

Firm Brochure
(Part 2A of Form ADV)

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This brochure provides information about the qualifications and business practices of ABG Consultants, LLC. If you have any questions about the contents of this brochure, please contact us at: 801-486-5069, or by email at: larry@consultabg.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about ABG Consultants, LLC is available on the SEC's website at www.adviserinfo.sec.gov.

March 23, 2022

2. Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

Since our last annual updating amendment of ABG Consultants, LLC on 3/29/2021, the following material changes have taken place:

- In July 2021, Thomas Krusic was removed from the 2B portion of this brochure.
- In August 2021, Item 10 was updated to disclose certain ABGC personnel are licensed insurance agents.
- In October 2021, Nathan Fitzgerald was removed from the 2B portion of this brochure.
- In November 2021, Tabitha Garreffa was added to the 2B portion of this brochure.
- In January 2022, Wesley Jensen was removed from the 2B portion of this brochure.
- In March 2022, Item 12 was updated to include disclosure of ABGC's role when recommending a rollover of retirement account assets.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 801-486-5069 or by email at: larry@consultabg.com.

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4. Advisory Business

Firm Description

ABG Consultants, LLC, ("ABGC") was founded in 2004.

ABGC provides personalized confidential investment management to individuals, pension and other retirement plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client.

ABGC is strictly a fee-only investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder's fees are accepted.

Investment advice is provided, with the client making the final decision on investment selection unless ABGC is hired as an ERISA section 3-38 (full fiduciary) investment manager for a qualified retirement plan. ABGC does not act as a custodian of client assets. The client always maintains asset control. ABGC places trades for clients under a limited power of attorney.

A written evaluation of each client's initial situation is provided to the client for each of their accounts and the account holdings.

Principal Owners

ABG Consultants, LLC is a wholly owned subsidiary of Rocky Mountain Employee Benefits, Inc. Effective January 1, 2021, Rocky Mountain Employee Benefits, Inc. was acquired by Fiduciary Services Group, LLC.

Types of Advisory Services

ABGC provides investment supervisory services, also known as asset management services; manages investment advisory accounts not involving investment supervisory services; furnishes investment advice through consultations; issues periodic newsletters; issues special reports about securities; and issues, charts, graphs, formulas, or other devices which clients may use to evaluate securities.

ABGC provides managed accounts for retirement plans where an individual will take a risk tolerance questionnaire to determine one of several glide paths they should be on between conservative and aggressive. This can be adjusted annually.

ABGC provides financial plans and financial planning, which may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; education planning; and debt/credit planning.

As of December 31, 2021, ABGC has \$477,846,807 in assets under management. Of this amount, \$353,673,808 is managed on a discretionary basis, and \$124,172,999 is managed on a non-discretionary basis.

ABGC does not sponsor nor do they participate in any Wrap Fee Programs.

Tailored Relationships

The goals and objectives for each client are documented in our client relationship management system. Investment policy statements are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

Types of Agreements

The following agreements define the typical client relationships.

Advisory Service Agreement

Most clients choose to have ABGC manage their assets in order to obtain ongoing in-depth advice and life planning. All aspects of the client's financial affairs are reviewed, including those of their children. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work and fee for an Advisory Service Agreement is provided to the client in writing prior to the start of the relationship. An Advisory Service Agreement includes: cash flow management; insurance review; investment management (including performance reporting); education planning; retirement planning; estate planning, as well as the implementation of recommendations within each area.

The annual Advisory Service Agreement fee is based on a percentage of the investable assets according to the following schedule:

Non-Discretionary Advisory Fees:

\$	0	-	499,999	1.00%
\$	500,000	-	1,999,999	0.85%
\$	2,000,000	-	2,999,999	0.75%
\$	3,000,000	-	3,999,999	0.70%
\$	4,000,000	-	4,999,999	0.65%
\$	5,000,000	-	5,999,999	0.60%
\$	6,000,000	-	6,999,999	0.55%
\$	7,000,000	-	7,999,999	0.50%
\$	8,000,000	-	8,999,999	0.45%

\$ 9,000,000	-	9,999,999	0.40%
\$ 10,000,000	-	11,999,999	0.35%
\$ 12,000,000	-	13,999,999	0.32%
\$ 14,000,000	-	15,999,999	0.30%
\$ 16,000,000	-	17,999,999	0.28%
\$ 18,000,000	-	19,999,999	0.26%
\$ 20,000,000	-	24,999,999	0.25%
\$ 25,000,000	-	29,999,999	0.23%
\$ 30,000,000	-	34,999,999	0.22%
\$ 35,000,000	-	39,999,999	0.21%
\$ 40,000,000	-		0.20%

The minimum annual fee is \$3,000. Current client relationships may exist where the fees are higher or lower than the fee schedule above.

Discretionary Advisory Fees:

\$ 0	-	399,999	1.20%
\$ 400,000	-	599,999	1.10%
\$ 600,000	-	799,999	1.00%
\$ 800,000	-	999,999	0.95%
\$ 1,000,000	-	1,499,999	0.90%
\$ 1,500,000	-	1,999,999	0.85%
\$ 2,000,000	-	2,999,999	0.80%
\$ 3,000,000	-	3,999,999	0.75%
\$ 4,000,000	-	4,999,999	0.70%
\$ 5,000,000	-	5,999,999	0.65%
\$ 6,000,000	-	6,999,999	0.60%
\$ 7,000,000	-	7,999,999	0.55%
\$ 8,000,000	-	8,999,999	0.50%
\$ 9,000,000	-	9,999,999	0.45%
\$ 10,000,000	-	14,999,999	0.40%
\$ 15,000,000	-	16,999,999	0.35%
\$ 17,000,000	-	18,999,999	0.33%
\$ 19,000,000	-	21,999,999	0.32%
\$ 22,000,000	-	24,999,999	0.31%
\$ 25,000,000	-	28,999,999	0.29%
\$ 29,000,000	-	32,999,999	0.28%
\$ 33,000,000	-	37,999,999	0.27%

\$ 38,000,000	- 42,999,999	0.25%
\$ 43,000,000	- 48,999,999	0.24%
\$ 49,000,000	- 54,999,999	0.23%
\$ 55,000,000	- 62,999,999	0.21%
\$ 63,000,000	-	0.20%

The minimum annual fee is \$3,000 for Non-Discretionary clients and \$4,000 for Discretionary clients. Current client relationships may exist where the fees are higher or lower than the fee schedule above.

Although the Advisory Service Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the investment manager may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The portfolio value at the time the final invoice is created is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

Investment Management Agreement

An *Investment Management Agreement* is executed with each relationship. The annual fee for an *Investment Management Agreement* is negotiable and set forth in the tables listed in this document.

Hourly Planning Engagements

ABGC provides hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements is \$250.

Asset Management

Assets are invested primarily in no-load or low-load mutual funds and exchange-traded funds, usually through discount brokers or fund companies. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Discount brokerages may charge a transaction fee for the purchase of some funds.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades. ABGC does not receive any compensation, in any form, from fund companies.

Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts, futures contracts, and interests in partnerships.

Initial public offerings (IPOs) are not available through ABGC.

Termination of Agreement

A Client may terminate any of the aforementioned agreements at any time by notifying ABGC in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, ABGC will refund any unearned portion of the advance payment.

ABGC may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, ABGC will refund any unearned portion of the advance payment.

5. Fees and Compensation

Description

ABGC bases its fees on a percentage of assets under management, hourly charges and/or fixed fees (not including subscription fees).

Some *Retainer Agreements* may be priced based on the complexity of work, especially when asset management is not the most significant part of the relationship.

Lower fees than those charged by ABGC may be available from other sources. It is the responsibility of the client to compare fees and services between those sources before engaging ABGC.

Fees are negotiable.

Managed Account Fees

The rate for managed account services is 0.25% of the plan assets for which ABGC is providing such managed account services. These fees are negotiable.

Financial Planning Fees

The rate for creating client financial plans is between \$1,500 and \$5,000. The fees are negotiable and the final fee schedule will be attached as Exhibit II of the Financial Planning Agreement.

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

Fee Billing

Investment management fees are billed quarterly, in arrears, meaning that we invoice you after the three-month billing period has ended. Payment in full is expected upon invoice presentation. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Clients may elect to pay their fees directly.

Managed account fees are withdrawn directly from client's accounts with client's written authorization. Fees are paid quarterly in arrears.

Financial planning fees are withdrawn directly from the client's accounts with client's written authorization or may be invoiced and billed directly to the client; clients may select the method in which they are billed. Fees are paid in advance at point of sale.

Prepayment of Fees

While ABGC collects portfolio management fees in arrears, ABGC does collect some fees in advance. Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

ABGC, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

New Advisory Service Agreement fees are calculated on a formula basis and adjusted for complexity of individual situations. *The formula is based on gross income, gross assets and other financial considerations.*

ABGC does not accept any compensation for the sale of securities or other investment products. ABGC does not accept any asset-based sales charges or service fees from the sale of mutual funds. In addition ABGC will recommend "no-load" funds or funds which have had their loads waived.

Expense Ratios

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For

example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to ABGC.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

Past Due Accounts and Termination of Agreement

ABGC reserves the right to stop work on any account that is more than 30 days overdue. Any unused portion of fees collected in advance will be refunded within 30 days.

6. Performance-Based Fees

ABGC does not charge performance-based fees. Performance-based fees are fees that are based on a share of the capital gains or capital appreciation of a client's account. ABGC's fees are calculated as described in Item 5 above.

7. Types of Clients

Description

ABGC generally provides investment advice to individuals, pension and other retirement plans, trusts, estates, corporations or business entities.

Client relationships vary in scope and length of service.

Account Minimums

The minimum account size is dependent on whether the account will be managed on a discretionary or non-discretionary basis. For accounts managed on a discretionary basis, we require a minimum account size of \$400,000 in assets under management. For accounts managed on a non-discretionary basis, we require a minimum account size of \$300,000 of assets under management. If any account falls below the abovementioned minimum thresholds, a minimum annual fee will still be imposed as follows:

When an account falls below \$400,000 in value, the minimum annual fee of \$4,000 is charged and when an account falls below \$300,000 in value, the minimum annual fee of \$3,000 is charged for non-discretionary advisory clients. Depending upon circumstances, ABGC will sign an *Hourly Agreement* with the client if assets have diminished significantly below \$250,000.

ABGC has the discretion to waive the account minimum. Accounts of less than \$250,000 may be set up when the client and the advisor anticipate the client will add additional funds to the accounts bringing the total to \$250,000

within a reasonable time. Other exceptions will apply to employees of ABGC and their relatives, or relatives or employees of existing clients.

Clients receiving ongoing asset management services will be assessed a \$3,000 minimum annual fee for non-discretionary advice and \$4,000 for discretionary advice. Clients with assets below the minimum account size may pay a higher percentage rate on their annual fees than the fees paid by clients with greater assets under management.

8. Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Other sources of information that ABGC may use include Morningstar Principia mutual fund information, Morningstar Principia stock information, Charles Schwab & Company's "SchwabLink" service, Zephyr Style Advisor, Plan Investment Plus by DST Systems (formerly Newkirk) and the WorldWide Web.

Investment Strategies

The primary investment strategy used on client accounts is strategic asset allocation. ABGC may also utilize a core and satellite approach. This means that we use passively-managed index and exchange-traded funds as the core investments, and then add actively-managed funds where there are greater opportunities to make a difference. Portfolios are globally diversified to control the risk associated with traditional markets.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, short sales, margin transactions, and option

writing (including covered options, uncovered options or spreading strategies).

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks, among others:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

- **Exchange Traded Fund (ETF) Risk:** Risk of an investment in an ETF, including the possible loss of principal. ETFs typically trade on a securities exchange and the prices of their shares fluctuate throughout the day based on supply and demand, which may not correlate to their net asset values. Although ETF shares will be listed on an exchange, there can be no guarantee that an active trading market will develop or continue. Owning an ETF generally reflects the risks of owning the underlying securities it is designed to track. ETFs are also subject to secondary market trading risks. In addition, an ETF may not replicate exactly the performance of the index it seeks to track for a number of reasons, including transaction costs incurred by the ETF, the temporary unavailability of certain securities in the secondary market, or discrepancies between the ETF and the index with respect to weighting of securities or number of securities held.
- **Cybersecurity Risk:** Risk related to unauthorized access to the systems and networks of ABGC and its service providers. The computer systems, networks and devices used by ABGC and service providers to us and our clients to carry out routine business operations employ a variety of protections designed to prevent damage or interruption from computer viruses, network failures, computer and telecommunication failures, infiltration by unauthorized persons and security breaches. Despite the various protections utilized, systems, networks or devices potentially can be breached. A client could be negatively impacted as a result of a cybersecurity breach. Cybersecurity breaches can include unauthorized access to systems, networks or devices; infection from computer viruses or other malicious software code; and attacks that shut down, disable, slow or otherwise disrupt operations, business processes or website access or functionality. Cybersecurity breaches cause disruptions and impact business operations, potentially resulting in financial losses to a client; impediments to trading; the inability by us and other service providers to transact business; violations of applicable privacy and other laws; regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, or other compliance costs; as well as the inadvertent release of confidential information. Similar adverse consequences could result from cybersecurity breaches affecting issues of securities in which a client invests; governmental and other regulatory authorities; exchange and other financial market operators, banks, brokers, dealers and other financial institutions; and other parties. In addition, substantial costs may be incurred by those entities in order to prevent any cybersecurity breaches in the future.

9. Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of the adviser and the integrity of the adviser's management. ABGC has no information applicable to this Item.

10. Other Financial Industry Activities and Affiliations

ABGC nor any management persons or employees are registered or have an application pending to register as a broker-dealer or a registered representative of a broker-dealer.

ABGC nor any management persons or employees are registered or have an application pending to register as a futures commission merchant, a commodity pool operator, a commodity trading advisor or an associated person of any of the aforementioned entities.

Licensed Insurance Agents

Certain of the Firm's advisory persons are licensed insurance agents and may offer certain insurance products on a fully-disclosed commissionable basis. Please refer to the advisory person's individual 2B Supplement for more information. A conflict of interest exists to the extent that ABGC recommends the purchase of insurance products where its advisory persons may be entitled to insurance commissions or other additional compensation. Clients are under no obligation to purchase insurance products through any person affiliated with ABGC. The Firm has procedures in place whereby it seeks to ensure that all recommendations are made in its clients' best interest regardless of any such affiliations.

Rocky Mountain Employee Benefits, Inc., DBA: ABG Rocky Mountain, is wholly owned by Fiduciary Services Group, LLC ("FSG"). FSG has other subsidiary companies that are affiliated with ABGC due to this common ownership. PCS Retirement, LLC ("PCS") is a retirement plan recordkeeper and third-party administrator. Efficient Advisors, LLC ("Efficient") is an SEC registered investment adviser. Fiduciary Advisors, LLC ("FA") is an SEC registered investment adviser and sponsor of a wrap fee program called ManagedPlan. AdvisorTrust, LLC ("AT") is a non-depository trust company. Aspire Financial Services, LLC ("Aspire") is a retirement plan recordkeeper.

The way that we address any conflicts created by these relationships is by disclosure of the relationships, proper supervision, and upholding ABGC's Code of Ethics.

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

ABGC has a Code of Ethics (the “Code”) which requires ABGC’s employees (“supervised persons”) to comply with their legal obligations and fulfill the fiduciary duties owed to the Firm’s clients. Among other things, the Code of Ethics sets forth policies and procedures related to conflicts of interest, outside business activities, gifts and entertainment, compliance with insider trading laws and policies and procedures governing personal securities trading by supervised persons.

Personal securities transactions of supervised persons present potential conflicts of interest with the price obtained in client securities transactions or the investment opportunity available to clients. The Code addresses these potential conflicts by prohibiting securities trades that would breach a fiduciary duty to a client and requiring, with certain exceptions, supervised persons to report their personal securities holdings and transactions to ABGC for review by the Firm’s Chief Compliance Officer. The Code also requires supervised persons to obtain pre-approval of certain investments, including initial public offerings and limited offerings. ABGC will provide a copy of the Code of Ethics to any client or prospective client upon request.

12. Brokerage Practices

Selecting Custodians and/or Brokerage-Dealers

ABGC generally recommends that its clients utilize the custody and brokerage services of an unaffiliated broker/dealer custodian (a “BD/Custodian”) with which ABGC has an institutional relationship. Currently, this includes Charles Schwab, Fidelity Investments, and Matrix Financial Services Corporation, each of which is a “qualified custodian” as that term is described in Rule 206(4)-2 of the Advisers Act. Each BD/Custodian provides custody of securities, trade execution, and clearance and settlement of transactions placed on behalf of clients by ABGC. If your accounts are custodied at one of the above qualified custodians, the qualified custodian will hold your assets in a brokerage account and buy and sell securities when we instruct them to. Clients will pay fees to each custodian for custody and the execution of securities transactions in their accounts.

In making BD/Custodian recommendations, ABGC will consider a number of judgmental factors, including, without limitation: 1) clearance and settlement capabilities; 2) quality of confirmations and account statements; 3) the ability of the BD/Custodian to settle the trade promptly and accurately; 4) the financial standing, reputation and integrity of the BD/Custodian; 5) the BD/Custodian’s access to markets, research capabilities, market knowledge, and any “value added” characteristics; 6) ABGC’s past experience with the BD/Custodian; and 7) ABGC’s past experience with similar trades. Recognizing the value of these factors, clients may pay a brokerage commission in excess of that which another broker might have charged for effecting the same transaction.

ABGC will periodically review its arrangements with the BD/Custodians and other broker-dealers against other possible arrangements in the marketplace as it strives to achieve best execution on behalf of its clients. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including, but not limited to, the following:

- a broker-dealer's trading expertise, including its ability to complete trades, execute and settle difficult trades, obtain liquidity to minimize market impact and accommodate unusual market conditions, maintain anonymity, and account for its trade errors and correct them in a satisfactory manner;
- a broker-dealer's infrastructure, including order-entry systems, adequate lines of communication, timely order execution reports, an efficient and accurate clearance and settlement process, and capacity to accommodate unusual trading volume;
- a broker-dealer's ability to minimize total trading costs while maintaining its financial health, such as whether a broker-dealer can maintain and commit adequate capital when necessary to complete trades, respond during volatile market periods, and minimize the number of incomplete trades;
- a broker-dealer's ability to provide research and execution services, including advice as to the value or advisability of investing in or selling securities, analyses and reports concerning such matters as companies, industries, economic trends and political factors, or services incidental to executing securities trades, including clearance, settlement and custody; and
- a broker-dealer's ability to provide services to accommodate special transaction needs, such as the broker-dealer's ability to execute and account for client-directed arrangements, participate in underwriting syndicates, and obtain initial public offering shares.

Order Aggregation

Client orders are not generally aggregated due to the nature of the securities traded. Individual equity securities are typically liquidated as part of the allocation process on an individual trade basis. To the extent that the Firm determines to aggregate client orders for the purchase or sale of securities, including securities in which the Firm's supervised persons may invest, the Firm will generally do so in a fair equitable manner in accordance with applicable rules promulgated under the Advisers Act and guidance provided by the staff of the SEC and consistent with policies and procedures established by the Firm.

Rollover Recommendations

When ABGC provides investment advice to you regarding your retirement plan account or individual retirement account, ABGC is a fiduciary 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 ABGC makes money creates some conflicts with your interests, so ABGC operates under a special rule that requires ABGC to act in your best interest and not put our interest ahead of yours.

13. Review of Accounts

Periodic Reviews

ABGC monitors investment advisory portfolios as part of a continuous and ongoing process. ABGC offers clients at least one annual meeting to conduct a formal review of the client's accounts to review the allocation and performance and consider whether changes are warranted given the client's objectives and situation.

Review Triggers

Other conditions that may trigger an additional review, other than a periodic review, include material market, economic, or political events or changes in a client's situation/objectives.

Regular Reports

Account reviewers are members of the firm's Investment Committee. They are instructed to consider the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client.

Clients receive periodic communications on at least an annual basis. *Advisory Service Agreement* clients, *Investment Management* clients, and *Retainer Agreement* clients receive written quarterly updates. The written updates may include a net worth statement and/or a portfolio statement.

Written brokerage statements are generated no less than quarterly and are sent directly from the qualified custodian. These reports list the account positions, activity in the account over the covered period, and other related information. Clients are also sent confirmations following each brokerage account transaction unless confirmations have been waived.

Clients are urged to carefully review all custodial account statements and compare them to any statements and reports provided by ABGC. ABGC statements and reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

14. Client Referrals and Other Compensation

Economic Benefits Provided by Third Parties for Advice Rendered to Clients

ABGC does not receive benefits from third parties for providing investment advice to clients.

Compensation to non-Supervised Persons for Client Referrals

ABGC does not currently have referral arrangements with solicitors but may in the future enter into referral arrangements with unaffiliated individuals who may from time-to-time refer potential investors to ABGC for investment management services and be compensated for successful referrals by receiving a percentage of the advisory fee ABGC receives from such clients. Any such arrangements must be in compliance with Rule 206(4)-3 of the Advisers Act.

15. Custody

Account Statements

All assets are held at qualified custodians, which mean the custodians provide account statements directly to clients at their address of record at least quarterly.

ABGC may also be deemed to have custody over the funds and securities invested in pension consulting plans that ABGC manages.

Performance Reports

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by ABGC.

16. Investment Discretion

Discretionary Authority for Trading

ABGC accepts discretionary authority to manage securities accounts on behalf of clients. ABGC has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. However, ABGC consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

The client approves the custodian to be used and the commission rates paid to the custodian. ABGC does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy that you have approved in writing.

Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute the trades that you have approved.

17. Voting Client Securities

Proxy Votes

ABGC does not vote proxies on securities. Clients are expected to vote their own proxies.

When assistance on voting proxies is requested, ABGC will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

18. Financial Information

ABGC is not required to disclose any financial information pursuant to this item due to the following:

- a) ABGC does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance of rendering services;
- b) ABGC is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts; and
- c) ABGC has never been the subject of a bankruptcy petition.

Brochure Supplement (Part 2B of Form ADV)

Lawrence Solomon – AIF®
Peter Messina – CFP®, QKA, CPFA, AIF®
Tabitha Garreffa

ABG Consultants, LLC
7090 South Union Park Avenue, Suite 650
Salt Lake City, UT 84047
801-486-5069
801-486-5063
www.consultabg.com

This brochure supplement provides information about the above named individuals that supplements the ABG Consultants, LLC brochure. You should have received a copy of that brochure. Please contact ABG Consultants at the address or phone number above if you did not receive ABG Consultants, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about the above mentioned individuals is available on the SEC's website at www.adviserinfo.sec.gov.

Professional Certifications

Employees have earned the following certifications and credentials that are required to be explained in further detail.

Certified Financial Planner (“CFP®”)

The CFP® certification is a financial planning credential awarded by the Certified Financial Planner Board of Standards Inc. (the “CFP Board”) to individuals who meet its education, examination, experience and ethics requirements. Eligible candidates are required to have either five years of work experience in the financial planning industry or, in the alternative, three years of related experience and a bachelor’s degree from an accredited U.S. college or university. Certificants are further required to complete a CFP Board-Registered Education Program (or possess a qualifying professional credential), clear a personal and professional background check, and pass the CFP® Certification Examination, a 10-hour multiple choice exam divided into three separate sessions. To maintain the certification, CFP® designees must also complete at least 30 hours of continuing education every two years on an ongoing basis. For additional information about this credential, please refer directly to the website of the issuing organization.

Accredited Investment Fiduciary (“AIF®”)

The AIF® designation is granted by fi360, formerly known as the Center for Fiduciary Studies. The purpose of the Accredited Investment Fiduciary (AIF®) Designation is to assure that those responsible for managing or advising on investor assets have a fundamental understanding of the principles of fiduciary duty, the standards of conduct for acting as a fiduciary, and a process for carrying out fiduciary responsibility. Those who earn the AIF® mark successfully complete a specialized program on investment fiduciary standards of care, pass a comprehensive examination and attest to a Code of Ethics and Conduct of Standards. All AIF® designees must acquire 6 hours of Continuing Education (CE) each renewal year.

Certified Plan Fiduciary Advisor (“CPFA”)

This designation is through the National Association of Plan Advisors. The CPFA program covers four key areas: ERISA fiduciary roles and responsibilities, fiduciary oversight, investment management, and plan management. CPFA holders must successfully complete an exam covering the areas described above. In addition, CPFA holders must complete at least 10 hours of continuing education annually.

Qualified 401(k) Administrator (“QKA”)

The Qualified 401(k) Administrator (QKA) credential is offered for retirement plan professionals who work primarily with 401(k) plans and is designed to meet the needs of retirement plan administrators and consultants. The QKA Credential provides a comprehensive foundation for plan administration, from basic concepts to 401(k) plan compliance. A minimum of two years’ experience in retirement plan related matters is required along with completion of ASPPA’s QKA examination series to be a candidate for this credential. All credentialed members must acquire 40 hours of Continuing Education (CE) credits (2 of these must be Ethics) in a two-year cycle as well as renew ASPPA Membership annually to retain credentials.

Lawrence Solomon, AIF®

Birth Date: 1965

Education:

- Utah State University, Logan, Utah, 1999, Bachelor of Science in Accounting
- Utah State University, Logan, Utah, 2001, Master of Business Administration
- AIF® - Accredited Investment Fiduciary - 2015

Business Background:

- ABG Consultants, LLC; April 2004 to Present, President
- Rocky Mountain Employee Benefits, February 2001 to April 2004, CFO
- ELM, Inc., January 2000 to February 2001, CFO
- The Murdock Group, January 1998 to January 2000, CFO

Disciplinary Information:

ABGC is required to disclose the pertinent facts regarding any legal or disciplinary events material to a client's evaluation of Lawrence Solomon. ABGC has no information to disclose in relation to this Item.

Outside Business Activities:

The potential for a conflict of interest arises from an arrangement between ABG Consultants and parent company to furnish referrals of potential clients which may financially benefit both companies. All clients are free to choose to work with ABG Consultants, ABG Rocky Mountain or both.

Lawrence Solomon is also a licensed insurance agent and may recommend or offer insurance products for which he may be entitled to receive corresponding commissions and trail fees. You should be aware that these commissions and fees may present a potential conflict of interest because he may have a greater incentive to recommend the purchase or sale of insurance products when he would receive additional compensation by doing so.

Additional Compensation: None

Supervision:

Lawrence Solomon's advisory activities are supervised by James Hadaway, Chief Compliance Officer of ABGC. Mr. Hadaway may be contacted by calling 513-832-5477.

Peter Messina, CFP®, QKA, CPFA, AIF®

Birth Date: 1990

Education:

- University of Utah, 2011 Bachelor of Science in Economics
- University of Utah, 2011 Bachelor of Science in Anthropology
- American Society of Pension Professionals and Actuaries, 2015
Qualified 401(k) Administrator (QKA)
- American Society of Pension Professionals and Actuaries, 2015
Qualified Plan Financial Consultant (QPFC)

Business Background:

- ABG Consultants, LLC, 2013-Current, Advisor

Disciplinary Information:

ABGC is required to disclose the pertinent facts regarding any legal or disciplinary events material to a client's evaluation of Peter Messina. ABGC has no information to disclose in relation to this Item.

Other Business Activities:

Peter Messina is not engaged in any investment-related business or occupation (other than this advisory firm).

Additional Compensation: None

Supervision:

Peter Messina's advisory activities are supervised by James Hadaway, Chief Compliance Officer of ABGC. Mr. Hadaway may be contacted by calling 513-832-5477.

Tabitha Garreffa

Birth Date: 1980

Education:

- University of Phoenix, 2012, Master of Business Administration
- Grantham University, 2008, Bachelor of Science Business Administration

Business Background:

- ABG Consultants, LLC, November 2021 – Current, Advisor
- Fluent Financial, LLC, January 2020 – October 2021, Director of Operations/Advisor
- Fluent Financial, LLC, April 2017 – January 2020, Client Relationship Manager
- Private Client Services, LLC, July 2018 – October 2021, Registered Rep
- First Command Financial Planning, October 2013 – April 2017, Investment Advisor Rep/Registered Rep
- US Army, March 1999 – October 2021, Dental NCO/NCOIC

Disciplinary Information:

ABGC is required to disclose the pertinent facts regarding any legal or disciplinary events material to a client's evaluation of Tabitha Garreffa. ABGC has no information to disclose in relation to this Item.

Other Business Activities:

Tabitha Garreffa is not engaged in any investment-related business or occupation (other than this advisory firm).

Additional Compensation: None

Supervision:

Tabitha Garreffa's advisory activities are supervised by James Hadaway, Chief Compliance Officer of ABGC. Mr. Hadaway may be contacted by calling 513-832-5477.