



Part 2A of Form ADV: Firm Brochure

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This brochure provides information about the qualifications and business practices of The Private Investment Group, Inc. If you have any questions about the contents of this brochure, please contact us at 937-434-0500 or [privateinvestmentgroup@privateinvestmentgroup.com](mailto:privateinvestmentgroup@privateinvestmentgroup.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 The Private Investment Group, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 128876.

## Item 2 Material Changes

The SEC adopted "Amendments to Form ADV" in July, 2010. This Firm Brochure, dated 02/11/2021, is the update to our last disclosure document dated 03/31/2020.

This Item is used to provide our clients with a summary of new and/or updated information. We will inform you of the revision(s) based on the nature of the updated information.

Consistent with the new rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. Furthermore, we will provide you with other interim disclosures about material changes as necessary.

The following items have changes and/or updates:

Items 4, 5, 12 and 13 have been amended to remove disclosures for Consulting Services. We no longer offer these services.

Item 4 has been amended to disclose that we do not offer non-discretionary portfolio management services.

Item 5 has been amended to disclose that we will negotiate an annual rate ranging from 0.6% to 1.25% of managed assets based on the individual needs and circumstances of the client.

Item 10 has been amended to disclose that we do not offer back-office services for other investment advisers.

Item 12 has been amended to remove National Financial Services from our list of recommended broker-dealer/custodians for portfolio management clients. We now only recommend Charles Schwab.

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#### **ITEM 4:           ADVISORY BUSINESS**

The Private Investment Group, Inc. ("TPIGI") is an SEC-registered investment adviser with its principal place of business located in Ohio began conducting business in 1994.

Listed below are the firm's principal shareholders (i.e., those individuals and/or entities controlling 25% or more of this company).

- Jack R. Bowman, CEO and Chief Compliance Officer
- Alfredo A. Sandoval, Partner

We offer the following advisory services to our clients:

#### **PORTFOLIO MANAGEMENT**

We begin our portfolio management service by reviewing your present financial situation and gathering information relating to your goals, objectives, time horizons, and risk tolerance. We will review with you your present investment situation and the impact of your present investment plan. As part of this, we may, at our discretion, include a complimentary meeting to review your ongoing needs and objectives.

If you elect to have us provide Investment Supervisory or Management Services, you will sign our Client Agreement or Engagement Letter. Once you have signed the engagement letter, we will gather data from documents and interviews with you. We will work with you and your other advisers (your accountant, banker, or attorney, for example) to obtain information that, depending on your needs, may include:

- Past financial history
- Present financial condition
- Family background
- Short-term goals (such as college funding)
- Long-term goals (such as retirement planning)

Based on this information, we will create and manage a portfolio through which we will attempt to meet your investment goals. We manage these advisory accounts on a discretionary or non-discretionary basis. Account supervision is guided by the client's stated objectives (i.e., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations.

Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company and will generally include advice regarding the following securities:

- Exchange-traded stocks
- Over-the-counter-stocks

- Foreign securities issuers
- Corporate debt securities (other than commercial paper)
- Certificates of deposit
- Municipal Securities
- US Government Securities
- Money Market Funds
- Exchange-traded funds ("ETFs")
- No-load mutual funds

ETFs and mutual funds may invest in a wide variety of investments and may use investment strategies not used directly by our firm.

Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

We believe that reviews are key to the performance of your portfolio. We will review your portfolio to determine if your investment selections continue to be consistent with your stated goals. When reviewing your portfolio, we consider investment results, assess your ongoing and additional needs, determine if adjustments in the investment strategies are needed, and address any other concerns you bring to our attention.

#### **AMOUNT OF MANAGED ASSETS**

As of 03/23/2021, we were actively managing approximately \$161,000,000 of clients' assets on a discretionary basis.

#### **Item 5 Fees and Compensation**

##### **PORTFOLIO MANAGEMENT FEES**

The annualized fee for Portfolio Management Services will be charged as a percentage of assets under management. Annual fees typically range from 0.60% to 1.25%. Fees are negotiated with you based on the complexity of your financial situation, the amount of assets to be placed under management, anticipated future additional assets, related accounts, portfolio style, account composition, and reports to be provided, among other factors. The specific annual fee schedule will be identified in our contract.

Our fees are billed quarterly, in advance, at the beginning 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 billing period. Advisory fees may be deducted from the account managed, an associated account, or billed directly to the client in accordance with the authorization in the Client Services Agreement.

We may group certain related client accounts for the purposes of determining the annual fee.

Advisory fees may be discounted or waived for our associates and their families.

## **GENERAL INFORMATION**

*Termination of the Advisory Relationship:* A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days written notice. As disclosed above, certain fees are paid in advance of services provided. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. In calculating a client's reimbursement of fees, we will pro rate the reimbursement according to the number of days remaining in the billing period.

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

*Additional Fees and Expenses:* In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transactions for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

*ER/SA Accounts:* TPIGI is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"). As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, TPIGI may only charge fees for investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b-1 fees, or conversely, investment advice about products for which our firm and/or our related persons receive commissions or 12b-1 fees, however, only when such fees are used to offset TPIGI's advisory fees.

*Advisory Fees in General:* Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

*Limited Prepayment of Fees:* Under no circumstances do we require or solicit payment of fees in excess of \$1200 more than six months in advance of services rendered.

## **Item 6 Performance-Based Fees and Side-By-Side Management**

TPIGI does not charge performance-based fees.

#### **Item 7 Types of Clients**

TPIGI provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals)
- High net worth individuals
- Pension and profit sharing plans (other than plan participants)
- Charitable organizations

#### **Item 8 Methods of Analysis, Investment Strategies and Risk of Loss Methods of Analysis (How we determine what goes into your portfolio)**

We begin our securities analysis by evaluating global trends, the economic environment, legislative trends, and the political landscape to determine the potential impact on various asset classes such as equities, fixed income, real estate, and cash. We also use this "top down" analysis to determine our security sector allocations within each asset class. For example, banks, asset managers, and insurance companies would all belong to the financial services sector within the asset class called equities. Corporate notes and bonds would be a sector within the asset class called fixed income.

Fundamental analysis, which looks at a firm's earnings growth potential, financial strength, profitability, and business outlook, is implemented to determine if a security appears undervalued or overpriced. This "bottom up" analysis determines our individual security selections. 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.

Technical analysis, which is the study of past market and security movements to recognize recurring patterns, is considered to evaluate short term price momentum and investor sentiment. Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly-managed or financially unsound company may underperform regardless of market movement.

By using both fundamental and technical analysis, we strive to stay aware of both company- specific and market-driven risks.

Exchange-traded funds and/or mutual funds are sometimes utilized to capture exposure to various asset classes and provide appropriate diversification in order to achieve the targeted sector allocations. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held. In addition, the experience and track record of the fund manager is evaluated. The internal expenses charged by the fund are also scrutinized in order to help keep client costs at a minimum. A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a

risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the client's portfolio.

Risks for all forms of analysis are that these methods rely on assumptions, estimates, ratings, and other publicly-available sources of information considered to be accurate and unbiased. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

### **Investment Strategies**

Our strategy of sector allocation (overweighting and underweighting various financial sectors) specifically focuses on creating disciplined sector diversification. Sector allocations targets and acceptable ranges are determined and adjusted by changes in our analysis throughout the year. Sector allocation targets allow us to focus on those areas where we see the most potential for appreciation.

Sector allocations ranges prevent us from being too focused in one area and compel us not to overlook opportunities we might otherwise miss. There is always the risk with this strategy of being overweight to an underperforming sector or underweight in a sector which outperforms.

However, by maintaining a disciplined boundary on the minimum and maximum range for each sector, the volatility of any one sector's market performance on the overall portfolio is limited.

### **Item 9 Disciplinary Information**

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Alfredo Sandoval and Jack Bowman's disclosures can be found at [www.brokercheck.com](http://www.brokercheck.com).

### **Item 10 Other Financial Industry Activities and Affiliations**

Our Advisory Representatives concentrate the majority of their efforts (approximately 90% of their time) toward sales of investments and providing investment advisory services.

Certain Advisory Representatives are licensed to provide insurance services. While our portfolio management services do not typically include advice about insurance, our Advisory Representatives, in their capacities as insurance agents or brokers, may recommend the purchase of insurance products to minimize your exposure to identified risks. You are under no obligation to purchase insurance products recommended by these individuals. These individuals will receive commissions from insurance you purchase. These individuals spend approximately 10% of their time on their insurance-related activities.

Two Advisory Representative of TPIGI are Registered Representatives of Triad Advisors, a full service, general securities broker/dealer and Member of the Financial Industry Regulatory Authority, Inc. (FINRA) and SIPC. Triad is a diversified financial services company engaged in the sale of investment products. In the separate capacity as Registered Representative of Triad Advisors, Advisory Representatives of TPIGI may recommend securities or insurance products offered by Triad Advisors, and may receive the normal commissions if products are purchased through them. Clients are under no obligation to purchase products recommended by this Advisory Representative or to purchase products through Triad Advisors.



When appropriate to the needs of the client, Advisory Representatives of TPIGI will recommend the Registered Representatives of Triad Advisors for the purchase of specific investment products unavailable or outside the scope of TPIGI's portfolio management service.

Neither TPIGI nor its Advisory Representatives share in any commissions, 12b-1 fees or other compensation generated from the purchase or sale of securities in Portfolio Management accounts.

Under the rules and regulations of FINRA, Triad Advisors has obligations to maintain records and perform other functions regarding certain aspects of the investment advisory activities of its registered representatives in relation to certain advisory accounts for which its Registered Representatives provide investment advice. Triad Advisors may charge the Advisor/Advisory Representative (not the Client) a portion of the advisory fees it receives for the functions Triad Advisors is required to carry out by the FINRA. This fee will not increase execution or brokerage charges to the Client or the fee the Client has agreed to pay TPIGI.

You should be aware that the receipt of additional compensation by TPIGI management persons or employees creates a conflict of interest that may impair the objectivity of our firm and these individuals when making advisory recommendations. TPIGI Management, Inc. endeavors at all times to put the interests of its clients first as part of our fiduciary duty as a registered investment adviser; we take the following steps to address this conflict:

- we disclose to clients the existence of all material conflicts of interest, including the potential for our firm and our employees to earn compensation from advisory clients in addition to our firm's advisory fees;
- we disclose to clients that they are not obligated to purchase recommended investment products from our employees or affiliated companies;
- we collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;
- our firm's management conducts regular reviews of each client account to verify that all Recommendations made to a client are suitable to the client's needs and circumstances;
- we require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed;
- we periodically monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by our firm; and
- we educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

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

We have adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

TPIGI and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities. Our code also provides for oversight, enforcement and recordkeeping provisions.

TPIGI Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to [privateinvestmentgroup@privateinvestmentgroup.com](mailto:privateinvestmentgroup@privateinvestmentgroup.com) or by calling us at 937-434-0500.

TPIGI and individuals associated with our firm are prohibited from engaging in principal transactions.

TPIGI Inc. and individuals associated with our firm are prohibited from engaging in agency cross transactions.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees 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.

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client.

It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts.

As disclosed in the preceding section of this Brochure (Item 10), related persons of our firm are separately registered as securities representatives of a broker-dealer, investment adviser representatives of another registered investment adviser, and/or licensed as an insurance agent/broker of various insurance companies. Please refer to Item 10 for a detailed explanation of these relationships and important conflict of interest disclosures.

## **Item 12 Brokerage Practices**

We do not have any soft-dollar arrangements and do not receive any soft-dollar benefits.

## **Portfolio Management**

We typically recommend that clients use the custodial services of an approved list of firms that specialize in providing brokerage, custody and reporting services for advisory accounts. TPIGI has evaluated these firms and believes that they will provide our clients with a blend of execution services, commission costs and professionalism that will assist our firm to meet our fiduciary obligations to clients. These firms carry client accounts on their records, process transactions ordered by TPIGI provide various software and computer support services. These approved companies maintain custody of all account assets and, as custodian, performs other customary custodial functions associated with securities brokerage accounts. These companies forward confirmations of transactions to the client, as well as customary client account statements.

The custodian broker currently recommended to clients is Charles Schwab.

Security trades are directed to the custodian broker-dealer selected by the client. In directing the use of a particular broker-dealer, it should be understood that TPIGI will not have authority to negotiate commissions or to necessarily obtain volume discounts, and best execution may not be achieved. In addition, a disparity in commission charges may exist between the commissions charged to the client and those charged to other clients (who may direct the use of another broker).

We reserve the right to decline acceptance of any client account for which the client directs the use of a broker other than a recommended broker-dealer if we believe that this choice would hinder our fiduciary duty to the client and/or our ability to service the account.

Clients should note that, while TPIGI has a reasonable belief that the recommended broker-dealers are able to obtain best execution and competitive prices, our firm will not be independently seeking best execution price capability through other brokers. Not all advisers require clients to direct it to use a particular broker-dealer.

TPIGI will block trades where possible and when advantageous to clients. This blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple client accounts, so long as transaction costs are shared equally and on a pro-rated basis between all accounts included in any such block.

Block trading may allow us to execute equity trades in a timelier, more equitable manner, at an average share price. Clients using brokers not recommended by TPIGI will have their shares traded immediately after shares are traded with the recommended broker-dealer.

TPIGI block trading policy and procedures are as follows:

- 1) Transactions for any client account may not be aggregated for execution if the practice is prohibited by or inconsistent with the client's advisory agreement with our firm's order allocation policy.
- 2) TPIGI must determine that the purchase or sale of the particular security involved is appropriate for the client and consistent with the client's investment objectives and with any investment guidelines or restrictions applicable to the client's account.
- 3) The portfolio manager must reasonably believe that the order aggregation will benefit, and will enable TPIGI to seek best execution for each client participating in the aggregated order.

- 4) Prior to entry of an aggregated order, a written order ticket must be completed which identifies each client account participating in the order and the proposed allocation of the order, upon completion, to those clients.
- 5) If the order cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated pro rata among the participating client accounts in accordance with the initial order ticket or other written statement of allocation. However, adjustments to this pro rata allocation may be made to participating client accounts in accordance with the initial order ticket or other written statement of allocation. Furthermore, adjustments to this pro rata allocation may be made to avoid having odd amounts of shares held in any client account, or to avoid excessive ticket charges in smaller accounts.
- 6) Generally, each client that participates in the aggregated order must do so at the average price for all separate transactions made to fill the order, and must share in the commissions on a pro rata basis in proportion to the client's participation. Under the client's agreement with the custodian/broker, transaction costs may be based on the number of shares traded for each client.
- 7) If the order will be allocated in a manner other than that stated in the initial statement of allocation, a written explanation of the change must be provided to and approved by the Chief Compliance Officer no later than the morning following the execution of the aggregate trade.
- 8) TPIGI client account records separately reflect, for each account in which the aggregated transaction occurred, the securities which are held by, and bought and sold for, that account.
- 9) Funds and securities for aggregated orders are clearly identified on TPIGI records and to the broker-dealers or other intermediaries handling the transactions, by the appropriate account numbers for each participating client.
- 10) No client or account will be favored over another.

#### **Item 13 Review of Accounts**

### **PORTFOLIO MANAGEMENT**

REVIEWS: While the underlying securities within Individual Portfolio Management Services accounts are continually monitored, these accounts are reviewed at least annually (you may arrange for more frequent reviews). Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

These accounts are reviewed by Jack R. Bowman, CEO and Alfredo A. Sandoval, Partner.

REPORTS: Clients will receive monthly statements and confirmations of transactions from their custodian broker-dealer.

#### **Item 14 Client Referrals and Other Compensation**

It is TPIGI policy not to engage solicitors or to pay related or non-related persons for referring potential clients to our firm.

**Item 15 Custody**

We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm directly debits advisory fees from client accounts.

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

Our firm does not have physical custody of client accounts.

**Item 16 Investment Discretion**

Clients hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission.

Our discretionary authority includes the ability to do the following without contacting the client:

- Determine the security to buy or sell; and/or
- Determine the amount of the security to buy or sell

Clients give us discretionary authority when they sign a discretionary agreement with our firm, and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

**Item 17 Voting Client Securities**

TPIGI does not vote proxies for clients.

**Item 18 Financial Information**

TPIGI has no financial circumstances to report.

Under no circumstances do we require or solicit payment of fees in excess of \$1200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

TPIGI has not been the subject of a bankruptcy petition at any time during the past ten years.