

Crown Wealth Group LLC

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Crown Wealth Group LLC. If you have any questions about the contents of this brochure, please contact us at (704) 360-3995 or by email at: nick@crownwealthgroup.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 Crown Wealth Group LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Crown Wealth Group LLC's CRD number is: 299732.

2108 South Boulevard, Unit 300
Charlotte, NC 28203
(704) 360-3995
nick@crownwealthgroup.com
<https://crownwealthgroup.com>

Registration as an investment adviser does not imply a certain level of skill or training.

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Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of Crown Wealth Group LLC on 01/19/2021 are described below. Material changes relate to Crown Wealth Group LLC's policies, practices or conflicts of interests.

- Crown Wealth Group LLC has transitioned to registration with the United States Securities and Exchange Commission from its prior registration at the state level.
- Crown Wealth Group LLC has updated their Assets Under Management (Item 4E).

Item 3: Table of Contents

Item 1: Cover Page	
Item 2: Material Changes.....	ii
Item 3: Table of Contents.....	iii
Item 4: Advisory Business	2
Item 5: Fees and Compensation.....	6
Item 6: Performance-Based Fees and Side-By-Side Management	8
Item 7: Types of Clients	8
Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss	8
Item 9: Disciplinary Information	12
Item 10: Other Financial Industry Activities and Affiliations.....	12
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	13
Item 12: Brokerage Practices	15
Item 13: Review of Accounts.....	16
Item 14: Client Referrals and Other Compensation.....	17
Item 15: Custody	18
Item 16: Investment Discretion.....	18
Item 17: Voting Client Securities (Proxy Voting)	19
Item 18: Financial Information.....	19

Item 4: Advisory Business

A. Description of the Advisory Firm

Crown Wealth Group LLC (hereinafter “CWG”) is a Limited Liability Company organized in the State of North Carolina. The firm was formed in April 2018 and has been approved as an independent Registered Investment Advisory firm since January 2019. The principal owners are Nicholas Kolbensschlag, Tyler Kolbensschlag and Steven Lindgren.

B. Types of Advisory Services

Portfolio Management Services

CWG offers discretionary and non- discretionary ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. CWG creates an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

CWG evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

CWG seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of CWG’s economic, investment or other financial interests. To meet its fiduciary obligations, CWG attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, CWG’s policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is CWG’s policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

On-going Financial Planning/ Personal CFO (“Chief Financial Officer”) Services

CWG provides On-going Financial Planning/ Personal CFO Services to clients. The Financial Planning/ Personal CFO Services will include creating a financial plan and the

on-going monitoring of the plan progress along with factors described below. These services may include but are not limited to:

Organize & Simplify Your Financial Life

Utilizing our industry leading technology, we are able to aggregate all of your assets, liabilities, income and expenses in one place, in real time. We then organize and keep up-to-date your most important documents in your digital vault so you never have to search for that crucial piece of paper again.

Cash Flow Analysis

Utilizing that same technology, we are able to identify where your dollars are being utilized and determine the most effective way to prioritize spending vs. saving. Through our systematized review process, we will collaboratively create the discipline needed to achieve your most important life goals.

Wealth Accumulation

We believe that each of your goals should be approached independently when it comes to building an investment plan and allocating resources to that plan. As we continue to grow your wealth, we will benchmark the performance of each pool of dollars against the actual goal. This allows us to demonstrate to you how the growth is having a material impact on your life plan. Our Investment Committee has the experience needed to navigate all markets and ensure your portfolio goals are met.

Risk Management

Growing your wealth is a priority but protecting and preserving that wealth is equally as important. Our team will analyze multiple areas of risk to ensure you have the proper coverage and/or asset protection structures in place. This includes advice on life, disability, health, personal lines and various specialty insurance policies, as well as asset protection strategies through property entity structuring.

Tax Planning

It's not about what you make, it's about what you keep. Our team works with your CPA, or ours, to build a plan before the year starts to ensure we are executing for 365 days every year, minimizing your taxes to the largest degree possible. There are many advanced strategies that can be implemented to lower your tax bill and put more dollars in your pocket and/or into your investments.

Strategic Giving Strategies

Most families don't have a dedicated strategy for making charitable contributions and donate cash when asked or compelled to help. By creating a strategic gifting strategy, the impact of your dollars can be compounded greatly. While cash is a good option, donating highly appreciated, non-cash assets like stock or private business interests can save you even more on taxes and provide additional dollars for you to save, invest or donate. Our team can show you how to properly utilize a Donor Advised Fund, set up an Employee Assistance or Scholarship Program and even donate a portion of your business before you exit to create massive tax savings and significant giving impact.

Wealth Transfer

Unfortunately, life can be unpredictable, and we want to always be prepared for any situation that may arise. Our team of advisors will build and implement a wealth transfer strategy that ensures what you've built moves smoothly to the next generation or generations. We do this in the most tax efficient way possible to ensure you're making the greatest impact. This includes properly written Wills, Trust, and Powers of Attorney followed by ensuring your account beneficiaries match those decisions. For business owners, this can include long-term succession planning often accompanied by Buy/Sell Agreements, at times, funded by Key-Man life insurance.

Generational Wealth Planning

As your family and wealth grow, it's important that everyone be on the same page with how that wealth will transition over time; both during your lifetime and after you have passed. We have set up family advisory boards to educate the next generation and to get the entire family involved in the decision-making process. Having a clear strategy for the family's wealth and a platform for communicating regularly can set up many generations to come.

Business Strategy

A key strength of our team is bringing together your business and personal life into one congruent picture. We understand that owning and running a business may be your key wealth creation strategy, like it is ours, and our team can help you take full advantage of the opportunity that it presents. Areas of focus include growth strategies, expense reductions, employee planning and support, contract and agreement enhancements and many others.

Mergers and Acquisitions

Our team has run point on a growing number of business acquisitions to include coordinating contract negotiation, legal, tax, lending, accounting and operational transition. When ready to make your exit, we ensure our clients get top dollar for their business while implementing a proper tax strategy to keep more of what you make. We can help you take your business full cycle from start-up to exit, all while incorporating it into your family's life plan.

Real Estate

An area of advice that is typically siloed outside of the wealth management industry is the management of real estate assets within an overall portfolio. With real estate playing an integral part of an overall strategy and goal, Tyler Kolbensschlag, through his affiliation with Berkshire Hathaway HomeServices Carolinas Realty is able to represent our clients in the acquisition and sale of their primary homes, vacation properties and investment holdings.

Lifestyle Services

There are many transactions in life that require careful planning and detailed follow through to ensure you are making the right decision and that all the important pieces come together. We quarterback the process from start to finish for major purchases like

boats, cars, homes and life's other fun toys. Other concierge services include travel planning, club memberships, and entertainment experiences, just to name a few.

Financial Planning

Financial plans and financial planning may include, but are not limited to: cash flow planning, tax planning, debt/ credit planning, retirement planning, college planning, investment planning; insurance planning; and estate planning.

As part of the financial planning process, CWG will have a discovery call with client which generally can range from 60 to 120 minutes. The client then provides CWG with their documentation and the assessment build generally takes CWG's team 2 to 3 weeks. The assessment delivery generally takes 120 to 180 minutes to complete. CWG meets clients every 3 to 6 months to provide a comprehensive review of the actions completed, the actions that remain outstanding and to check back in on the client's major goals as a part of regularly updating the plan.

For financial planning clients that choose not to execute the recommendations with CWG, clients can request a financial plan update. A new fee will be charged to the client for an updated plan. The cost of the updated plan is the same as a new financial plan.

Services Limited to Specific Types of Investments

CWG generally limits its investment advice to ETFs, mutual funds, individual equities, fixed income securities, options trading, and insurance products including annuities, although CWG primarily recommends low cost, fully diversified ETF and mutual fund portfolios. CWG may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

CWG will tailor a program for each individual client. This will include a discovery session to get to know the client's specific needs and requirements as well as a plan that will be executed by CWG on behalf of the client. CWG's investment philosophy is built around goals-based investing. Each client goal is separately analyzed to determine the funding need, return need, appropriate risk level and investment time horizon. The asset allocation is determined by these factors. The portfolio holdings are then customized in this framework. CWG may use model allocations together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent CWG from properly servicing the client account, or if the restrictions would require CWG to deviate from its standard suite of services, CWG reserves the right to end the relationship.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, and certain other administrative fees. CWG does not participate in wrap fee programs.

E. Assets Under Management

CWG has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$111,526,652.00	\$0.00	March 2020

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Fees

Total Assets Under Management	Annual Fees
All Assets	1.00% – 1.50%

CWG uses the value of the account as of the last business day of the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

These fees are negotiable and the final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of CWG's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 5 days' written notice.

Financial Planning Fees

Fixed Fees

The negotiated one-time fixed rate for creating client financial plans is between \$500 and \$10,000.

Fees are based on the complexity and needs of each client. The more complexity the client has and the more demanding they are of availability and service needs, the higher their fee is.

Clients may terminate the agreement without penalty, for full refund of CWG's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

On-going Financial Planning/ Personal CFO Services

The negotiated annual fixed rate for client on-going financial planning/ Personal CFO services is between \$1,200 to \$30,000.

Fees are based on the complexity and needs of each client.

Clients may terminate the agreement without penalty, for full refund of CWG's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

B. Payment of Fees

Payment of Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly or monthly basis. Fees are paid in arrears or in advance and will be agreed upon in the Investment Advisory Contract.

Payment of Financial Planning Fees

Financial planning fees are paid via check or ACH.

Fixed financial planning fees are paid in arrears upon presentation of the plan.

On-going Financial Planning/ Personal CFO Services

On-going financial planning/ Personal CFO services fees are paid via check or ACH.

Fixed on-going financial planning/Personal CFO services are paid in advance on either a monthly or quarterly basis.

C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by CWG. Please see Item 12 of this brochure regarding custodian.

D. Prepayment of Fees

CWG collects certain fees in advance and certain fees in arrears, as indicated above. Refunds for fees paid in advance but not yet earned will be refunded on a prorated basis and returned within fourteen days to the client via check, or return deposit back into the client's account.

Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

E. Outside Compensation For the Sale of Securities to Clients

Neither CWG nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

CWG does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

CWG generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals

There are no requirements for opening or maintaining an account.

There is no account minimum for any of CWG's services.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

CWG's methods of analysis include Charting analysis, Cyclical analysis, Fundamental analysis, Modern portfolio theory, Quantitative analysis and Technical analysis.

Charting analysis involves the use of patterns in performance charts. CWG uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

Cyclical analysis involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

Technical analysis involves the analysis of past market data; primarily price and volume.

Investment Strategies

CWG uses long term trading.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Charting analysis strategy involves using and comparing various charts to predict long and short-term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Modern portfolio theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Quantitative analysis Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

CWG's use of options trading generally holds greater risk of capital loss. Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment

returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance.

Options are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option writing also involves risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry market conditions and general economic environments.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither CWG nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither CWG nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

CWG is a licensed insurance agency. Representatives of CWG are also licensed insurance agents and may offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. Additionally, the representatives of CWG may have an incentive to recommend insurance products via CWG as a licensed insurance agency. CWG always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of CWG in connection with such individual's activities outside of CWG.

Nicholas Martin Kolbenschlag, Tyler Joseph Kolbenschlag, Steven Quinton Lindgren, and Zac O'Brien are licensed insurance agents. From time to time, they will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. CWG always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of CWG in connection with such individual's activities outside of CWG.

Tyler Joseph Kolbenschlag acts as a real estate broker and from time to time, may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. CWG always acts in the best interest of the client and clients are in no way required to utilize the services of any representative of CWG in connection with such individual's activities outside of CWG.

Tyler Joseph Kolbenschlag is a Greater Carolinas Chapter Board of Trustees Member at National Multiple Sclerosis Society.

Steven Quinton Lindgren is a member of Charlotte Economics Club Board of Directors

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

CWG does not utilize third-party investment advisers.

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

A. Code of Ethics

CWG has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. CWG's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

CWG permits its employees to engage, on a limited basis, in personal securities transactions. To avoid any potential conflicts of interest involving personal trades, The Code includes formal insider trading, information barriers, and personal security transactions policies and procedures. CWG's Code of Ethics also requires employees to: (1) pre-clear certain personal securities transactions, (2) report personal securities transactions on at least a quarterly basis, and (3) provide CWG with a detailed summary of holdings (both initially upon commencement of employment and annually thereafter) over which the employee has a direct or indirect beneficial interest.

CWG, its employees, management persons, or other supervised or related persons do not currently: (1) buy or sell securities, as principal, to or from any clients, (2) solicit client investments into any related entity, or (3) act as an investment advisor to any investment company which we recommend to clients.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of CWG may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of CWG to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions would create a conflict of interest. CWG will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of CWG may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of CWG to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions would create a conflict of interest; however, CWG will never engage in trading that operates to the client's disadvantage if representatives of CWG buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians will be recommended based on CWG's duty to seek "best execution," which is the obligation to seek to execute securities transactions for a client on terms that are the most favorable to the client under the circumstances. The client will not necessarily pay the lowest commission or commission equivalent, and CWG may also consider the market expertise and research access provided by the payment of commissions, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the custodian to aid in the research efforts of CWG. CWG will never charge a premium or commission on transactions, beyond the actual cost imposed by the custodian.

CWG recommends SEI Private Trust Company and TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC.

1. Research and Other Soft-Dollar Benefits

While CWG has no formal soft dollars program in which soft dollars are used to pay for third party services, CWG may receive research, products, or other services from custodians in connection with client securities transactions ("soft dollar benefits"). CWG may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and CWG does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. CWG benefits by not having to produce or pay for the research, products or services, and CWG will have an incentive to recommend a based on receiving research or services. Clients should be aware that CWG's acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. Brokerage for Client Referrals

CWG receives no referrals from a custodian or third party in exchange for using that custodian or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

CWG will require clients to use a specific broker-dealer to execute transactions. By directing brokerage, CWG may be unable to achieve most favorable execution of client transactions, and this practice may cost clients more money.

B. Aggregating (Block) Trading for Multiple Client Accounts

If CWG buys or sells the same securities on behalf of more than one client, it might, but would be under no obligation to, aggregate or bunch, to the extent permitted by applicable law and regulations, the securities to be purchased or sold for multiple Clients in order to seek more favorable prices, lower brokerage commissions or more efficient execution. In such case, CWG would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. CWG would determine the appropriate number of shares to place with brokers and will select the appropriate brokers consistent with CWG's duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts for CWG's investment advisory services provided on an ongoing basis are reviewed at least quarterly or semi-annually by Nicholas Kolbenschlag, Chief Executive Officer & Co-Founder, by Tyler Kolbenschlag, Chief Operating Officer & Co-Founder, by Steven Lindgren, Chief Investment Officer ("CIO"), by Douglas Coppola, Investment Committee Chairman, or by Zachary O'Brien, CFP/Managing Director with regard to clients' respective investment policies and risk tolerance levels. All accounts at CWG are assigned to these reviewers.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Nicholas Kolbenschlag, Chief Executive Officer & Co-Founder, Steven Lindgren CIO, or Zachary O'Brien, CFP. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

All on-going financial planning/ Personal CFO accounts are reviewed upon financial plan creation and plan delivery by Nicholas Kolbenschlag, Chief Executive Officer & Co-Founder, Steven Lindgren, CIO, or Zachary O'Brien, CFP. On-going financial planning/ Personal CFO clients are provided an initial financial plan concerning their financial situation. After the presentation of the plan, it will be updated regularly and Crown will meet with the clients quarterly to review plan progress and make updates.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, CWG's services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each client of CWG's advisory services provided on an ongoing basis will receive a monthly or quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

Each financial planning client will receive the financial plan upon completion.

Each on-going financial planning/ Personal CFO client will receive a comprehensive quarterly report outlining actions completed, actions outstanding, current balance sheet, and plan updates.

For VA clients, CWG will also provide a monthly or quarterly, depending on their contract, separate written statement to the client, which will include the formula used to calculate the fee, the time period covered by the fee, and the amount of assets under management on which the fee was based.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

CWG participates in the institutional advisor program (the "Program") offered by TD Ameritrade. TD Ameritrade offers to independent investment advisor services which include custody of securities, trade execution, clearance and settlement of transactions. CWG receives some benefits from TD Ameritrade through its participation in the Program.

As part of the Program, CWG may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between CWG's participation in the Program and the investment advice it gives to its clients, although CWG 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 CWG 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 CWG's 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 CWG by third party vendors. TD Ameritrade may also pay for business consulting and professional services received by CWG's related persons. Some of the products and services made available by TD Ameritrade through the Program may benefit CWG but may not benefit its client accounts. These products or services may assist CWG in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help CWG manage and further develop its business enterprise. The benefits received by CWG 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, CWG endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by CWG or its related persons in and of itself creates a conflict of interest and may indirectly influence the CWG's choice of TD Ameritrade for custody and brokerage services.

CWG may receive similar benefits from SEI Private Trust Company.

B. Compensation to Non - Advisory Personnel for Client Referrals

CWG does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, CWG will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy. VA clients will also receive statements from CWG and are urged to compare the account statements they received from custodian with those they received from CWG.

Item 16: Investment Discretion

CWG provides discretionary and non-discretionary investment advisory services to clients. The Investment Advisory Contract established with each client outlines the discretionary authority for trading. Where investment discretion has been granted, CWG generally manages the client's account and makes investment decisions without consultation with the client as to what securities

to buy or sell, when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, or the price per share. In some instances, CWG's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to CWG) Clients with discretionary accounts will execute a limited power of attorney to evidence discretionary authority. Clients may, but typically do not, impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

CWG will also have discretionary authority to determine the broker or dealer to be used for a purchase or sale of securities for a client's account.

Item 17: Voting Client Securities (Proxy Voting)

CWG will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Clients can call or email CWG for advice at any time on proxy voting decisions

Item 18: Financial Information

A. Balance Sheet

CWG neither requires nor solicits prepayment of more than \$50,000 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither CWG nor its management has any financial condition that is likely to reasonably impair CWG's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

CWG has not been the subject of a bankruptcy petition in the last ten years.