LLC's Investment Adviser Supervisory Manual and Code of Ethics and are asked to annually certify their understanding of the material.

Donna S. Sterwerf Biographical Information

Item 2: Educational Background and Business Experience

Donna S. Sterwerf was born in 1977. She received a BBA degree in Finance & Concentration in Accounting from the University of Cincinnati in 2001. She has passed the General Securities Representative Examination, Series 7 (03/2002) and the Uniform Combined State Law Examination, Series 66 (12/2002).

Ms. Sterwerf earned a CERTIFIED FINANCIAL PLANNER™ certification (CFP®) in 2016.

In order to achieve and maintain certification, CFP® professionals must: 1) pass the comprehensive CFP® Certification Examination, 2) pass the CFP Board's Fitness Standards for Candidates and Registrants, 3) agree to abide by CFP Board's Code of Ethics and Professional Responsibility and Rules of Conduct which put clients' interests first, 4) comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement, and 5) complete 30 hours of continuing education (including 2 hours of approved Ethics CE) every two years. See more at: <http://www.cfp.net/become-a-cfp-professional/cfp-certification-requirements#sthash.qwXJz3yF.dpuf>.

Ms. Sterwerf has been an employee of Constellation Wealth Advisors since 2017 and also Quadrant Capital Group, LLC. Prior to joining Quadrant Capital Group, LLC, Ms. Sterwerf spent 12 years at Merrill Lynch and more recently 2 plus years at Oxford Financial Group.

Item 3: Disciplinary Information

Ms. Sterwerf has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Ms. Sterwerf or of Quadrant Capital Group, LLC. Ms. Sterwerf's CRD number is 4028787.

Item 4: Other Business Activities

Ms. Sterwerf is not engaged in any other investment related business.

Item 5: Additional Compensation

Ms. Sterwerf does not receive economic benefits from any person or entity other than Quadrant Capital Group, LLC in connection with the provision of investment advice to clients.

Item 6: Supervision

At Quadrant Capital Group, LLC, Mr. Lafley maintains primary responsibility for the company's administration and operations, and services client relationships. Mr. Lafley also serves as Chief Compliance Officer and may be reached directly by calling (513) 871-5504. All employees with client responsibility meet with members of the Investment Committee as frequently as necessary to discuss current market conditions and client accounts. All employees also receive Quadrant Capital Group, LLC's Investment Adviser Supervisory Manual and Code of Ethics and are asked to annually certify their understanding of the material.

Kevin B. Thomas Biographical Information

Item 2: Educational Background and Business Experience

Kevin B. Thomas was born in 1989. He received a Bachelor of Business Administration degree from the University of Cincinnati in 2011.

Mr. Thomas earned a CERTIFIED FINANCIAL PLANNER™ certification (CFP®) in 2017.

In order to achieve and maintain certification, CFP® professionals must: 1) pass the comprehensive CFP® Certification Examination, 2) pass the CFP Board's Fitness Standards for Candidates and Registrants, 3) agree to abide by CFP Board's Code of Ethics and Professional Responsibility and Rules of Conduct which put clients' interests first, 4) comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement, and 5) complete 30 hours of continuing education (including 2 hours of approved Ethics CE) every two years. See more at: <http://www.cfp.net/become-a-cfp-professional/cfp-certification-requirements#sthash.qwXJz3yF.dpuf>.

Mr. Thomas has been an employee of Constellation Wealth Advisors since 2018 and is also an employee of Quadrant Capital Group, LLC since 2015. Prior to joining Quadrant Capital Group, LLC, Mr. Thomas was an analyst at PL Marketing from 2014-2015 and in the Accounting area at Luxottica Retail 2011-2013.

Item 3: Disciplinary Information

Mr. Thomas has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Mr. Thomas or of Quadrant Capital Group, LLC. Mr. Thomas' CRD number is 6764399.

Item 4: Other Business Activities

Mr. Thomas is not engaged in any other investment related business other than Quadrant Capital Group, LLC, and does not receive compensation in connection with any business activity outside of Quadrant Capital Group, LLC. As noted in Form ADV Part 2, Item 4, Quadrant Capital Group, LLC has private funds that are managed by an affiliate.

Item 5: Additional Compensation

Mr. Thomas does not receive economic benefits from any person or entity other than Quadrant Capital Group, LLC and its affiliates in connection with the provision of investment advice to clients.

Item 6: Supervision

At Quadrant Capital Group, LLC, Mr. Lafley maintains primary responsibility for the company's administration and operations, and services client relationships. Mr. Lafley also serves as Chief Compliance Officer and may be reached directly by calling (513) 871-5504. All employees with client responsibility meet with members of the Investment Committee as frequently as necessary to discuss current market conditions and client accounts. All employees also receive Quadrant Capital Group, LLC's Investment Adviser Supervisory Manual and Code of Ethics and are asked to annually certify their understanding of the material.

T. Michael Veith Biographical Information

Item 2: Educational Background and Business Experience

T. Michael Veith was born in 1979. He received a BA degree in Economics from Rollins College in 2001 and his MBA from The Crummer Graduate School of Business (Rollins College) in 2003.

Mr. Veith received the Chartered Financial Analyst ("CFA") designation in 2010.

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High Ethical Standards

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Global Recognition

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Mr. Veith has been a member of Constellation Wealth Advisors since 2017 and is also a member of Quadrant Capital Group, LLC since 2017. Prior to joining Quadrant Capital Group, LLC, Mr. Veith spent 11 years at Merrill Lynch and more recently 2 years at Oxford Financial Group.

Item 3: Disciplinary Information

Mr. Veith has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Mr. Veith or of Quadrant Capital Group, LLC. Mr. Veith's CRD number is 4756283.

Item 4: Other Business Activities

Mr. Veith is not engaged in any other investment related business other than Quadrant Capital Group, LLC, and does not receive compensation in connection with any business activity outside of Quadrant Capital Group, LLC. As noted in Form ADV Part 2, Item 4, Quadrant Capital Group, LLC has private funds that are managed by an affiliate.

Item 5: Additional Compensation

Mr. Veith does not receive economic benefits from any person or entity other than Quadrant Capital Group, LLC and its affiliates in connection with the provision of investment advice to clients.

Item 6: Supervision

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their understanding of the material.

John M. Williams Biographical Information

Item 2: Educational Background and Business Experience

John M. Williams was born in 1971. He received a Bachelor of Arts degree in Economics from Vanderbilt University in 1993.

Mr. Williams received the Chartered Financial Analyst (“CFA”) designation in 2010.

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Mr. Williams has been a member of Quadrant Capital Group, LLC since 2009. Prior to joining Quadrant Capital Group, LLC he was a Vice President of Fifth Third Bank from 2002 to 2009.

Item 3: Disciplinary Information

Mr. Williams has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Mr. Williams or of Quadrant Capital Group, LLC. Mr. Williams' CRD number is 2669535.

Item 4: Other Business Activities

Mr. Williams is not engaged in any other investment related business other than Quadrant Capital Group, LLC, and does not receive compensation in connection with any business activity outside of Quadrant Capital Group, LLC. As noted in Form ADV Part 2, Item 4, Quadrant Capital Group, LLC has private funds that are managed by an affiliate.

Item 5: Additional Compensation

Mr. Williams does not receive economic benefits from any person or entity other than Quadrant Capital Group, LLC and its affiliates in connection with the provision of investment advice to clients.

Item 6: Supervision

At Quadrant Capital Group, LLC, Mr. Lafley maintains primary responsibility for the company's administration and operations, and services client relationships. Mr. Lafley also serves as Chief Compliance Officer and may be reached directly by calling (513) 871-5504. All employees with client responsibility meet with members of the Investment Committee as frequently as necessary to discuss current market conditions and client accounts. All employees also receive Quadrant Capital Group, LLC's Investment Adviser Supervisory Manual and Code of Ethics and are asked to annually certify their understanding of the material.