



**BEACON GLOBAL
ADVISOR NETWORK**

**FORM ADV PART 2A APPENDIX 1
BEACON GLOBAL ADVISOR WRAP PROGRAM BROCHURE**

Item 1 - Cover Page
Beacon Global Advisor Network, LLC
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This wrap fee program brochure provides information about the qualifications and business practices of Beacon Global Advisor Network, LLC. If you have any questions about the contents of this Brochure, please contact us at (678) 517-4474 and/or dawnbond@bganetwork.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 Beacon Global Advisor Network, LLC. also is available on the SEC's website at www.adviserinfo.sec.gov.

Any references to Beacon Global Advisor Network, LLC. as a registered investment adviser or its related persons as registered advisory representatives does not imply a certain level of skill or training.

Item 2 – Material Changes

The most recent annual update to this brochure is dated March 2020.

At least annually, this section will discuss only specific material changes that are made to the Brochure and provide you with a summary of such changes. Additionally, reference to the date of the last annual update to this Brochure will be provided.

Pursuant to new SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent brochures within 120 days of the close of our fiscal year, which is December 31st. We may further provide other ongoing disclosure information about material changes as necessary.

Additionally, we will further provide you with a new brochure as necessary based on change or new information, at any time, without charge.

Our brochure may be requested free of charge by contacting Dawn Bond at 678-517-4474 or dawnbond@bganetwork.com. Additional information about BGAN is also available via the SEC's website www.adviserinfo.sec.gov. The website also provides information about any persons affiliated with BGAN who are registered, or are required to be registered, as investment adviser representatives of BGAN.

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Item 4 - Services, Fees and Compensation

Beacon Global Advisor Network, LLC (hereinafter referred to as “BGAN”) is an investment advisory firm offering a variety of advisory services customized to your individual needs.

BGAN was established in April 2017. The principal owners and members of BGAN are: Joseph Gruber, President; Robert Rigby-Hall, Treasurer; and Randy Landsman, Vice President.

BGAN is an investment adviser that consists of many independent contractors who have affiliated with BGAN as Advisory Representatives to offer the advisory services and programs described within this brochure. The Advisory Representatives each have their own businesses and offices through which they conduct not only advisory business but provide other financial services. They market a variety of financial related services including accounting and insurance services not offered by BGAN through their independent businesses. These businesses are separate from and not affiliated with BGAN. The Advisory Representatives have a direct interest in the fee charged to you since BGAN will pay a portion of the advisory fee charged to you to your Advisory Representative. It is important to refer to the Fees Schedules disclosed below. Our Advisory Representatives cannot exceed the fee disclosed below. However, the negotiability and the fee that you will pay for advisory services is determined between you and your Advisory Representative. The fee structure charged by your advisory representative could be higher than a fee structure charged by another BGAN advisory representative. It should not be assumed that a wrap program will cost more or less than a non-wrap program.

As an investment adviser, we are a fiduciary to our advisory clients. As fiduciaries, we are expected act and provide advice in the best interests of clients; have a duty to be loyal to our clients; make full and fair disclosure of all material conflicts of interest; seek best execution for client transactions; ensure that investment advice is suitable for clients' objectives, needs and circumstances; have a duty to have a reasonable, independent basis for investment advice; and refrain from effecting personal securities transactions that are inconsistent with client interests. If your account is a retirement account and subject to the Employee Retirement Income Security Act of 1974, we are also a fiduciary within Section 3(21) under the Employee Retirement Income Security Act of 1974 (ERISA), as amended. As ERISA fiduciaries, we are expected to provide advice that is in your best interest; only charge fees that are reasonable; and not make any materially misleading statements about recommended transactions, fees and compensation, conflicts of interest, or any other matters relevant to your investment decisions.

BGAN offers asset management services as a wrap program where the client will not pay transaction fees as further described below or a non-wrap program where the client will pay an advisory fee and transaction fees separately.

Wrap accounts are more suitable for the client who wants the cost of management and trading in one single fee without being charged for each transaction. While a non-wrap account will be more suitable for a client who prefers to separate management fees and pay for each transaction. Actively management accounts will generally be better suited for a wrap account. Managed accounts

infrequently traded or trade in no-transaction fee securities will be better suited for a non-wrap fee structure.

A wrap program will cost you more or less than if you purchased advisory and transactional services separately. Factors that affecting the relative cost of the program include:

- Advisory Representative's fee schedule
- Anticipated trading costs
- Costs incurred by BGAN and the Advisory Representative

BGAN offers two wrap programs as further described below:

1. Beacon Global Advisor Custom Wrap Program
2. Beacon Global Advisor Aptus Wrap Program

Transactions in the account, account reallocations and rebalancing often trigger a taxable event, with the exception of IRA accounts, 403(b) accounts and other qualified retirement accounts.

Investment recommendations and advice offered by BGAN are not legal advice or accounting advice. You should coordinate and discuss the impact of financial advice with your attorney and/or accountant. You are advised that it is necessary to inform BGAN promptly with respect to any changes in your financial situation and investment goals and objectives. Failure to notify BGAN of any such changes could result in investment recommendations not meeting your needs.

Beacon Global Advisor Custom Wrap Program (“BGAN Custom Wrap Program”)

This wrap program option offers the client a customized managed account managed directly by the client's advisory representative. Trading in the account will vary depending on the Advisory Representative's investment strategy and philosophy and the client's objective and risk profile. Trading can be frequent or infrequent.

Managed accounts will primarily consist of exchange traded funds and open-ended mutual funds and uses no-load and load waived or mutual funds using institutional shares or when in the best interest of the client mutual funds purchased at net asset value (NAV). Additionally, managed accounts can include exchange traded funds, equity and fixed income securities, and alternative investments.

The advice provided by Advisory Representatives often involves recommendations to invest assets according to an asset allocation primarily involving mutual funds, exchange traded funds, stocks, bonds, and other types of securities. Recommendations include investing into various share classes. Different share classes of securities involve different fee structures and internal costs. Institutional shares are often the least expensive from an internal cost perspective; however, the transaction fees can be higher. It is important you understand the internal cost structure of the various share classes. Additional information about costs and the various share classes can be found in the prospectus.

Registered investment company securities such as mutual funds, and variable products offer the securities in various share classes. Different share classes are priced differently and share classes other than institutional share classes will involve higher internal costs that over time will cost you more. Institutional share classes often have higher trading costs. A client needs to consider the amount

being invested and the length of anticipated holding to make a decision as to the share class most suitable to the client. Please read the disclosures under Item 9 Financial Industry Activities and Affiliations below for important information about the advice and recommendations offered by advisory representatives and registered representatives. Representatives will select the lowest share class funds available and appropriate to the situation. However, in selecting the lowest share class, trading costs are sometimes higher. Selecting the lowest share class appropriate to the situation does not imply the lowest cost share class but means what the Representative deems lowest cost for the situation. Representatives consider the anticipated holding period, cost structure, and administrative and transaction costs associated with selecting a share class. However, there is no way to predict the future and there could be occasions where a holding is liquidated sooner or held longer resulting in higher costs to the client. Additional information about share classes can be found in an Investor Alert issued by the Securities and Exchange Commission at <https://www.investor.gov/additional-resources/news-alerts/alerts-bulletins/investor-bulletin-mutual-fund-classes> and <https://www.investor.gov/additional-resources/news-alerts/alerts-bulletins/investor-bulletin-mutual-fund-classes>. Additionally, the SEC and FINRA provides investor information at www.sec.gov and www.finra.org.

Beacon Global Advisor Unified Managed Program (“BGAN Unified Managed Program”)

BGAN’s Unified Managed Program includes the use of various managers and their managed models. BGAN has assembled various portfolios made up of multiple managers and model portfolios covering a range of investment objectives. The portfolios contain a diversification of managed model portfolios containing stocks, bonds, and exchange traded funds. Your advisory representative selects one or more of the BGAN portfolios containing various third-party managed portfolios.

The following third party manager platforms and programs are utilized and will change at the discretion of the management platform adding or deleting managers: Aptus Capital Advisors, LLC (CRD #167626), AllianceBernstein Corporation (CRD#107445), Riverbridge Partners, LLC (CRD #108074), Gryroscope Capital Management Group, LLC (CRD #142672), Legg Mason Private Portfolio Group, LLC (142219), GEMS Management Limited (CRD #132028), W.E. Donoghue & Co., LLC (CRD #285403), Athenainvest Advisors, LLC (CRD #146224), State Street Global Advisors, Ocean Park Asset Management, LLC (CRD #105765), Wilbanks, Smith & Thomas Asset Management, LLC (CRD #106060), Bristol Gate Capital Partners, Inc. (CRD #175139), River Road Asset Management, LLC (CRD #134918). A client can request a current copy of any manager’s Form ADV Part 2A upon request. Additionally, a current version of the disclosure brochure is available on the SEC’s website at www.adviserinfo.sec.gov.

Additional information about the various managers outlined above is found and is available in the manager’s Disclosure Brochure (Form ADV Part 2A). The Disclosure Brochure contains important information about the fees, services, and conflicts of interests associated with the program and the Third-Party Service Provider. The most current version of any Managers Disclosure Brochures can be obtained directly from the SEC’s website www.adviserinfo.sec.gov. Alternatively, you can request your Advisory Representative to provide you a copy of the most current version at any time.

Wrap Fee Schedule

Fees are negotiable and are not based on a share of capital gains upon or capital appreciation of the funds or any portion of the funds.

You may make additions to the Account or withdrawals from the Account. Additional assets deposited into the Account after it is opened will be charged a pro-rata fee based upon the number of days remaining in the then current calendar quarter. Additionally, partial withdrawals from the account will result in a prorated portion of the fee being credited to the Account. Fee adjustments for inflows and outflows in accounts charged based on the average daily balance will be factored into the quarterly fee using the average daily value of the account. No fee adjustments will be made for Account appreciation or depreciation.

Beacon Global Advisor Custom Wrap Program (“BGAN Custom Wrap Program”)

Fee Breakpoint Levels	Advisor Directed Maximum Advisory Fee*
Up to \$250,000	2.75%
\$250,000 to \$500,000	2.00%
\$500,001 to \$1,000,000	1.75%
\$1,000,001 to \$3,000,000	1.50%
\$3,000,001 to \$5,000,000	1.00%
\$5,000,001 to \$10,000,000	0.80%
Over \$10,000,000	Negotiable

Your Advisory Representative will have the discretion to determine:

➤ ***How the fee will be determined***

Option A: A quarterly fee will be calculated based on the value of each account registration under management (e.g. you have four accounts and each is charged a fee based on the account value based on the negotiated fee schedule).

Option B: A quarterly fee will be calculated based on the aggregated value of all managed accounts for the household.

For example, if you have four managed accounts with a value as of the just completed calendar quarter of: \$101,569.40, \$55,498.46, \$675,879.50, and \$74,301.12 with a total value of \$907,248.48, you will not pay a fee on the managed accounts greater than 1.75%.

➤ ***Valuation of the account for purposes of calculating the fee***

Option A: Fees will be determined and calculated based on the average daily balance of the account for the calendar quarter.

Option B: Fees will be determined and calculated based on the just completed quarter ending account value.

Beacon Global Advisor Unified Managed Program (“BGAN Unified Managed Program”)

Aptus Capital Advisors, LLC Fee Schedule

Fee Breakpoint Levels	Advisory Rep Fee	BGAN Program Fee	Maximum Total Fee
Up to \$250,000	1.75%	0.40%	2.15%
\$250,000 to \$500,000	1.35%	0.40%	1.75%
\$500,001 to \$1,000,000	1.10%	0.40%	1.50%
\$1,000,001 to \$3,000,000	0.85%	0.40%	1.25%
\$3,000,001 and above	0.60%	0.40%	1.00%

Aptus is compensated based on receipt of internal fund costs of the Aptus funds in the models. Internal costs of Aptus ETFs typically range from 0.69 to 0.79. Disclosure of the costs and expenses associated with the mutual funds and exchange traded funds is contained in the prospectus. The costs of the mutual funds and exchange traded funds could be higher or lower than other securities available. Further, there is an incentive for Aptus to use its funds over other funds.

SMArtX Advisory Solutions, LLC (SMArtX)

Fee Breakpoint Levels	AR Fee	BGAN Program Fee	Max Manager & Platform Fee*	Maximum Total Fee
Up to \$250,000	1.75%	0.40%	0.85%	3.00%
\$250,000 to \$500,000	1.35%	0.40%	0.85%	2.60%
\$500,001 to \$1,000,000	1.10%	0.40%	0.85%	2.35%
\$1,000,001 to \$3,000,000	0.85%	0.40%	0.85%	2.10%
Over \$3,000,000	0.60%	0.40%	0.85%	1.85%

*Each manager in the model portfolio charges an advisory fee for management of their portion of the portfolio. Manager fees can be as high as 0.60%. Therefore, depending on the manager fees in the selected portfolio(s), the client’s Manager and Platform Fee will be less. The BGAN Balanced Portfolio does not have a separate manager fee. In addition to the manager fee, SMArtX charges a platform fee of 0.25%. The fee reflected under the Manager & Platform Fee column is the maximum fee that will be charged.

BGAN calculates and withdraws from client accounts the AR fee and the BGAN Program fee as stated below. SMArtX calculates and withdraws the manager fees and the SMArtX platform fee. The account custodian calculates and withdraws the custodian asset-based fee or transaction charges.

How the fee will be determined

- A quarterly fee will be calculated based on the average daily balance of each account registration under management (e.g. you have two accounts, therefore, each account is charged a fee based on the account value based on the negotiated fee schedule).

- *Fee timing.* Fees will be deducted from the account on a calendar quarterly basis in arrears.

Fee Formula Calculation

Accounts Maintained at TD Ameritrade: The fee formula used to calculate your quarterly BGAN advisory fee is as follows. Average daily account value of the account x percentage fee x # of days in quarter / # of days in the year.

Accounts Maintained at Interactive Brokers: The fee formula used to calculate your quarterly BGAN advisory fee is as follows. Average daily account value of the account x percentage fee x # of days in quarter / 252 (Interactive Brokers uses the average business days in the year for fee calculations).

- *Structure of the fee*

The fee will be a flat fee based on the average daily balance of the account each calendar quarter.

BGAN can change the above fee schedule upon 30-days prior written notice to you.

Collection of Advisory Fees

Advisory fees will generally be collected directly from your account, provided you have given BGAN written authorization. Written authorization is granted to BGAN by execution of the client advisory agreement. You will be provided with an account statement reflecting the deduction of the advisory fee direct from the account custodian. If the Account does not contain sufficient funds to pay advisory fees, BGAN has limited authority to sell or redeem securities in sufficient amounts to pay advisory fees. You can reimburse the account for advisory fees paid to BGAN, except for ERISA and IRA accounts.

Additional Fees and Costs

The client will pay fees for custodial services, account maintenance fees, and other fees associated with maintaining the Account. Such fees are not charged by BGAN and are charged by the product, broker/dealer or account custodian. BGAN does not share in any portion of such fees. Additionally, you will pay your proportionate share of the fund's management and administrative fees and sales charges as well as the mutual fund adviser's fee of any mutual fund purchased. Such advisory fees are not shared with BGAN and are compensation to the fund-manager.

The custodian offers some securities, a limited number of open-ended mutual funds and exchange traded fund, at no transaction fee. However, the security positions will be subject to a holding period or the client will incur early redemption fees which could be substantial in comparison to a transaction fee.

Alternative Products (real estate investment trusts, special purpose vehicles, private placements)

Alternative products are generally illiquid and a regular valuation is typically not obtainable. Clients with a position in alternative products will be charged an annual fee not to exceed 1% of the client's investment into alternative products. One-quarter (1/4) of the annual fee will be charged each calendar quarter and will be deducted from a designated managed account at an account custodian.

Solicitor / Introducer Fee

U.S. connected persons with U.S. based assets referred to BGAN by a non-U.S. advisor for participation in asset management services will in some situations be charged an additional one-time 1% fee solicitor or introducer fee. BGAN will not retain or share in any portion of the 1% fee. The fee will be calculated based on the transferred value deposited to the account. The fee will be deducted by BGAN from client's account and paid to the solicitor/introducer.

The client will be advised of the fee and have the ability to agree and authorize or not authorize the payment of the fee by execution of the Solicitor/Introducer's Disclosure Statement. Clients are advised there is a conflict of interest for the non-U.S. advisor (i.e. solicitor or introducer) to refer clients to BGAN because of the receipt of compensation. **As disclosed in the Solicitor / Introducer's Disclosure Statement, the payment of the solicitor or introducer fee directly increases the cost to the client. Further clients engaging BGAN directly would not otherwise incur the additional fees. Further, the increase in fees will impact the client's portfolio performance. Clients are under no obligation to authorize the payment of a solicitor or introducer fee.** To mitigate these conflicts of interest, this disclosure and the Solicitor / Introducer's Disclosure Statement is provided. It is important to refer to additional disclosures found in section 9 under the heading "Client Referrals and Other Compensation".

Termination Provisions

You can terminate investment advisory services obtained from BGAN, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with BGAN. You will be responsible for any fees and charges incurred from third parties as a result of maintaining the Account such as transaction fees for any securities transactions executed and Account maintenance or custodial fees. Thereafter, you can terminate investment advisory services upon delivery to BGAN and your Advisory Representative of your written notice to terminate.

- **Fees Paid in Advance:** Should you terminate investment advisory services during calendar quarter, you will be issued a pro-rated refund of the advisory fee from the date of termination to the end of calendar quarter if fees are charged in advance.
- **Fees Paid in Arrears:** Should you terminate or transfer funds and securities out of the account prior to the end of the calendar quarter, you will be charged a prorated advisory fee for the quarter up to the date of termination. In the event you transfer the account and no funds or securities remain in the account for BGAN to deduct its advisory fee, you will be sent a fee invoice. Fee invoices must be paid within 30 days of the date of the invoice or late fees of \$15 per 30 days after the date of the invoice will be charged plus interest of 18% per annum will be assessed until the invoice is paid in full.

IRA Rollover Considerations

As part of our consulting and advisory services, we offer you recommendations and advice concerning your employer retirement plan or other qualified retirement account. Our recommendations can include you consider withdrawing the assets from your employer's retirement plan or other qualified

retirement account and roll the assets over to an individual retirement account ("IRA"). Further, we offer our management services be applied to those funds and securities rolled into an IRA or other account for which we will receive compensation. If you elect to roll the assets to an IRA that is subject to our management, we will charge you an asset-based fee as described above under Item 5. This practice presents a conflict of interest because persons providing investment advice on our behalf have an incentive to recommend a rollover to you for the purpose of generating fee-based compensation. You are under no obligation, contractually or otherwise, to complete the rollover. Furthermore, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by us.

It is important for you to understand many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of each.

An employee will typically have four options:

1. Leave the funds in your employer's (former employer's) plan.
2. Move the funds to a new employer's retirement plan.
3. Cash out and taking a taxable distribution from the plan.
4. Roll the funds into an IRA rollover account.

Each of these options has advantages and disadvantages and before making a change we encourage you to speak with your CPA and/or tax attorney.

If you are considering rolling over your retirement funds to an IRA for us to manage it is important you understand the following:

1. Determine whether the investment options in your employer's retirement plan address your needs or whether you might want to consider other types of investments.
 - a. Employer retirement plans generally have a more limited investment menu than IRAs.
 - b. Employer retirement plans may have unique investment options not available to the public such as employer securities, or previously closed funds.
2. Your current plan may have lower fees than our fees.
 - a. If you are interested in investing only in mutual funds, you should understand the cost structure of the share classes available in your employer's retirement plan and how the costs of those share classes compare with those available in an IRA.
 - b. You should understand the various products and services you might take advantage of at an IRA provider and the costs of those products and services.
 - c. It is likely you will not be charged a management fee and will not receive ongoing asset management services unless you elect to have such services. In the event your plan offers asset management or model management, there may be a fee associated with the services that is more or less than our asset management fee.
3. Our strategy can have higher risk than the option(s) provided to you in your plan.
4. Your current plan may offer financial advice, guidance, and/or model management or portfolio options at no additional cost.

5. If you keep your assets titled in a 401k or retirement account, you could delay your required minimum distribution beyond age 70.5 (70 ½).
6. Your 401k may offer more liability protection than a rollover IRA; each state may vary.
- a. Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies. However, there can be some exceptions to the general rules so you should consult an attorney if you are concerned about protecting your retirement plan assets from creditors.
7. You may be able to take out a loan on your 401k, but not from an IRA.
8. IRA assets can be accessed any time; however, distributions are subject to ordinary income tax and may also be subject to a 10% early distribution penalty unless they qualify for an exception such as disability, higher education expenses or the purchase of a home.
9. If you own company stock in your plan, you may be able to liquidate those shares at a lower capital gains tax rate.
10. Your plan may allow you to hire us as the manager and keep the assets titled in the plan name.

It is important that you understand the differences between these types of accounts and to decide whether a rollover is best for you. Prior to proceeding, if you have questions contact your investment adviser representative, or call our main number as listed on the cover page of this brochure.

Item 5 - Account Requirements and Types of Clients

BGAN's services are geared toward individuals both high net worth (i.e. clients with a net worth of \$2,000,000, exclusive of primary residence or has \$1,000,000 under management with BGAN) and other than high net worth. Additionally, BGAN's services are suitable for businesses, pension and profit-sharing plans, and trusts. Furthermore, BGAN offers tailored advisory services involving pension transfer services to British expatriates living in the United States as further described in BGAN's Form ADV Part 2A available upon request or found on the SEC's website at www.adviserinfo.sec.gov.

The minimum account size for participation in the BGAN Aptus Wrap Program is \$50,000.

SMartX Advisory Solutions, LLC (SMartX)

The minimum account size requirements are driven by the various sub-advisors or managers in the portfolios. The minimums for the BGAN portfolios are as follows:

Global Thematic Focused Portfolios: Adventurous, Balanced, Cautious,	\$15,000
Moderately Adventurous, Defensive, Very Adventurous, Very Defensive	
Secular Growth Trends Portfolios: Balanced Cautious, Moderately	\$15,000
Adventurous	
Defensive Global Thematic Focused, Very Adventurous Secular Growth,	\$10,000
Very Defensive Global Thematic Focused	

Item 6 - Portfolio Manager Selection and Evaluation

Selection and Review of Managers

Advisory Representatives licensing under BGAN go through a due diligence process with BGAN management, which includes a review of education, experience in the industry, disciplinary history, and past business production, services, and product offerings. As disclosed above, BGAN Advisory Representatives have a direct interest in the wrap fee charged since a portion of the advisory fee will be paid to the advisory representative. Furthermore, Advisory Representatives have an incentive to purchase securities with lower or no transaction fees or to trade less frequently to reduce their expenses and increase the portion of the fee retained. This is a conflict of interest. To mitigate this conflict of interest, this disclosure is provided.

You have the independence to select your Advisory Representative or portfolio manager. Should you want to change your advisory representative you may contact the Compliance Department of BGAN at 678-517-4474.

Third party managers are selected after a due diligence process which includes review of the third-party manager's Form ADV, interviews, potentially a due diligence trip to visit facilities, model account objectives, investment strategy and philosophy, expense structure, performance, time in the industry, and regulatory issues. BGAN's guideline standards include: a minimum of 5 years of investment management experience by the managers, no significant disciplinary issues, and fees under 1%, and performance is GIPS compliant.

Performance Reviews

Advisory Representatives of BGAN are not permitted to advertise their performance. Reports produced to clients reflecting performance are provided either directly by the account custodian or by the Advisory Representative using a reporting program acceptable to BGAN.

BGAN does not validate a third-party manager's performance or conduct any testing. Neither BGAN nor a third-party reviews portfolio manager performance information. Therefore, the performance information may not be calculated on a uniform and consistent basis.

Advisory Services Offered by BGAN

The following services are more fully disclosed in BGAN's Form ADV Part 2A.

BGAN offers the following advisory services. Each of the services is more fully described below.

- Asset Management
- Financial Planning
- Retirement Consulting Services
- Analysis, Recommendation and Monitoring of Third-Party Managed Programs
- Pension Advice for United Kingdom and other Nationals Expatriates

BGAN tailors the advisory services it offers to your individual needs. You may impose restrictions and/or limitations on the investing in certain securities or types of securities.

Services will begin with an initial consultation and data gathering. Your Advisory Representative will ask you various questions about your financial situation and request certain documents about your financial accounts. You may be asked to complete a fact finder or data gathering document. The information gathered by BGAN will assist BGAN to provide you with the requested services and customize the services to your financial situation. Depending on the services you have requested, BGAN will gather various financial information and history from you including, but not limited to:

- Retirement and financial goals
- Investment objectives
- Investment horizon
- Financial needs
- Cash flow analysis
- Cost of living needs
- Education needs
- Savings tendencies
- Other applicable financial information required by BGAN in order to provide the investment advisory services requested.

Wrap Account Verses Non-Wrap Account

It is important to refer to the disclosures above under Item 4 – Advisory Business explaining the differences between a wrap account and non-wrap account and the cost structure.

Whether you select a wrap account option or non-wrap account, the management of your account will be treated the same. The difference lies in the pricing structure. The maximum fee an Advisory Representative can charge is the same whether clients participate in a wrap program or non-wrap program. However, in a non-wrap account, any transaction fees will be charged to the client and are in addition to the advisory fee.

Performance Based Fees and Side by Side Management

BGAN does not charge performance-based fees.

Methods of Analysis, Investment Strategies and Risk of Loss

Each Advisory Representative conducts their own analysis to determine the securities and asset allocations they will use in a client's portfolio. They will use a variety of resources to gather information including but not limited to newspapers, magazines, due diligence visits and interviews with vendors, product literature and prospectuses, asset allocation programs and software. Advisory Representatives conduct economic analysis to attempt to analyze and determine trends as well as fundamental analysis. Fundamental analysis generally involves looking at economic and financial factors. Additionally, they will assess a company's or security's value based on factors such as sales, assets, markets, management, products and services, earnings, and financial structure. Some Advisory representatives employ technical market analysis and technical trend following. Technical analysis

generally involves studying trends and movements in a security's price, trading volume, and other market-related factors in an attempt to discern patterns.

Depending on the needs of the client and the investment philosophy of the Advisory Representative, long term, short term and active trading strategies will be utilized. Factors that can result in a change to a client's portfolio include but are not limited to, economic factors, management changes with the security, tax law changes, objective change, and news or press releases, and financial changes with the client.

BGAN emphasizes that investment returns, particularly over shorter time periods, can be highly volatile and are dependent on a wide variety of factors. Thus, our investment management services are generally suitable only for long-term investment objectives or strategies, rather than for short-term trading purposes. Neither diversification nor asset allocation assure a profit or protect you against a loss, and there is no guarantee that your investment objectives will be achieved.

Investing in securities involves risk of loss, including the loss of principal. Therefore, your participation in any of the management programs offered by BGAN will require you to be prepared to bear the risk of loss and fluctuating performance.

BGAN does not represent, warrant or imply that the services or methods of analysis used by BGAN can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to major market corrections or crashes. Past performance is no indication of future performance. No guarantees can be offered that your goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by BGAN will provide a better return than other investment strategies.

Wrap accounts primarily include the use of mutual funds, exchange traded funds, individual equities and fixed income securities, and the use of third-party manager strategies. The following are some of the primary risks associated with the securities and strategies utilized. Please do not hesitate to contact us to discuss these risks and others in more detail.

Mutual Funds: Mutual fund fees are described in the fund's prospectus, which the custodian mails directly to the client following any purchase of a mutual fund that is new to the client's account. In addition, a prospectus is available online at each mutual fund company's Web site. At the client's request at any time BGAN will direct the client to the appropriate Web page to access the prospectus. The risks with mutual funds include

- **Manager Risk:** This is the risk that an actively managed mutual fund's investment adviser will fail to execute the fund's stated investment strategy.
- **Market Risk:** This is the risk that the Stock Market will decline, decreasing the value of the securities contained within the mutual funds we recommend to you.
- **Industry Risk:** This is the risk that a group of stocks in a single industry will decline in price due to adverse developments in that industry, decreasing the value of mutual funds that are significantly invested in that industry.
- **Inflation Risk:** This is the risk that the rate of price increases in the economy deteriorates the returns associated with the mutual fund.

Registered investment company securities such as mutual funds, and variable products offer the securities in various share classes. Different share classes are priced differently and have varying levels of internal costs and share classes other than institutional share classes will involve higher internal costs that over time will cost you more. Institutional share classes often have higher trading costs; however, the internal costs of the fund are lower. Over a period of time, share classes other than institutional shares will become more expensive if held in the account for a long period time. A client needs to consider the amount being invested and the length of anticipated holding to make a decision as to the share class most suitable to the client. Advisory Representatives will select the lowest share class funds available and appropriate to the situation. However, in selecting the lowest share class, trading costs are sometimes higher. Selecting the lowest share class appropriate to the situation does not imply the lowest cost share class but means what the Advisory Representative deems lowest cost for the situation. Advisory Representatives consider the anticipated holding period, cost structure, and administrative and transaction costs associated with selecting a share class. However, there is no way to predict the future and there will be occasions where a holding is liquidated sooner or held longer resulting in higher costs to the client. Additional information about share classes can be found in an Investor Alert issued by the Securities and Exchange Commission at <https://www.investor.gov/additional-resources/news-alerts/alerts-bulletins/investor-bulletin-mutual-fund-classes> and <https://www.investor.gov/additional-resources/news-alerts/alerts-bulletins/investor-bulletin-mutual-fund-classes>. Additionally, the SEC and FINRA provide investor information at www.sec.gov and www.finra.org.

Exchange Traded Funds (ETFs): ETFs are professionally managed pooled vehicles that invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities or any combination thereof. ETFs trade on an auctionable market. Therefore, there is more price fluctuation with ETFs than with mutual funds since ETFs trade throughout the day, whereas mutual funds are priced once a day. Also, since most ETFs only mirror a market index, such as the S&P 500, they won't outperform the index. While ETFs generally provide diversification, risks can be significantly increased for funds concentrated in a particular sector of the market, or that primarily invest in small cap or speculative companies, use leverage (i.e. borrow money) to a significant degree, or concentrate in a particular type of security rather than balancing the fund with different types of securities.

Individual Equities: The risks with stocks is prices fluctuate throughout the day. Stocks can drop in value and become worthless. The risks with stocks are market risk and company specific risk. The price of a stock can decline due to company-specific reasons as well as the health of the overall stock market. Even dividends, which many beginning investors believe are guaranteed payments by the company, can decline or be totally eliminated. Investing in micro, small or mid-sized companies involve risks not associated with investing in more established companies. Since equity securities of smaller companies do not always trade as often as equity securities of larger, more established companies, it is difficult or impossible for the securities to sell.

Bonds: Investing in bonds involves the assumption of risk including:

- Interest Rate Risk: which is the risk that the value of the bond investments we recommend to you will fall if interest rates rise.
- Call Risk: which is the risk that your bond investment will be called or purchased back from you when conditions are favorable to the bond issuer and unfavorable to you.

- Default Risk: which is the risk that the bond issuer is unable to pay you the contractual interest or principal on the bond in a timely manner or at all.
- Inflation Risk: which is the risk that the rate of price increases in the economy deteriorates the returns associated with the bond.

Alternative Products (real estate investment trusts, special purpose vehicles, private placements):

Investing in alternative and private placement investments involves unique and serious risks an investor must be prepared to bear. **It is crucial an investor reads the offering memorandum prior to investing for full disclosure of qualification requirements and risks including:**

- Operational, economic, market cycles and trends, investment, tax
- Risk of hedge funds, derivatives, and other investment vehicles
- Trading risks such as short selling, performance based fees, limited operating and investment experience, consulting fees, interest and lending fees
- Use of leverage
- Illiquidity or limited liquidity
- Non-existence of or minimal secondary market
- Valuation complexities and limitations of valuations
- High degree of risk and potential loss of principal

Third Party Managers: Please refer to the third-party service provider's Form ADV and associated disclosure documents for details on their investment strategies, methods of analysis and associated risks. The risks with utilizing third party managed programs include:

- Market and economic risk.
- The risk the third-party manager is not managing to the objective or managing based on the stated strategy.
- The risk the securities managed by the third-party manager will decline or fluctuate impacting the overall performance of the portfolio.
- The risk that the performance of the portfolio will be diminished by the fees of the third-party manager and expenses associated with the securities.

Risks

The business of investing in securities is highly competitive and the identification of attractive investment opportunities is difficult and involves a high degree of uncertainty. Varied fluctuations in the price of investments are a normal characteristic of securities markets due to a variety of influences. Managed account programs should be considered a long-term investment and thus long-term performance and performance consistency are the major goals.

Tax Risk

Income tax costs result from the sale of individual securities within your account, unless the account is otherwise tax sheltered or tax deferred. Income tax costs directly reduce investment returns. Under the current income tax system, securities held less than one year that are sold at a gain (short term capital gains) are taxed at the client's highest marginal tax rate, and securities held greater than one year that are sold at a gain (long term capital gains) are taxed at a reduced long-term capital gains rate. Furthermore, the Alternative Minimum Tax (AMT) impact of long and short-term capital gains incurred in the tax year in question should be considered. Client is responsible for all tax liabilities arising from the sale of securities within the account.

International investing presents certain risks not associated with investing solely in the United States. These include, for instance, risks relating to fluctuations in the value of the U.S. dollar relative to the values of other currencies, custody arrangements made for foreign holdings, political risks, differences in accounting procedures and the lesser degree of public information required to be provided by non-U.S. companies.

Investing in emerging markets involves greater risk than investing in more established markets. Such risks include exchange rate changes, political and economic upheaval, the relative lack of information about these companies, relatively low market liquidity, and the lack of strict financial and accounting controls and standards.

Investing in fixed income securities involves special risks not typically associated with equity securities. These risks include credit risk, which is the risk of loss due to the inability to meet contractual debt obligations, and interest rate risk, which is the risk that an investment's value will change due to a change in the level of interest rates. Additionally, there is an inverse relationship between bond prices and interest rates specific to fixed income securities. As interest rates rise, bond prices fall and, conversely, as interest rates fall, bond prices rise.

Long-term purchases – Using a long-term purchase strategy generally assumes the Financial Markets will go up in the long-term which is not always the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall Financial Markets advance. Purchasing investments long-term creates an opportunity cost - “locking-up” assets that is better utilized in the short-term in other investments.

Active Trading – frequent trading of securities; explain how frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes

Fundamental Analysis does not attempt to anticipate market movements. This represents a 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 security. The success of this strategy depends in large part on the ability to accurately assess the fundamental value of securities. An accurate assessment of fundamental value deepens on a complex analysis of a number of financial and legal factors. No assurance can be given that we can assess the nature and magnitude of all material factors having a bearing on the value of securities.

Quantitative Analysis: The risk of the analysis using mathematical and statistical modeling is that they do not accurately predict future investment patterns. Day to day changes in the market prices of investments follow random patterns and are not predictable with any reliable degree of accuracy.

Qualitative Analysis: The risk of analysis using more subjective criteria is that the information obtained to make the analysis is inaccurate and skew the analysis. In addition, measuring (or weighting) the criteria will likely be inconsistent from one analysis to another and could adversely affects the investment decisions.

No investment strategy can avoid loss. Investing in securities involves risk of loss that you need to be prepared to bear.

Investing in securities involves risk of loss, including the loss of principal. Therefore, your participation in any of the management programs offered by BGAN will require you to prepare to bear the risk of loss and fluctuating performance.

Voting Client Securities

BGAN does not vote your securities. Unless you suppress proxies, securities proxies will be sent directly to you by the account custodian or transfer agent. You may contact BGAN about questions you have and opinions on how to vote the proxies. However, the voting and how you vote the proxies is solely your decision.

Item 7 - Client Information Provided to Portfolio Managers

Your financial history and information and personal information such as social security number, identify verification information, account numbers, etc. will be gathered and obtained by your Advisory Representative and maintained by BGAN. The aforementioned information will be communicated as required by the account custodian you select to establish your account and to the third-party manager engaged to manage a portion or all of your account. Your non-public information will not be disclosed to any third party unless required by law or to provide you services you have requested.

At least annually your Advisory Representative will offer to meet with you to update your personal information, review your account and determine if the management of your account is suitable to your financial situation. Should your financial situation or investment goals or objectives change, you must notify BGAN promptly of the changes.

Item 8 - Client Contact with Portfolio Managers

There are no restrictions or limitations on your ability to contact your Advisory Representative or any member of the BGAN management team of the BGAN model portfolios. You along with your Advisory Representative determine the frequency of meetings and reviews.

If you are participating in the BGAN model portfolio options, you may contact the management team directly at any time by calling 770-713-9001 or 678-517-4474 or scheduling an appointment through your Advisory Representative.

Item 9 - Additional Information

Disciplinary Information

Investment Advisers must disclose any legal or disciplinary events that would be material to your evaluation of BGAN or the integrity of our services. In the most recent ten year period, there are no events that have occurred requiring disclosure.

Other Financial Industry Activities and Affiliations

Certain supervised persons and Advisory Representatives are associated or dually registered as advisory representatives of BGAN and as registered representatives of a broker/dealer, Regulus Advisors, LLC. For specific information regarding whether or not your Advisory Representative maintains multiple registrations with different entities and information about the broker/dealer with which your Advisory Representative is registered please refer to your Advisory Representative's Form ADV Part 2B Item 2 and 4 disclosures. It is important to understand investment advisers have a fiduciary obligation to provide advice and services through the investment adviser that are in the best interest of the client. However, when advisory representatives act in the capacity of a registered representative, their obligation is to make recommendation and conduct transactions that are suitable to you but are not necessarily be in your best interest.

If your Advisory Representative is a registered representative with a broker/dealer, you are under no obligation to purchase or sell securities through your Advisory Representative. However, if you choose to implement the plan the individual in their capacity as a registered representative of the broker/dealer, commissions will be earned in addition to any fees paid for advisory services. Commissions are higher or lower at your Advisory Representative's broker/dealer than at other broker/dealers. Advisory Representatives who are registered representatives have a conflict of interest in having you purchase securities and/or insurance related products through their broker/dealer in that the higher their production with their broker/dealer the greater opportunity for obtaining a higher pay-out on commissions earned. Additionally, it is important to understand when offering advice and services through an investment adviser, an advisory representative has a fiduciary obligation to act in your best interests. However, registered representatives providing recommendations and engaging in securities transactions through the broker/dealer only have an obligation to make suitable recommendations and such advice and recommendations would not necessarily be in your best interest.

Under the rules and regulations of the FINRA, an Advisory Representative's broker/dealer has an obligation to perform certain supervisory functions regarding certain activities engaged in by the Advisory Representatives who is also a registered representative.

Non-U.S. based advisors have qualifications and are associated with other licensed firms to offer securities and insurance products to clients outside the United States and receive compensation. BGAN is not affiliated with the non-U.S. based licensed firms and does not participate in any

compensation. Furthermore, BGAN does not oversee or supervise activities of non-U.S. based advisory representatives conducting business outside the U.S. through the non-U.S. based licensed companies.

Certain Advisory Representatives are affiliated with other Investment Advisers for purposes of offering other advisory program, platforms, or services not available through BGAN. Please refer to your Advisory Representative's Form ADV Part 2B for disclosure regarding whether your Advisory Representative is associated with another investment adviser or has direct ownership in another investment adviser. Advisory Representatives could offer advisory services that are similar or different from the advisory services offered through BGAN and services cost more or less.

BGAN has an advisory representative who is a certified public accountant ("CPA"). Tax preparation and accounting services are not offered or sponsored by BGAN. Tax preparation and accounting services are an outside business activity from BGAN and are conducted through the advisory representative's independent business, unaffiliated with BGAN. Clients are under no obligation to participate in tax or accounting services offered by any advisory representative.

Certain advisory representatives are licensed insurance agents. BGAN does not offer or sponsor insurance products or services. The insurance business engaged in by advisory representatives is an outside business activity and is unaffiliated with the services offered by BGAN. Clients are under no obligation to participate in insurance products or services offered by any advisory representative. Advisory Representatives who are insurance licensed have a conflict of interest to recommend and offer insurance products and services to you because they will earn a commission. To mitigate this conflict of interest this disclosure is provided to you. Further, you are encouraged to seek a second opinion on any insurance recommendations.

The members and owners of BGAN are also owners and principals of Gentium Global B.V. the arranger of the Universal Access Bond (UAB) a securities product listed on the Irish Stock Exchange (Euronext Dublin). The UAB is designed for the U.S. expatriate living outside the United States. The UAB is attached to a collective investment fund and reports in a U.S. tax compliant manner. The UAB is not advised upon or recommended by BGAN.

BGAN is not and does not have a related person who is a: futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities. Further, BGAN is not and does not have a related person who is: broker/dealer or other similar type of broker or dealer; investment company futures commission merchant or commodity pool operator; banking or thrift institution; lawyer or law firm; pension consultant; real estate broker or dealer; or sponsor or syndicator of a limited partnership.

BGAN attempts to mitigate the conflicts of interest with the receipt of commissions if recommendations are implemented by providing you with these disclosures. Further, you are encouraged to consult other professionals and implement recommendations through other financial professionals

BGAN recommends other investment advisers (i.e. third-party managers and third-party service providers). The fees charged to clients utilizing a third-party manager recommended by BGAN are

higher than if the client obtained services directly from the third-party manager since client is paying the third-party manager and BGAN for advisory services.

Code of Ethics

BGAN has a fiduciary duty to you to act in your best interest and always place your interests first and foremost. BGAN takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as BGAN's policies and procedures. Further, BGAN strives to handle your non-public information in such a way to protect information from falling into hands that have no business reason to know such information and provides you with BGAN's Privacy Policy. As such, BGAN maintains a code of ethics for its Advisory Representatives, supervised persons and staff. The Code of Ethics contains provisions for standards of business conduct in order to comply with federal securities laws, personal securities reporting requirements, pre-approval procedures for certain transactions, code violations reporting requirements, and safeguarding of material non-public information about your transactions. Further, BGAN's Code of Ethics establishes BGAN's expectation for business conduct. A copy of our Code of Ethics will be provided to you upon request.

Neither BGAN nor its associated persons recommend clients buy or sell securities in which we have a material financial interest. BGAN and its associated persons buy or sell securities identical to those securities recommended to you. Therefore, BGAN and/or its associated persons have an interest or position in certain securities that are also recommended and bought or sold to you. BGAN and its associated persons will not put their interests before your interest. BGAN and its associated persons cannot trade in such a way to intentionally obtain a better price for themselves than for you or other clients.

BGAN is required to maintain a list of all securities holdings for its associated persons and develop procedures to supervise the trading activities of associated persons who have knowledge of your transactions and their related family accounts at least quarterly. Further, associated persons are prohibited from trading on non-public information or sharing such information.

You have the right to decline any investment recommendation. BGAN and its associated persons are required to conduct their securities and investment advisory business in accordance with all applicable Federal and State securities regulations.

Review of Accounts

Reviews will be performed not less than at least annually or as agreed to between you and your Advisory Representative. You may request more frequent reviews and set thresholds for triggering events that would cause a review to take place. Advisory Representatives will monitor for changes or shifts in the economy, changes to the management and structure of a mutual fund or company in which your assets are invested, and market shifts and corrections.

It is important you notify your Advisory Representative promptly of any changes to your financial goals, objectives or financial situation as such changes require a review of your portfolio allocation.

You will be provided statements at least quarterly direct from the account custodian. Additionally, you will receive confirmations of all transactions occurring direct from the account custodian.

Brokerage Practices

BGAN does not maintain custody of your assets, although we are deemed to have custody of your assets if you give us authority to withdraw our advisory fee directly from your managed account. Additionally, BGAN will be deemed to have custody in certain situations involving standing letters of authorization and if you give us authority to transfers funds or securities between your accounts. Your assets must be maintained in an account at a qualified custodian. Generally, a qualified custodian is a broker/dealer or bank.

BGAN participates in the institutional advisor program (the “Program”) offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc. (“TD Ameritrade”), member FINRA/SIPC. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer. TD Ameritrade is offered as a custodian for U.S. based clients. Additionally, BGAN has a custodial arrangement with Interactive Brokers, LLC to enable expatriates who choose to rollover their retirement assets from a 401k of a previous U.S. employer to a brokerage account for asset management services. Interactive Brokers has the ability to establish accounts for clients outside the U.S. for their U.S. based assets. Interactive Brokers, LLC is an independent and unaffiliated SEC-registered broker-dealer.

Client Referrals and Other Compensation

Product and service vendors recommended by BGAN can provide monetary and non-monetary assistance with client events, provide educational tools and resources. BGAN does not select products as a result of any monetary or non-monetary assistance. The selection of product is first and foremost. BGAN’s due diligence of a product does not take into consideration any assistance it receives. Additionally, those Advisory Representatives who are registered representatives have incentives and benefits offered by the broker/dealer enabling them to attend certain events and have the costs covered by the broker/dealer. The qualification for events and incentives or benefits is based on overall production with the broker/dealer or tenure. This is a conflict of interest for the Advisory Representative to recommend business be directed through the broker/dealer. To mitigate this conflict of interest this disclosure is provided.

BGAN has entered into a solicitor agreement with another investment adviser to act in the capacity of a solicitor to refer certain clients to the investment adviser for advisory services and programs not offered by BGAN. As a result of referring a client to the investment adviser, BGAN will receive a portion of the advisory fee paid by the referred client. This is a conflict of interest since BGAN has a direct interest in the client engaging the investment adviser. A portion of the advisory fee received by BGAN will be paid to the BGAN Advisory Representative. Clients will be provided with a Solicitor

Disclosure explaining the arrangement and the receipt of compensation and the effect on the amount of fee paid by the client as a result of BGAN sharing in a portion of the advisory fee. To mitigate this conflict of interest, BGAN is informing you of this relationship.

BGAN has entered into a solicitor agreement with non-U.S. based pension financial services firms to refer United Kingdom (“UK”) expatriates or other nationals generally residing in the United States who have UK based pension plans and want to transfer to a SIPP or QROPs. A description of this service is provided in Item 4 and Item 5 above. A portion of the advisory fee paid by clients to BGAN for transferring and managing their SIPP or QROPs will be paid to the pension financial services firm. Clients will be provided with a Solicitor Disclosure explain the arrangement and the payment of the fee. Clients will not be charged a higher fee as a result of payment of the solicitor fee.

As described under Item 4 above under the heading, Additional Fees and Costs and Solicitor/Introducer fee, BGAN enters into various solicitor or introducer arrangements. The solicitor or introducer arrangements are with various non-U.S. financial service firms in order to offer BGAN’s management services to their US connected clients with U.S. assets, including a previous employer 401k plan. The compensation structures vary but in most cases will cause the client to incur additional costs. In some cases, clients will be charged an additional 1% fee based on the value of the account upon transfer as a referral or introducer fee which will be paid to the financial services entity or its advisors. BGAN will not retain or share in any portion of the 1% fee. **This fee is a direct cost to the client and will result in costing the client more than if the client engaged BGAN directly.** In some arrangements, BGAN shares a portion of the advisory representative’s fee with the solicitor or introducer. BGAN’s fee is not increased as a result of BGAN sharing its fee with the solicitor or introducer. Solicitor or introducer arrangements vary and the incentive to the solicitor or introducer will vary.

The client will be advised of the fees being paid to the solicitor or introducer and the client is given the opportunity to agree and authorize the payment of the fee by execution of the Solicitor/Introducer’s Disclosure Statement. There is a conflict of interest for the client’s non-U.S. advisor to refer clients to BGAN to manage their U.S. based assets because of the non-U.S. advisor’s receipt of the additional fee directly incurred by the client and/or a portion of the BGAN advisory representative’s fee. **As disclosed in the Solicitor/Introducer’s Disclosure Statement, the payment of the solicitor or introducer fee directly increases the cost to the client. Further, clients engaging BGAN directly will not otherwise incur the additional fees. Additionally, the increase in fees will impact the client’s portfolio performance. Clients are under no obligation to authorize the payment of a solicitor or introducer fee.** To mitigate these conflicts of interest, this disclosure and the Solicitor/Introducer’s Disclosure Statement is provided.

As stated under Item 4 above, Advisory Representatives are independent contractors. As such, the Advisory Representatives have a direct incentive in the advisory fees being charged since a portion of the advisory fee collected by BGAN will be paid to the Advisory Representative for compensation for advisory services. In other words, Advisory Representatives are not salaried, but instead, share in the fees charged to you by BGAN. Further, clients are advised that the amount paid by BGAN to the Advisory Representative will be based on the production of the Advisory Representative. Therefore, the higher sales the Advisory Representative produces the more compensation the Advisory Representative will receive. Consequently, since production is a basis for determining the Advisory

Representative's payout, and since a portion of the advisory fees will be retained by BGAN, there is a conflict of interest for the Advisory Representative to charge the maximum fee as disclosed under Item 5 above.

TD Ameritrade Important Information

As disclosed under Brokerage Practices above, Advisor participates in TD Ameritrade's institutional customer program and Advisor recommends TD Ameritrade to Clients for custody and brokerage services. There is no direct link between Advisor's participation in the program and the investment advice it gives to its Clients, although Advisor receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Advisor by third party vendors. TD Ameritrade offers from time to time to pay for business consulting and professional services received by Advisor's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Advisor but may not benefit its Client accounts. These products or services assist Advisor in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Advisor manage and further develop its business enterprise. The benefits received by Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Advisor endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a conflict of interest and indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

Financial Information

BGAN will not require you to prepay more than \$1,200 and six or more months in advance of receiving the advisory service.

As stated above, BGAN has discretionary authority over client accounts; however, that authority does not extend to the withdrawal of any client assets, with the exception of deduction of BGAN's advisory fees from your accounts. We are financially stable. There is no financial condition that is likely to impair our ability to meet our contract actual commitment to you or any other client.

Neither BGAN nor any of its Advisory Representatives has ever been the subject of a bankruptcy petition.

BEACON GLOBAL ADVISOR NETWORK, LLC'S PRIVACY NOTICE



**BEACON GLOBAL
ADVISOR NETWORK**

Updated as of September 2019

Beacon Global Advisor Network, LLC (“BGAN”) values our customers and makes it a top priority to safeguard the confidential information of our customers. We are committed to protecting your privacy and maintaining your trust and confidence.

BGAN collects information about you to assist us in providing services and products to help you meet your financial goals and objectives and provide high standards of customer service. Additionally, information is obtained from you in order to help us fulfill our legal and regulatory requirements. Information collected varies depending on the products and services requested and the scope of your engagement with us.

Facts	
What does Beacon Global Advisor Network, LLC Do with Your Personal Information?	
Why?	<p>Beacon Global Advisor Network, LLC collects information about you to assist us in providing services and products to help you meet your financial goals and objectives and provide high standards of customer service. Additionally, information is obtained from you in order to help us fulfill our legal and regulatory requirements. Information collected will vary depending on the products and services requested and the scope of your engagement with us. Further, in providing financial services, the data is necessary for our legal and regulatory requirements and responsibilities and failing to provide information will result in discontinuance of services.</p> <p>Financial companies choose how they share your personal information. Federal and European Union law gives consumers the right to limit some but not all sharing. Federal and European Union law also requires us to tell you how we collect, share and protect your personal information. Please read this notice carefully to understand what we do.</p>
What?	<p>The types of personal information we collect can include:</p> <ul style="list-style-type: none">• Social Security number• Income• Assets• Personal information (address, date of birth, net worth, income)• Account numbers and information• Financial Information• Insurance, health, and medical information <p>We have an obligation to ensure that your personal information is accurate and up to</p>

	<p>date. Please contact us promptly to correct or remove any information that you think is incorrect.</p> <p><i>Use of our website.</i> Information relating to usage of our website is collected using cookies. These are text files placed on your computer to collect standard internet log information and visitor behaviour information. We use your information collected from the website to personalise your repeat visits to the site. Additionally, we use cookies to track visitor use of the website and to compile statistical reports on website activity. For further information visit http://www.allaboutcookies.org/.</p> <p>You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However, in a few cases some of our website features do not function as a result.</p> <p><i>Information about connected individuals.</i> We may need to gather personal information about your close family members and dependents in order to provide our service to you effectively. In such cases it will be your responsibility to ensure that you have the consent of the people concerned to pass their information on to us. We'll provide a copy of this privacy notice for them or, where appropriate, ask you to pass the privacy information to them.</p> <p><i>No longer our customer.</i> When you are no longer our customer, we will continue to hold your information and share it as described in this notice.</p>
How?	<p>All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons why financial companies can share their customers' personal information, the reasons Beacon Global Advisor Network, LLC chooses to share personal information and whether you can limit this sharing.</p> <p>Where third parties are involved in processing your data, we'll have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data and that they will maintain the security and confidentiality of your information.</p> <p>When and where necessary for us to transmit or deliver your personal information to a third party, we will use appropriate security measures to protect your personal information in transit. Such methods can include the use of password protection, data encryption, and secured portals.</p>

Reasons We Can Share Your Personal Information	Does Adviser share?	Can you limit this sharing?
For our everyday business purposes, such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus.	Yes	No
To fulfill our obligations to aid in the prevention of money laundering and other	Yes	No

Beacon Global Advisor Network, LLC

financial crimes we send your personal information to third party agencies for identity verification purposes.		
For our marketing purposes to offer our products and services to you.	Yes	Yes
For joint marketing with other financial companies.	Yes	Yes

Reasons We Can Share Your Personal Information	Does Adviser share?	Can you limit this sharing?
For our affiliates' everyday business purposes—information about your transactions and experiences. We share information about our customers to process transactions, maintain your account(s), or respond to court orders and legal investigations.	Yes	No
For our affiliates' everyday business purposes—information about your creditworthiness.	No	NA
For non-affiliates' everyday business purposes to assist us in obtaining business or providing account maintenance or customer service to your account(s).	Yes	No
For our affiliates to market to you—to offer new products or services to you.	No	NA
For nonaffiliates to market to you—we do not sell, share, or disclose your nonpublic personal information to nonaffiliated third-party marketing companies.	No	NA
<p>For advisory representatives who leave Beacon Global Advisor Network, LLC</p> <p>If your advisory representative leaves Beacon Global Advisor Network, LLC to join another investment adviser or other financial institution, the advisory representative retains copies of your personal information so that he or she can continue to serve you at the new firm. In doing so, your advisory representative shares your information with the new firm but is otherwise required to keep confidential the personal information obtained from you while the advisory representative was affiliated with Beacon Global Advisor Network, LLC, and he or she may use it only to service your account(s).</p> <p>Please note: Certain states and countries require affirmative consent to allow sharing. See below for more on your rights under state law.</p> <p>In the event that a Beacon Global Advisor Network, LLC advisory representative terminates his or her relationship with Beacon Global Advisor Network, LLC, and you want to follow your advisory representative to his or her new firm, please do not request to limit our sharing.</p>	Yes	Yes

Who We Are	
Who is providing this notice?	Beacon Global Advisor Network, LLC

What We Do	
How does Beacon Global Advisor Network, LLC protect my personal information?	<p>Beacon Global Advisor Network, LLC recognizes the need to prevent unauthorized access to the information we collect, including information held in electronic format, and we protect your personal information in the following ways:</p> <ul style="list-style-type: none"> • Computer safeguards and secured files and buildings. • We only grant access to your personal information to parties with whom we have executed confidentiality/nondisclosure agreements and who need that information

Beacon Global Advisor Network, LLC

	<p>to serve you or to assist us in conducting our operations.</p> <ul style="list-style-type: none"> • We have physical and electronic safeguards in place to ensure that we comply with our own policy, industry practices, federal and state regulations, and European Union law. • Our employees are trained in the proper handling of sensitive information.
How does Beacon Global Advisor Network, LLC collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> • Open an account • Apply for insurance • Seek advice about your investments • Enter into an investment advisory account • Tell us about your investment or retirement portfolio <p>We also collect your personal information from others such as credit bureaus, affiliates or other companies.</p>
Why can't I limit all sharing?	<p>Federal and European Union law give you the right to limit only:</p> <ul style="list-style-type: none"> • Sharing for affiliates' everyday business purposes—information about your creditworthiness • Affiliates from using your information to market to you • Sharing for non-affiliates to market to you <p>State laws, European Union Law, and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
Marketing	<p>We would like to send you information about our products and services which may be of interest to you. If you are a European Union citizen and have agreed to receive marketing information, you may opt out at a later date by contacting us by one of the methods below.</p> <p>You have a right at any time to stop us from contacting you for marketing purposes or providing your information to other associated Companies. If you no longer wish to be contacted for marketing purposes, please contact us using the contact information below.</p>

How Long We Maintain Your Information

During the course of our relationship with you we'll retain personal data which is necessary to provide services to you. We will take all reasonable steps to keep your personal data up to date throughout our relationship. Additionally, we are subject to regulatory requirements requiring us to retain your data for a specified minimum period, which is generally five years from the date you cease being our customer: This minimum period is the period during which we have a legal obligation to retain your records. Additionally, we reserve the right to retain data for a longer period where we believe it is in our legitimate interests to do so. In any case, we will not keep your personal data for longer than seven years after our relationship with you has ended. You have the right to request deletion of your personal data. We'll comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

How You Can Access Information We Hold About You

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please contact us using the contact details noted below. When your personal data is processed by automated methods you have the right to ask us to move your personal data to another organization for their use.

To Limit Our Sharing and Your Rights

- Call Beacon Global Advisor Network, LLC at 678-517-4474
- Mail your request to: One Glenlake Parkway, Suite 600, Atlanta, GA 30328

If you are a European Union citizen, you also have a right to lodge a complaint with the supervisory authority for data protection. However, in the first instance please contact the Beacon Global Advisor Network, LLC Compliance Department at:

One Glenlake Parkway, Suite 600
Atlanta, GA 30328
770-713-9001

Changes to Our Privacy and Data Use Policy

Any changes we make to this policy in the future will be posted on our website and an updated version of this Privacy Notice will be provided to you so that you are always aware of how we use your Personal Data.

Definitions

Affiliates	Companies related by common ownership or control. They can be financial and non-financial companies.
Non-Affiliates	Companies not related by common ownership or control. They can be financial and non-financial companies.
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. This may include banks, credit unions, or other financial institutions with which we have a joint marketing agreement.

Other Important Information

Website. Our website contains links to other websites. This privacy policy only applies to our website. Therefore, when you link to other websites you should read their privacy policies and our privacy policy does not extend to any other vendor, company, or third party linked to from our website.

If you live in an “opt-in” state, where we are required to obtain your affirmative consent to share your nonpublic personal information with nonaffiliated third parties who do not currently assist us in servicing your account or conducting our business, your advisory representative is required to obtain your consent before your advisory representative can take your information with him or her should your advisor leave Beacon Global Advisor Network, LLC

Information for California, North Dakota, and Vermont Customers

In response to applicable state law, if the mailing address provided for your account is in California, North Dakota, or Vermont, we will automatically treat your account as if you do not want us to disclose your personal information to non-affiliated third parties for purposes of them marketing to you, except as permitted by the applicable state law.

Information for New Jersey Clients

The New Jersey Bureau of Securities (“Bureau”), an arm of the Office of the New Jersey Attorney General, is charged with protecting investors from investment fraud, and regulating the securities industry in New Jersey. In addition to bringing investigative and enforcement actions against firms or individuals who violate the New Jersey Uniform Securities Law and regulations thereunder, the Bureau registers securities offered or sold in New Jersey and oversees the firms and individuals selling securities or providing investment advice to or from New Jersey.

Investors can contact the Bureau to research the professional background of current and former registered broker-dealers, investment advisers, agents, and investment adviser representatives. **To research a financial professional, contact the Bureau via phone at 1-866-I-Invest (within New Jersey) or at 973-504-3600 (both within and outside New Jersey) or via email at njbos@lps.state.nj.us.**

Investors can also file complaints with the Bureau against individuals and firms selling securities or offering investment advice, as well as companies issuing securities investments directly.

To file a complaint or learn more about the Bureau, visit the Bureau’s website at www.NJSecurities.gov.