



## Form ADV Part 2A

November 2021

This Brochure provides information about the qualifications and business practices of BGM Wealth Partners, LLC. If you have any questions about the contents of this Brochure, please contact Jon Meyer at 952-844-2513. 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.

## Material Changes

Since the date of BGM Wealth Partners, LLC's last annual Brochure dated, December 2020, we have made a material change to our disclosures related to our role when we provide investment advice to clients regarding a retirement plan account or individual retirement account. This explanation is provided under the section titled "Advisory Business" and reads as follows:

When we provide investment advice to clients regarding a retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with client interests, so we operate under a special rule that requires us to act in our clients' best interest and not put our interest ahead of our clients' interests.

Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees and investments;
- Follow policies and procedures designed to ensure that we give advice in our clients' best interest;
- Charge no more than is reasonable for our services; and
- Give clients basic information about conflicts of interest.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to SEC Rules, we will ensure that you receive a summary of any material changes within 120 days of the close of our business' fiscal year. We will also provide other ongoing disclosure information about material changes or new information as necessary. We will always provide you with a current brochure at any time without charge which may be requested by contacting Jon Meyer at 952-844-2513 or email at [jmeyer@bgmwealth.com](mailto:jmeyer@bgmwealth.com).

Additional information about BGM Wealth Partners, LLC, is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). BGM Wealth Partners, LLC is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

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# Advisory Business

## Our Mission

BGM Wealth Partners, LLC (BGM Wealth Partners) is a fee-only, independent wealth management firm. BGM Wealth Partners' goal is to handle the financial details of clients' lives, providing comprehensive advice and implementing investment, tax and wealth management strategies, so clients can spend more time with their family and pursuing their passions.

## Our History and Ownership

BGM Wealth Partners was originally established in 1996. There are five experienced employees, many of whom have pursued and maintain professional designations in addition to their industry experience. Staff biographies for our investment staff members are available in BGM Wealth Partners' Form ADV 2B that accompanies this brochure.

BGM Wealth Partners is owned by BGM Holdings, LLC. Jon Meyer is on the Executive Committee of BGM Holdings, LLC as a management stakeholder and minority owner.

## Our Services

BGM Wealth Partners provides a broad range of comprehensive investment advisory services including:

- Financial Planning and Consulting, as well as Wealth Coaching
- Investment Management
- Selection of Independent Managers

BGM Wealth Partners consults with you to obtain detailed financial information and other pertinent data to determine appropriate investment guidelines, confirm and understand unique risk tolerance, and identify other personalized factors that will assist us in ascertaining the investment style of your asset management account. This may include tax-related planning and other non-investment matters. We construct a diversified selection of portfolio investments and manage your portfolio to meet your investment goals, adapting strategies as needed with changes.

The portfolios we manage for you may include accounts at a custodian where we have trading ability as well as accounts held at other financial institutions and in employer-sponsored plans. You may hold common stocks and bonds in your accounts as part of the complete portfolio. While we do specialize in the development of bond ladders, we do not specialize in research, selection and monitoring of individual stocks. Portfolios may also include accounts where an Independent Manager is supervising and trading individual stocks and bonds.

Our goal is to handle the financial details of clients' lives, providing comprehensive advice and implementing investment, tax and wealth management strategies, so clients can spend more time with their family and pursuing their passions

Our customized approach will address any or all of the following concerns and needs:


- **Net worth calculation:** We review all assets and liabilities for potential opportunities or risks.
- **Tax and cash flow analysis:** We review past taxes and spending to find opportunities for future tax savings and spending needs. Future tax liability is always taken into account in developing the investment portfolio.
- **Retirement planning:** We analyze where you are today and where you want to be in the future. We then develop income strategies and investment portfolios to help achieve that vision.
- **Estate planning:** We assist in developing an ongoing estate plan that may include wills, trusts, powers of attorney, healthcare directives, asset protection and multi-generational family issues. We will work with your attorney in their drafting of the final documents.
- **Investment planning:** We review past investment decisions, develop an overall asset allocation to fit your goals, and monitor that plan on an ongoing basis.
- **Education planning:** We analyze the costs of the school you want your children or grandchildren to attend and develop a savings plan to achieve this goal.
- **Risk management:** We review a family's needs based on a death, disability, long-term care, liability or home/auto. When needed, we will bring in outside consultants in this analysis.
- **Business planning:** We recognize that most business owners intertwine their business and personal lives. We analyze the business for opportunities to build the wealth of the owner outside the business and to protect the business from unknown liabilities. We will work with your accountant and attorney in this process.

BGM Wealth Partners may also provide non-discretionary investment management services regarding: (1) variable life/annuity products that you own, (2) individual employer-sponsored retirement plans, and (3) investment accounts that may be held at custodians which do not allow us to place transactions for you. In so doing, we either direct or recommend the allocation of your assets among the various fund options that comprise the variable life annuity product or the retirement plan. Your assets will continue to be maintained at the specific insurance company that issued the variable life/annuity product which you own, or at the custodian designated by the trustee of your retirement plan.

When we provide investment advice to clients regarding a retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with client interests, so we operate under a special rule that requires us to act in our clients' best interest and not put our interest ahead of our clients' interests.

Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees and investments;
- Follow policies and procedures designed to ensure that we give advice in our clients' best interest;
- Charge no more than is reasonable for our services; and
- Give clients basic information about conflicts of interest.



BGM Wealth Partners offers a meeting at no cost so that you can determine if our services are right for you. In this meeting we discuss and understand goals and objectives and review a prospective client's current financial situation.

## Assets Under Management

As of September 30, 2021, the combined assets under management for the firm is \$479,859,000 in 672 discretionary accounts and \$3,848,000 in 28 non-discretionary accounts.

## Fees and Compensation

BGM Wealth Partners offers a meeting at no cost so that you can determine if our services are right for you. We use this meeting to discuss and understand goals and objectives, review a prospective client's current financial situation, and to jointly determine if an investment advisory relationship with BGM Wealth Partners would be a complementary fit. At the time a new investment advisory relationship is established with BGM Wealth Partners, a written agreement specifies the terms and conditions of the relationship. The agreement details the fees associated with advisory services and the specific assistance to be provided by BGM Wealth Partners. Fees may be subject to negotiation.

In most cases, we deduct the fees from your investment accounts. In rare situations, we provide a bill for the quarterly fee. In all situations, we send a quarterly invoice outlining the amount and how we calculated the fee. For the initial quarter of investment management services, the first quarter's fees will be calculated on a pro rata basis.

Contracts may be terminated by either party upon written notice. Fees are prorated to the amount of days in the quarter in which you received services.

## Financial Planning/Consulting and Wealth Coaching

For planning, consulting and coaching services, we typically determine a fixed fee based on the scope of work planned before you enter into a written agreement for the work. We usually collect half of the fee before the work begins, and the remainder is due when we complete the work to your satisfaction. The fixed fee for this aspect of our consulting services ranges from \$1,000 to \$5,000. If you engage BGM Wealth Partners to provide additional planning, consulting and/or coaching services after delivery of the comprehensive financial plan, we charge a fixed fee that ranges from \$1,500 to \$100,000 per year depending upon the level and scope of services provided.

## Investment Management and Selection of Independent Managers

Investment advisory fees will typically be a variable fee up to 1.00% of your investable assets, based on the size, nature and complexity of the account. Our fees are payable in advance on a quarterly basis and are based on the value (market value, or fair market value in absence of market value, plus any credit balance or minus any debit balance) of the assets at the end of the previous quarter. "Assets under management" includes assets held in an account whether or not the purchase of the assets was at the recommendation of BGM Wealth Partners advisory personnel.

## General Information

Clients with mutual funds in their portfolios are effectively paying BGM Wealth Partners and the mutual fund advisor for the management of the client's assets because mutual funds pay advisory fees to the mutual fund advisor and such fees are therefore indirectly charged to all holders of the mutual fund shares. Clients who place mutual fund shares under BGM Wealth Partners' management are therefore subject to both a direct management fee of BGM Wealth Partners, the indirect management fee of the mutual fund and all applicable trading costs.

Clients who elect to use Separately Managed Accounts (Independent Managers) in the management of their portfolio will be paying BGM Wealth Partners and the selected Independent Manager for the management of assets. Independent Managers have the discretion to trade individual securities on behalf of the client, with the client's best interest in mind. Clients who use an Independent Manager are subject to the direct management fee of BGM Wealth Partners, the Independent Manager's fee and all applicable trading costs.

You may make additions to and withdrawals from the account at any time, subject to our right to terminate an account. If you deposit assets into or withdraw from an account after the beginning of a quarter, the fee payable with respect to such assets may be adjusted or prorated based on the number of days remaining in the quarter. You may withdraw account assets, subject to the usual and customary securities settlement procedures. BGM Wealth Partners designs its portfolios as long-term investments, and withdrawals may impair the achievement of your investment objectives.

You may add to your accounts with cash or securities, although we reserve the right to liquidate any transferred securities, or decline to accept particular securities into a client's account. We will consult with you about the options and ramifications of transferring securities. You should be aware that when transferred securities are liquidated, they may be subject to transaction fees, fees assessed at the mutual fund level (i.e., contingent deferred sales charge) and/or tax ramifications.

A brokerage firm (called a Custodian) holds your assets and may charge fees for trading and custodial services, such as account, trading or service fees. Under the section titled Brokerage Practices, we describe the factors that we consider in selecting or recommending broker dealers for your transactions and determining the reasonableness of their compensation or commission schedules.

## Performance-Based Fees and Side-By-Side Management

BGM Wealth Partners does not charge any performance-based fees (fees based on a share of capital gains or on capital appreciation of the assets of a client) believing they may create an unintentional conflict of interest. Additionally, we do not charge side-by-side management fees.

## Types of Clients

BGM Wealth Partners provides services to individuals and families, trusts, estates, entrepreneurs, small business owners, and corporate executives. In addition, BGM Wealth Partners clients may also include banking institutions, corporations, pension and profit-sharing plans and domestic business entities.

## Methods of Analysis, Investment Strategies and Risk of Loss

BGM Wealth Partners specializes in constructing asset allocated portfolios of managed investments. These investments include Mutual Funds, Exchange Traded Funds (ETFs) and Separately Managed Accounts (Independent Managers). At BGM Wealth Partners, we focus on designing the allocation and selecting the managers that select individual securities for you. Your portfolio is designed with multiple asset classes, multiple styles of management, and multiple Investment Managers.

We use analysis from third parties, as well as our own analysis, in building your portfolio. Our underlying assumption is that trying to time the market with your money has a low chance of success. Your portfolio should have a strategic allocation that may change gradually. We rely on economists and economic strategists at large institutional investment firms for our economic outlook and asset allocation.

We analyze Investment Manager results by benchmarking long term results using Morningstar®, and relevant market indexes. We also rely on research and analysis performed by investment manager research firms that are independent, objective, and have no affiliation with the managers they evaluate and recommend.


Your portfolio may include common stocks and bonds at your request. While BGM Wealth Partners does specialize in the development of bond ladders and monitoring, we do not actively manage stock positions and will hold equity positions in your portfolio only to accommodate your interests. You may direct us to include these securities in the asset allocation in place of funds that we would choose.

The primary strategy that we use for client accounts is based on a set of asset allocated model portfolios. The portfolios are globally diversified in an effort to balance and manage a broad array of risks and opportunities. We will determine the appropriate amount of portfolio risk with you. Based on that risk level, we choose the model that matches your risk level, and make any modifications necessary in your situation. After we have invested your portfolio in the strategy, we continually monitor the drift from the target allocation, and rebalance back to the target allocation when appropriate. The frequency of trades will vary based on when you add or withdraw money from your portfolio, as well as the amount of market volatility. We monitor the drift in all portfolios and may trade in portfolios as often as monthly or infrequently as annually depending on the drift.

We review your target portfolio and the corresponding risk and return opportunities with you regularly. As your situation changes, we will adjust the target model as appropriate.

While we do not recommend private investments, BGM Wealth Partners may provide advice about private investments that you hold or are considering in your portfolio. We will discuss the strength of our knowledge regarding private investments at the time you choose to review these investments and encourage you to also consult with your tax advisor and attorney regarding the purchase of these types of investments.





We **review** your target portfolio and the corresponding risk and return opportunities with you regularly.

BGM Wealth Partners believes it is important for each client to understand investing in securities involves a risk of loss that each client should be prepared to bear. There is no assurance that an investment will provide positive performance over any period of time. Past performance, while important, is no guarantee of future results and different periods and market conditions may result in significantly different outcomes. Specific types of risk each client should understand, as they may be applicable to unique investment assets in a portfolio, include:

### **Market Risk**

The market values of securities owned may decline, at times sharply and unpredictably. Market values of equity securities are affected by a number of different factors, including the historical and prospective earnings of the issuer, the value of its assets, management decisions, and decreased demand of an issuer's products or services, increased production costs, general economic conditions, interest rates, currency exchange rates, investor perceptions and market liquidity.

### **Economic Risk**

Changes in economic conditions, for example, interest rates, inflation rates, political and diplomatic events and trends, tax laws and innumerable other factors, can substantially and adversely affect investments.

### **Asset Allocation Risk**

Asset allocation may have a more significant effect on account value when one of the heavily weighted asset classes is performing more poorly than the others. Diversification and strategic asset allocation do not assure profit or protect against loss in declining markets.

### **Concentrated Portfolio Risk**

To the extent a portfolio has a large portion in a single security or several securities it bears more risk because it is not diversified. Changes in the value of significantly over-weighted security positions may have a much more substantial directional effect, either negative or positive, on the portfolio's performance.



## Emerging Foreign Market Risk

Investment in the securities of foreign issuers may experience more rapid and extreme changes in value than funds with investments solely in securities of U.S. companies. The securities markets of many foreign countries are relatively small, with limited number of companies representing a small number of industries. Additionally, foreign securities issuers may not be subject to the same degree of regulation as U.S. issuers. Reporting, accounting, and auditing standards of foreign countries differ, in some cases significantly, from U.S. standards. Also, nationalization, expropriation or confiscatory taxation, currency blockage, political change or diplomatic developments could adversely affect investments in a foreign country.

As your situation changes, we will **adjust** the target model as appropriate.

## Fixed Income Risk

Including: interest rate risk, which is the chance that bond prices overall will decline because of rising interest rates; income risk, which is the chance that a strategy's income will decline because of falling interest rates; credit risk, which is the chance that a bond issuer will fail to pay interest and principal in a timely manner, or that negative perceptions of the issuer's ability to make such payments will cause the price of the bond to decline; and call risk, which is the chance that during periods of falling interest rates, issuers of callable bonds may call (repay) securities with higher coupons or interest rates before their maturity dates. The investment would then lose any price appreciation above the bond's call price and would be forced to reinvest the unanticipated proceeds at lower interest rates, resulting in a decline in the investment's income.

## Non-Traded Investment Risk

Non-traded investments, such as hedge funds, private equity and real estate create exposure to markets and investment strategies that cannot be accessed through traditional fixed income and equity markets and may result in a lack of liquidity if there is no secondary market. Non-traded investments are exposed to potential loss of all or a substantial portion of the investment due to leverage (borrowing that may involve using assets as collateral), short-selling or other more speculative investment practices. Returns may be volatile, there may be delays in tax reporting and there are typically restrictions on transferring interests.

## Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of BGM Wealth Partners or the integrity of BGM Wealth Partners' management. BGM Wealth Partners has no such disclosures.

## Other Financial Industry Activities and Affiliations

BGM Wealth Partners is not registered and does not have an application pending to become registered as a securities broker dealer, a futures merchant, commodity pool operator or a commodity trading adviser. None of our personnel are associated with a broker dealer, futures or commodity firm.


Clients may be solicited to invest in products in which a related person holds a financial interest. Currently, some BGM Wealth Partners personnel, hold a financial interest in Cornerstone Private Asset Trust Company, LLC. BGM Wealth Partners clients may also be clients of Cornerstone Private Asset Trust Company, LLC. Clients must understand that investments made through BGM Wealth Partners are not obligations of BGM Wealth Partners or the trust company and are not insured by any other government agency.

Cornerstone Private Asset Trust Company, LLC is a Trust Company and an affiliate of BGM Wealth Partners. Both the Trust Company and BGM Wealth Partners are operated as separate and distinct business entities and do not share personnel or services beyond common ownership. BGM Wealth Partners clients may be clients of Cornerstone Private Asset Trust Company and hire BGM Wealth Partners to manage assets held by Cornerstone Private Asset Trust Company.

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

We have a fiduciary duty to our clients; to act in the best interest of each client and always place the client's interests first and foremost. Acting as a fiduciary according to the Advisors Act and the Department of Labor Fiduciary Rule, we strive to serve at the highest fiduciary standard of care, including the avoidance, disclosure and management of actual or perceived conflicts of interest. BGM Wealth Partners takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as BGM Wealth Partners' policies and procedures. We also strive to handle clients' non-public information in such a way to protect information from falling into hands that have no business reason to know such information and provides clients with our Privacy Policy (included as the attached supplement).

BGM Wealth Partners maintains a Code of Ethics for its staff. The Code of Ethics contains provisions for standards of business conduct in order to comply with federal securities laws, personal securities reporting requirements, pre-



We have a fiduciary duty to our clients: to act in the best interest of each client and always place the client's interests first and foremost.

approval procedures for certain transactions, code violation reporting requirements, and safeguarding of material non-public information about client transactions. BGM Wealth Partners' Code of Ethics establishes expectations for business conduct and each employee must annually acknowledge the terms of the Code of Ethics.

Employees of BGM Wealth Partners may trade for their own accounts in securities which are recommended to and/or purchased for our clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of BGM Wealth Partners will not interfere with:

- Making decisions in the best interest of our advisory clients; and
- Implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of our clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, to reasonably prevent conflicts of interest between BGM Wealth Partners employees and our clients.


BGM Wealth Partners' clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Jon Meyer at 952-844-2513 or email at [jmeyer@bgmwealth.com](mailto:jmeyer@bgmwealth.com).

## Brokerage Practices

### The Custodians and Brokers We Use

Your assets must be maintained in an account at a qualified custodian; generally, a brokerage firm, mutual fund company or bank. While we do not have discretion to determine which custodian will be used or the commission rates paid, we have a relationship with Schwab Advisor Services, a division of Charles Schwab & Co. ("Schwab"). Schwab is a registered broker dealer and SIPC member. We are independently owned and operated and are not affiliated with Schwab.

Schwab maintains client brokerage accounts for our clients and buys and sells securities when we instruct them to do so, as your adviser. While we recommend Schwab as a qualified custodian, the ultimate decision is left with you. If you elect to establish an account to custody assets elsewhere, this may result in the loss of possible advantages derived from bunching of orders for several clients as a single transaction or more attractive share classes at lower minimums. Also, even though an account is maintained at Schwab, clients can still use other brokers to execute trades for their account.



Schwab maintains client brokerage accounts for our clients and buys and sells securities when we instruct them to do so, as your advisor.

## How We Select Brokers/Custodians

BGM Wealth Partners seeks to recommend a custodian/broker who will hold client assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. The factors that we consider in recommending Schwab to clients include respective financial strength, reputation, execution quality, pricing, research, and service. Schwab enables us to obtain many mutual funds without transaction charges and other securities at nominal transaction charges.

BGM Wealth Partners may recommend transactions in fixed income securities. BGM Wealth Partners may execute municipal bond transactions through broker dealers other than Schwab depending upon the type of bond and price comparisons. Best execution is tested periodically when similar or the same bonds appear in inventory at multiple dealers. Outside broker dealers may act as principal on those trades.

## Brokerage and Custody Costs

Schwab is compensated by charging commission, collecting shareholder service fees from Mutual Fund companies, or other fees associated with trade execution. Schwab does not charge separately for custody services. You may pay a commission that is higher than another qualified custodian might charge to effect the same transaction where we determine, in good faith, that the commission is reasonable in relation to the value of the brokerage and research services received. We determined that having Schwab execute most trades is consistent with our duty to seek best execution. Best execution means the most favorable terms for a transaction based on all relevant factors, taking into consideration the full range of a broker dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Therefore, while we will seek competitive rates, we may not necessarily obtain the lowest possible commission rates for every client transaction.

Clients that select Schwab to serve as custodian of their assets may benefit from the commission rates Schwab makes available to our clients. While BGM Wealth Partners will execute most trades through Schwab for client accounts held at Schwab, trades may be executed through a different broker dealer if we reasonably believe that an alternate broker dealer will provide best execution. Therefore, trades may be executed at different times and different prices. We periodically and systematically review our policies and procedures regarding recommending broker dealers to our clients in light of our duty to obtain best execution.


You may direct BGM Wealth Partners, in writing, to use a particular broker dealer to execute some or all of your transactions; also known as directed brokerage. In that case, you will negotiate terms and arrangements for the account with that broker dealer. With these directed brokerage arrangements, you may pay higher commissions, greater spreads or less favorable net prices. If we agree to your request to direct brokerage, we are relieved of our obligation to seek better execution services or prices from other broker dealers. Furthermore, we will be unable to “batch” client transactions for execution through other broker dealers with orders for other accounts managed by BGM Wealth Partners. We may decline a client’s request to direct brokerage if, in our sole discretion, such directed brokerage arrangements would result in undue operational difficulties.

### Batched Trades

Given the highly individualized nature of the investment services we provide, securities transactions for client accounts are generally accomplished separately for each account. On occasion we may decide to purchase or sell the same securities (stocks, bonds, and ETFs) for several clients at approximately the same time. Although we are not obligated to do this, we may combine or “batch” your order with other clients’ orders and place one batched trade. We do this to obtain best execution, to negotiate more favorable commission rates, or to allocate differences in prices, commissions and other transaction costs fairly among multiple clients. If a batched order is filled at several prices (which may occur in more than one transaction), each client participating in the order will receive the average price, which could be higher or lower than the actual price that would otherwise be paid by the client in the absence of batching. The transaction costs per account are generally the same for batched or individually executed trades. Trade executions will generally be allocated among our clients on a pro rata basis. If we determine to “batch” client orders for the purchase or sale of securities, we will not receive any additional compensation or remuneration as a result of the batching.

### Partial Fill Allocation

When a batched order is not filled in its entirety or we determine that allocating a batch execution on a pro rata basis is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which may include: (i) when only a small percentage of the order is executed, shares may be allocated to the account with



BGM Wealth Partners seeks to recommend a **custodian/broker** who will hold client assets and execute transactions on terms that are, overall, **most advantageous** when compared with other available providers and their services.

the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates; (ii) allocations may be given to one account if that account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts; (iii) if an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts; (iv) with respect to sale allocations, allocations may be given to accounts low in cash; (v) in cases when a pro rata allocation of an execution would result in a de minimis allocation in one or more accounts, BGM Wealth Partners may exclude the account(s) from the allocation and the transactions may be allocated on a pro rata basis among the remaining accounts; or (vi) in cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis.

As most of our clients use Schwab as their custodian, the opportunity to “batch” trades for clients who have elected to direct brokerage to an alternate firm is extremely limited and you should understand that you may lose the possible advantage that clients using Schwab as their custodian may derive, from the batching of orders.

## Trade Error Policy

Occasionally, a trading error may occur in a client’s account, (e.g., the wrong security may be bought or sold). Of course, we seek to keep these errors to a minimum. However, if a trading error is discovered, we immediately contact the broker dealer to provide notice of the error and to seek to correct it. If feasible, the trade will be canceled.

If we were responsible for the trade error, we will bear any net loss. If it is not feasible to cancel the trade, (e.g., because the trade has settled), we will instruct the broker dealer to reverse the trade. If this results in a net loss to you, and we were responsible for the trade error, we will reimburse you. You will retain any net gain that results from reversing the trade error. If you choose not to keep a gain, we will take reasonable measures to ensure we do not benefit from the gain, such as making a charitable donation. As a general matter, to the extent related trade errors result in both gains and losses in your account, they will be netted for the purpose of determining the amount of overall loss or gain. With respect to trade errors in an account maintained at Schwab, it is Schwab’s policy to retain/absorb any gain or loss under \$100.

## Soft Dollars

Broker dealers who execute securities transactions for our clients may also provide certain brokerage products and/or services to us in exchange for the commission revenue generated by client’s trading activities. Generally, “soft dollars” is a recognized term that refers to the receipt of a product or service from a broker dealer or third party in exchange for the commissions generated from executing brokerage transactions on behalf of client accounts. Consistent with obtaining best execution, we have entered into a “soft dollar” arrangement with Schwab. The products and services received under this arrangement assist us in monitoring your accounts and managing our overall trading and portfolio management activities. Such brokerage products and services generally will be used to service all of our clients, but brokerage commissions paid by one client may be used to pay for research that is not used in managing that client’s portfolio.



Specifically, BGM Wealth Partners directs the trading for client transactions to Schwab. In exchange Schwab provides the following products and services without charge:

- Computer software and related systems support
- Receipt of duplicate client confirmations and bundled duplicate statements
- Access to trading desks that exclusively provide services to Schwab participants
- Access to block trading functionality that provides the ability to aggregate (“batch”) securities transactions and then allocate the appropriate shares to client accounts
- Access to an electronic communication network for client order entry and account information

These products and services generally benefit all clients who receive Investment Management services from BGM Wealth Partners. That said, brokerage commissions paid by one client may be used to pay for products and services not used in managing that client’s portfolio. The receipt of brokerage products and/or services as well as the allocation of the benefit of such products and/or services poses a possible conflict of interest.

We believe that our relationship with Schwab is multi-faceted and the soft dollar benefits derived from Schwab account for only a nominal portion of the total menu of service and support that Schwab provides to BGM Wealth Partners. Nonetheless, we formally evaluate Schwab’s execution quality on an annual basis to identify any issues or concerns.

## Other Information

It is BGM Wealth Partners’ policy that the firm will not affect principal or agency cross securities transactions for client accounts. BGM Wealth Partners will also typically not cross trades between client accounts, unless it would be mutually beneficial to both clients and in which case the transaction would be fully disclosed to and approved by both clients. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction.

## Review of Accounts

For those clients who receive Investment Management services, we monitor your portfolios on a continuous basis. We review accounts for variations from the target allocation and cash needs. We contact ongoing investment advisory clients at least annually to review previous services and recommendations and to discuss the impact resulting from any changes in your financial situation or investment objectives.

For those to whom we provide financial planning and/or consulting services, we conduct reviews on an “as needed” basis. We encourage you to discuss your needs, goals, and objectives with us and keep us informed of any changes in your financial situation.



We communicate with you by way of meetings, telephone calls, letters, email and portfolio reports. The frequency and mode of personal contact is flexible and usually dependent on what is needed to ensure an effective working relationship.

Unless otherwise agreed upon, the broker dealer/custodian provides you with transaction confirmation notices and regular summary account statements directly. Those clients to whom we provide Investment Management services may also receive a quarterly report from us that includes relevant account and market-related information, an inventory of account holdings and account performance.

Those clients to whom we provide Financial Planning and Consulting services will receive reports summarizing our analysis and conclusions as requested by the client or otherwise agreed to in writing.

## Client Referrals and Other Compensation

BGM Wealth Partners has arrangements with affiliated firms (i.e. Boeckermann, Grafstrom & Mayer, P.A. and Cornerstone Private Asset Trust Company, LLC) and individuals who may receive compensation from BGM Wealth Partners for referring a new client relationship. If a client is referred under this arrangement, disclosure is provided to the prospective client at the time of the solicitation and referral. These referral fees represent no additional expenses to client accounts.


BGM Wealth Partners is also a Solicitor for Boeckermann, Grafstrom and Mayer, P.A. and Cornerstone Private Asset Trust Company, LLC. Employees may receive non-material referral fees for new business.

## Custody

Custody is a term used to describe the role of the entity that maintains and reports on investment assets held in client accounts. These services are typically provided by brokerage firms or banks. The role of a qualified custodian is highly specialized, independently protecting each client's assets in a role that complements the responsibilities of an advisory firm like BGM Wealth Partners.

Clients will receive at least quarterly account statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. BGM Wealth Partners urges clients to carefully review account statements and compare such official custodial records to the performance reports that are provided by BGM Wealth Partners. BGM Wealth Partners' reports may vary from custodial statements based on accounting procedures, reporting dates or valuation methodologies of certain securities.

Recent regulatory guidance directs BGM Wealth Partners to recognize custody when assisting clients with third party money movements. We maintain internal documentation supporting our compliance with the conditions of this guidance. BGM Wealth Partners also recognizes custody responsibilities due to the fact that we provide advisory services to related affiliate entities. To comply with this responsibility, we engage an independent, qualified accounting firm to conduct an annual surprise exam that reviews those specific account relationships.



We encourage you to discuss your needs, goals and objectives with us and keep us informed of any changes in your financial situation.

## Investment Discretion

You must provide prior written authorization to establish a discretionary account with BGM Wealth Partners to determine which securities are bought and sold and the amount of securities to be bought or sold. When selecting securities and determining amounts, BGM Wealth Partners observes the investment policies, limitations and restrictions established by each client. Investment guidelines and restrictions must be provided to BGM Wealth Partners in writing. We do not have discretion to determine the broker to be used or the commission paid in executing securities transactions.

## Voting Client Securities

As a matter of firm policy and practice, BGM Wealth Partners empowers you with full rights and authority to vote on proxy matters in connection with your individual investments. You are free to vote on proxy issues as you see fit. Private Managers receive and vote proxies for all client assets under their management.

## Financial Information

As a registered investment adviser, BGM Wealth Partners is required to provide you with certain financial information or disclosures about BGM Wealth Partners' financial conditions. BGM Wealth Partners has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

## Brochure Supplement—BGM Wealth Partners' Privacy Policy

BGM Wealth Partners, LLC recognizes and respects the privacy of our client relationships and is committed to maintaining the highest standards of confidentiality. We will provide the annual Privacy Notice to all of our clients who obtain financial products and services in accordance with Title V of the Gramm-Leach-Bliley Act of 1999 and its implementing regulations.

BGM Wealth Partners is entrusted with, or has access to, non-public personal information about its clients and is responsible for the confidentiality and security of that information. BGM Wealth Partners recognizes and respects the privacy expectation of its customers and will only disclose customer information it collects to third parties who are not affiliated with BGM or its affiliates (1) as authorized or directed by a client, (2) as permitted by law, (3) to service providers who provide investment products or services to the client, (4) in connection with an audit or examination or (5) to respond to a subpoena or similar legal process. Information provided to BGM Wealth Partners is used to help clients meet their personal financial goals while guarding against any real or perceived infringements of privacy rights. BGM Wealth Partners may disclose client information we have collected to our affiliates Boeckermann, Grafstrom & Mayer, P.A. and Cornerstone Private Asset Trust Company, LLC after a signed waiver is provided by the client. BGM Wealth Partners' policy with respect to personal information is stated below:

- BGM Wealth Partners maintains a hardware firewall to protect our server from intrusion by outside parties whereby non-public personal information might be accessed from outside BGM Wealth Partners.
- BGM Wealth Partners maintains all customer records electronically, and in cases where we must maintain paper files, they are in a secure area in locked cabinets so that access to those records can be controlled. All electronic client records are password protected.
- BGM Wealth Partners has a disaster recovery plan that provides for redundant recordkeeping.
- BGM Wealth Partners personnel are regularly coached on providing a high level of professionalism to all clients, making each employee responsible for the security and confidentiality of client information. BGM Wealth Partners limits employee access to non-public personal information to those employees who have a business reason for knowing such information.

All clients receive the BGM Wealth Partners Privacy Policy as part of the process for establishing a client relationship and thereafter in the event of a policy change.

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