



Brand Asset Management Group  
A Mosaic of Financial Experts

## Item 1 – Cover Page

Brand Asset Management Group, Inc.  
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Chesterfield, MO 63017  
(636) 532-7333  
[www.brandamg.com](http://www.brandamg.com)

May 2021

Form ADV, Part 2, our “Disclosure Brochure” or “Brochure,” as required by the U.S. Securities and Exchange Commission is a very important document between Clients (you, your) and Brand Asset Management Group, Inc. (BAMG, us, we, our). BAMG’s IARD firm number is 106162.

This Brochure provides information about our qualifications and business practices. If you have any questions about the contents of this brochure, please contact us at (636) 532-7333. The information in this brochure has not been approved or verified by the U.S. Securities and Exchange Commission (SEC) or by any state securities authority.

We are a registered investment adviser with the U.S. Securities and Exchange Commission. Our registration as an Investment Adviser does not imply any level of skill or training. Additional information about BAMG is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) (click on the link, select “investment adviser firm” and type in our firm name). Results will provide you with both Parts 1 and 2 of our Form ADV.

## Item 2 – Material Changes

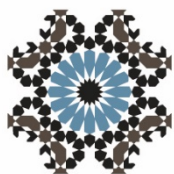
This section of the Brochure will address only those “material changes” that have been incorporated since our last delivery or posting of this document on the SEC’s public disclosure website (IAPD) [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

No material changes have been incorporated since our last filing on March 22, 2021.

We may, at any time, update this Brochure and send a copy to you, or offer to send you a copy (either by electronic means (email) or in hard copy form).

If you would like another copy of this Brochure, please download it from the SEC website as indicated above or you may contact our Chief Compliance Officer, Sara Smith at (636) 532-7333, [ssmith@brandamg.com](mailto:ssmith@brandamg.com), or mail to our office located at 16090 Swingley Ridge Road, Suite 400, Chesterfield, MO 63017.

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## Item 4 – Advisory Business

Brand Asset Management Group, Inc. (BAMG, us, we, our) is a corporation organized under the laws of the State of Missouri on March 2, 1992. Todd H. Brand is the principal owner of BAMG. BAMG's advisory services are made available to clients primarily through individuals associated with BAMG as investment adviser representatives ("IARs"). For more information about the IARs providing advisory services, clients should refer to the Brochure Supplement for his or her IAR. The Brochure Supplement is a separate document that is provided by the IAR along with this Brochure before or at the time the client engages the IAR.

We offer investment advisory services to individuals including high net worth individuals, trusts and estates, pension and profit sharing plans, charitable organizations, and corporations. This Disclosure Brochure provides you with information regarding our qualifications, business practices, and the nature of advisory services that should be considered before becoming our advisory client.

Please contact Sara Smith, Chief Compliance Officer, if you have any questions about this Brochure.

Individuals associated with us will provide our investment advisory services. These individuals are appropriately licensed and qualified to provide advisory services on our behalf. Such individuals are known as Investment Adviser Representatives (Advisors).

Below is a description of the investment advisory services we offer. For more detail on any product or service please reference the advisory agreement or speak with your Advisor.

### **DESCRIPTION OF SERVICES PROVIDED**

BAMG emphasizes continuous personal client consultation and interaction when providing discretionary investment advisory services. We will work with our clients to identify their investment goals, objectives, and risk tolerance in order to create an initial portfolio allocation designed to reach those goals and objectives. We typically create a portfolio consisting of a variety of securities, including but not limited to, mutual funds, (including closed-end funds), equities, exchanged traded funds, bonds, U.S. governments, municipals, unit investment trusts (UITs), no-load variable annuities, and life insurance. While we do not recommend or acquire new individual securities, often times we advise and manage legacy assets that you bring into our wealth management program.

Investment strategies vary based on your investment objectives and risk tolerance and at times include long-term buy and hold trading, short-term trading and/or margin transactions. Each portfolio will be designed to meet your particular investment goals, objectives, circumstances, and risk tolerance. Each client will have the opportunity to place reasonable written restrictions on the types of investments to be held in the portfolio. You also should notify us in writing of any changes in your financial status, investment objectives, policies, or restrictions. It could adversely affect the investment decisions we make on your behalf if we do not have complete and accurate information.

### **Mosaic Wealth Management©**

BAMG undertakes to provide each client with objective setting and asset allocation services and assistance and the means to utilize the multi-asset, multi-style, multi-manager diversification techniques used by the large institutional pools of assets. BAMG prepares periodic reports concerning the investment programs and portfolios of each client.

BAMG manages a client's account on a discretionary basis; such discretion is granted by you in writing when you sign our investment advisory agreement. We have the authority to make investment decisions without consultation with you. These decisions would involve determinations regarding which securities are bought and sold, the total amount of securities to be bought or sold, and the price per share. Our discretionary authority in making these determinations will be limited by conditions imposed by you in your investment guidelines, objectives, or instructions otherwise provided to us.

In certain situations, the Mosaic option will be offered as a turnkey wealth management service allowing advisory clients to pay one fee that can include BAMG's advisory services, most routine estate planning, and accounting services under an arrangement established by BAMG with a certified public accounting firm and a law firm.

### **Institutional Advisory**

BAMG provides trusted counsel to Qualified Retirement Plans working with retirement plan sponsors to efficiently design your plan and ensure that it is high functioning towards the objective of making successful retirees out of your people.

As an investment fiduciary, we work closely with your investment committee to create and manage a retirement plan that reduces your fiduciary risk, utilizes the lowest-cost strategy that will accomplish the job, provides completely transparent and full fee disclosure, and emphasizes defined and continuous participant education.

BAMG brings completely tailored investment counsel and education to fiduciaries and plan participants. Our solutions involve the creation of customized investment strategies using the lowest cost available share classes of institutional quality investments.

### **BrandConnect<sup>SM</sup>**

For certain related or smaller portfolios, we will recommend portfolio management services through Institutional Intelligent Portfolios<sup>TM</sup>, an automated, online investment management platform for use by independent investment advisors and sponsored by Schwab Performance Technologies (the “Program” and “SPT,” respectively). Through the Program, we offer clients a range of investment strategies we have constructed and manage, each consisting of a portfolio of exchange traded funds (“ETFs”) and a cash allocation. The client may instruct us to exclude up to three ETFs from their portfolio. The client’s portfolio is held in a brokerage account opened by the client at SPT’s affiliate, Charles Schwab & Co., Inc. (“CS&Co”). We are independent of and not owned by, affiliated with, or sponsored or supervised by SPT, CS&Co or their affiliates (together, “Schwab”).

We, and not Schwab, are the client’s investment advisor and primary point of contact with respect to the Program. We are solely responsible, and Schwab is not responsible, for determining the appropriateness of the Program for the client, choosing a suitable investment strategy and portfolio for the client’s investment needs and goals, and managing that portfolio on an ongoing basis.

We have contracted with SPT to provide us with the technology platform and related trading and account arrangement services for the Program. This platform enables us to make the Program available to clients online and includes a system that automates certain key parts of our investment process (the “System”). The System includes an online questionnaire that helps us determine the client’s investment objectives and risk tolerance and select an appropriate investment strategy and portfolio. Clients should note that we will recommend a portfolio via the System in response to the client’s answers to the online questionnaire. The client may then indicate an interest in a portfolio that is one level less or more conservative or aggressive than the recommended portfolio, but we then make the final decision and select a portfolio based on all the information we have about the client. The System also includes an automated investment engine through which we manage the client’s portfolio on an ongoing basis through automatic rebalancing and tax-loss harvesting (if the client is eligible and elects).

Clients do not pay fees to SPT in connection with the Program, but we charge clients a fee for our services as described below under *Item 5 Fees and Compensation*. Our fees are not set or supervised by Schwab. Clients do not pay brokerage commissions or any

other fees to CS&Co as part of the Program. Schwab does not receive other revenues in connection with the Program.

### **Flourish Cash**

BAMG may recommend Flourish Cash (“Flourish”) as a courtesy to clients who maintain large cash balances for short term needs. Flourish Cash is a service offered by Flourish Financial LLC, a registered broker-dealer and FINRA member. Flourish Financial LLC is not a bank. This service is being offered to clients of BAMG because this is a service only available through a participating RIA. Clients are free to decline this service.

Flourish provides BAMG clients an alternative to money market and other sweep vehicles and is designed to help BAMG clients earn more competitive interest rates on short term cash deposits than in traditional cash accounts. This service is free to BAMG Flourish Cash clients and there is no minimum amount required to establish an account.

While BAMG has opted to co-brand the solution as BAMG Flourish Cash, BAMG does not actively manage assets invested with Flourish nor does it charge an advisory fee for assets invested with BAMG Flourish Cash. Flourish accounts are monitored on a view-only basis. BAMG does not receive any fees or remuneration from Flourish for deposits made or assets held at Flourish by BAMG clients. Assets held in BAMG Flourish Cash accounts are not subject to BAMG oversight. Clients will engage with Flourish directly to open cash accounts and have the option of granting view-only access to BAMG Investment Advisor Representatives (“IARs”).

A Flourish Cash account is a brokerage account offered by Flourish Financial LLC. The cash balance in a Flourish Cash account is swept from the brokerage account to deposit account(s) at one or more third-party banks that have agreed to accept deposits from customers of Flourish Financial LLC (“Program Banks”). Because assets are maintained through Program Banks, assets invested through Flourish are protected by FDIC insurance up to \$2,000,000 for an individual account and up to \$8,000,000 for a two-person household. FDIC coverage limits are outside of BAMG’s control, are subject to change, and vary by the type of account opened so clients must review all Flourish offering materials directly for details regarding eligibility, coverage limits, and conditions. Clients will receive monthly consolidated statements that reflect cash balances held at each Program Bank and a consolidated tax form on an annual basis. The accounts at Program Banks pay a variable rate of interest.

Clients interested in BAMG Flourish Cash are encouraged to review all offering documents provided by Flourish Financial LLC and consult with BAMG IARs prior to making a deposit.

## **Presentation Services and Special Projects**

We have provided educational programs to organizations and associations for more than 25 years. BAMG offers keynote speaking on a variety of topics such as behavioral economics, asset location and allocation principles, avoiding the six most common investment mistakes, how to integrate active and passive management in a portfolio, tax strategies to help you keep more of what your investments earn, determining an appropriate lifestyle and the means of funding it, understanding global capital markets, and how to talk to your heirs about money.

We also provide two to eight hour programs on understanding personal finance. These programs typically include education, materials and action plans in the areas of financial goal setting, net worth analysis, investment types and uses, portfolio design and asset allocation, financial independence, income generation, savings and cash flow strategies, insurance needs analysis, estate planning concepts, and educational funding strategies. We provide all necessary equipment and materials and can tailor our comments to the needs of your organization or group.

As of December 31, 2020, we had approximately 202 clients with \$707,599,236 of assets under management; \$668,472,563 on a discretionary basis and \$39,126,673 on a non-discretionary basis.



## Item 5 – Fees and Compensation

### **Fee Schedules**

BAMG's fee schedule is based on the market value of the client's portfolio. The fee schedule is as follows:

#### **Mosaic Wealth Management©**

<u>Portfolio Value</u>	<u>Annual Fee*</u>
First \$ 3,000,000	1.00%
Next \$ 3,000,000	0.80%
Next \$ 4,000,000	0.60%
Over \$10,000,000	0.40%

\*Subject to a Minimum Quarterly Fee of \$5,000

#### **BrandConnect<sup>SM</sup>**

<u>Portfolio Value</u>	<u>Annual Fee</u>
Over \$250,000	0.85%

### **Payment of Fees**

The fee for investment management will be based on the ending value of the account on the last business day of the previous quarter and is payable quarterly in advance. The first advisory fee will be assessed on a pro-rata basis taking into account the time for which the account was not managed by BAMG and the time left in the quarter. Intra-quarter fee adjustments are made when deposits or withdrawals are significant. Fees, including the minimum quarterly fee, are negotiable. While this fee schedule is typical, negotiability of fees will be based on such factors as services you require, type of assets held in the account, prior relationships and related account holdings, and intention to have us manage additional assets in the future.

Fees are automatically deducted from the account pursuant to the advisory agreement. You will be provided with a quarterly statement from the account custodian reflecting deduction of the advisory fee. Non BrandConnect accounts can terminate our ability to automatically deduct our fees from your account by giving us at least 30 days written notice.

### **Termination of Contracts**

The advisory agreement may be terminated by either party at any time by written notice. Fees paid in advance will be prorated to the date of termination and any unearned portion of the fee will be refunded to the client.

We provide applicable disclosure brochure(s) or the Form ADV Part 2 (including Form CRS) to you and prospective clients before or at the time you enter into an advisory contract.

### **Mosaic Wealth Management©**

The Mosaic option is a turnkey wealth management service allowing advisory clients to pay one fee that can include BAMG's advisory services, most routine estate planning, and accounting services under an arrangement established by BAMG with a certified public accounting firm and a law firm.

### **BrandConnect<sup>SM</sup>**

As described in *Item 4 Advisory Business*, clients do not pay fees to SPT in connection with the Program, but we charge clients a fee for our services as described above. Our fees are not set or supervised by Schwab. Clients do not pay brokerage commissions or any other fees to CS&Co as part of the Program. Schwab does not receive other revenues in connection with the Program. Brokerage arrangements are further described in *Item 12 Brokerage Practices*.

### **Presentation Services and Special Projects**

Presentation services and project assistance fees are negotiable and charged as a flat fee on a case-by-case basis, depending on the nature and complexities of the service provided. Prior to the commencement of services, you and BAMG will enter into a written agreement that sets forth the terms and conditions of the engagement, describes the scope of the services to be provided, and the portion of the fee that is due from you prior to our commencing and upon finalizing services.

Additionally, at times clients require special assistance with projects on an "ad hoc" basis for which BAMG charges a fixed fee. Project assistance fees are negotiable, depending on the nature and complexities of the service provided, and are agreed upon in advance with you.

### **Additional Information Concerning Fees**

Below are general characteristics regarding “other” fees incurred, payment of fees, and termination of contracts that will affect your account(s).

- All clients retain BAMG by entering into a written agreement for services, which contains a more complete discussion and disclosure regarding the Account’s services and fee structure.
- By mutual consent, these fee schedules will be modified to reflect special circumstances. For purpose of fee calculation, certain accounts are aggregated.
- The advisory fee does not cover charges imposed by third parties for investments held in the Account, such as contingent deferred sales charges or 12b-1 trails on mutual funds. In addition, investment advisers to mutual funds charge asset management fees, which are in addition to the advisory fees charged by us. The fees charged by such funds are disclosed in each fund’s prospectus or current offering materials.
- BAMG’s advisory fee does not cover debit balances or related margin interest, commissions, or SEC fees or other fees or taxes required by law.
- You could invest in a mutual fund directly, without our services. In that case, you would not receive the services provided by us which are designed, among other things, to assist in determining which mutual fund or funds are most appropriate for your financial condition, goals, and objectives. Accordingly, you should review both the fees charged by the funds and the fees charged by us to fully understand the total amount of fees to be paid and to thereby evaluate the advisory services being provided.
- Advisory recommendations are based on your financial situation at the time the services are provided and are based on financial information disclosed by you. We incorporate information about trends and performance of securities, the market and the economy into our recommendations, which are designed toward meeting your specific goals, objectives, and needs. Past performance is in no way an indication of future performance. As your financial situation, goals, objectives, or needs change, you must notify us promptly.

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

We do not charge advisory fees on a share of the capital gains or capital appreciation of the funds or securities in a client account (so-called performance based fees). Our compensation structure is disclosed in detail in *Item 5 Fees & Compensation* above.

## Item 7 – Types of Clients

### **Mosaic Wealth Management© and Institutional Advisory Clients**

We provide investment advisory services to individuals including high net worth individuals, trusts and estates, pension and profit sharing plans, charitable organizations, and corporations. New clients accepted for management will generally have assets under management in excess of \$2 million. We can waive this minimum account size at our discretion. Such factors involved in our determination to waive the minimum account size include, but are not limited to, services you require, type of assets held in the account, prior relationships and related account holdings, and intention to have us manage additional assets in the future. BAMG also has the discretion to waive the requirement that this minimum account size be maintained.

### **BrandConnect<sup>SM</sup> Clients**

Clients eligible to enroll in the Program include individuals, IRAs and revocable living trusts. Clients that are organizations (such as corporations and partnerships) or government entities, and clients that are subject to the Employee Retirement Income Security Act of 1974, are not eligible for the Program. The minimum investment required to open an account in the Program is \$250,000. We can waive this minimum account size at our discretion. Such factors involved in our determination to waive the minimum account size include, but are not limited to, services you require, type of assets held in the account, prior relationships and related account holdings, and intention to have us manage additional assets in the future. The minimum required account balance for maintenance of an account and automatic rebalancing is \$5,000. The minimum required account balance to enroll in the tax-loss harvesting feature is \$50,000.

## Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

As described in *Item 4 Advisory Business* above, our investment strategies at times include long term buy and hold strategies and rarely if ever short-term trading strategies and incorporate margin transactions.

We use strategic allocation principles to evaluate your overall allocation and we compare this to target allocations designed to better achieve your investment objectives. We will assist you in repositioning investments from existing portfolio positions. Evaluation of individual issues, mutual funds, portfolio managers, etc., will be drawn from internal team members and a variety of third party sources believed to be, but not guaranteed, reliable.

Pre-existing investment vehicles may be utilized in the building and maintaining of client portfolios. For example, investments owned by clients prior to, or since, retaining our services, if deemed suitable, will be retained in the portfolios. Similarly, assets that for reasons of income tax liabilities, surrender penalties, etc., which are deemed appropriate, will be retained.

As noted above, our Advisors at times incorporate margin transactions for client's accounts. The use of margin will result in interest charges as well as all other fees and expenses associated with the security or account involved.

There are inherent risks involved for each investment strategy or method of analysis we use and the particular type of security we recommend. Investing in securities involves risk of loss which you should be prepared to bear.

- **Market Risk.** Prices of securities in which an account invests tend to be volatile in response to certain events taking place around the world, including: those directly involving the companies whose securities are owned by an account; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Clients should have a long-term perspective and be able to tolerate potentially sharp declines in market value.
- **Equity Risk.** Equity securities tend to be more volatile than other asset classes. The value of an individual stock, mutual fund, or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies tend to experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies.
- **Fixed Income Risk.** The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a

security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security tends to decline because investors demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.

- *Junk Bond Risk.* A client's portfolio may be invested in mutual funds and ETFs that are subject to greater levels of interest rate and credit risk as a result of such funds' investments in high-yield securities and unrated securities of similar credit quality (commonly known as "junk bonds") than funds that do not invest in such securities. Junk bonds are considered predominately speculative with respect to the issuer's continuing ability to make principal and interest payments. An economic downturn or period of rising interest rates could adversely affect the market for these securities and reduce the client's ability to sell these securities (liquidity risk). If the issuer of a security is in default with respect to interest or principal payments, the client's portfolio may lose its entire investment.
- *Mutual Fund and ETF Risk.* Open-end and closed-end mutual funds and ETFs invest in a broad range of equity and fixed income securities, including foreign securities and securities of issuers located in emerging markets. Underlying funds also invest in equity securities of any market capitalization including micro-, small- and mid-cap companies, real estate, commodities-related assets, fixed income securities of any maturity or credit quality, including high-yield, high-risk debt securities, and they engage in leveraged or derivative transactions. We have no control over the investment strategies, policies or decisions of the underlying funds and, in the event of dissatisfaction with such a fund, our only option would be to liquidate clients' investments in that fund. Mutual funds and ETFs charge their own management fees and expenses, which can be duplicative.
- *Foreign Securities Risk.* Mutual funds or ETFs in which clients invest can invest in foreign securities. Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks include, among others, currency risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government supervision, less publicly available information, limited trading markets and greater volatility. To the extent that underlying funds invest in issuers located in emerging markets, the risk tend to be heightened by political changes, changes in taxation, or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.
- *U.S. Government Securities.* BAMG may recommend securities issued by the U.S. Government and by U.S. Government agencies and instrumentalities. Only U.S. Government securities are supported by the full faith and credit of the United States.

## **Item 9 – Disciplinary Information**

We do not have any legal, financial or other “disciplinary” item to report. We are obligated to disclose any disciplinary event that would be material to you when evaluating us to initiate a Client / Adviser relationship, or to continue a Client / Adviser relationship with us.



## Item 10 – Other Financial Industry Activities and Affiliations

Neither BAMG nor its employees are registered, or have an application pending to register as a broker-dealer, futures commission merchant, commodity pool operator, commodity trading advisor or an associated person (or registered representative) of the foregoing entities.

In addition, neither BAMG nor its employees have any arrangement that is material to its advisory business or to our clients with an affiliated person that is a:

- Broker-dealer,
- Investment Company or other pooled investment vehicle,
- Other investment adviser or financial planner,
- Futures commission merchant (or commodity pool operator or commodity trading advisor),
- Banking or thrift institution,
- Accountant or accounting firm,
- Lawyer or law firm,
- Pension consultant, or
- Real estate broker or dealer.
- Insurance company or agency
- Sponsor or syndicator of limited partnerships

## Item 11 – Code of Ethics

BAMG has adopted a Code of Ethics which is based on the principle that BAMG and its employees owe a fiduciary duty to clients. In complying with this duty, advisory personnel must avoid activities or interests that might interfere with making decisions in the best interest of clients.

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 BAMG's access persons. The Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. It also contains oversight, enforcement and recordkeeping provisions.

In addition, each person subject to the Code of Ethics is required to report all violations of which such person becomes aware to BAMG's President and/or Chief Compliance Officer. BAMG will provide a copy of its Code of Ethics, free of charge, upon the written or oral request of any client or prospective client. You may request a copy by email sent to [ssmith@brandamg.com](mailto:ssmith@brandamg.com) or by calling 636-532-7333.

Our Advisors will buy or sell for their own accounts, securities that are also held by their clients. Conversely, they will buy and sell securities for client accounts which they themselves own. Such transactions are permitted if in compliance with our Policy on Personal Securities Transactions. Reports of personal transactions in securities by our Advisors are reviewed by the firm's Compliance Department quarterly or more frequently if required.

BAMG will not simultaneously engage in purchasing or selling securities or investment products, with the exception of mutual funds or index securities, for its own account or its principals if such securities are being traded for clients. The principals are required to disclose any securities transaction on a regular basis to BAMG and such reports are reviewed regularly. In order to ensure that each of our officers and employees strictly adheres to the highest standards of conduct and integrity in conducting business on behalf of our clients, we have each officer and employee sign our Code of Ethics and Personal Trading Policy.

## **Privacy Policy**

### ***Our Promise to You***

As a client of BAMG, you share both personal and financial information with us. Your privacy is important to us, and we are dedicated to safeguarding your personal and financial information.

### ***Information Provided by Clients***

In the normal course of doing business, we typically obtain the following non-public personal information about our clients:

- Personal information regarding our clients' identity such as name, address and social security number.
- Information regarding securities transactions effected by us; and
- Client financial information such as net-worth, assets, income, bank account information and account balances.

### ***How We Manage and Protect Your Personal Information***

We do not sell information about current or former clients to third parties, nor is it our practice to disclose such information to third parties unless requested to do so by a client or client representative or, if necessary, in order to process a transaction, service an account or as permitted by law. Additionally, we may share clients' nonpublic personal information with certain service providers (e.g. accountants, lawyers and insurance agents) to service clients' accounts. However, our contractual arrangements with these service providers require them to treat your information as confidential.

In order to protect your personal information, we maintain physical, electronic and procedural safeguards to protect your personal information. Our Privacy Policy restricts the use of client information and requires that it be held in strict confidence.

We ensure that the privacy of your nonpublic personal information is maintained at all times, including during the disposal of information that we no longer are required to maintain. For example, whenever possible, we shred paper documents and records prior to disposal and erase and/or obliterate any data contained on electronic media in such a manner that the information can no longer be read or reconstructed.

### ***Client Notifications***

We are required by law to annually provide a notice describing our privacy policy. In addition, we will inform you promptly if there are changes to our policy.

Please do not hesitate to contact us with questions about this notice.

## Item 12 – Brokerage Practices

Although, we have no formal soft dollar arrangements or directed brokerage arrangements at this time, our approved custodians provide BAMG with certain brokerage and research products and services that qualify as “brokerage or research services” under Section 28(e) of the Securities Exchange Act of 1934.

BAMG’s fundamental policy is to seek for its clients what, in its judgment, will be the best overall execution of purchase or sale orders and favorable net prices in securities transactions consistent with its judgment as to the business qualifications of the various broker/dealer firms with which BAMG does business. Our decisions with respect to the market in which the transaction is to be completed, the form of transaction, and the allocation of orders among broker/dealers are made in accordance with this policy.

In selecting brokers/dealers to effect transactions, consideration is given to the proven integrity and financial responsibility of the various firms as well as to the demonstrated execution, experience and capability generally and in regard to particular markets or securities and to the competitiveness of the commission rates they charge.

With respect to any brokerage commissions charged by executing broker/dealers, BAMG will regularly review such charges within the foregoing criteria and such other comparative standards that it regards as pertinent for purposes of evaluating the reasonableness of such commissions.

As permitted by law, BAMG can cause its clients to pay broker/dealers an amount of commission for executing a portfolio transaction order on behalf of its clients which is in excess of commissions other broker/dealers would have charged for effecting such a transaction. In order to do so, BAMG must determine in good faith that the higher commission is reasonable in relationship to the value of the services provided by the executing broker/dealer viewed in terms of either a particular transaction or BAMG’s overall responsibilities to the clients.

Our clients have the option to choose between two qualified custodians:

- National Financial Services LLC and Fidelity Brokerage Services LLC (collectively, and together with all affiliates, “Fidelity”), a FINRA-registered broker-dealer, member SIPC
- Charles Schwab & Co., Inc. (“CS&Co”), a FINRA-registered broker-dealer, member SIPC

BAMG has an arrangement with Fidelity through which Fidelity provides BAMG with “institutional platform services.” The institutional platform services include, among others, brokerage, custody, and other related services. Fidelity’s institutional platform services that assist BAMG in managing and administering clients’ accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple clients’ accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of fees from its clients’ accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Fidelity also offers other services intended to help BAMG manage and further develop its advisory practice. Such services include, but are not limited to, third party research, publications, access to educational conferences, roundtables and webinars, practice management resources, access to consultants and other third party service providers who provide a wide array of business related services and technology with whom BAMG may contract directly.

BAMG is independently operated and owned and is not affiliated with Fidelity.

Fidelity generally does not charge its advisor clients separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Fidelity or that settle into Fidelity accounts (i.e., transactions fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Fidelity provides access to many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges.

BAMG has an arrangement with Schwab Advisor Services (formerly called Schwab Institutional) which is Schwab’s business serving independent advisory firms like us. Through Schwab Advisor Services, CS&Co provides us and our clients, both those enrolled in the BrandConnect<sup>SM</sup> Program and our clients not enrolled in the BrandConnect<sup>SM</sup> Program, with access to its institutional brokerage – trading, reporting and related services – many of which are not typically available to CS&Co retail customers. CS&Co also makes available various support services. Some of those services help us manage or administer our clients’ accounts while others help us manage and grow our business.

CS&Co also makes available to us other products and services that assist us in managing and administering our clients’ accounts. They include investment research, both Schwab’s own and that of third parties. We use this research to service all or some substantial number of our clients’ accounts, including accounts not maintained at CS&Co.

In addition to investment research, CS&Co also makes available software and other technology that: (i) provides access to client account data (such as duplicate trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide pricing and other market data; (iv) facilitate payment of our fees from our clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Schwab's institutional brokerage services include access to a broad range of investment products, execution of security transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

CS&Co also offers other services intended to help us manage and further develop our business enterprise. These services include: (i) educational conferences and events; (ii) technology, compliance, legal, and business consulting; (iii) publications and conferences on practice management and business succession; and (iv) access to employee benefit providers, human capital consultants and insurance providers. CS&Co provides some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. CS&Co may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. CS&Co also provides us with other benefits such as occasional business entertainment of our personnel.

With respect to the BrandConnect<sup>SM</sup> Program, as described under *Item 4 Advisory Business*, we do not pay SPT fees for its services in connection with the Program. As part of our fiduciary duty to our clients, our firm will endeavor at all times to put the interests of our clients first. Clients should be aware, however, that the receipt of economic benefits by our firm or our related persons creates a potential conflict of interest and may indirectly influence our firm's choice of CS&Co as a custodial recommendation. Our firm examined this potential conflict of interest when our firm chose to recommend CS&Co and have determined that the recommendation is in the best interest of our firm's clients and satisfies our fiduciary obligations, including our duty to seek best execution.

BAMG is independently operated and owned and is not affiliated with Schwab.

For our clients' accounts it maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. This commitment benefits you because the overall commission rate you pay are lower than they would be if we had not made the commitment. In addition to commissions, Schwab charges you a flat dollar

amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities are bought or the funds from the securities are sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account.

As Fidelity and Schwab do not offer every investment available, BAMG will, from time to time, establish relationships with other providers of financial products, or any other bank, trust company or other custodian as agreed upon between the client and BAMG.

It is BAMG’s policy to ensure clients are made whole following any trade error. BAMG will reimburse you when BAMG causes a trade error to occur in your account that results in a loss. If the trade error results in a gain, our policy is to follow custodian guidelines. Fidelity requires all trade corrections to be processed using BAMG’s trade correction account, which is netted at the end of each quarter. Any net gains are donated to charity. Schwab’s policy is to have gains remain in your account unless certain criteria is met (e.g. you sign proper documentation rejecting the gain, the error is a mutual fund trade and the mutual fund company’s policies do not readily allow retention of gains as part of correcting the error, the same error involved other client account(s) that should have received the gain, etc.). If the gain is not retained in your account, Schwab will retain the gain. For errors with a gain of \$100 or more, Schwab will donate it to the Charles Schwab Foundation, which is done on a monthly basis. For gains less than \$100, Schwab will keep the gain to offset its own administrative time and expense to process advisor trade errors.

## Item 13 – Review of Accounts

**Reviews:** Advisors perform regular, periodic reviews which include monitoring the performance of investments in the account, a comparison of the client's portfolio to the diversification and asset allocation of the account as compared with the client's investment objectives, and an evaluation of the investment strategy in light of any change in the client's circumstances.

You are provided with monthly or quarterly account statements from the custodian, depending on the activity in the account. Our reports include details of your holdings, asset allocation, and other transaction information. Comparisons to market indices and account performance will be used to evaluate account performance.

BAMG will provide to you written reports it prepares regarding your portfolio. You are encouraged to review these reports and compare them against reports received from the independent custodian that services your advisory account. You should immediately inform us of any discrepancy noted between the custodian records and the reports you receive from us.

BrandConnect<sup>SM</sup> clients will receive electronically an account statement (at least quarterly) detailing positions and activity in their accounts.



## Item 14 – Client Referrals and Other Compensation

### **Client Referrals:**

When providing investment advisory services to our clients, BAMG emphasizes a team approach. We connect clients with legal, accounting and risk management services as part of our “Mosaic Wealth Management©” services, when requested by clients or if we believe that such services are in the best interest of the client. BAMG typically recommends specific attorneys, accountants, insurance agents or asset management firms to clients, and these service providers, in turn, may recommend BAMG to their clients for investment advisory services. As a result, BAMG will have a conflict of interest in making these recommendations because it could receive referrals from professionals recommended to advisory clients. BAMG attempts to refer other professionals to clients only when we believe that the services provided by the professional would best suit our client’s needs.

We have entered a solicitor relationship with an investment advisor in which BAMG receives compensation for referring clients to that advisor. Such referral fee shall be paid for referring existing clients for the first three calendar quarters at 75%; for the next three calendar quarters at 60%; the next four calendar quarters at 50% of advisory fees paid. Such referral fee shall be paid for new relationships for twenty-four (24) months at 25%. If you are introduced to the investment advisor by BAMG, we, at the time of the solicitation shall disclose the nature of the solicitor relationship, and shall provide each prospective client with a copy of the investment adviser’s written disclosure brochure, together with a copy of the written disclosure brochure from us, as solicitor, disclosing the terms of the solicitation arrangement, including the compensation we receive.

BAMG typically refers its advisory clients to qualified custodians and broker-dealers, including Charles Schwab and Fidelity, for custody and brokerage services. BAMG has a conflict of interest in making these referrals because BAMG receives economic benefits, regulatory compliance assistance and other benefits from these broker-dealers, which benefits generally are available to all financial advisers that utilize the broker-dealer’s professional adviser platform. For a description of these products and services, how they benefit BAMG, and related conflicts of interest, see *Item 12 Brokerage Practices*. Fidelity and Schwab’s products and services offered to BAMG are not based on BAMG’s agreement to recommend any particular type of investment, although the benefits provided to BAMG could increase as clients’ assets under management custodied by these broker-dealers increase.

## Item 15 – Custody

BAMG is deemed to have custody of certain client funds and securities within the meaning of Rule 206(4)-2 of the Advisors Act where the clients grant us the authority to deduct our advisory fees directly from their account, and/or to the extent that our clients have signed standing letters of authorization with their custodians that allow us to transfer funds at the client's request, and where the clients grant access. For instance, access will occur with clients who seek advice in their employer-based retirement accounts, e.g. 401(k). Each client receives account statements, at least quarterly, directly from the client's custodian that identify the amount of funds and each security in the account at the end of the quarter, and setting forth all transactions in the account during that quarter, including the amount of advisory fees paid directly to us. We urge our clients to carefully compare the information provided in these statements with any reports received from us to ensure that all account transactions, holdings and advisory fees deducted are correct and current. You should immediately inform us of any discrepancy noted between the custodian records and the reports you receive from us.

SEC registered investment advisors that are deemed to have custody must obtain an annual surprise examination of client assets by an independent registered public accountant. BAMG has engaged Brown Smith Wallace, LLC to complete this exam. At the completion of the examination, Brown Smith Wallace, LLC will file a report with the SEC attesting to BAMG's compliance with the regulatory requirements of custody.

All client assets are held with custodians who are "qualified custodians" under the applicable SEC rules. BAMG utilizes the custodial and trading services of Fidelity Brokerage Services and Charles Schwab & Co., Inc. with whom we have contractual relationships. While Fidelity and Schwab do not offer every investment available, BAMG will, from time to time, establish relationships with other providers of financial products, or any other bank, trust company or other custodian as agreed upon between the client and BAMG.

## Item 16 – Investment Discretion

As described in the details in *Item 4 Advisory Business*, you give BAMG discretionary authority to actively manage your assets and assist you in implementing your investment strategy. This authority is disclosed in the advisory agreement entered into between you and BAMG. This authority grants us the discretion to determine the types of securities to be bought or sold, the total amount of securities to be bought or sold, and the brokers or dealers through whom securities are to be bought or sold. You will have the right to place reasonable restrictions on such authority. Any restrictions must be submitted in writing to us.

We do not actively recommend or acquire new individual securities, but will monitor and often assist clients with sell strategies for legacy positions held in a Clients account. Clients may have stock accounts not under our management. Atypically some clients will retain discretion over the repositioning of assets in their accounts.

## Item 17 – Voting Client Securities (i.e., Proxy Voting)

Clients enrolled in the BrandConnect<sup>SM</sup> Program designate SPT to vote proxies for the ETFs held in their accounts. We have directed SPT to process proxy votes and corporate actions through and in accordance with the policies and recommendations of a third party proxy voting service provider retained by SPT for this purpose. Clients who do not wish to designate SPT to vote proxies can retain the ability to vote proxies themselves by signing a special CS&Co form available from us.

We do not generally accept authority from clients to vote proxies relating to securities held in their accounts. You maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by you shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to your investment assets. We and/or you shall correspondingly instruct each custodian of the assets to forward copies of all proxies and shareholder communications relating to your investment assets to you. In limited cases for certain institutional clients, however, BAMG will accept authority to vote proxies on behalf of such a client as stated in the advisory agreement between BAMG and such client.

As a result, BAMG has adopted proxy voting policies and procedures reasonably designed to ensure that proxies are voted in such institutional clients' best interests. As a brief summary, our policy requires BAMG to review each proxy proposal on a company-by-company basis and to analyze the economic impact each proposal has on shareholder value. Our policy also outlines the guidelines and factors that BAMG considers when deciding how to vote proxies relating to, among other things, director elections, corporate governance, director and executive compensation, capital structure and social and environmental proposals. Our policy provides methods of resolving potential conflicts of interests, such as requiring a second review by BAMG's proxy committee, as well as either (i) disclosing the conflict to the client and obtaining the client's consent or (ii) voting according to the recommendation of an independent third party.

We will provide a copy of our proxy voting policy, as well as a written summary of all votes cast in your account, without charge upon request to Sara Smith, our Chief Compliance Officer, by email to [ssmith@brandamg.com](mailto:ssmith@brandamg.com) or mail to our office located at 16090 Swingley Ridge Road, Suite 400, Chesterfield, MO 63017.

## **Item 18 – Financial Information**

We have no financial condition that is reasonably likely to impair our ability to meet contractual commitments to you given that we do not have custody of client funds or securities, or require or solicit prepayment of fees more than \$500 per client and six months or more in advance. In addition, we are not currently subject of a bankruptcy petition.

Due to the unforeseen circumstances as a result of Covid-19, we have applied for and received a PPP loan in order to ensure our ability to retain our highly skilled employees.

## **Part 2B of Form ADV: *Brochure Supplement***

**James C. Blake, AIF**  
**Ryan T. Bouchard, CFA, AIF**  
**Todd H. Brand, AIF**  
**Phillip A. Daniels, CFP, AIF**  
**Tim C. Egart, CFP, AIF**  
**Damaris Wyand Gingerich**  
**Ryan C. Green, CFP, AIF**  
**Kevin T. York, AIF, FPQP**

### **Brand Asset Management Group, Inc.**

16090 Swingley Ridge Road, Suite 400  
Chesterfield, MO 63017

636-532-7333

[www.brandamg.com](http://www.brandamg.com)

April 2021

This brochure supplement provides information about our advisors that supplements the Brand Asset Management Group, Inc.'s brochure. You should have received a copy of that brochure. Please contact Todd Brand if you did not receive Brand Asset Management Group, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about any of these individuals is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 - Educational Background and Business Experience**

**Full Legal Name:** James C. Blake, AIF

**Year of Birth:** 1978

### **Education:**

- Santa Clara University – 2000 – Bachelors in Philosophy

### **Business Background:**

- Brand Asset Management Group, 10/2019 to present, Investment Advisor Representative
- Thrivent Financial – 09/2017 to 09/2019, Financial Associate
- Elite Orthopedics – 09/2012 to 09/2017, Sales Manager
- Midwest Medical Group – 02/2011 – 09/2012, Sales Representative
- Select Orthopedics. – 10/2004 – 02/2011, Financial Advisor

## **Item 3 - Disciplinary Information**

There are no disciplinary actions to report on this individual.

## **Item 4 - Other Business Activities**

James Blake has no other business activities

## **Item 5 - Additional Compensation**

James Blake receives no additional compensation

## **Item 6 – Supervision**

All investment decisions are formulated utilizing a team approach under the supervision of Todd H. Brand, President, and Sara E. Smith, Chief Compliance Officer, (636) 532-7333.

## **Item 2 - Educational Background and Business Experience**

**Full Legal Name:** Ryan T. Bouchard, CFA, AIF

**Year of Birth:** 1978

### **Education:**

Mr. Bouchard received his BS in Business Administration with a major in Finance from the University of Missouri – Columbia, and his MBA with a concentration in Finance from Saint Louis University.

### **Business Background:**

Ryan joined Brand Asset Management Group in 2013 as an Investment Analyst and has worked in the financial services industry since 2000. His current responsibilities include heading up the firm's Investment Committee, overseeing the portfolio management function, assisting in on-going client consultation, and working to provide research support for multi-media presentations. Previously he performed research at a wealth advisory firm and later became an Associate Analyst covering technology and transportation stocks for many years. Most recently, Ryan was a Senior Research Analyst publishing research on transportation stocks and macroeconomic trends.

## **Item 3 - Disciplinary Information**

There are no disciplinary actions to report on this individual.

## **Item 4 - Other Business Activities**

Ryan Bouchard has no other business activities

## **Item 5 - Additional Compensation**

Ryan Bouchard receives no additional compensation

## **Item 6 – Supervision**

All investment decisions are formulated utilizing a team approach under the supervision of Todd H. Brand, President, and Sara E. Smith, Chief Compliance Officer, (636) 532-7333.



## **Item 2 - Educational Background and Business Experience**

**Full Legal Name:** Todd H. Brand, AIF

**Year of Birth:** 1967

### **Education:**

Mr. Brand received his Bachelor of Science degree in Business Administration with an emphasis in Financial Services and Planning from Baylor University in Waco, TX in 1990. Additionally, he received his Master of Business Administration from Baylor's Hankamer School of Business in Waco, TX in 1991.

### **Business Background:**

Todd serves as our President and Chief Executive Officer and is a principal consultant of Brand Asset Management Group, Inc. since 1992. Additionally, he provides financial education programs to student, professional and investor groups. Mr. Brand has experience in the investment, wealth and retirement planning business with Brand Asset Management Group since 1992.

## **Item 3 - Disciplinary Information**

There are no disciplinary actions to report on this individual.

## **Item 4 - Other Business Activities**

Todd Brand has other business activities.

## **Item 5 - Additional Compensation**

Todd Brand receives no additional compensation

## **Item 6 – Supervision**

All investment decisions are formulated utilizing a team approach under the supervision of Todd H. Brand, President, and Sara E. Smith, Chief Compliance Officer, (636) 532-7333.

## **Item 2 - Educational Background and Business Experience**

**Full Legal Name:** Phillip A. Daniels, CFP, AIF

**Year of Birth:** 1969

### **Education:**

Mr. Daniels earned a Bachelor of Science degree in Finance from Millikin University in Decatur, IL in 1991 and received his Masters of Business Administration with a concentration in Finance from the Olin School of Business at Washington University in St. Louis in 2003.

### **Business Background:**

Phil joined Brand Asset Management Group in 2004 and has experience in the investment industry since 1993. He serves as our Executive Vice President. Previously, he served as an Associate Vice President at A.G. Edwards & Sons, Inc. from 1994 to 2004 where he spent ten years as a NASDAQ market maker. In that capacity he secured quality executions for both retail and institutional order flow while managing firm capital and provided trading services to corporate accounts. Prior to joining A.G. Edwards he was an associate analyst with Raymond James Financial, Inc. from 1993 to 1994. In that position, Phil wrote research reports and developed financial models for U.S. companies, primarily in the environmental sector.

## **Item 3 - Disciplinary Information**

There are no disciplinary actions to report on this individual.

## **Item 4 - Other Business Activities**

Phillip Daniels has no other business activities

## **Item 5 - Additional Compensation**

Phillip Daniels receives no additional compensation

## **Item 6 – Supervision**

All investment decisions are formulated utilizing a team approach under the supervision of Todd H. Brand, President, and Sara E. Smith, Chief Compliance Officer, (636) 532-7333.

## **Item 2 - Educational Background and Business Experience**

**Full Legal Name:** Tim C. Egart, CFP, AIF

**Year of Birth:** 1985

### **Education:**

Mr. Egart earned his Bachelor of Science degree in Finance from Arkansas State University in 2008 and his Masters from Saint Louis University's John Cook School of Business in 2017.

### **Business Background:**

Tim joined Brand Asset Management Group, Inc. in May of 2015. He currently serves as an Advisor. Tim's responsibilities include assisting with client review preparation and participation. Prior to joining the team, Tim served as a senior manager at DTZ (formerly Cassidy Turley).

## **Item 3 - Disciplinary Information**

There are no disciplinary actions to report on this individual.

## **Item 4 - Other Business Activities**

Tim Egart has no other business activities

## **Item 5 - Additional Compensation**

Tim Egart receives no additional compensation

## **Item 6 – Supervision**

All investment decisions are formulated utilizing a team approach under the supervision of Todd H. Brand, President, and Sara E. Smith, Chief Compliance Officer, (636) 532-7333.

## **Item 2 - Educational Background and Business Experience**

**Full Legal Name:** Damaris Wyand Gingerich

**Year of Birth:** 1996

### **Education:**

Mrs. Gingerich earned her Bachelor of Science degree in Business Administration from Missouri Baptist University in 2018. Prior to attending Missouri Baptist University, she graduated from Next Generation Academy in 2016.

### **Business Background:**

Damaris joined Brand Asset Management Group, Inc. in December 2017 as an Intern, but joined the firm full-time in June 2018 as an Operations Analyst. She currently serves as a Financial Planning Associate. Damaris' responsibilities include trading, creating financial planning models for clients, and preparing reports for client meetings.

Mosaic Family Wealth, Intern, January 2018-April 2018

Missouri Baptist University, Campus Worker, August 2016-Janury 2018

The Hauser Group, Intern, June 2017-August 2017

Self Employed, Piano Teacher, September2014 - Present

## **Item 3 - Disciplinary Information**

There are no disciplinary actions to report on this individual.

## **Item 4 - Other Business Activities**

Damaris Gingerich has no other business activities

## **Item 5 - Additional Compensation**

Damaris Gingerich receives no additional compensation

## **Item 6 – Supervision**

All investment decisions are formulated utilizing a team approach under the supervision of Todd H. Brand, President, and Sara E. Smith, Chief Compliance Officer, (636) 532-7333.

## **Item 2 - Educational Background and Business Experience**

**Full Legal Name:** Ryan C. Green, CFP, AIF

**Year of Birth:** 1979

### **Education:**

Mr. Green earned his Bachelor of Human Environmental Sciences degree in Personal Finance from the University of Missouri–Columbia in 2003. Additionally, in 2005 he completed his Masters in Business Administration in Finance from the Crosby Graduate program also at the University of Missouri–Columbia.

### **Business Background:**

Ryan joined Brand Asset Management Group, Inc. in November of 2007. He currently serves as an Advisor. Ryan's responsibilities include trading, assisting with client charitable giving, performance reporting, and tax reporting.

Magnamite, LLC – 2005 to 2007 - Sales & Marketing, a family business

## **Item 3 - Disciplinary Information**

There are no disciplinary actions to report on this individual.

## **Item 4 - Other Business Activities**

Ryan Green has no other business activities

## **Item 5 - Additional Compensation**

Ryan Green receives no additional compensation

## **Item 6 – Supervision**

All investment decisions are formulated utilizing a team approach under the supervision of Todd H. Brand, President, and Sara E. Smith, Chief Compliance Officer, (636) 532-7333.

## **Item 2 - Educational Background and Business Experience**

**Full Legal Name:** Kevin T. York, AIF, FPQP

**Year of Birth:** 1989

### **Education:**

Mr. York earned his MBA in Management from Lindenwood University in 2013 after earning a Bachelor of Arts in Business Administration in 2012.

### **Business Background:**

Kevin joined Brand Asset Management Group, Inc. in February 2015 as an Associate assisting the team of advisors and now serves as a Financial Planning Associate. Kevin's responsibilities include trading, creating and maintaining financial planning models for clients, and preparing reports for client meetings.

## **Item 3 - Disciplinary Information**

There are no disciplinary actions to report on this individual.

## **Item 4 - Other Business Activities**

Kevin York has no other business activities

## **Item 5 - Additional Compensation**

Kevin York receives no additional compensation

## **Item 6 – Supervision**

All investment decisions are formulated utilizing a team approach under the supervision of Todd H. Brand, President, and Sara E. Smith, Chief Compliance Officer, (636) 532-7333.

# Certification Information

## **Chartered Financial Analyst Charter**

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute—the largest global association of investment professionals.

There are currently more than 178,000 CFA charter holders worldwide in 162 markets. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

### **High Ethical Standards**

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charter holders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

### **Global Recognition**

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charter holders—often making the charter a prerequisite for employment.

### **Comprehensive and Current Knowledge**

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit [www.cfainstitute.org](http://www.cfainstitute.org).

### **Accredited Investment Fiduciary®**

Since October 2002, the Accredited Investment Fiduciary® (AIF®) designation has been the mark of commitment to a standard of investment fiduciary excellence. Those who earn the AIF mark successfully completed a specialized program on investment fiduciary standards of care and subsequently passed a comprehensive examination. AIF designees demonstrate a thorough understanding of fi360's Prudent Practices for investment advisors and stewards.

This professional designation awarded by fi360 demonstrates the focus on all the components of a comprehensive investment process, related fiduciary standards of care, and commitment to excellence. AIF designees undergo an initial training program, annual continuing education, and pledge to abide by the designation's code of ethics.

### **Certified Financial Planner® Certification**

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education, (2) stringent code of conduct and standards of practice and (3) ethical requirements that govern professional engagements with clients.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary.
- Examination – Pass the comprehensive CFP® Certification Examination, a 10-hour exam.
- Experience – Complete at least two years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year).
- Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years.
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.