



Part 2A of Form ADV: *Firm Brochure*

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This brochure provides information about the qualifications and business practices of BCG Securities, Inc. (hereinafter "BCG" or "firm" or "we"). If you have any questions about the contents of this brochure, please contact us at (856) 393-1950 or at info@bcgsecurities.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about BCG is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for BCG is 70.

Item 2. Summary of Material Changes

On January 2, 2019, BCG Securities, Inc. was acquired by Horace Mann Educators Corporation (“Horace Mann”). Horace Mann is the largest financial services company focused on providing America's educators with insurance and retirement solutions. Founded by Educators for Educators in 1945, the company is headquartered in Springfield, Ill.

Horace Mann has entered into an agreement to purchase Benefit Consultants Group, Inc., the parent company of BCG Securities (the “Transaction”). As a result of the Transaction, Horace Mann became the owner of BCG Securities.

The Transaction will not result in any change to your financial advisor, the advisory fees you pay or the custodian where your investment assets are held. In addition, we do not expect the Transaction to affect the operation of your advisory account, or the assets invested under any of our advisory programs. However, the Transaction did cause an “assignment” of investment advisory client agreements under the Investment Advisers Act of 1940.

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Item 4. Advisory Business

BCG is a SEC-registered investment adviser (SEC file number 801-56943) with its principal place of business located in Cherry Hill, New Jersey. We have been in business since 1968. Horace Mann Educators Corp. is the direct owner of BCG Securities. Michael Weckenbrock is CEO and Adam Paglione is President and Chief Compliance Officer.

Assets under our firm's management were approximately \$516,160,184 as of December 31, 2018. Of this amount, \$61,925,196 of assets were managed on a discretionary basis.

Portfolio Management Services

Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop and manage a portfolio based on those discussions. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. We may also review and discuss a client's prior investment history, as well as family composition and background. We charge an asset based fee for the management of these accounts, a portion of which is kept by the Investment Advisor Representative and by the firm. Section 5 provides more information regarding the fee structure.

We will manage advisory accounts on a non-discretionary and discretionary basis. Account supervision is guided by the stated objectives of the client (i.e. preservation, conservative, moderate, moderately aggressive, or aggressive strategies), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Use of Sub-Advisers and Third-Party Managers

We may also, when appropriate, sub-advise certain portions of a client portfolio to independent third-party managers or recommend direct investment with independent third-party managers, typically when those managers demonstrate knowledge and expertise in a particular investment strategy.

As part of this service, we perform management searches of various unaffiliated third-party managers. Based on a client's individual circumstances and needs, we will determine which selected manager's portfolio management style is appropriate for that client. Factors considered in making this determination include account size, risk tolerance, the opinion of each client and the investment philosophy of the selected manager. We encourage clients to review each third-party manager's disclosure document regarding the particular characteristics of any program and managers selected by us.

Once we determine which selected third-party manager(s) are most appropriate for the client, we will provide the selected registered investment adviser(s) with the client's investment goals and risk tolerance. The selected manager(s) will then create and manage the client's portfolio based upon the client's individual needs as exhibited in the client's IPS or investment plan.

We will regularly and continuously monitor the performance of the selected third-party manager(s). If we determine that a particular selected manager(s) are not providing sufficient management services to the client, or are not managing the client's portfolio in a manner consistent with the client's IPS or investment plan, we will remove the client's assets from that selected manager(s) and place the client's assets with another third-party manager(s) at our discretion and without prior consent from the client.

Our firm will conduct appropriate due diligence on all independent third-party managers, making reasonable inquiries into their performance calculations, policies and procedures, Code of Ethics, and other operational and compliance matters deemed important to account performance and risk management.

Financial Planning Services

Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information and analysis will be considered as they impact and are impacted by the entire financial and life situation of the client. Clients purchasing this service will receive a written report, providing the client with a detailed financial plan designed to achieve his or her stated financial goals and objectives.

In general, the financial plan will address any or all of the following areas of concern:

- Personal: Family records, budgeting, personal liability, estate information and financial goals;
- Tax & Cash Flow: Income tax and spending analysis and planning for past, current and future years. We will illustrate the impact of various investments on a client's current income tax and future tax liability;
- Death & Disability: Cash needs at death, income needs of surviving dependents, estate planning and disability income analysis;
- Retirement: Analysis of current strategies and investment plans to help the client achieve his or her retirement goals;
- Investments: Analysis of investment alternatives and their effect on a client's portfolio;

- Estate: Analysis of financial issues with respect to living trusts, wills, estate tax, powers of attorney, asset protection plans, nursing homes, Medicaid and elder law;
- Insurance: Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile; and/or
- Business Planning: Employee benefits analysis, executive compensation planning, risk management, real estate planning, business transfer planning, employee recruiting needs, and expansion planning.

Typically, if requested, the financial plan will be presented to the client within six months of the contract date, provided that all information needed to prepare the financial plan has been promptly provided by the client.

Pension Consulting Services

We provide several consulting services separately or in combination. Clients may choose to use any or all of these services.

Investment Policy Statement ("IPS") Development or Review

We will meet with the client (in person and/or over the telephone) to determine or review the client's investment needs and goals. For clients needing an IPS, we will prepare a written IPS stating their needs and goals and encompassing a policy under which these goals are to be achieved. The IPS will also list the criteria for the selection of investment vehicles and the procedures and timing interval for monitoring investment performance.

Selection of Investment Vehicles and Independent Money Managers

We will review various investments, consisting primarily of mutual funds, service providers and strategies to determine which ones are appropriate to implement the client's IPS. The nature and selection of investments and service providers to be recommended will be determined by the client, based on the IPS.

Based on a client's individual circumstances and needs, we will determine which independent manager's portfolio is appropriate for that client. Factors we consider in making this determination include account size, risk tolerance, the opinion of each client and the investment philosophy of the independent adviser. If we believe that a selected independent adviser is not performing adequately or if we believe that a different manager is more suitable for a client's particular needs, then we may suggest that a client contract with a different adviser. While we may assist the client in selecting a new adviser, any move to a new adviser is solely at the discretion of the client.

Monitoring of Investment Procedures and Performance

We will monitor client investments continuously based on the procedures and timing

intervals delineated in the IPS. Although we will not be involved in any way in the purchase or sale of these investments, we will monitor the client's portfolio and will make recommendations to the client as market factors and the client's needs dictate. The frequency of reviews will be determined by the client's needs and the IPS.

Employee Communications:

For pension, profit sharing and 401(k) plan clients in self-directed plans, we will provide periodic educational support and investment workshops designed for the plan participants. Topics to be discussed will be determined in conjunction with the plan sponsor and in accordance with guidelines established in ERISA Section 404(c). The educational support and investment workshops will not provide plan participants with individualized, tailored investment advice or individualized, tailored asset allocation recommendations.

Wealth Management/Consulting Services

We provide wealth management services for individuals and businesses. Wealth management services are generally provided over the course of a year, and may be continued from year to year by mutual agreement. Depending on each client's circumstances and needs, our wealth management services may include: an evaluation of the likelihood of the client meeting certain financial goals or objectives, based on the client's assets, liabilities, and relevant economic assumptions (a "Capital Needs Analysis"); tax planning; insurance planning; estate planning; risk management needs analysis; assessment of mortgages, debt refinancing, and loan alternatives; bill paying and budgeting analysis; strategies for philanthropic and multigenerational planning; gifting strategies, including amounts, form of gift (monetary or securities), and the manner of making the gifts, such as through trusts and foundations; family business succession planning; coordination of external advisors; and financial reporting.

Services in General

We tailor all of our investment recommendations and advice to the individual needs of each client. All investment recommendations and advice are based on information gathered through client questionnaires, electronic communications, telephone and in-person discussions.

Our investment recommendations are not limited to any specific product or service offered by a broker dealer or insurance company and will primarily include advice regarding no-load or load-waived mutual funds, exchange-traded funds (ETFs), equity securities, and independent third-party managers.

Occasionally, we may also advise on or recommend investments in the following instruments:

- Fixed income securities

- Certificates of deposit
- Warrants
- Commercial paper
- Municipal securities
- Variable life insurance
- Variable annuities
- United States government securities
- Interests in pooled investment vehicles

Item 5. Fees and Compensation

Portfolio Management Services

Our fees for Portfolio Management Services are based upon a percentage of assets under management. The following fee schedule is indicative of a typical wealth management account; however your actual fee may vary depending upon your specific portfolio, the complexity of the portfolio and overall management. The fee schedule may be negotiated with the client on a case by case basis. No fee will be in excess of 1.50% without specific approval by the firm's Compliance Officer.

<u>Assets Under Management (\$)</u>	<u>Approximate Annual Fee (%)</u>
Under \$100,000	1.50%
\$100,000 to 1,000,000	1.00%
Over \$1,000,000	1.00% or individually negotiated

Portfolio management fees are deducted in advance of each quarterly, based upon the net value of the assets in the client account on the last business day of the previous quarter, pro-rated for additions and withdrawals.

Depending on the particular arrangement with each client, we will generally debit their custodial accounts for portfolio management fees. The firm may also receive periodic money market distribution assistance from our custodian, Pershing for assets held in a money market sweep account. Currently the distribution assistance is 0% for retirement accounts and .035% for taxable accounts. This revenue is retained only by the firm and not shared with any other person. Pershing provides full disclosure and details regarding this assistance to all customers via statement inserts.

Some asset classes are generally not charged an asset based fee or are exempt from the quarterly fee. Typically these asset types are annuities, insurance products, alternative investment products, certain fixed income positions, certain cash or money market positions, and certain share classes of mutual funds. You may contact the firm or your IAR regarding your specific account.

Financial Planning Services:

We charge Financial Planning clients based on an hourly fee of up to \$500 per hour or a fixed fee based on the client's net worth and in accordance with the fee schedule below. The entire fee is due and payable at the commencement of the financial planning service if the project is done on a fixed fee basis. If the project is done on an hourly basis, the client will pay our reasonable estimate of the total fee at the time the advisory contract is signed, and when the financial planning project is completed, will pay any balance due or will receive a refund of any amount overpaid.

The length of time it will take us to complete a particular financial planning project will depend on the nature and complexity of the individual client's personal circumstances. An estimate for total hours will be determined at the start of the advisory relationship.

Pension Consulting Services

Our fees for these services are charged based on a fixed annual fee ranging from \$1,000 to \$10,000 and are charged quarterly in advance, based upon the net value of the assets in the client account on the last business day of the previous quarter, pro-rated for additions and withdrawals. Depending on the particular arrangement with each client, we will either invoice clients or directly debit their custodial accounts for pension consulting fees.

Fees in General

Fees and account minimums for all services are negotiable based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.). Discounts, not generally available to our advisory clients, may be offered to family members and friends of BCG or its staff.

We may group certain related client accounts for the purposes of determining the account size and/or annualized fee.

Certain legacy client agreements may be governed by fee schedules different from those listed above.

Account Termination

Clients will have a period of five (5) business days from the date of signing the agreement to unconditionally rescind the agreement and receive a full refund of all fees. Thereafter, the client may terminate the agreement by providing us with a 7-day written notice at our principal place of business. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

Mutual Fund and ETF Fees and Expenses: All fees paid to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. A client could invest in a mutual fund or and ETF directly, without the services of our firm. In that case, the client would not receive the services provided by us which are designed, among other things, to assist the client in determining which mutual fund or funds or ETFs are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and ETFs and the fees charged by us to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Brokerage, Custodial, and Third-Party Manager Fees

In addition to advisory fees paid to our firm, clients will also be responsible for all transaction, brokerage, trade-away and custodial fees incurred as part of their account management with the selected third-party investment advisers. Please see Item 12 of this Brochure for important disclosures regarding our brokerage practices. All advisory fees charged by selected third-party managers and/or programs are incurred by clients in addition to our advisory fees.

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

We do not charge any fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7. Types of Clients

Our primary clients groups are retirement plans such as 401(k) plans, and individual accounts with assets exceeding \$25,000.

Third-party managers we select may impose additional and different minimum account sizes and/or fee minimums. Such requirements will be described in each manager's disclosure documents and/or advisory agreement.

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

Our firm employs the following types of analysis to formulate client recommendations.

Fundamental Analysis: Fundamental analysis of a business involves analyzing its income statement, financial statements and health, its management and competitive advantages, and its competitors and markets. Fundamental analysis school of thought maintains that markets may mis-price a security in the short run but that the "correct" price will eventually be reached. Profits can be made by trading the mis-priced security and then waiting for

the market to recognize its "mistake" and re-price the security. We would typically categorize our individual stock discipline as Middle-to-Large Capitalization Growth.

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock. Therefore, unforeseen market conditions and/or company developments may result in significant price fluctuations that can lead to investor losses.

Mutual fund and/or ETF analysis: 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 funds 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.

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

Technical analysis. We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and to potentially predict future price movement.

Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly-managed or financially unsound company may underperform regardless of market movement.

Third-Party Manager Analysis: We examine the experience, expertise, investment philosophies, and past performance of independent third-party investment managers 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 monitor the manager's underlying holdings, strategies, concentrations and leverage as part of our overall periodic risk assessment. Additionally, as part of our due-diligence process, we survey the manager's compliance and business enterprise risks.

A risk of investing with a third-party manager who has been successful in the past is that he/she may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a third-party manager's portfolio, there is also a risk that a manager may deviate from the stated investment mandate or strategy of the

portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager's daily business and compliance operations, it is possible for us to miss the absence of internal controls necessary to prevent business, regulatory or reputational deficiencies.

Risks for all forms of analysis: Our securities analysis method relies on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

Our firm employs the following investment strategies to formulate and/or implement investment advice given to clients:

Long-term purchases: We or third-party managers selected by us mostly purchase securities with the idea of holding them in the clients account for a year or longer. We/they may do this because we believe the securities to be currently undervalued. We/they may do this because we want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that, by holding the security for this length of time, we may not take advantages of short-term gains that could be profitable to a client. Moreover, if our/their predictions are incorrect, a security may decline sharply in value before we/they make the decision to sell.

Short-term purchases: At times, we or third-party managers selected by us may also purchase securities with the idea of selling them within a relatively short time (typically a year or less). We/they do this in an attempt to take advantage of conditions that we/they believe will soon result in a price swing in the securities we purchase.

A risk in a short-term purchase strategy is that, should the anticipated price swing not materialize, we/they are left with the option of having a long-term investment in a security that was designed to be a short-term purchase, or potentially taking a loss. In addition, this strategy involves more frequent trading than does a longer-term strategy, and will result in increased brokerage and other transaction-related costs, as well as less favorable tax treatment of short-term capital gains.

Short sales: We or third-party managers selected by us borrow shares of a stock for your portfolio from someone who owns the stock on a promise to replace the shares on a future date at a certain price. We/they then sell the shares we have borrowed. On the agreed-upon future date, we/they buy the same stock and return the shares to the original owner. We/they engage in short selling on based on our determination that the stock will go down in price after we/they have borrowed the shares. If the stock has gone down since we/they purchased the shares from the original owner, we/they keep the difference.

One risk in selling short is that losses are theoretically unlimited; we are obligated to repurchase the stock no matter how much the price has climbed. In addition, even if we/they are correct in determining that the price of a stock will decline, we/they run the risk of incorrectly determining when the decline will take place. Short selling may not be appropriate in times of inflation, as prices may adjust upwards regardless of the value of the stock.

Margin transactions: We or third-party managers selected by us may purchase stocks for your portfolio with money borrowed from your brokerage account. This allows you to purchase more stock than you would be able to with your available cash, and allows us/them to purchase stock without selling other holdings.

A risk in margin trading is that, in volatile markets, securities prices can fall very quickly. If the value of the securities in your account minus what you owe the broker falls below a certain level, the broker will issue a "margin call", and you will be required to sell your position in the security purchased on margin or add more cash to the account. In some circumstances, you may lose more money than you originally invested.

Item 9. Disciplinary Information

Our firm has no reportable disciplinary events to disclose.

Item 10. Other Financial Industry Activities and Affiliations

Neither our firm nor our employees have any other financial industry affiliations or are engaged in any other financial industry activities.

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

Code of Ethics Disclosure

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws. Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code provides for oversight, enforcement and recordkeeping provisions. A copy of our Code of Ethics is available to our advisory clients and prospective clients upon request to Adam Paglione, President and Chief Compliance Officer, at the firm's principal office address.

Our firm or individuals associated with our firm may buy or sell securities identical to those recommended to or purchased for customers for their personal accounts. In addition, any related person(s) may have an interest or position in a certain security(ies) which may

also be recommended to a client. This practice results in a potential conflict of interest, as we may have an incentive to manipulate the timing of such purchases, to the extent possible, to obtain a better price or more favorable allocation in rare cases of limited availability.

We may aggregate our employee trades with client trades. In case there is a partial fill of a particular batch order, we will allocate all the purchases pro-rata, with each account paying average price. Our clearing firm, Pershing, may execute trades on a riskless principal basis. This is generally done for fixed income transactions when a fee is not being charged.

To mitigate these potential conflicts of interest and ensure the fulfillment of our fiduciary responsibilities, we have established the following restrictions:

1. No principal or employee of our firm may buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No principal or employee of our firm may prefer his or her own interest to that of the advisory client;
2. It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, and therefore, preventing such employees from benefiting from transactions placed on behalf of advisory accounts;
3. We maintain a list of all securities holdings for our firm and anyone associated with this advisory practice with access to advisory recommendations. These holdings are reviewed on a regular basis by our compliance staff;
4. In case of partial fills, client accounts will receive preference over employee accounts;
5. We emphasize the unrestricted right of the client to decline to implement any advice rendered, except in situations where our firm is granted discretionary authority;
6. All of our principals and employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices; and
7. Any individual not in observance of the above may be subject to disciplinary action or termination.

Item 12. Brokerage Practices

In most instances any brokerage transactions will take place through our own broker/dealer. All BCG Securities broker/dealer transactions are executed and held by our clearing firm, Pershing, LLC. As broker/dealer, BCG Securities does not receive any “soft dollar” compensation from any investment company. Clients may use an outside broker/dealer at their own discretion. In some instances, such as a high frequency trading client, we may request or suggest the client use an outside broker/dealer as the fees may be significantly less.

Trade Aggregation

We may aggregate client trades when doing so is advantageous to our clients. Mostly, we will batch client transactions to receive volume discounts and to obtain better and more uniform pricing across client accounts. If we determine that aggregation of trades in a certain situation will be beneficial to our clients, transactions will be averaged as to price and will be allocated among our clients in proportion to the purchase and sale orders placed from each client account on any given day.

Third-Party Manager Practices

While we do not have any direct control over third-party manager brokerage or aggregation practices, we will review their respective policies to ensure that they are reasonable and in the overall best interest of our clients prior to placing client assets with any third-party manager.

Item 13. Review of Accounts

Portfolio Management Services

The firm’s Chief Compliance Officer is responsible for all account reviews. He and his designees will continuously monitor the underlying securities in client accounts and perform periodic reviews of account holdings for all clients. Various exception and production reports produced by the system are reviewed and addressed. We will also monitor the performance of third-party managers on a continuous basis. Accounts are reviewed periodically for consistency with client investment strategy, asset allocation, risk tolerance and performance relative to the appropriate benchmark. Account reviews may be in writing or may be done electronically without a written report. More frequent reviews may be triggered by changes in an account holder’s personal, tax or financial status. Significant domestic, geopolitical and macroeconomic events may also trigger reviews.

In addition to the monthly statements and confirmations of transactions that clients receive from their custodian and/or broker dealer, our firm may provide quarterly holdings and/or performance reports depending upon the account type selected by the client.

Pension Consulting Services

For these clients, we will review the client's IPS whenever the client indicates a change in circumstances regarding the needs of the plan. We will also review the investment options of the plan according to the agreed-upon time intervals established in the IPS. Such reviews will generally occur quarterly.

In addition to the monthly statements and confirmations of transactions that clients receive from their custodian and/or broker dealer, our firm will provide quarterly holdings, manager monitoring and/or performance reports.

Financial Planning/Wealth Management/Consulting Services

We will review these client accounts as contracted for at the inception of the advisory relationship, typically at least annually. We will provide Financial Planning clients with a completed financial plan. We will provide additional reports as contracted for at the inception of the advisory relationship.

Item 14. Client Referrals and Other Compensation

Other than that already described in this Brochure, our firm does not receive any additional compensation from third parties for providing investment advice to its clients and does not compensate anyone for client referrals.

Item 15. Custody

Custody is defined as any legal or actual ability by our firm to access client funds or securities. BCG Securities, Inc. does not hold custody of any client assets. Assets are held by our clearing firm, Pershing, LLC, a third-party asset manager, or in the case of retirement plans, a designated trust company. All statement will be prepared and sent by the applicable custodian.

Item 16. Investment Discretion

For clients granting us discretionary authority to determine which securities and the amounts of securities that are to be bought or sold for their account(s) or which third-party managers to hire and fire, we request that such authority be granted in writing, typically in the executed investment management agreement.

Should the client wish to impose reasonable limitations on this discretionary authority, such limitations shall be included in this written authority statement. Clients may change/amend these limitations as desired. Such amendments must be submitted to us by the client in writing.

Item 17. Voting Client Securities

Advisory clients may elect to delegate their proxy voting authority to us. Alternatively, clients may, at their election, choose to receive proxies related to their own accounts, in which case we may consult with clients as requested. (With respect to ERISA accounts, we will vote proxies unless the plan documents specifically reserve the plan sponsor's right to vote proxies. To direct us to vote a proxy in a particular manner, clients should contact BCG by telephone, electronic mail, or in writing.

When we have discretion to vote proxies for our clients, we will vote those proxies in the best interests of its clients and in accordance our established policies and procedures. Our firm will retain all proxy voting books and records for the requisite period of time, including a copy of each proxy statement received, a record of each vote cast, a copy of any document created by us that was material to making a decision how to vote proxies, and a copy of each written client request for information on how the adviser voted proxies. If our firm has a conflict of interest in voting a particular action, we will notify the client of the conflict and retain an independent third-party to cast a vote.

Clients may obtain a copy of our complete proxy voting policies and procedures by contacting Adam Paglione directly. Clients may request, in writing, information on how proxies for his/her shares were voted. If any client requests a copy of our complete proxy policies and procedures or how we voted proxies for his/her account(s), we will promptly provide such information to the client.

We will neither advise nor act on behalf of the client in legal proceedings involving companies whose securities are held in the client's account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. If desired, clients may direct us to transmit copies of class action notices to the client or a third party. Upon such direction, we will make commercially reasonable efforts to forward such notices in a timely manner.

Item 18. Financial Information

Under no circumstances will we earn fees in excess of \$1,500 more than six months in advance of services rendered.