ADG Wealth Management Group, LLC

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PART 2A OF FORM ADV: FIRM BROCHURE
ITEM 1: COVER PAGE

This brochure provides information about the qualifications and business practices of ADG Wealth Management Group, RIA. If you have any questions about the contents of this brochure, please contact us at (504) 267-9880. 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 ADG Wealth Management Group, RIA also is available on the SEC's website at www.adviserinfo.sec.gov

*The designation of RIA, Registered Investment Advisor, does not imply a certain level of skill or training.

Item 2 Material Changes

This Brochure dated March 2020 serves as a replacement to all previous Brochures. There have been no material changes to this brochure since our last annual update.

Item 3 Table of Contents

Item 4 Advisory Business

ADG Wealth Management Group, LLC is a Registered Investment Advisor offering investment advice, financial planning, and portfolio management services to our clients. Our firm has been in business since 2010 and we have been registered with the SEC since 2015. Our firm is owned by Pierre Adams (25%), John Dalton (25%), Nicholas Danna, IV (25%), and Paul Guidry (25%).

Types of Advisory Services We Offer

Portfolio Management Services. As an active money manager, we use technical and fundamental indicators in determining the strength and value of the market. We then reposition your accounts into areas that we expect to be the strongest going forward. We may also reposition a client's assets to cash as a defensive strategy.

Our portfolio management services are based on security analysis which includes charting, fundamental, and technical methods. Economic and market data is compiled and reviewed on a weekly basis. We use moving averages to monitor the performance of investments. Analysis focuses on historical data regarding past performance of securities as well as expectations regarding future performance. A changing buy or sell signal produced by moving averages would trigger a review of a client's portfolio.

Financial Planning Services. As part of our comprehensive financial planning services, we provide advice on life insurance, health insurance, long-term care insurance and disability insurance. Additionally, financial planning services could include advice related to estate tax, income tax, and retirement or business planning. Financial Planning information will be obtained through personal interviews with clients concerning their current financial status, future goals and attitudes towards risks. Clients are under no obligation to act on our recommendation. If they elect to act on any or all of the recommendations, they are under no obligation to effect the transactions through our firm.

Referrals to Third Party Money Managers. Our firm may use the services of a third party money manager for the management of client accounts. Prior to referring clients, our firm will provide initial due diligence on third party money managers and ongoing reviews of their management of client accounts. In order to assist in the selection of a third party manager, we will gather information about your investment objectives and risk tolerance as well as any reasonable restrictions to be imposed upon the management of the account.

Tailoring of Advisory Services

We offer individualized investment management services to our clients. Our Strategic Asset Management (SAM) portfolio can be customized to meet the needs of each individual client. More information about the SAM Portfolio can be found in Item 8. Additionally, we can accommodate requests for reasonable restrictions on assets held at our firm.

Participation in Wrap Fee Programs

The firm has developed several advisory services and programs to give you as much flexibility as possible. Wrap fee programs allow clients to pay a specified fee for portfolio management and trade execution services. ADG does not sponsor a wrap fee program but does act as a portfolio manager for clients by utilizing the Pinnacle Platform available through Triad Advisors. ADG is compensated by advisory fees charged through the wrap program. ADG also offers advisory services outside of a wrap fee program through Fidelity Investments, TD Ameritrade, and Nationwide (formerly Jefferson National). The specific advisory program selected by you may cost you more or less than purchasing the services offered in each program separately. Factors that bear upon the cost of a particular advisory program in relation to the cost of the same services purchased separately include, but may not be limited to, the type and size of the account, and the historical and/or expected size or number of trades for the account.

Regulatory Assets Under Management

As of December 31, 2019 the firm managed $267 million in client assets. Of that amount, $210 million is managed in discretionary accounts and $57 million is managed in non-discretionary accounts.

ITEM 5 FEES AND COMPENSATION

All fees charged for advisory services should be calculated and charged in accordance with the terms of the client signed investment advisory agreement or financial planning agreement.

The Advisor typically charges clients directly for active money management services. Management fees are negotiable but will not exceed 2% per year.

Fidelity Investments as Custodian. Advisory fees are billed in arrears, either quarterly or semi-annually. The fee is based on the account balance at the end of the billing period. Account balances used for billing may or may not equal the statement balance due to a variety of factors, primarily related to dividends and interest earned but not yet received. Client fees are typically directly deducted from client accounts. Clients also have the option to pay the fee directly or to request the fee be deducted from an alternate account.

TD Ameritrade as Custodian. Advisory fees are billed in arrears, either quarterly or semi-annually. The fee is based on the account balance at the end of the billing period. Account balances used for billing may or may not equal the statement balance due to a variety of factors, primarily related to dividends and interest earned but not yet received. Client fees are typically directly deducted from client accounts. Clients also have the option to pay the fee directly or to request the fee be deducted from an alternate account.

National Financial Services (via Triad Advisors) as Custodian. Advisory fees are billed in advance, typically on a quarterly basis. The fee is based on the average daily balance of the account during the billing period. Client fees are typically deducted from client accounts. Clients also have the option to request the fee be deducted from an alternate non-retirement account.

Upon receipt of your notice of termination, all unearned advisory fees paid at the beginning of any billing period, as calculated by multiplying the total fee for the period by the number of days remaining in the period after the effective date of termination, shall by refunded by the program sponsor.

Nationwide (Formerly Jefferson National) as Custodian. For fee-based annuity accounts held at Jefferson National, client fees are billed in arrears on a quarterly basis. The fee is based on the account balance at the end of the billing period. Account balances used for billing may or may not equal the statement balance due to a variety of factors, primarily related to interest earned but not yet received. Client fees are typically deducted from client accounts. Clients also have the option to pay the fee directly or to request the fee be deducted from an alternate account.

Other Fees and Expenses

In addition to annual advisory fees, you will also be responsible for transaction costs associated with the purchase of mutual funds, exchange traded funds, stocks, and bonds. Other client fees will vary by custodian but may include, but are not limited to, IRA maintenance fees, inactivity fees, wire fees, and annuity subscription fees. Please refer to the information provided by your custodian for details regarding fees specific to your account.

Advisor may be paid a fixed fee for general financial planning and consulting services. Because financial planning services can vary in complexity, we do not have a set fee schedule for these services. Financial planning fees may by paid in advance or in arrears and may be billed as a flat fee or at an hourly rate. Please refer to the fee schedule detailed in the financial planning agreement signed by the client.

Termination of Advisory Services

The advisory agreement may be terminated at any time by notice in writing by either party. Termination shall be effective when received by all parties to said Agreement or ten (10) business days from the date of termination notice, whichever occurs sooner, or if a later termination date is specified in the notice, on that specified date. Advisor will not accept any termination instructions, including account liquidation instructions, unless provided in writing by the Client. Client is responsible for termination fees and account transfer fees charged by the custodian. Fees paid in advance hereunder will be prorated to the date of termination, and any unearned portion thereof will be refunded to Client. No assignment, as the term is defined in the Investment Advisors Act of 1940, of the Agreement shall be made by Advisor without written consent of Client.

Commissionable Securities Sales

Representatives of our firm are registered representatives of Triad Advisors, a registered broker-dealer and member of FINRA/SIPC. As such, they are able to accept compensation for the sale of securities other than investment products, including distribution or service ("trail") fees from the sale of mutual funds. Clients should be aware that the practice of accepting commissions for the sale of securities presents a conflict of interest and gives our firm and/or our representatives an incentive to recommend investment products based on the compensation received. Our firm generally addresses commissionable sales conflicts that arise when explaining to clients these sales create an incentive to recommend based on the compensation to be earned and/or when recommending commissionable mutual funds, explaining that "no-load" funds are also available. Our firm does not prohibit clients from purchasing recommended investment products through other unaffiliated brokers or agents.

In limited circumstances and at the investment advisor representative's discretion, an advisory fee may be waived when the client has elected to pay a commission and or 12b-1 trail fee on a mutual fund held at Pioneer Investments.

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

Advisor does not charge Performance-Based Fees or other fees based on a share of capital gains on or capital appreciation of assets of a client.

Item 7 Types of Clients

Advisor generally provides investment advice to individuals, high net worth individuals, trusts, corporations, or business entities.

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

As an active money manager, Advisor, uses technical and fundamental indicators in determining the strength and value of the market. Advisor then repositions the client's accounts into areas that the Advisor expects to be the strongest going forward. Advisor can also reposition a client's assets to cash as a defensive strategy.

Advisor's security analysis includes charting, fundamental and technical methods. Economic and market data is compiled and reviewed on a weekly basis. Advisor uses moving averages to monitor the performance of investments. Analysis focuses on historical data regarding past performance of funds and/or partnership sponsors as well as expectations regarding future performance. A changing buy or sell signal produced by moving averages would trigger a review of a client's portfolio. Investment strategies used to implement any investment advice given to clients include long-term purchases and/or short-term purchases. Investing in securities involves risk of loss that clients should be prepared to bear.

Investment in any asset class comes with inherent risks and uncertainties that could result in loss of value. The value of fixed income securities and equity securities are impacted by the expected risks and returns of other asset classes, including money markets, CDs and each other. Risk factors for fixed income securities include, but are not limited to, credit risk, interest rate risk, and liquidity risk. Risk factors for equity securities include, but are not limited to, adverse economic conditions, changes to the outlook for corporate earnings, changes in interest or currency rates, political uncertainty, and adverse investor sentiment. Because equities represent ownership interest in companies, they are inherently volatile. Equity and fixed income securities are also issued and traded around the world offering global diversification but a near infinite number of investment options as well. Equity securities are also grouped relative to market capitalization and style, growth versus value. Due to these complexities, Advisor utilizes various third party research to help determine asset allocation and to assist with security and manager selection.

Investment Strategies

Advisor's **Bond Rotation Model** is comprised of various positions and may include a combination of Fixed Income Securities, Mutual Funds, Exchange Traded Funds, Closed End Funds, Annuity Subaccounts, and the Cash/Money Market position. The investments utilized in the model will primarily invest in fixed income instruments, including but not limited to U.S. treasury bonds, municipal bonds, corporate bonds, mortgage backed securities, high yield bonds, floating rate bonds, and international government bonds. A client's account can be positioned, in whole or in part, to any of the aforementioned fixed income positions. Allocations will be determined by a combination of technical and fundamental analysis. Advisor can utilize the Cash/Money market position in a down market in order to minimize the loss to a client. Investment in this model comes with inherent risks and uncertainties that could result in loss of value. Risk factors for fixed income securities include, but are not limited to, credit risk (the ability or willingness of a borrower to repay interest and principal), interest rate risk (increases in interest rates generally cause fixed income prices to decline), and liquidity risk (the difficulty in purchasing or selling could cause values to decline). The value of fixed income securities could also be impacted by the expected risks and returns of other asset classes, including money markets, CDs, and equities. Risk factors for equity securities include, but are not limited to, adverse economic conditions, changes to the outlook for corporate earnings, changes in interest or currency rates, political uncertainty, and adverse investor sentiment. Because equities represent ownership interest in companies, they are inherently volatile. The value of equity securities could also be impacted by the expected risks and returns of other asset classes, including money markets, CDs, and fixed income securities.

Advisor's **Fixed Income Model (Municipal Bonds)** is comprised of various positions and may include a combination of Fixed Income Securities, Mutual Funds, Exchange Traded Funds, Closed End Funds, Annuity Sub-Accounts, and the Cash/Money Market position. The investments utilized in the model will primarily invest in fixed income instruments whose interest is generally exempt from federal income taxes. Investment in this model comes with inherent risks and uncertainties that could result in loss of value. Risk factors for fixed income securities include, but are not limited to, credit risk (the ability or willingness of a borrower to repay interest and principal), interest rate risk (increases in interest rates generally cause fixed income prices to decline), and liquidity risk (the difficulty in purchasing or selling could cause values to decline). The value of fixed income securities could also be impacted by the expected risks and returns of other asset classes, including money markets, CDs, and equities.

The Advisor's **Fixed Income Model (Qualified)** is comprised of various positions and may include a combination of Fixed Income Securities, Mutual Funds, Exchange Traded Funds, Closed End Funds, Annuity Sub-Accounts, and the Cash/Money Market position. The investments utilized in the model will primarily invest in fixed income instruments, including but not limited to U.S. treasury bonds, taxable municipal bonds, corporate bonds, mortgage backed securities, high yield bonds, floating rate bonds, and international government bonds. Investment in this model comes with inherent risks and uncertainties that could result in loss of value. Risk factors for fixed income securities include, but are not limited to, credit risk (the ability or willingness of a borrower to repay interest and principal), interest rate risk (increases in interest rates generally cause fixed income prices to decline), and liquidity risk (the difficulty in purchasing or selling could cause values to decline). The value of fixed income securities could also be impacted by the expected risks and returns of other asset classes, including money markets, CDs, and equities.

The Advisor's **Fixed Income Model (Non-Qualified)** is comprised of various positions and may include a combination of Fixed Income Securities, Mutual Funds, Exchange Traded Funds, Closed End Funds, Annuity Sub-Accounts, and the Cash/Money Market position. The investments utilized in the model will primarily invest in fixed income instruments including, but not limited to, U.S. treasury bonds, municipal bonds, corporate bonds, mortgage backed securities, high yield bonds, floating rate bonds, and international government bonds. Investment in this model comes with inherent risks and uncertainties that could result in loss of value. Risk factors for fixed income securities include, but are not limited to, credit risk (the ability or willingness of a borrower to repay interest and principal), interest rate risk (increases in interest rates generally cause fixed income prices to decline), and liquidity risk (the difficulty in purchasing or selling could cause values to decline). The value of fixed income securities could also be impacted by the expected risks and returns of other asset classes, including money markets, CDs, and equities.

The Advisor's **Strategic Advisory Model** is comprised of various positions. The portfolio may consist of a combination of Equities, Fixed Income Securities, Mutual Funds, Exchange

Traded Funds, Closed End Funds, Annuity Sub-Accounts, the Cash/Money Market position, and/or Alternative Investments. The portfolio may also include positions the Client acquired/held prior to his/her relationship with Advisor, though the Client seeks ongoing investment advice relative to those positions. Client and Advisor mutually agree that it is beneficial to both Client and Advisor to enter into the Agreement. Investment in this model comes with inherent risks and uncertainties that could result in loss of value. Risk factors for fixed income securities include, but are not limited to, credit risk (the ability or willingness of a borrower to repay interest and principal), interest rate risk (increases in interest rates generally cause fixed income prices to decline), and liquidity risk (the difficulty in purchasing or selling could cause values to decline). The value of fixed income securities could also be impacted by the expected risks and returns of other asset classes, including money markets, CDs, and equities. Risk factors for equity securities include, but are not limited to, adverse economic conditions, changes to the outlook for corporate earnings, changes in interest or currency rates, political uncertainty, and adverse investor sentiment. Because equities represent ownership interest in companies, they are inherently volatile. The value of equity securities could also be impacted by the expected risks and returns of other asset classes, including money markets, CDs, and fixed income securities.

The Advisor's **Strategic Income Model** is comprised of various positions and may include a combination of Mutual Funds, Exchange Traded Funds, Closed End Funds, Annuity Subaccounts, and the Cash/Money Market position. This model may invest in both equity and fixed income securities. The equity investments may include, but are not limited to, dividend paying stocks, master limited partnerships, real estate investment trusts, preferred stocks, and business development companies. The fixed income investments may include, but are not limited to, U.S. treasury bonds, municipal bonds, corporate bonds, mortgage backed securities, high yield bonds, floating rate bonds, and international government bonds. Investment in this model comes with inherent risks and uncertainties that could result in loss of value. Risk factors for fixed income securities include, but are not limited to, credit risk (the ability or willingness of a borrower to repay interest and principal), interest rate risk (increases in interest rates generally cause fixed income prices to decline), and liquidity risk (the difficulty in purchasing or selling could cause values to decline). The value of fixed income securities could also be impacted by the expected risks and returns of other asset classes, including money markets, CDs, and equities. Risk factors for equity securities include, but are not limited to, adverse economic conditions, changes to the outlook for corporate earnings, changes in interest or currency rates, political uncertainty, and adverse investor sentiment. Because equities represent ownership interest in companies, they are inherently volatile. The value of equity securities could also be impacted by the expected risks and returns of other asset classes, including money markets, CDs, and fixed income securities.

The Advisor's **Equity Rotation Model** is comprised of various positions and may include a combination of Equities, Mutual Funds, Exchange Traded Funds, Closed End Funds, Annuity Subaccounts, and the Cash/Money Market position. There is the U.S. equity allocations, the international equity allocations, the emerging/frontier market allocations, and the cash/money market allocations. Based on signals produced by moving averages as well as fundamental analysis, a client's account can be invested in any or all of these asset classes. The maximum allocation for U.S. equities and for cash/money market is 100%, for international equities is 75%, and for emerging/frontier equities is 50%. The Advisor can utilize the Cash/Money Market position in a down market in order to minimize the loss to a client. The Advisor manages aggressive and moderate versions of this model.

Investment in this model comes with inherent risks and uncertainties that could result in loss of value. Risk factors for equity securities include, but are not limited to, adverse economic conditions, changes to the outlook for corporate earnings, changes in interest or currency rates, political uncertainty, and adverse investor sentiment. Because equities represent ownership interest in companies, they are inherently volatile. The value of equity securities could also be impacted by the expected risks and returns of other asset classes, including money markets, CDs, and fixed income securities. Risk factors for fixed income securities include, but are not limited to, credit risk (the ability or willingness of a borrower to repay interest and principal), interest rate risk (increases in interest rates generally cause fixed income prices to decline), and liquidity risk (the difficulty in purchasing or selling could cause values to decline). The value of fixed income securities could also be impacted by the expected risks and returns of other asset classes, including money markets, CDs, and equities.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear. While the stock market may increase and your account(s) could enjoy a gain, it is also possible that the stock market may decrease and your account(s) could suffer a loss. In addition, the methods of analysis, investment strategies and assets classes may have the following associated risks:

Capital Risk: Capital risk is one of the most basic, fundamental risks of investing; it is the risk that you may lose 100% of your money. All investments carry some form of risk and the loss of capital is generally a risk for any investment instrument.

Credit Risk: Credit risk is the probable risk of loss resulting from a borrower's failure to repay a loan or meet contractual obligations. Traditionally, it refers to the risk that a lender may not receive the owed principal and interest, which results in an interruption of cash flows and increased costs for collection.

Economic Risk: The prevailing economic environment is important to the health of all businesses. Some companies, however, are more sensitive to changes in the domestic or global economy than others. These types of companies are often referred to as cyclical businesses. Countries in which a large portion of businesses are in cyclical industries are thus also very economically sensitive and carry a higher amount of economic risk. If an investment is issued by a party located in a country that experiences wide swings from an economic standpoint or in situations where certain elements of an investment instrument are hinged on dealings in such countries, the investment instrument will generally be subject to a higher level of economic risk.

Financial Risk: Financial risk is the possibility that shareholders or other financial stakeholders will lose money when they invest in a company that has debt if the company's cash flow proves inadequate to meet its financial obligations.

Fixed Income Securities Risk: Typically, the values of fixed-income securities change inversely with prevailing interest rates. Therefore, a fundamental risk of fixed-income securities is interest rate risk, which is the risk that their value will generally decline as prevailing interest rates rise, which may cause your account value to likewise decrease, and vice versa. How specific fixed income securities may react to changes in interest rates will depend on the specific characteristics of each security. Fixed-income securities are also subject to credit risk, prepayment risk, valuation risk, and liquidity risk. Credit risk is the chance that a bond issuer will fail to pay interest and principal in a timely manner, or that negative perceptions of the issuer's ability to make such payments will cause the price of a bond to decline.

Inflation Risk: Inflation risk involves the concern that in the future, your investment or proceeds from your investment will not be worth what they are today. Throughout time, the prices of resources and end-user products generally increase and thus, the same general goods and products today will likely be more expensive in the future. The longer an investment is held, the greater the chance that the proceeds from that investment will be worth less in the future than what they are today. Said another way, a dollar tomorrow will likely get you less than what it can today.

Interest Rate Risk: Certain investments involve the payment of a fixed or variable rate of interest to the investment holder. Once an investor has acquired or has acquired the rights to an investment that pays a particular rate (fixed or variable) of interest, changes in overall interest rates in the market will affect the value of the interest-paying investment(s) they hold. In general, changes in prevailing interest rates in the market will have an inverse relationship to the value of existing, interest paying investments. In other words, as interest rates move up, the value of an instrument paying a particular rate (fixed or variable) of interest will go down. The reverse is generally true as well.

Legal/Regulatory Risk: Certain investments or the issuers of investments may be affected by changes in state or federal laws or in the prevailing regulatory framework under which the investment instrument or its issuer is regulated. Changes in the regulatory environment or tax laws can affect the performance of certain investments or issuers of those investments and thus, can have a negative impact on the overall performance of such investments.

Liquidity Risk: Certain assets may not be readily converted into cash or may have a very limited market in which they trade. Thus, you may experience the risk that your investment or assets within your investment may not be able to be liquidated quickly, thus, extending the period of time by which you may receive the proceeds from your investment. Liquidity risk can also result in unfavorable pricing when exiting (i.e. not being able to quickly get out of an investment before the price drops significantly) a particular investment and therefore, can have a negative impact on investment returns.

Manager Risk: There is always the possibility that poor security selection will cause your investments to underperform relative to benchmarks or other funds with a similar investment objective.

Market Risk: The value of your portfolio may decrease if the value of an individual company or multiple companies in the portfolio decreases or if our belief about a company's intrinsic worth is incorrect. Further, regardless of how well individual companies perform, the value of your portfolio could also decrease if there are deteriorating economic or market conditions. It is important to understand that the value of your investment may fall, sometimes sharply, in response to changes in the market, and you could lose money. Investment risks include price risk as may be observed by a drop in a security's price due to company specific events (e.g. earnings disappointment or downgrade in the rating of a bond) or general market risk (e.g. such as a "bear" market when stock values fall in general). For fixed-income securities, a period of rising interest rates could erode the value of a bond since bond values generally fall as bond yields go up. Past performance is not a guarantee of future returns.

Past Performance: Charting and technical analysis are often used interchangeably. Technical analysis generally attempts to forecast an investment's future potential by analyzing its past performance and other related statistics. In particular, technical analysis often times involves an evaluation of historical pricing and volume of a particular security for the purpose of forecasting where future price and volume figures may go. As with any investment analysis method, technical analysis runs the risk of not knowing the future and thus, investors should realize that even the most diligent and thorough technical analysis cannot predict or guarantee the future performance of any particular investment instrument or issuer thereof.

Item 9 Disciplinary Information

There is no pending or historical criminal or civil action in a domestic, foreign or military court of competent jurisdiction involving Advisor or a management member of Advisor. There is no pending or historical administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority involving Advisor or a management member of Advisor. There is no pending or historical self-regulatory organization (SRO) proceeding involving Advisor or a management member of Advisor.

Item 10 Other Financial Industry Activities and Affiliations

Investment advisor representatives are representatives of Triad Advisors, LLC., a registered broker/dealer and member of FINRA/SIPC, based in Atlanta, Georgia. Triad Advisors, LLC. is also registered as an investment advisor.

ADG is a sub-advisor to WealthHarbor Capital Group, who is registered as an investment advisor with the SEC. Additionally, Nicholas Danna, IV and Pierre Adams are partners and Investment Advisor Representatives of Wealthharbor Capital Management Group, LLC. This relationship establishes Wealthharbor Capital Group, LLC as an affiliated firm of ADG.

ITEM 11 CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

We recognize that the personal investment transactions of members and employees of our firm demand the application of a high Code of Ethics and require that all such transactions be carried out in a way that does not endanger the interest of any client. At the same time, we believe that if investment goals are similar for clients and for members and employees of our firm, it is logical and even desirable that there be common ownership of some securities.

Therefore, in order to prevent conflicts of interest, we have in place a set of procedures with respect to transactions effected by our members, officers and employees for their personal accounts. In order to monitor compliance with our personal trading policy, we have a quarterly securities transaction reporting system for all of our associates.

Furthermore, our firm has established a Code of Ethics which applies to all of our associated persons. An investment adviser is considered a fiduciary. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. Our fiduciary duty is considered the core underlying principle for our Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. We require all of our supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with our Code of Ethics. Our firm and supervised persons must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics. However, if a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided promptly upon request.

Neither our firm nor a related person recommends to clients, or buys or sells for client accounts, securities in which our firm or a related person has a material financial interest.

ITEM 12 BROKERAGE PRACTICES

We recommend broker-dealers with which clients may establish accounts to be managed by the Firm. In recommending these broker-dealers, the Firm takes into account the range and quality of services provided by the broker-dealer to the client and to the Firm in its capacity as discretionary investment manager for the client's account. Some items for consideration include, but are not limited to, the broker-dealer's computer software and support systems, timeliness of trade execution, record keeping services provided, financial condition, and business reputation.

We may recommend that clients establish brokerage accounts with Triad Advisors, member FINRA/SIPC, TD Ameritrade, and/or Fidelity Brokerage Services LLC ("Fidelity"). The firm is not affiliated with nor compensated by any of the above custodians/investment firms. ADG is a registered investment adviser. In addition, the principals of ADG are registered representatives of Triad Advisors, LLC., a registered broker/dealer and member of FINRA/SIPC, based in Atlanta, Georgia. Clients are not required to use Triad Advisors, LLC. for the purchase of any investment/financial products. If they do so, Advisor makes full disclosure to them of any applicable fees or commissions that apply to the investment/financial products. Clients are free to implement advisory recommendations through any firm.

The Firm generally will direct transactions in securities for the account of a client to the broker-dealer firm that the client has selected as its broker-dealer and account custodian, provided that the Firm reasonably believes that such broker-dealer will provide best execution for such transactions. With "best execution" the determining factor is not the lowest possible commission cost, but whether the transaction represents the best qualitative execution. Clients may pay commission or fees that are higher or lower than those that may be obtained from elsewhere for similar services.

All fees are fully disclosed and are available to clients either in writing or in electronic form from the custodian's website.

ITEM 13 REVIEW OF ACCOUNTS

Advisor monitors accounts on, at minimum, a quarterly basis. Advisor does so in conjunction with carrying out the investment analysis and implementation of each model. The client has full access via the custodian's website through which they can monitor every detail of their personal accounts. Clients are advised to notify the Advisor of any change in circumstance which would potentially affect a change in investment objectives. Such notification would begin a process encompassing a client meeting and discussion to clarify the clients' position and determine any changes in investments or models which seems appropriate.

In addition, our principals review accounts with clients. Meetings are scheduled with clients either in person or over the phone no less than annually. At that time, discussions are held regarding any changes clients wish to implement or concerns they may have. The review may include analysis and discussion of statements provided by the custodian. Financial Plans are updated as frequently as the client deems necessary.

Item 14 Client Referrals and Other Compensation

The firm does not directly or indirectly compensate any person who is not advisory personnel for client referrals. ADG does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Item 15 Custody

Clients will receive account statements from the custodians, including mutual fund companies, variable annuity companies, Triad Advisors, LLC or other qualified custodians on a minimum of a quarterly basis. Clients should review those statements carefully.

Under guidance from the SEC regarding Standing Letters of Authorization (SLOAs), an adviser who has the power to disburse client funds to a third party under a standing letter of instruction is deemed to have custody. As such, our firm has adopted the following safeguards in conjunction with the account custodian:

- The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.

- The client authorizes the investment adviser, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.

- The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization, and provides a transfer of funds notice to the client promptly after each transfer.

- The client has the ability to terminate or change the instruction to the client's qualified custodian.

- The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.

- The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.

- The client's qualified custodian sends to the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

ITEM 16 INVESTMENT DISCRETION

Clients have the option of providing our firm with investment discretion on their behalf, pursuant to an executed investment advisory client agreement. For those client accounts where Advisor will have investment discretion, the client has given the Advisor written discretionary authority with respect to the securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. Limitations may be imposed by the client in the form of specific restrictions on any of these areas of discretion with our firm's written acknowledgement.

ITEM 17 VOTING CLIENT SECURITIES

We do not have the authority to vote client securities. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. The client may contact us by phone with questions regarding a particular solicitation they received.

ITEM 18 FINANCIAL INFORMATION

Advisor does not require or solicit prepayment of more than $1,200 in fees per client, six (6) months or more in advance. Advisor has not been the subject of a bankruptcy petition at any time during the past ten years.