

The Advisory Group

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Form ADV Part 2A: Firm Brochure

March 18, 2022

This brochure provides information about the qualifications and business practices of The Advisory Group. If you have any questions about the contents of this brochure, please contact us at 909.869.7880. 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.

The Advisory Group 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. Additional information about The Advisory Group also is available on the SEC's website at www.adviserinfo.sec.gov

Material Changes

The last annual update of The Advisory Group (“TAG, we, us, our, ours”) was dated March 22, 2021. Since that time, we have updated our assets under management information on page 2.

TAG is required to send a summary of any material changes to our brochures to our clients (“you, your, yours”) by April 29th of each year. We may also provide updated disclosure information about material changes on a more frequent basis. Any summaries of changes include the date of our last annual update of our brochure.

The most current version of our brochure may be requested by contacting Brent Beverly, President

and Chief Compliance Officer at 909.869.7880 or mail@tagfinancial.com or at our website: www.TAGFinancial.com. We will provide you with a new brochure at any time without charge.

Additional information about our company is available via the United States Securities and Exchange Commission’s (“SEC”) website: www.adviserinfo.sec.gov. The SEC’s website also provides information about any persons affiliated with TAG who are registered Investment Adviser Representatives (“IARs”) of TAG.

Information on our Investment Adviser Representatives who work with your account can be found in our brochure supplements.

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Advisory Business

TAG is a corporation organized under the laws of California. Current advisors Brent J. Beverly, Christian F. Li, and Gregory P. Schill founded the Diamond Bar-based investment advisory firm in 2000. Brent Beverly and Christian Li are the principal owners and have worked together as business partners since 1985. TAG is an SEC registered investment advisory firm.

As of December 31, 2021, we managed approximately \$261.5million in client assets where we make the investment decisions (discretionary assets) and \$118.1million in nondiscretionary assets. TAG also provides consulting services to pension funds having an approximate aggregate value of \$343.55 million.

Financial Planning Services

We believe the starting point for any client seeking personal financial goals is a written document with your goals quantified, your resources outlined, and an initial plan of action specified. We also provide this advice in the form of a financial plan or a less comprehensive financial review. You are given a financial planning contract, disclosure information and a consultation to determine the need and/or advantage to having a plan prepared. If you choose a financial plan, you will receive a written report, providing you with a detailed financial plan designed to help achieve your stated financial goals and objectives.

In general, the financial plan may address any or all of the following areas of concern as contracted for between us:

- **Personal:** Family records, budgeting, personal liability, estate information and financial goals.
- **Tax & Cash Flow:** Income tax and spending analysis and planning for past, current and future years. We may illustrate the impact of various investments on your current income tax and future tax liability. We work with your tax adviser, as we do not provide tax advice.
- **Death, Disability, and Long-Term Care:** Cash needs at death, income needs of surviving dependents, estate planning and disability income analysis.
- **Financial Independence:** Analysis of current strategies and investment plans to help you determine and achieve your retirement goals.
- **Investments:** Analysis of investment alternatives and their effect on your portfolio.
- **College Funding:** Analysis of college funding needs.

We gather required information through personal interviews. Information gathered includes your current financial status, future goals and attitudes towards risk. Related documents that you supply are carefully reviewed, including a questionnaire that you complete, and a written report is prepared.

Should you choose to implement the recommendations contained in the plan,

we suggest that you work closely with your attorney, accountant, insurance agent, and investment adviser. Implementation of financial plan recommendations is entirely at your discretion. Some implementation services are available through us and our affiliates. You, however, are under no obligation to utilize us or our associated persons for implementation of financial planning recommendations. All such decisions are at your discretion.

You can also receive investment advice on a more limited basis. This may include advice on only an isolated area(s) of concern such as estate planning, retirement planning, or any other specific topic. We also provide specific consultation and administrative services regarding your investment and financial concerns.

Wealth Management Platform

The Wealth Management Platform -- (“Wealth Management Program” or “WMP”) provides suitable Clients the opportunity to invest their assets across multiple investment strategies and asset classes by implementing an asset allocation strategy. These services are offered through VISION2020 Wealth Management Corp. (“Program Sponsor”), a Registered Investment Advisor. VISION2020 Wealth Management Corp. is an affiliate of FSC Securities Corporation, Royal Alliance Associates, Inc., Sage Point Financial,

Inc., Securities America Advisors, Inc., Triad Advisors, LLC, and Woodbury Financial Services, Inc., members FINRA/SIPC.

WMP may use a variety of investment models. As outlined in greater detail below, implementation may use:

- Advisor Managed Portfolios Program
- Model Portfolio Strategies Program
- Separately Managed Account (SMA) Program
- Unified Managed Account (UMA) Program

TAG will present the Client with a WMP asset allocation model (“WMP Model”) for Client approval which will consist of: 1) third party money managers (“WMP Managers”) who will manage Client funds according to a particular equity or fixed income model or strategy, 2) no-load mutual funds (“funds”), 3) closed-end funds, 4) individual bonds, 5) ETFs, or any combination thereof (individually or collectively, “WMP Investments”).

WMP Investments will be managed according to the selected WMP Model. WMP Models consist of a separately managed account or a series of separately managed accounts (collectively, “SMA Account”) or a unified managed account (“UMA Account”) as further described below.

A WMP Model will be suggested to the Client based upon Client responses to a risk tolerance questionnaire and/or discussion between TAG and Client regarding among other things,

investment objective, risk tolerance, investment time horizon, account restrictions, and overall financial situation.

WMP clients enter into an advisory client agreement with TAG, as Advisor, and Program Sponsor, as Co-Advisor.

TAG will monitor the Client's WMP Investments on an ongoing basis. TAG and Client will be responsible for determining initial and ongoing suitability.

Program Sponsor has entered into a sub-agreement with Envestnet Asset Management, Inc. ("Envestnet") pursuant to which Envestnet will perform due diligence and provide research on WMP Managers, construct and recommend asset allocation targets to be used in WMP Models and provide a password-protected web site and associated technology to assist the Advisor and Client with the selection and adjustment of WMP Models. Additional Program Sponsor services are disclosed in the Client Agreement. In addition to the due diligence performed by Envestnet on the WMP Managers, TAG will conduct its own due diligence review of the WMP Managers.

ADVISOR MANAGED PORTFOLIOS PROGRAM

The Wealth Management Platform – Advisor Managed Portfolios Program ("Advisor Managed Portfolios") is offered as a discretionary wrap account program which bundles advisory and

administrative fees, as well as transaction charges into one asset-based fee.

The Advisor Managed Portfolios provide comprehensive investment management of your assets through the application of asset allocation planning software as well as the provision of execution, clearing and custodial services through Pershing, LLC ("Pershing").

Advisor Managed Portfolios provide risk tolerance assessment, efficient frontier plotting, fund profiling and performance data, and portfolio optimization and re-balancing tools. Utilizing these tools, and based on your responses to a risk tolerance questionnaire and discussions that we have together regarding, among other things, investment objective, risk tolerance, investment time horizon, account restrictions, and overall financial situation, we construct a portfolio of investments for you. This portfolio may consist of mutual funds, exchange traded funds, equities, options, debt securities, variable life, variable annuity sub-accounts (certain restrictions may apply) and other investments.

Each portfolio is designed to meet your individual needs, stated goals and objectives. Additionally, you have the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio.

For further Advisor Managed Portfolios details, please see the Advisor Managed Portfolios Wrap Fee Program Brochure created by the Program Sponsor. We provide this brochure to you prior to or concurrent with your enrollment

in Advisor Managed Portfolios. Please read it thoroughly before investing.

MODEL PORTFOLIO STRATEGIES PROGRAM

The Wealth Management Platform - Model Portfolio Strategies Program ("Model Program") is offered as a discretionary wrap account program which bundles advisory and administrative fees, as well as transaction charges into one asset-based fee.

The Model Program offers Model Program Clients managed asset allocation models ("Asset Allocation Models") of mutual funds or exchange traded funds ("ETFs") diversified across various investment styles and strategies. The Asset Allocation Models are constructed using a large selection of Strategists. Strategists can be added or removed from this list without notice.

Strategists that recommend mutual fund Asset Allocation Models use load waived or no-load mutual funds. The cost of purchasing and holding mutual fund shares through the Model Program may be more or less than investing in mutual fund shares in a brokerage account, depending upon the amount of the advisory fees and the specific mutual funds selected for investment within the Model Program.

Based upon the risk tolerance of each Client, the Model Program utilizes a system that selects a specific Asset Allocation Model which may contain

either 1) a combination of mutual funds or 2) a combination of exchange traded funds ("ETFs"). Whether mutual funds or exchange traded funds are used will depend on which Strategist is used. TAG and Client will select an Asset Allocation Model. After such determination is made, TAG, with the assistance of program sponsor, VISION2020 Wealth Management Corp. ("Program Sponsor"), will open a Model Program account and client assets will be invested in the specific investments contained within the recommended Asset Allocation Model.

The Model Program will be governed by an advisory client agreement signed between Client, TAG, as Advisor, and Program Sponsor as Co-Advisor. With the Client's assistance, TAG will determine initial and ongoing suitability of the Model Program selected.

As Co-Advisor, Program Sponsor will provide monitoring and review of Asset Allocation Models. Program Sponsor has the discretion to modify and/or rebalance a Strategist's Asset Allocation Model and its associated Model Program client accounts without Client consent consistent with the Client's agreed upon investment objectives and risk tolerance.

For further Model Portfolio Strategies Program details please see the Model Portfolio Strategies Program Wrap Fee Program Brochure created by the Program Sponsor. We provide this brochure to you prior to or concurrent with your enrollment in the Model Program. Please read it thoroughly before investing.

SEPARATELY MANAGED ACCOUNT

An SMA Account may contain one or multiple WMP Managers with each WMP Manager investing according to a specific model or strategy and each in their own custodial account. The SMA Model may also contain Funds, generally used to compliment the WMP Managers employed within the SMA Model and when the recommended allocation to an asset class is too small for a WMP Manager to manage. Please contact our office for a complete list of managers.

After discussion with the Client and after the relevant information is processed, WMP provides an asset allocation model which consists of asset allocation targets or sleeves across various asset classes and investment strategies. The Advisor and the Client complete the SMA Account by choosing which WMP Managers and Funds will be contained within each asset allocation sleeve. Upon suitability determinations made by the Advisor and Client, Advisor may adjust the aforementioned asset allocation targets, within predetermined limits.

UNIFIED MANAGED ACCOUNT

A UMA Account may contain one or multiple WMP Managers with each WMP Manager investing according to a specific model or strategy. The UMA Account may also contain funds and ETFs. Unlike the SMA Account, all WMP Manager investments, funds and ETFs will be held in a single custodial account. Overlay management is

provided to coordinate the trading activities of UMA Account Managers, rebalancing and to provide greater tax-efficiency.

After discussion with the Client and after the relevant information is processed, WMP provides an asset allocation model which consists of asset allocation targets or sleeves across various asset classes and investment strategies. The Advisor and the Client complete the UMA Account by choosing which Third Party Managers, Funds and ETFs will be contained within each asset allocation sleeve. Upon suitability determinations made by the Advisor and Client, Advisor may adjust the aforementioned asset allocation targets or create its own asset allocation model within predetermined limits.

Orion Portfolio Solutions Platform

Orion is a fee-based mutual fund platform offering no-load and load-waived mutual funds, as well as ETF models. It is an asset management program that allows us the ability to develop our own model portfolios or outsource the asset allocation decision to institutional portfolio strategists.

Orion works with us to develop asset class and fund specific portfolios for use with your accounts based on our proprietary approach to investing. In addition, Orion provides us with access to asset allocation models developed by a number of different Strategists they have selected and regularly monitor.

SEI Investments Platform

SEI Investments is a fee-based mutual fund platform offering no-load proprietary mutual funds. It is an asset management program that allows us the ability to outsource the asset allocation and manager selection decisions to SEI Investments, an institutional portfolio strategist. SEI Investments works with us to develop asset class and fund specific portfolios for use with your accounts based on their proprietary approach to investing. In addition, SEI Investments provides us with access to asset allocation models and proprietary mutual funds they have created and regularly monitor.

Retirement Plan Consulting Services

We offer retirement consulting services to employee benefit plans and their fiduciaries. The services are designed to assist the plan sponsor (the “Company”) in meeting its management and fiduciary obligations to the plan under ERISA. Retirement consulting services will consist of general or specific advice, and may include any one or all of the following:

- Platform Provider Search and Plan Set-up,
- Strategic Planning and Investment Policy Development/Review,
- Plan Review,
- Plan Fee and Cost Review,
- Acting as Third-Party Service Provider Liaison,

- Assessment of Plan Investments and Investment Options,
- Plan Participant Education and Communication,
- Investment Advice to Participants,
- Plan Benchmarking,
- Plan Conversion to New Vendor Platform,
- Assistance in Plan Merger,
- Legislative and Regulatory Updates, and
- Plan Corrections.

The Company may also engage us to provide a review of executive benefits, for separate compensation.

We will determine with the Company in advance the scope of services to be performed and the fees for all requested services. Prior to engaging us to provide pension consulting services, the Company will be required to enter into a written agreement with us setting forth the terms and conditions of the engagement, describing the scope of the services to be provided, and the relevant fees and fee-paying arrangements. The services outlined above that we provide are explained in more detail in the written agreement. We will also provide additional disclosures about our services and fees, where required by ERISA.

When we perform our agreed upon services, we will not be required to verify the accuracy or consistency of any information received from the Company.

We will serve in a nondiscretionary ERISA fiduciary capacity with respect to some but not all of the services that we provide which will be further explained in the written agreement we sign with the Company. The Company is always free to seek independent advice about the appropriateness of any recommendations made by us.

Fees and Compensation

Financial Planning Services Fees

The financial plan may be comprehensive or a financial review. The standard fee for a comprehensive plan is \$20,000 and may be higher based on expected work involved. A financial review is normally \$2,500 to \$5,000. All fees are negotiable with consideration of the anticipated work hours needed and the extent of evaluation involved. In some cases, a percentage of assets may be used as a fee basis.

You may also elect to pay an hourly rate for financial planning advice without a plan. The standard hourly rate is \$375.

Staff services may be billed at a lower hourly rate. The plan preparation fee is payable upon signature of the financial planning contract. The fee is 100% refundable if canceled within the terms of said contract. You can terminate within 5 days with no penalty or cost. Refunds after the contract deadline are prorated according to work performed. All notifications of termination must be

in writing. Hourly fees will be billed as services are rendered.

Platform Fees

We direct and supervise the investment management of your assets using fee-based investment platforms in accordance with the following fee schedule:

Investment Management Advisor Fee Schedule

Assets under Management	Fee Range
\$0 to \$250,000	0.86% - 1.40%
\$250,001 to \$500,000	0.86% - 1.14%
\$500,001 to \$750,000	0.74% - 1.05%
\$750,001 to \$1,000,000	0.66% - 1.04%
\$1,000,001 and above	0.60% - 0.92%

We help you choose among multiple platforms for investment management, tailoring our solution to fit your goals, needs, and resources. As with all investment platforms there are additional charges such as platform and administration fees, per account fees, strategist/manager fees, and internal fund fees. All mutual fund shares on these platforms are acquired at net asset value (NAV) or on a “no-load” basis. Where available we use Institutional shares for lower internal costs.

WMP ADVISOR MANAGED PORTFOLIOS PROGRAM FEES

Wrap Fee Option

We offer Advisor Managed Portfolios as an account where no separate transactions charges apply and a single fee is paid for all advisory services and transactions ("Wrap Account"). The wrap fees may be higher or lower than if such services were obtained separately. Generally, wrap programs are relatively less expensive for actively traded accounts. However, they often result in higher overall costs to the client in accounts that experience little trading activity.

If you select the Wrap Fee Option you will pay an all-inclusive fee, not to exceed 2.5%, according to the schedule described in *the Advisor Managed Portfolios Wrap Fee Program Brochure created by the Program Sponsor. Any additional ancillary fees that may apply are described in this brochure. Investment Advisory Representatives provide this brochure to their Clients prior to or concurrent with their engagement in the Advisor Managed Portfolios. Clients should read it thoroughly before investing.*

WMP MODEL PORTFOLIO STRATEGIES PROGRAM FEES

Clients selecting the Model Program are charged quarterly fees based upon the assets under management. Fees are negotiable and range up to 3.00% (annualized) of the assets under management that may be collected by

Advisor, its associated broker-dealer and all associated broker-dealer affiliates.

For more complete details, including a schedule of Model Program fees, please see the Model Program Wrap Fee Program Brochure created by the Program Sponsor. Any additional ancillary fees that apply are described in this brochure. Investment Advisory Representatives provide this brochure to their Clients prior to or concurrent with their engagement in the Model Program. Clients should read it thoroughly before investing.

WMP SMA AND UMA PROGRAM FEES

Clients pay a single fee for the SMA Account, as well as for the UMA Account. Fees are negotiable and range up to 2.75% (annualized) of the assets under management that may be collected by Advisor, its associated broker-dealer and all associated broker-dealer affiliates. Fees are paid quarterly, in advance, based on the value of the Client's account on the last day of the previous quarter.

For more complete details, including a schedule of SMA and UMA Program fees, please see the WMP SMA and UMA Program Wrap Fee Program Brochure created by the Program Sponsor. Any additional ancillary fees that apply are described in this brochure. Investment Advisory Representatives provide this brochure to their Clients prior to or concurrent with their engagement in the SMA and UMA Program. Clients should read it thoroughly before investing.

ORION PORTFOLIO SOLUTIONS FEES

Information regarding Orion's platform fees and available strategists are available online at

<https://www.orionportfoliosolutions.com>.

We will provide you with a copy of Orion's Disclosure Brochure, which also contains information about their fees and services.

The fees charged by Orion are in addition to the fees you pay to TAG. The combination of TAG and Orion's fees will not exceed 2.5%.

SEI INVESTMENTS FEES

Clients pay a single fee for SEI Investment's advisor fees. SEI Investments uses only proprietary SEI mutual funds and associated accounts. We will provide you with a copy of SEI's Disclosure Brochure, which also contains information about their fees and services. The fees charged by SEI Investments are in addition to the fees you pay to TAG. The combination of TAG and SEI Investments' fees will not exceed 2.5%.

Retirement Plan Consulting Services Fees

We will bill the Company for Retirement Plan Consulting Services at a pre-determined hourly rate or a fixed fee. The exact fee is negotiated in advance of services rendered and is disclosed in the executed written agreement that we sign with the Company. Fees are billed as described below. In special

circumstances other fee-paying arrangements may be negotiated.

The Company may terminate the written agreement they signed with us within five days of the execution date without penalty. Thereafter, the written agreement may be terminated by us or the Company at any time upon 60 days' prior written notice. Upon termination, we will deliver a final billing statement for unbilled work performed prior to termination, and the Company will have a period of 30 days within which to deliver payment. If termination occurs after the first five days, any prepaid fee will be credited back to the Company on a pro-rata basis for the unused portion of the billing period. When we calculate the credit, we will subtract any unbilled work we performed for the Company prior to termination.

Our Retirement Plan Consulting Services fee is billed in one of two ways:

- As a fixed fee ranging from \$2,500 to \$50,000 depending upon the size and nature of the client circumstances, and upon mutual agreement with the client. Up to 50% of this fee may be due and payable at the inception of the advisory relationship, with the balance due and payable upon completion of the service. Upon termination, any unearned fees will be refunded on a pro rata basis. TAG will not hold client funds greater than \$1,200 for more than six months in advance of completing this service.

- At an hourly rate of \$375 per hour, due and payable as earned. Staff services may be billed at a lower hourly rate.

General Fee Information

We offer our advisory services on a fee-only basis. Our fee is calculated based upon the market value of the assets in your account on the last day of the previous quarter.

Broker-dealers and other financial institutions that hold client accounts are referred to as custodians (hereinafter referred to as “custodian/broker-dealer”). Your custodian/broker-dealer determines the values of the assets in your portfolio.

You must authorize us to have the custodian/broker-dealer pay us directly by charging your account. This authorization must be provided in writing.

Your custodian/broker-dealer provides you with statements that show the amount paid directly to us. You review your custodian/broker-dealer’s statement and verify the calculation of our fees. Your custodian/broker-dealer does not verify the accuracy of fee calculations.

In addition to our fee, you will be required to pay one or more of the following charges:

- platform fees,
- custodial fees,
- brokerage commissions,

- transaction fees,
- SEC fees,
- internal fees and expenses charged by mutual funds or exchange traded funds (“ETFs”), and
- other fees and taxes on brokerage accounts and securities transactions.

Mutual fund companies, ETFs, and variable annuity issuers charge internal fees and expenses for their products. Client will pay a portion of the fees and expenses of the mutual funds selected in proportion to the number of shares owned. These fees and expenses may include the fund’s investment advisory, administrative, distribution, transfer agent, custodial, legal, audit and other customary fees and expenses related to investment in mutual funds. These fees and expenses are in addition to any advisory fees charged by us and are in addition to the Platform Fees. Complete details of these internal fees and expenses are explained in the prospectuses for each investment. You are strongly encouraged to read these explanations before investing any money. You may ask us any questions you have about fees and expenses.

If you purchase mutual funds through the custodian/broker-dealer, you may pay a transaction fee that would not be charged if the transactions were made directly through the mutual fund company. Also, mutual funds held in accounts at brokerage firms may pay internal fees that are different from funds held at the mutual fund company.

While you may purchase shares of mutual funds directly from the mutual fund company without a transaction fee, those investments would not be part of our advisory relationship with you. This means that they would not be included in our investment strategies, investment performance monitoring, or portfolio reallocations.

Please be sure to read the section entitled “Brokerage Practices,” which follows later in this brochure.

You must pay the majority of our advisory fees in advance of receiving our services. Should you terminate the advisory agreement we have entered into within five (5) business days from the date the agreement is executed, you will receive a full refund of any fees paid.

Should either one of us terminate the advisory agreement we have entered into before the end of a billing period, any unearned fees that were deducted from your account will be returned to you by us. The amount refunded to you is calculated by dividing the most recent advisory fee you paid by the total number of days in the quarter. This daily fee is then multiplied by the number of calendar days in the quarter that our agreement was in effect. This amount, which equals the amount we earned for the partial quarter, is subtracted from the total fee you paid in advance to determine your refund.

Our Investment Advisory Representatives are also Registered

Principals, Registered Representatives and/or Investment Adviser Representatives of FSC Securities Corporation ("FSC"), a Registered Broker/Dealer, member FINRA/SIPC, and Registered Investment Adviser. If you choose to implement your financial plan through FSC, commissions may be earned by your financial advisor in addition to any fees paid for advisory services. In addition, the financial advisor may be entitled to a portion of the internal expense fees (such as 12b-1 fees) charged by mutual funds.

Our Investment Advisory Representatives are also licensed with various insurance companies. Commissions may be earned by our financial advisors if insurance products are purchased through these insurance companies.

We may receive benefits such as assistance with conferences and educational meetings from product sponsors.

Our Investment Advisory Representatives may also recommend various asset management firms through their affiliation with FSC. If you establish an investment advisory relationship with one of these firms, our financial advisors may share in the advisory fees you pay to these asset management firms.

The above arrangements present a conflict of interest because they create an incentive to make recommendations

based upon the amount of compensation we receive rather than based upon your needs. We will explain the specific costs associated with any recommended investments with you upon request. We also recommend no-load and load-waived mutual funds to further reduce conflicts of interest. Additionally, you have the option to purchase investment and insurance products through other brokers or agents who are not affiliated with us.

Performance-Based Fees

Performance-based fees are designed to give a portion of the returns of an investment to the investment adviser as a reward for positive performance. The fee is generally a percentage of the profits made on the investments.

We do not charge performance-based fees on any of our client accounts.

Types of Clients

We provide advisory services primarily to individuals and high net worth individuals, including their trusts, estates, and retirement accounts. We also provide services to corporations or business entities including their pension and profit sharing plans, and charitable organizations.

We require new advisory clients to meet one of the following conditions:

- a minimum of \$1,000,000 in investable assets, or

- a minimum \$1,000,000 roll-over from a pension plan or IRA, or
- income in excess of \$10,000 per month.

We, at our sole discretion, may accept clients with smaller portfolios based upon certain factors including anticipated future earning capacity, anticipated future additional assets, account composition, related accounts, and pre-existing client relationships. We may consider the portfolios of your family members to determine if your portfolio meets the minimum size requirement.

Methods of Analysis, Investment Strategies and Risk of Loss

We select specific investments for your portfolios through the use of charting, fundamental, cyclical and technical analysis.

Charting involves identifying patterns that can suggest future activity in price movements. A chart pattern is a distinct formation on a stock chart that creates a trading signal or a sign of future price movements. Chartists use these patterns to identify current trends and trend reversals to trigger buy and sell signals. Some of the chart types are Line Charts, Bar Charts, Candlestick, Point and Figure, etc.

Fundamental analysis is a method of evaluating a company that has issued a security by attempting to measure the value of its underlying assets. It entails studying overall economic and industry

conditions as well as the financial condition and the quality of the company's management. Earnings, expenses, assets, and liabilities are all important in determining the value of a company. The value is then compared to the current price of the issuing company's security to determine whether to purchase, sell or hold the security.

Cyclical analysis is a form of fundamental analysis that involves the process of making investment decisions based on the different stages of an industry at a given point in time.

Technical analysis is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity.

Our investment strategies may include long-term and short-term purchases and sales, trading (securities sold within 30 days) and the use of options, margin, and short sales. You may place reasonable restrictions on the strategies to be employed in your portfolio and the types of investments to be held in your portfolio.

All investments involve risks that can result in loss:

- loss of principal,
- a reduction in earnings (including interest, dividends and other

- distributions), and
- the loss of future earnings.

Additionally, these risks may include:

- market risk,
- interest rate risk,
- issuer risk, and
- general economic risk.

Although we manage your portfolio in a manner consistent with your risk tolerances, we cannot guarantee that our efforts will be successful. You should be prepared to bear the risk of loss.

You must also be aware that the use of margin, options and short sales are higher risk strategies. It is possible to lose all of the principal you invest, and sometimes more. In a cash account, your risk is limited to the amount of money that you have invested. In a margin account, your risk includes the amount of money invested plus the amount that has been loaned to you. When you short sell, your losses can be infinite.

Disciplinary Information

TAG has not been the subject of any reportable legal or disciplinary event.

Other Financial Industry Activities and Affiliations

Our IARs are also Registered Principals, Registered Representatives, and/or Investment Adviser Representatives of FSC, a Securities Broker-Dealer and Registered Investment Adviser. In our

capacities as Registered Principals, Registered Representatives, and/or Investment Adviser Representatives, we will be able to effect securities transactions and/or give investment advice, and will receive separate, yet customary compensation for these activities. We may recommend products and services of FSC to you. The advisory services that we offer are entirely separate and distinct from (though complimentary to) the advisory services of FSC. You are in no way obligated to utilize the products or services of FSC Securities.

We are also licensed Accident and Health, Life-Only and Variable Contract insurance agents. We have met the requirement to provide Long Term Care insurance, California Partnership Long Term Care insurance and Annuities. We are individually licensed to sell insurance products through various insurance companies. As such, we will be able to receive separate, yet customary commission compensation resulting from implementing product transactions on your behalf.

While we endeavor at all times to put your interests first as part of our fiduciary duty, you should be aware that the receipt of additional compensation itself creates a conflict of interest.

Additionally, we are also involved in presenting seminar and webinar workshops to the public. The seminars are objective, comprehensive forums designed to educate the public to the

need for planning to achieve financial goals. Although a marketing tool for us, the possible conflict of interest and our "no obligation" policy is clearly maintained, meaning no seminar or webinar attendee is obligated to use us for any products or services. The content of the workshops is completely objective and contains no reference to any specific products or services of TAG or any of its affiliated persons or entities. There is no fee charged for the workshop meetings. We do not charge a fee for the seminar workbook.

We present occasional lectures on general financial planning in local community educational facilities. These lectures are objective forums designed to educate the public on financial planning and various investment areas.

Recommendations for specific products or services are not given in these lectures. Fees charged for lectures are collected by the respective educational facility. We may receive an instructional fee for teaching. Although these lectures are used as a marketing tool, lecture attendees are under no obligation to use us for any products or services.

We have an agreement to act as solicitor for various unaffiliated third-party investment managers. We receive from these managers a percentage of the fee that you pay to the manager if you become a client as the result of our direct or indirect efforts. Any solicitation or referral arrangements will comply with applicable laws that govern the nature of

the service, fees to be paid, disclosures to clients and any necessary client consents.

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

We have adopted a Code of Ethics (“Code”) to address the securities-related conduct of our advisory representatives and employees. The Code includes our policies and procedures developed to protect your interests in relation to the following:

- the duty at all times to place your interests ahead of ours;
- that all personal securities transactions of our advisory representatives and employees be conducted in a manner consistent with the Code and avoid any actual or potential conflict of interest, or any abuse of an Investment Advisory Representative’s or employee’s position of trust and responsibility;
- that Investment Advisory Representatives may not take inappropriate advantage of their positions;
- that information concerning the identity of your security holdings and financial circumstances are confidential; and
- that independence in the investment decision-making process is paramount.

We will provide a copy of the Code to you or any prospective client upon

request. This document is also available on our website.

We do not buy or sell securities for our firm that we also recommend to clients. Our Investment Advisory Representative’s and employees are permitted to buy or sell the same securities for their personal and family accounts that are bought or sold for your account(s). The personal securities transactions by Investment Advisory Representative’s and employees may raise potential conflicts of interest when they trade in a security that is owned by you or considered for purchase or sale for you.

We have adopted policies and procedures that are intended address these conflicts of interest. These policies and procedures:

- require our Investment Advisory Representatives and employees to act in your best interest,
- prohibit favoring one client over another, and
- provide for the review of transactions to discover and correct any same-day trades that result in an Investment Advisory Representative or employee receiving a better price than a client.

Investment Advisory Representatives and employees must follow our procedures when purchasing or selling the same securities purchased or sold for you.

Brokerage Practices

We generally recommend that your account be managed through our relationship with FSC Securities. We may recommend that your broker-dealer/custodian be Pershing, LLC (“Pershing”). Pershing will assist us in servicing your account. We are independently owned and operated and not affiliated with Pershing. Our use of Pershing is, however, a beneficial business arrangement for us and for Pershing. Information regarding the benefits of this relationship is described below.

In recommending Pershing as custodian and as the securities brokerage firm responsible for executing transactions for your portfolios, we consider at a minimum Pershing’s:

- existing relationship with us,
- financial strength,
- reputation,
- reporting capabilities,
- execution capabilities,
- pricing, and
- types and quality of research.

The determining factor in the selection of Pershing to execute transactions for your accounts is not the lowest possible transaction cost, but whether Pershing can provide what is in our view the best qualitative execution for your account.

Pershing provides us with access to its institutional trading and custody services, which includes:

- brokerage,
- custody,
- research, and
- access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

We are not required to place a minimum volume of transactions or maintain a minimum dollar amount of client assets to receive these services.

Pershing does not charge separately for holding our clients’ accounts, but may be compensated by you through other transaction-related fees associated with the securities transactions it executes for your accounts. They may charge an annual fee if there is insufficient activity in the account. They have also implemented additional fees such as: paper statements, reporting, etc. that are charged to the clients.

Pershing also makes available to us other products and services that benefit us but may not benefit you directly. Some of these products and services assist us in managing and administering our client accounts, such as software and other technology that:

- provide access to account data such as:
 - duplicate trade confirmations,
 - bundled duplicate account statements, and
 - access to an electronic communication network for

- client order entry and account information;
- facilitate trade execution, including:
 - access to a trading desk serving advisory participants exclusively and
 - access to block trading which provides the ability to combine securities transactions and then allocate the appropriate number of shares to each individual account;
- provide research, pricing information and other market data;
- facilitate payment of our fees from client accounts; and
- assist with back-office functions, record keeping and client reporting; and
- receipt of compliance publications.

Pershing makes available to us other services intended to help us manage and further develop our business. These services may include:

- consulting,
- publications and conferences on practice management,
- information technology,
- business succession,
- regulatory compliance, and
- marketing.

Pershing may also make available or arrange for these types of services to be provided to us by independent third parties. Pershing may discount or waive the fees it would otherwise charge for some of the services it makes available to us. It may also pay all or a part of the

fees of a third party providing these services to us. Thus, we receive economic benefits as a result of our relationship with Pershing, because we do not have to produce or purchase the products and services listed above.

Because the amount of our compensation or the products or services we receive may vary depending on the broker-dealer/custodian we recommend to be used by our clients, we may have a conflict of interest in making that recommendation. Our recommendation of specific broker-dealer/custodians may be based in part on the economic benefit to us and not solely on the nature, cost or quality of custody and brokerage services provided to you and our other clients. We nonetheless strive to act in your best interests at all times.

Commissions and other fees for transactions executed through Pershing may be higher than commissions and other fees available if you use another broker-dealer/custodian firm to execute transactions and maintain custody of your account. We believe, however, that the overall level of services and support provided to our clients by Pershing outweighs the benefit of possibly lower transactions cost which may be available under other brokerage arrangements. Many of the services described above are used to benefit all or a substantial number of our accounts, including accounts not maintained through Pershing. We do not attempt to allocate these benefits to specific clients.

We have developed procedures to evaluate the various services provided by Pershing or any custodian or broker/dealer utilized by TAG. It is TAG's policy to seek best execution for all client orders under the circumstances, which may not always reflect the best prices or lowest commission rate.

You may direct us in writing to use a particular custodian/ broker-dealer to execute some or all of the transactions for your account. In this case, you are responsible for negotiating the terms and arrangements for the account with the custodian/broker-dealer. We will not be able to negotiate commissions, obtain volume discounts or best execution pricing. In addition, under these circumstances a difference in commission charges may exist between the commissions charged to clients who direct us to use a particular custodian/ broker-dealer and clients who do not direct us to use a particular custodian/broker-dealer.

In regard to securities trades, we aggregate discretionary orders in a bunched, or block, trade(s) when securities are purchased or sold for multiple client accounts. We must reasonably believe that the block trade is consistent with our efforts to achieve best execution and will benefit each client participating in the block trade equally. The average price of the security in each block trade is allocated to each account that participates in the trade. Client accounts that participate in the same block trade are charged

commissions, if applicable, as described in their advisory agreements.

Prior to entry of a block trade, a written pre-allocation worksheet is generated which identifies the group of client accounts participating in the order. If a block trade cannot be fully executed by the end of the business day, the securities purchased or sold are allocated in a way that is consistent with the initial pre-allocation of the trade. This is done in a way that does not advantage or disadvantage any particular client accounts. If an account is added to the block trade after the first business day of trading, it is accorded a prorated share of the remaining block as it is traded.

Changes in allocation before final execution may be made provided that all client accounts receive fair and equitable treatment. A written explanation of the reason for any material change in the allocation is documented no later than the morning following the execution of the trade.

We are not obligated to include any client account in a blocked trade but may do so if it's in the best interests of all participating clients. Blocked trades will not be effected for nondiscretionary accounts or any client's account if doing so is prohibited or otherwise inconsistent with that client's investment advisory agreement. No client will be favored over any other client.

It is our policy that a client must not be disadvantaged for trade errors attributed

to us. Trades are amended to reflect the original intent of the client. If this change results in a loss, we will reimburse this loss to you. If this change results in a gain, that gain is applied to your account.

We do not receive client referrals from executing broker/dealers.

Review of Accounts

Advisor Managed Portfolios Program

While the underlying securities within Advisor Managed Portfolios program accounts are continuously monitored, these accounts will be formally reviewed at least quarterly by our President, Vice President and other principal adviser representatives. All other accounts are reviewed quarterly or as provided for by contract.

More frequent reviews may be triggered by material changes in variables such as your individual circumstances, or the market, political or economic environment.

Model Portfolio Strategies Program

As needed, but no less than annually, TAG reviews Program Accounts and contacts Clients. TAG will then work with Clients to update financial status, goals and objectives as necessary.

SMA and UMA Programs

As needed, but no less than annually, TAG reviews WMP Accounts and contacts Clients. TAG will then work with Clients to update financial status, goals and objectives as necessary.

We will periodically review reports that are provided to you. We will contact you at least annually, or more often as agreed upon with you, to review your financial situation and objectives, communicate information to the WMP Manager as warranted, and to assist you in understanding and evaluating the services provided by the WMP Manager. You will be expected to notify your IAR of any changes in your financial situation, investment objectives, or account restrictions.

Orion Portfolio Solutions and SEI Investments Programs

As needed, but no less than annually, TAG reviews Program Accounts and contacts Clients. TAG will then work with Clients to update financial status, goals and objectives as necessary.

Retirement Plan Consulting Services

Your investments will be monitored continuously based on the procedures and timing intervals delineated in the Investment Policy Statement. Although TAG will not be involved in any way in the purchase or sale of these investments, TAG will supervise your

portfolio and will make recommendations to you as market factors and your needs dictate.

You will receive statements from the custodian/broker-dealer at least quarterly. These statements identify your current investment holdings, the cost of each of those investments, and their current market values.

We also provide additional consolidated reports via a third-party vendor if you request them. We will not provide any additional regular reports to you. Financial planning accounts will receive an initial report and updated reports as provided for by contract.

Client Referrals and Other Compensation

We do not directly or indirectly compensate any person who is not one of our advisory representatives or employees for client referrals.

We receive certain economic benefits as a result of our participation in Pershing's institutional program. Those benefits are described in detail in the preceding section entitled "Brokerage Practices."

Custody

All assets will be held by the custodian ("Custodian") designated in a customer agreement provided to Client. Custodian will provide statements of account to each Client including consolidated monthly statements. Client will also be

provided with quarterly performance reports and year-end tax statements. Fees payable to Adviser and its Investment Advisory Representatives will be deducted from the accounts quarterly and reflected within the statements provided to the Clients. Fees may be negotiable depending upon the amount of assets under management, the nature and extent of account relationships between Adviser and the Client, the type of services requested and other factors that Adviser deems relevant to the advisory services relating to the Model Program. Custodian will also serve as broker-dealer for securities transactions directed by WMP Managers.

We urge you to carefully review these statements. You should verify that the transactions in your account are consistent with your investment goals and the objectives for your account. We also encourage you to contact your advisory representative or our Chief Compliance Officer should you have any questions or concerns regarding your account.

Investment Discretion

We offer our advisory services on a discretionary and non-discretionary basis. **Discretionary** means that we do not need advance approval from you to determine the type and amount of securities to be bought and sold for your accounts. **Non-discretionary** means that we need advance approval from you to determine the type and amount of

securities to be bought and sold for your accounts.

We do not, however, have the ability to choose the broker-dealer through which transactions will be executed.

Additionally, we do not have the ability to withdraw funds from your account (other than to withdraw our advisory fees which, may only be done with your prior written authorization.)

This discretion is used in a manner consistent with the stated investment objectives for your account, if you have given us written authorization to do so. We only exercise discretion in accounts where we have been authorized by you. This authorization is typically included in the investment advisory agreement you enter into with us.

TAG does not exercise investment discretion over assets allocated to Separate Managers; rather, each Separate Manager acts as discretionary adviser for the assets assigned to it through implementation of the Investment Model. Client directs the Separate Manager to effect transactions for

investment assets designated by Client to be invested in Funds and ETFs.

Voting Client Securities

We do not take any action or give any advice with respect to voting of proxies solicited by or with respect to the issuers of securities in which your accounts may be invested. In addition, we do not take any action or give any advice with respect to any securities held in any accounts that are named in or subject to class action lawsuits. We may, however, forward to you any information received by us regarding proxies and class action legal matters involving any securities held in your accounts.

Financial Information

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to you and we have not been the subject of a bankruptcy proceeding.