

Item 1: Cover Page



Form ADV Part 2A Investment Adviser Brochure

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April 2021

This Brochure provides information about the qualifications and business practices of Benedetti and Gucer, Inc. ("we", "us", "our"). If you have any questions about the contents of this Brochure, please contact Bob Gucer, Chief Financial Officer and Chief Compliance Officer, at (404) 602-0034.

Additional information about our Firm is also available on the SEC's website at <https://adviserinfo.sec.gov/firm/166911>. 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.

We are a registered investment adviser. Please note that use of the term "registered investment advisor" and a description of the Firm and/or our employees as "registered" does not imply a certain level of skill or training. For more information on the qualifications of the Firm and our employees who advise you, we encourage you to review this Brochure and the Brochure Supplement(s).

Item 2: Summary of Material Changes

Annual Update and Material Changes

In this Item of Benedetti and Gucer, Inc. dba Benedetti, Gucer & Associates' (BGA) Form ADV 2, the Firm is required to discuss any material changes that have been made to Form ADV since the last Annual Amendment, dated March 29, 2020.

Material Changes since the Last Update

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

Full Brochure Available

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

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Item 4: Advisory Business

Firm Description

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

Principal Owners

BGA is owned equally by Jaime Benedetti and Bob Gucer.

Types of Advisory Services

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

Wealth Management

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

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

Financial Planning

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

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

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

Consulting Services – 401(k) Plan Review

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

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

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

Consulting Services - ERISA/ Plan Sponsor Consulting

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

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

Tailored Relationships

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

Fiduciary Statement

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

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

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

Wrap Fee Programs

BGA does not refer clients to wrap fee programs.

Conflicts of Interest

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

Client Assets

As of February 1, 2021, BGA manages \$365,807,476 million in assets; \$340,358,210 million on a discretionary basis and \$25,449,266 million on a non-discretionary basis.

Item 5: Fees and Compensation

Compensation

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

Compensation – Wealth Management Services

Fees for Wealth Management Services are as follows:

Assets Under Management	Annual Fee
First \$500,000	1.30%
\$500,001 to \$1,000,000	1.10%
\$1,000,001 to \$4,000,000	1.00%
Over \$4,000,001	0.80%

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

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

Compensation – Financial Planning Services

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

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

Compensation – Consulting Services – 401(k) Plan Review

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

Compensation – Consulting Services - ERISA/ Plan Sponsor Consulting

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

Assets	Annual Fees
Under \$1,000,000	Flat Fee
\$1,000,000 to \$2,999,999	0.50%
\$3,000,000 to \$5,999,999	0.40%
\$6,000,000 to \$8,999,999	0.35%
\$9,000,000 to \$11,999,999	0.30%
\$12,000,000 to \$14,000,000	0.25%
\$15,000,000 to \$19,000,000	0.20%
\$20,000,000+	Negotiated Flat Fee

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

Other Fees

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

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

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

Termination of Agreement

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

General Information on Compensation

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

responsibility assumed, complexity of the engagement, special skills needed to solve problems, the application of experience and knowledge of the client's situation. Lower fees for comparable services may be available from other sources.

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

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

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

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

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

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

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

Item 7: Types of Clients

Types of Clients

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

Account Minimums

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

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

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

Methods of Analysis

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

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

Investment Strategies

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time.

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

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear.

All investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends and other distributions), and the loss of future earnings. Although we manage assets in a manner consistent with your investment objectives and risk tolerance, there can be no guarantee that our efforts will be successful. You should be prepared to bear the following risk of loss:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar next year will not buy as much as a dollar today, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties (i.e., Non-traded REITs and other alternative investments) are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- **Cybersecurity Risk:** A breach in cyber security refers to both intentional and unintentional events that may cause an account to lose proprietary information, suffer data corruption, or lose operational capacity. This in turn could cause an account to incur regulatory penalties, reputational damage, and additional compliance costs associated with corrective measures, and/or financial loss.
- **Pandemic Risk:** Large-scale outbreaks of infectious disease can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption.

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

Item 9: Disciplinary Information

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

Item 10: Other Financial Industry Activities and Affiliations

Financial Industry Activities – Broker-Dealers

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

Financial Industry Activities – Futures and Commodities

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

Broker-Dealer Registered Representatives

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

Insurance Company or Agency

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

Other Investment Advisors

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

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

Code of Ethics

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

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

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

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

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

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

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

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

Participation or Interest in Client Transactions – Personal Securities Transactions

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

a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between BGA and its clients.

Item 12: Brokerage Practices

Research and Other Soft Dollar Benefits

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

Brokerage for Client Referrals

BGA does not receive client referrals from broker/dealers.

Directed Brokerage

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

Directed Brokerage – Other Economic Benefits

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

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

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

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

Trade Aggregation

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

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

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

Item 13: Review of Accounts

Reviews

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

Accounts are reviewed by Jaime Benedetti, Chief Executive Officer and Financial Advisor; Bob Gucer, Chief Financial Officer and Chief Compliance Officer; Cher Scout, Investment Advisor Representative; Erik T. Anhaus, Investment Advisor Representative; Russell Clarke, Investment Advisor Representative; Heather Gardner, Investment Advisor Representative; and Allen Sakon, Investment Advisor Representative.

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

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

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

Reporting

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

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

Financial Planning – Reviews and Reporting

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

Item 14: Client Referrals and Other Compensation

Other Compensation

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

Other Compensation – Brokerage Arrangements

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

Compensation – Client Referrals

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

Item 15: Custody

Custody – Fee Debiting

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

Custody – First Party Money Transfers

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

Custody – Third Party Money Transfers

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

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

Custody – Account Statements

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

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

Item 16: Investment Discretion

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

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

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

Item 17: Voting Client Securities

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

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

Item 18: Financial Information

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

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

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Form ADV Part 2B – Investment Adviser Brochure Supplement

**Benedetti | Gucer
& Associates**

Form ADV Part 2B Investment Adviser Brochure Supplement

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Building 6 Suite 100
Atlanta, GA 30328
(404) 602-0034

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

Supervisor's Name: Bob Gucer

Supervisor of:

Jaime Benedetti	Casey Johnson
Carl Rosenthal	Russell Clarke
Lawrence Donroe-Wells	Cher Scout
Christopher A. Cristallo	(Brenda) Allen Sakon
Erik Anhaus	Heather Gardner

April 2021

This Brochure Supplement provides information about the Firm's ("we", "us", "our") employees that supplements our Brochure. You should have received a copy of that Brochure. Please contact Bob Gucer, Chief Financial Officer and Chief Compliance Officer, at (404) 602-0034 if you did not receive our Brochure or if you have any questions about the contents of this Supplement.

Additional information about our employee(s) referenced above is also available on the SEC's website at www.adviserinfo.sec.gov. You may search this site using a unique identifying number, known as a CRD number for each employee.

Item 2: Educational Background and Business Experience

Education and Business Background

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

Supervised Persons

Jaime Benedetti

Born 1978

CRD #: 4524413

Business Background:

Benedetti and Gucer, Inc.

2013 to Present

Chief Executive Officer and Investment Adviser Representative

Purshe Kaplan Sterling

2013 to Present

Registered Representative

Formal Education after High School:

University of Dayton, Georgia State University

Bachelor of Science, Computer Science

Professional Designations:

Accredited Investment Fiduciary (AIF®)

CERTIFIED FINANCIAL PLANNER™ (CFP®)

Chartered Retirement Planning Counselor (CRPC)

Bob Gucer

Born 1972

CRD #: 3207431

Business Background:

Benedetti and Gucer, Inc.

2013 to Present

Chief Financial Officer, Chief Compliance Officer
and Investment Adviser Representative

Purshe Kaplan Sterling

2013 to Present

Registered Representative

Formal Education after High School:

University of Orleans, France

Bachelor of Science, Finance and Economics

Master of Science, Finance and Economics

Professional Designations:

Accredited Investment Fiduciary (AIF®)
CERTIFIED FINANCIAL PLANNER™ (CFP®)
Chartered Financial Consultant (ChFC®)
Chartered Retirement Planning Counselor (CRPC)

Erik T. Anhaus
CRD #: 4601461

Born 1976

Business Background:

Benedetti and Gucer, Inc.
Investment Adviser Representative

2013 to Present

Purshe Kaplan Sterling
Registered Representative

2013 to Present

Formal Education after High School:

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

Professional Designations:

N/A

Carl Rosenthal
CRD #: 2936461

Born 1938

Employment History:

Benedetti and Gucer, Inc.
Wealth Advisor

2018 to Present

Rosenthal & Kaplin P.C.
Partner

1982 to 2018

Perimeter Wealth Advisors, Inc.
Personal Financial Specialist

2013 to 2018

Fox and Company, CPA's
Partner

1975 to 1982

Formal Education after High School:

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

Professional Designations:

Certified Public Accountant (CPA)

Casey Johnson
CRD #: 5437601

Born 1984

Business Background:

Benedetti and Gucer, Inc.
Paraplanner

2008 to Present

Purshe Kaplan Sterling
Registered Representative

2013 to Present

Formal Education after High School:

Emory University, Atlanta, GA
Bachelor of Science, Biology

Professional Designations:

CERTIFIED FINANCIAL PLANNER™ (CFP®)

Cher Scout
CRD #: 4423245

Born 1969

Business Background:

Benedetti and Gucer, Inc.
Wealth Advisor

2018 to Present

Wells Fargo Advisors
Financial Advisor

2011 to 2018

JPMorgan Chase
Financial Advisor

2005 to 2010

Morgan Stanley
Financial Advisor

2001 to 2005

Formal Education after High School:

Saint Bonaventure University
Associates Degree, Hospitality Management

Professional Designations:

Certified Divorce Financial Analyst (CDFA)

Russell Clarke

Born 1955

CRD #: 1422335

Business Background:

Benedetti and Gucer, Inc.
Financial Planner

2019 to Present

Ameriprise Financial Services, Inc.
Financial Planner

1997 to 2019

Formal Education after High School:

Georgia State University
Master of Business Administration, Finance

University of North Carolina
Bachelor of Arts, English

Professional Designations:

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

Lawrence M. Donroe-Wells
CRD #: 1348744

Born 1959

Business Background:

Benedetti and Gucer, Inc.
Associate Financial Advisor

2019 to Present

Ameriprise Financial Services
Associate Financial Advisor

2014 to 2019

Donroe-Wells & Associates
Marketing Consultant

2005 to 2019

Formal Education after High School:

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

Professional Designations:

N/A

Christopher A. Cristallo
CRD #: 6649156

Born 1986

Business Background:

Benedetti and Gucer, Inc.
Investment Consultant

2019 to Present

Alliant Retirement Consulting
Investment Consultant

2016 to 2019

Formal Education after High School:

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

Sacred Heart University
Bachelor of Science, History

Professional Designations:

CERTIFIED FINANCIAL PLANNER™ (CFP®)

(Brenda) Allen Sakon
CRD #: 7339978

Born 1969

Business Background:

Benedetti and Gucer, Inc.
Financial Advisor

2021 to Present

Immaculate Heart of Mary Catholic Church
Accountant

2018 to Present

Numma Numma LLC
Owner and President

2007 to 2017

Formal Education after High School:

The University of Alabama
Master of Accountancy

The University of West Alabama
Bachelor of Science, Accounting

Professional Designations:

Certified Public Accountant (CPA)

Heather Gardner
CRD #: 5882325

Born 1971

Business Background:

Benedetti and Gucer, Inc.
Wealth Manager

2021 to Present

Bank of America
Financial Advisor

2014 to 2021

Merrill Lynch, Pierce, Fenner & Smith, Inc.
Financial Advisor

2013 to 2021

Trustwell Financial Advisors
Advisor

2011 to 2013

Formal Education after High School:

Georgia Institute of Technology
Master of Science, Health Systems

Georgia Institute of Technology
Bachelor of Science, Industrial Engineering

Professional Designations:

CERTIFIED FINANCIAL PLANNER™ (CFP®)

Professional Certifications

Our Supervised Persons maintain professional designations, which require the following minimum requirements:

Accredited Investment Fiduciary (AIF®)

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

Issued by: Center for Fiduciary Studies

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

Educational Requirements/Examination: Holders of the AIF® mark have successfully completed a specialized program on investment fiduciary standards and subsequently passed a

comprehensive examination. The Accredited Investment Fiduciary® (AIF®) designation represents a thorough knowledge of and ability to apply the fiduciary practices.

Continuing Education/Experience Requirements: AIF designees must accrue six hours of continuing professional education annually and attest to a Code of Ethics.

CERTIFIED FINANCIAL PLANNER™ (CFP®)

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

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

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

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

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

Examination Type: CFP Certification Examination

Continuing Education/Experience Requirements: 30 hours every 2 years

Chartered Financial Consultant (ChFC)

Issued by: The American College

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

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

Educational Requirements: 6 core and 2 elective courses

Examination Type: Final proctored exam for each course

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

Chartered Retirement Planning Counselor (CRPC)

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

Prerequisites/Experience Required: None

Educational Requirements: Candidate must complete the CFP-board registered Chartered Retirement Planning Counselor (CRPCSM) program

Examination Type: Multiple Choice Certification Examination

Continuing Education/Experience Requirements: 16 hours every 2 years

Certified Public Accountant (CPA)

Issued by: State Boards of Accountancy

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

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

Educational Requirements:

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

Examination Type: Uniform CPA Examination

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

Certified Divorce Financial Analyst (CDFA)

Issued by: Institute for Divorce Financial Analysts

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

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

Educational Requirements:

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

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

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

Chartered Life Underwriter (CLU)

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

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

Educational Requirements: Candidate must complete the following:

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

Examination Type: None

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

Chartered Advisor for Senior Living (CASL)

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

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

Educational Requirements: Candidate must complete the following:

- 15 semester credit hours with 5 proctored exams

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

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

Certified Long-Term Care (CLTC)

Prerequisites/Experience Required: None

Educational Requirements: Candidate must complete the following:

- 2-day class or online course

Examination Type: Final course exam

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

Item 3: Disciplinary Information

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

Item 4: Other Business Activities

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

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

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

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

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

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

Item 5: Additional Compensation

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

Item 6: Supervision

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