

## Item 1 – Cover Page



### **PMG Wealth Management, Inc**

### **FORM ADV Part 2A – Firm Brochure**

**Date of Brochure: February 19, 2024**

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The purpose of this brochure is to provide information to you on our firm, PMG Wealth Management, (referred to as we, us and PMG throughout this disclosure brochure). This provides a deeper dive into the services we provide allowing you to be informed on how we can assist your situation. If you have any questions about the contents of this disclosure brochure, please contact us at the number above.

This information in this disclosure brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about PMG Wealth Management, Inc. is also available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can view our firm's information on this website by searching for PMG Wealth Management, Inc. or our firm's CRD number 285899.

\*Registration as an investment adviser does not imply a certain level of skill or training.

**PMG Wealth Management, Inc.**

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## Item 2 – Material Changes

PMG has updated this brochure according to regulatory requirements and rules. The following material change has been made to since our last update in February 2023:

- In 2023 PMG ceased offering WRAP Accounts to our management clients. All references to the previous WRAP program have been removed from this brochure.

Pursuant to regulations, we will ensure that you receive a summary of any material changes to this and subsequent Disclosure Brochures within 120 days after our fiscal year ends. Our fiscal year ends on December 31 so you will receive the summary of material changes no later than April 30 each year. At that time we will also offer a copy of the most current Disclosure Brochure. We may also provide other ongoing disclosure information about material changes as necessary.

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## **Item 4 – Advisory Business**

### **Firm Information**

PMG Wealth Management is a registered investment adviser based in Hawthorn Woods, Illinois. The firm is registered with the U.S. Securities and Exchange Commission and is a S-corporation formed under the laws of the State of Illinois. PMG is also approved to do business in other states as required by regulation. The firm was originally incorporated in 2007 as an S-Corp under the laws of the state of Illinois. Advisory services have been offered through individuals registered as investment advisor representatives of LPL Financial and its corporate RIA since 2007. In 2017, PMG formed its own RIA and since then all advisory services have been offered through PMG. Our custodian continues to be LPL Financial.

The investment advisory services of PMG are provided to you through an appropriately licensed and qualified individual who is an investment adviser representative of PMG (referred to as your investment adviser representative throughout this brochure).

PMG is a registered investment advisor (RIA) with offices in Hawthorn Woods, IL and Cape Coral, FL, and maintains state registrations in other states as required by regulation, such as Florida and California.

Your investment adviser representative is limited to providing the services and charging investment advisory fees in accordance with the descriptions detailed in this brochure. However, the exact services you receive and the fees you will be charged will be specified in your advisory services agreement.

PMG is solely owned by Phillip Guerrero, CFP®.

### **Description of Advisory Services**

PMG offers investment advisory services to individuals, high net worth individuals, trusts, estates, and business owners (each referred to as a “Client”).

PMG serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness, and good faith to each Client while seeking to minimize and disclose any conflicts of interest. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Please understand that a written agreement, which details the exact terms of the service, must be signed by you and PMG before we can provide you the services described below.

### **Investment Management Services**

PMG offers customized investment management services, which involves PMG providing you with continuous and ongoing supervision over your specified accounts. The majority of our portfolios are managed directly in house, custom built to your specific situation, and held in custody at LPL Financial. We may recommend the use of outside professional managers from time to time or decide to hold a client's previous outside professionally managed account upon the time services begin. PMG works

closely with each client to identify their investment goals and objectives as well as risk tolerance and financial situation to build an overall strategy.

Our investment management services are provided on a discretionary basis. You must provide us with written authority to use discretion, as this is part of the account opening procedure. Any discretion is limited to investment authority only. With this authority our advisors make all decisions to buy, sell, exchange, or hold the specific securities within the portfolio. This also includes the use of cash as an asset class and, from time to time, will raise and lower cash levels depending on risk concerns with the markets. It is not our typical investment strategy to attempt to time the market, but we may increase cash holdings modestly as deemed appropriate based on your risk tolerance and our expectations of market behavior. We may modify our investment strategy to accommodate special situations such as low basis stock, stock options, legacy holdings, inheritances, closely held businesses, collectibles, or special tax situations.

PMG has no authority to transfer monies to other accounts, has no access to your funds, other than the ability to debit the account for agreed upon management fees.

All clients who utilize PMG's advisory services must sign an "Advisory Agreement" along with any applicable custodian or outside manager platform forms as applicable. You must appoint our firm as your investment adviser of record on specified accounts (collectively, the "Account"). The Account consists only of separate account(s) held by qualified custodian(s) under your name. The qualified custodians maintain physical custody of all funds and securities of the Account, and you retain all rights of ownership (e.g., right to withdraw securities or cash, exercise or delegate proxy voting and receive transaction confirmations) of the Account.

The Account is managed by us based on a number of factors including your financial situation, investment objectives and risk tolerance. We actively monitor the Account and provide advice regarding buying, selling, reinvesting or holding securities, cash or other investments of the Account.

We will need to obtain certain information from you to determine your financial situation and investment objectives. You will be responsible for notifying us of any updates regarding your financial situation, risk tolerance or investment objective and whether you wish to impose or modify existing investment restrictions; however we will contact you at least annually to discuss any changes or updates regarding your financial situation, risk tolerance or investment objectives. We are always reasonably available to consult with you relative to the status of your Account. You have the ability to impose reasonable restrictions on the management of your accounts, including the ability to instruct us not to purchase certain securities.

It is important that you understand that we manage investments for other clients and may give them advice or take actions for them or for our personal accounts that is different from the advice we provide to you or actions taken for you. We are not obligated to buy, sell or recommend to you any security or other investment that we may buy, sell or recommend for any other clients or for our own accounts.

Conflicts may arise in the allocation of investment opportunities among accounts that we manage. We strive to allocate investment opportunities believed to be appropriate for your account(s) and other accounts advised by our firm among such accounts equitably and consistent with the best interests of all accounts involved. However, there can be no assurance that a particular investment opportunity that

comes to our attention will be allocated in any particular manner. If we obtain material, non-public information about a security or its issuer that we may not lawfully use or disclose, we have absolutely no obligation to disclose the information to any client or use it for any client's benefit.

### **Financial Planning & Consulting Services**

PMG offers financial planning services, which involves preparing a written financial plan covering specific or multiple topics. We provide full written financial plans, which typically address the following topics: Investment Planning, Retirement Planning, Tax Planning, Portfolios Review, and Asset Allocation. When providing financial planning and consulting services, the role of your investment adviser representative is to find ways to help you understand your overall financial situation and help you set financial objectives.

We also offer consultations in order to discuss financial planning issues when you do not need a written financial plan. Some are one-time consultations, which cover mutually agreed upon areas of concern related to investments or financial planning. These may be recommended by us. We also offer "as-needed" consultations, which are in response to a particular investment or financial planning issue raised or requested by you. Under an "as-needed" consultation, it will be incumbent upon you to identify those particular issues for which you are seeking our advice or consultation on

Depending on your situation, Financial Planning and Consulting Services may be more comprehensive in nature and other times it may be better addressed in a modular format. The planning areas listed below can be part of a larger comprehensive plan or individually addressed as needed.

- **Cash Flow and Debt Management:** We will conduct a review of your gross/net incomes and expenses to determine your cash flow situation. This enables us to project your surplus or deficit each month and provide advice on tackling your priorities. Advice could include which debts to pay of first, which order, and where to save any surplus. We are big believers in creating an emergency savings fund and will double check that this amount is appropriate for your situation.
- **Investment Planning:** PMG will make recommendations in this area based on the review of a client's overall investment objective, return requirements, risk tolerance, time horizon, liquidity needs, tax preference and other unique circumstances. Any change in your personal circumstance in between reviews should be conveyed to PMG so we can make any adjustments as needed. Investment planning can take anywhere between six to forty hours depending upon the client's profile and circumstances
- **Retirement Planning:** PMG determines retirement income goals and gathers information about potential sources of retirement. PMG creates a unified and comprehensive retirement plan covering assets, income needs, budgeting (as needed), cash flow review and strategy, income, taxation, inheritance, and risk management. A long-term asset management plan is structured considering economic environment and inflationary conditions, tax minimization strategy, uncertainty and market volatility. Retirement planning services include research, financial modeling and mathematical simulation to identify adequacy of client's investment and savings to attain retirement readiness, and to clarify strategic choices and actions. Retirement planning can take anywhere between ten to fifty hours depending upon the client's profile and circumstances.
- **Tax Planning:** PMG works with third party tax / accounting advisor(s) to align financial goals with tax efficiency planning. Tax planning would encompass many different aspects e.g. selection of

investment options and types of retirement plans, timing of income and capital growth as well as tax lot selection for investment transactions within client's portfolio. Tax planning services would include recommendations on tax reduction strategies based on income, expenses, individual needs and goals. As needed, PMG is available to work with your existing tax / accounting advisor(s) or can recommend one if you are looking for a new relationship. PMG does not share any fees with any outside CPA's / accounting advisor(s). Fee arrangements with outside professionals are described in the section 'Other Fee Terms for Financial Planning, Institutional Advisory & Consulting Services'. Tax planning can take anywhere between five to forty hours depending upon the client's profile and circumstances.

- **Portfolio Review and Asset Allocation:** PMG researches clients' existing portfolios and underlying investments to determine the asset class mix, return profile and risk characteristics. PMG will also compare existing holdings to the clients risk objectives based on the client profile to ensure that the two match. PMG also analyzes return, risk and modern portfolio statistics and runs mathematical simulation, wherever necessary, to identify the adequacy of the portfolio against client's investment objectives and risk tolerance. Portfolio Review and asset allocation can take anywhere between ten to fifty hours depending upon the client's profile and circumstances.

Our financial planning and consulting services do not involve implementing any transaction on your behalf or the active and ongoing monitoring or management of your investments or accounts. You have the sole responsibility for determining whether to implement our financial planning and consulting recommendations. To the extent that you would like to implement any of our investment recommendations through PMG or retain PMG to actively monitor and manage your investments, you must execute a separate written agreement with PMG for our asset management services.

#### **Referral of Third-Party Money Managers**

Occasionally PMG offers advisory services by referring clients to a third-party money manager offering asset management and other investment advisory services. The third-party managers are responsible for continuously monitoring client accounts and making trades in client accounts when necessary. As a result of the referral, we are paid a portion of the fee charged and collected by the third-party money managers in the form of solicitor fees. Each solicitation arrangement is performed pursuant to a written solicitation agreement and is in compliance with SEC Rule 206(4)-3 and applicable state securities rules and regulations.

Under this program, we assist you with identifying your risk tolerance and investment objectives. We recommend third-party money managers in relation to your stated investment objectives and risk tolerance, and you may select a recommended third-party money manager or model portfolio based upon your needs. You must enter into an agreement directly with the third-party money manager who provides your designated account with asset management services.

We are available to answer questions that you may have regarding your account and act as the communication conduit between you and the third-party money manager. The third-party money manager may take discretionary authority to determine the securities to be purchased and sold for your account. We do not have any trading authority with respect to your designated account managed by the third-party money manager.

Although we review the performance of numerous third-party investment adviser firms, we enter into only a select number of relationships with third-party investment adviser firms. PMG will only enter in to agreements with other investment advisory firms that are properly registered in the state of client residence. All of the third-party firms we use have also agreed to pay us a portion of the overall fee charged to our clients. Therefore, PMG has a conflict of interest in that it will only recommend third-party investment advisors that will agree to compensate us for referrals of our clients.

Clients are advised that there may be other third-party managed programs not recommended by our firm, that are suitable for the client and that may be more or less costly than arrangements recommended by our firm. No guarantees can be made that a client's financial goals or objectives will be achieved by a third-party investment adviser recommended by our firm. Further, no guarantees of performance can ever be offered by our firm (*Please refer to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more details.*)

### **Retirement Plan Services**

PMG offers retirement plan services to retirement plan sponsors and to individual participants in retirement plans. For a corporate sponsor of a retirement plan, our retirement plan services can include, but are not limited to, the following services:

#### Fiduciary Consulting Services

PMG provides the following Fiduciary Retirement Plan Consulting Services:

- Investment Policy Statement Preparation. PMG will help you develop an investment policy statement. The investment policy statement establishes the investment policies and objectives for the Plan. You will have the ultimate responsibility and authority to establish such policies and objectives and to adopt and amend the investment policy statement.
- Non-Discretionary Investment Advice. PMG will provide you with general, non-discretionary investment advice regarding assets classes and investment options, consistent with your Plan's investment policy statement.
- Investment Selection Services. PMG will provide you with recommendations of investment options consistent with ERISA section 404(c).
- Investment Due Diligence Review. PMG will provide you with periodic due diligence reviews of the Plan's reports, investment options and recommendations.
- Investment Monitoring. PMG will assist in monitoring investment options by preparing periodic investment reports that document investment performance, consistency of fund management and conformation to the guidelines set forth in the investment policy statement and PMG will make recommendations to maintain or remove and replace investment options.
- Default Investment Alternative Advice. PMG will provide you with non-discretionary investment advice to assist you with the development of qualified default investment alternative(s) ("QDIA"), as defined in DOL Reg. Section 2550.404c-5(e)(4)(i), for participants who are automatically enrolled in the Plan or who otherwise fail to make an investment election. You will retain the sole responsibility to provide all notices to participants required under ERISA section 404(c)(5).



- Individualized Participant Advice. Upon request, PMG will provide one-on-one advice to Plan participants regarding their individual situations.

For Fiduciary Consulting Services, all recommendations of investment options and portfolios will be submitted to you for your ultimate approval or rejection. For retirement plan Fiduciary Consulting Services, the retirement plan sponsor client or the plan participant who elects to implement any recommendations made by us is solely responsible for implementing all transactions.

Fiduciary Consulting Services are not management services, and PMG does not serve as administrator or trustee of the plan. PMG does not act as custodian for any client account or have access to client funds or securities (with the exception of, some accounts, having written authorization from the client to deduct our fees).

PMG acknowledges that in performing the Fiduciary Consulting Services listed above that it is acting as a “fiduciary” as such term is defined under Section 3(21)(A)(ii) of Employee Retirement Income Security Act of 1974 (“ERISA”) for purposes of providing non-discretionary investment advice only. PMG will act in a manner consistent with the requirements of a fiduciary under ERISA if, based upon the facts and circumstances, such services cause PMG to be a fiduciary as a matter of law. However, in providing the Fiduciary Consulting Services, PMG (a) has no responsibility and will not (i) exercise any discretionary authority or discretionary control respecting management of Client’s retirement plan, (ii) exercise any authority or control respecting management or disposition of assets of Client’s retirement plan, or (iii) have any discretionary authority or discretionary responsibility in the administration of Client’s retirement plan or the interpretation of Client’s retirement plan documents, (b) is not an “investment manager” as defined in Section 3(38) of ERISA and does not have the power to manage, acquire or dispose of any plan assets, and (c) is not the “Administrator” of Client’s retirement plan as defined in ERISA.

#### Non-Fiduciary Services

Although an investment adviser is considered a fiduciary under the Investment Advisers Act of 1940 and required to meet the fiduciary duties as defined by the Advisers Act, the services listed here as non-fiduciary should not be considered fiduciary services for the purposes of ERISA since Advisor is not acting as a fiduciary to the Plan as the term “fiduciary” is defined in Section 3(21)(A)(ii) of ERISA. The exact suite of services provided to a client will be listed and detailed in the Qualified Retirement Plan Agreement.

PMG provides clients with the following Non-Fiduciary Retirement Plan Consulting Services:

- Participant Education. PMG will provide education services to Plan participants about general investment principles and the investment alternatives available under the Plan. PMG’s assistance in participant investment education will be consistent with and within the scope of DOL Interpretive Bulletin 96-1. Education presentations will not take into account the individual circumstances of each participant and individual recommendations will not be provided unless otherwise agreed upon. Plan participants are responsible for implementing transactions in their own accounts.
- Participant Enrollment. PMG will assist you with group enrollment meetings designed to increase retirement plan participation among employees and investment and financial understanding by the employees.

- Qualified Plan Development. PMG will assist you with the establishment of a qualified plan by working with you and a selected Third Party Administrator. If you have not already selected a Third Party Administrator, we shall assist you with the review and selection of a Third Party Administrator for the Plan.
- Due Diligence Review. PMG will provide you with periodic due diligence reviews of your Plan's fees and expenses and your Plan's service providers.
- Fiduciary File Set-up. PMG will help you establish a "fiduciary file" for the Plan which contains trust documents, custodial/brokerage statements, investment performance reports, services agreements with investment management vendors, the investment policy statement, investment committee minutes, asset allocation/asset liability studies, due diligence fields on funds/money managers and monitoring procedures for funds and/or money managers.
- Benchmarking. PMG will provide you benchmarking services and will provide analysis concerning the operations of the Plan.

Securities and other types of investments all bear different types and levels of risk. Those risks are typically discussed with clients in defining the investment policies and objectives that will guide investment decisions for their qualified plan accounts. Upon request, as part of our retirement plan services, we can discuss those investments and investment strategies that we believe may tend to reduce these risks for a particular client's circumstances and plan participants.

Clients and plan participants must realize that obtaining higher rates of return on investments entails accepting higher levels of risk. Based upon discussions with the client, we will attempt to identify the balance of risks and rewards that is appropriate and comfortable for the client and other employees. It is still the clients' responsibility to ask questions if the client does not fully understand the risks associated with any investment. All plan participants are strongly encouraged to read prospectuses, when applicable, and ask questions prior to investing.

We strive to render our best judgment for clients. Still, PMG cannot assure that investments will be profitable or assure that no losses will occur in their portfolios. Past performance is an important consideration with respect to any investment or investment advisor, but it is not necessarily an accurate predictor of future performance.

PMG will disclose, to the extent required by ERISA Regulation Section 2550.408b-2(c), to you any change to the information that we are required to disclose under ERISA Regulation Section 2550.408b-2(c)(1)(iv) as soon as practicable, but no later than sixty (60) days from the date on which we are informed of the change (unless such disclosure is precluded due to extraordinary circumstances beyond our control, in which case the information will be disclose as soon as practicable).

In accordance with ERISA Regulation Section 2550.408b-2(c)(vi)(A), we will disclose within thirty (30) days following receipt of a written request from the responsible plan fiduciary or Plan Administrator (unless such disclose is precluded due to extraordinary circumstances beyond our control, in which case the information will be disclosed as soon as practicable) all information related to the Qualified Retirement Plan Agreement and any compensation or fees received in connection with the Agreement that is required for the Plan to comply with the reporting and disclosure requirements of Title 1 of ERISA and the regulations, forms and schedules issued thereunder.

If we make an unintentional error or omission in disclosing the information required under ERISA Regulation Section 2550.408b-2(c)(1)(iv) or (vi), we will disclose to you the correct information as soon as practicable, but no later than thirty (30) days from the date on which we learn of such error or omission.

### **Retirement Plan Rollover Recommendations**

When PMG provides investment advice about your retirement plan account or individual retirement account (“IRA”) including whether to maintain investments and/or proceeds in the retirement plan account, roll over such investment/proceeds from the retirement plan account to a IRA or make a distribution from the retirement plan account, we acknowledge that PMG is a “**fiduciary**” within the meaning of Title I of the Employee Retirement Income Security Act (“ERISA”) and/or the Internal Revenue Code (“IRC”) as applicable, which are laws governing retirement accounts. The way PMG makes money creates conflicts with your interests so PMG operates under a special rule that requires PMG to act in your best interest and not put our interest ahead of you.

Under this special rule’s provisions, PMG must as a fiduciary to a retirement plan account or IRA under ERISA/IRC:

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

To the extent we recommend you roll over your account from a current retirement plan account to an individual retirement account managed by PMG, please know that PMG and our investment adviser representatives have a conflict of interest.

We can earn increased investment advisory fees by recommending that you roll over your account at the retirement plan to a IRA managed by PMG. We will earn fewer investment advisory fees if you do not roll over the funds in the retirement plan to an IRA managed by PMG.

Thus, our investment adviser representatives have an economic incentive to recommend a rollover of funds from a retirement plan to an IRA which is a conflict of interest because our recommendation that you open an IRA account to be managed by our firm can be based on our economic incentive and not based exclusively on whether or not moving the IRA to our management program is in your overall best interest. We have taken steps to manage this conflict of interest. we have adopted an impartial conduct standard whereby our investment adviser representatives will (i) provide investment advice to a retirement plan participant regarding a rollover of funds from the retirement plan in accordance with the fiduciary status described below, (ii) not recommend investments which result in PMG receiving unreasonable compensation related to the rollover of funds from the retirement plan to an IRA, and (iii) fully disclose compensation received by PMG and our supervised persons and any material conflicts of interest related to recommending the rollover of funds from the retirement plan to an IRA and refrain from making any materially misleading statements regarding such rollover.

When providing advice to a retirement plan account or IRA, our investment advisor representatives will act with the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with like aims, based on the investment objectives, risk, tolerance, financial circumstances, and a client's needs, without regard to the financial or other interests of PMG or our affiliated personnel.

### **Participation in Wrap Fee Programs**

PMG currently only offers services through traditional non-wrap fee asset management programs.

### **Tailored Advisory Services to Individual Needs of Clients**

PMG's advisory services, financial planning services, and consulting services are always provided based on your individual needs. This means, for example, that when we provide asset management services, you are given the ability to impose restrictions on the accounts we manage for you, including specific investment selections and sectors. Our services are done with you on a one-on-one basis through interviews and questionnaires to determine your investment objectives and suitability information.

We will not enter into an investment adviser relationship with a prospective client whose investment objectives may be considered incompatible with our investment philosophy or strategies or where the prospective client seeks to impose unduly restrictive investment guidelines.

### **Client Assets Managed by PMG**

As of December 31, 2023, PMG manages \$138,935.766 of client assets, all on a discretionary basis.

## **Item 5 – Fees and Compensation**

In addition to the information provided in *Item 4 – Advisory Business*, this section provides additional details regarding our firm's services along with descriptions of each service's fees and compensation arrangements. It should be noted that lower fees for comparable service may be available from other sources. The exact fees and other terms will be outlined in the agreement between you and PMG.

PMG allows your investment adviser representative to set fees within ranges provided by PMG. As a result, your investment adviser representative may charge more or less for the same service than another investment adviser representative of PMG.

### **Fees for Advisory Services**

#### **Investment Management Services**

Fees charged for our investment management services are charged based on a percentage of assets under management, billed in advance (at the start of the billing period) on a quarterly calendar basis and calculated based on the fair market value of your account as of the last business day of the previous billing period. PMG does not process the deduction of the advisory fees from client's managed accounts, LPL Financial is responsible for calculating and debiting all fees from your accounts. You must provide our custodian, LPL with written authorization to debit advisory fees from your accounts and pay the fees to PMG. Fees are based on the account's asset value as of the last business day of the prior calendar

quarter. Fees for accounts opened at any time other than the beginning of a quarter is prorated based on the number of days remaining in the initial quarter. The prorated fee for the initial billing period is billed in arrears at the same time as the next full billing period's fee is billed.

The asset management services continue in effect until terminated by either party (i.e., PMG or you) by providing written notice of termination to the other party. Any prepaid, unearned fees will be promptly refunded by PMG to you. Fee refunds will be determined on a pro rata basis using the number of days services are actually provided during the final period.

Fees charged for our asset management services are negotiable based on the type of client, the complexity of the client's situation, the composition of the client's account (i.e., equities versus mutual funds), the potential for additional account deposits, the relationship of the client with the investment adviser representative, and the total amount of assets under management for the client. As such it may differ from the fee schedule listed below.

Prior to engaging PMG to provide investment management services, you are required to enter into a formal investment advisory agreement with us setting forth the terms and conditions, including the amount of investment advisory fees, under which we manage your assets and also a separate custodial/clearing agreement with LPL.

<u>Assets Under Management</u>	<u>Annual Fees – Non-Wrap</u>
Up to \$99,999	1.45%
\$100,000 – \$249,999	1.30%
\$250,000 – \$499,999	1.20%
\$500,000 – \$749,999	1.00%
\$750,000 – \$1,249,999	0.95%
\$1,250,000 – \$1,999,999	0.90%
Over \$2,000,000	Negotiable

You can only open a non-wrap account. With a non-wrap account you are responsible for any transaction charges LPL may have to offset the costs of trading. PMG is not compensated on any of these charges. These costs are set out in the LPL Strategic Wealth Management platform brokerage account and application agreement.

Industry Standards view advisory fees in excess of 3% as excessive; PMG asset management fees will not exceed industry standards.

You may incur certain charges imposed by third parties other than PMG in connection with investments made through the account including, but not limited to, 12b-1 fees and surrender charges, confirmation fees, and IRA and qualified retirement plan fees. Our management are separate and distinct from the fees and expenses charged by investment company securities that may be recommended to you. A description of these fees and expenses are available in each investment company security's prospectus.

The advisory accounts may cost you more or less than if the assets were held in a traditional brokerage account. In a brokerage account, you are charged commissions for each transaction, and the representative has no duty to provide ongoing advice with respect to the account. If you plan to follow a buy and hold investment strategy for the account or do not wish to purchase ongoing investment advice

or management services, you should consider opening a brokerage account rather than an advisory account.

Either party may terminate the agreement for services at any time. If services are terminated within five business days of executing the agreement, services are terminated without penalty and a full refund of all fees paid in advance is provided. If services are terminated after the initial five day period, we provide you with a prorated refund of fees paid in advance. The refund is based on the number of days service is actually provided during the final billing period. Termination is effective from the time the other party receives written notification or such other time as may be mutually agreed upon, subject to the settlement of transactions in progress and the final refund of advisory fees. There is no penalty charge on termination.

### **Direct Bill Retirement Plan Advisory Services**

Fees for 3(21) retirement plan advisory services are charged on a flat fee basis. Flat fees generally range from \$300-\$3,500, pursuant to the terms listed in the Financial Planning and Consulting Agreement. Fees charged for our direct bill retirement asset management services (retirement accounts held outside of LPL Financial, LLC) are typically billed in advance (at the start of the billing period) on a quarterly calendar basis. In rare circumstances they may be billed in arrears. Fees are prorated (based on the number of days service is provided during the initial billing period) for your account opened at any time other than the beginning of the billing period. If asset management services are commenced in the middle of a billing period, the prorated fee for the initial billing period is billed in arrears at the same time as the next full billing period's fee is billed.

The asset management services continue in effect until terminated by either party (i.e., PMG or you) by providing written notice of termination to the other party. Any prepaid, unearned fees will be promptly refunded by PMG to you. Fee refunds will be determined on a pro rata basis using the number of days services are actually provided during the final period.

For PMG's Direct Bill Retirement Plan Services you will pay our firm upon receipt of a billing notice sent directly to you. Fees for our services will be due immediately upon receipt of the billing notice.

PMG does not receive any portion of such commissions or fees from you or the qualified custodian. In addition, you may incur certain charges imposed by third parties other than PMG in connection with investments made through your account including, but not limited to, mutual fund sales loads, 12(b)-1 fees and surrender charges, and charges imposed by the qualified custodian(s) of your account. Management fees charged by PMG are separate and distinct from the fees and expenses charged by investment company securities that may be recommended to you. A description of these fees and expenses are available in each investment company security's prospectus.

### **Financial Planning & Consulting Services**

Fees charged for our financial planning and consulting services are negotiable based upon the services requested, the complexity of the client's situation, the composition of the client's account, other advisory services provided and the relationship of the client and the investment adviser representative.

PMG provides financial planning services under an hourly fee arrangement. An hourly fee of up to \$300 per hour (depending on the complexity of the client's situation) is charged by PMG for financial planning services provided under this arrangement. The hourly fee to be charged to the client will be specified in

the Financial Planning & Consulting Agreement executed before services can begin. Before commencing financial planning services, PMG provides an estimate of the approximate hours needed to complete the requested financial planning services. If PMG anticipates exceeding the estimated amount of hours required, PMG will contact you to receive authorization to provide additional services. The standard billing dates and events of PMG are the following: (1) the first business day of each month; (2) the date when incurred hourly fees and expenses will cause the retainer balance to be depleted to zero; (3) the date or thereafter that PMG substantially provides the agreed upon services; and (4) the date the engagement is terminated by either you or PMG. Upon presentment of the invoice to you, PMG will deduct the hourly fees due PMG against your current retainer balance and you are required to pay immediately PMG any outstanding balance of hourly fees due.

The financial planning services terminate upon delivery of the written financial plan or upon either party providing the other party with written notice of termination.

You may terminate the financial planning services within five (5) business days of entering into an agreement with PMG without penalty or fees due. If you terminate the financial planning services after entering into an agreement with us, you will be responsible for immediate payment of any financial planning services performed by PMG prior to the receipt by PMG of your notice of termination. For financial planning services performed by PMG under an hourly arrangement, you will pay PMG for any hourly fees incurred at the rates described above.

#### **Other Fee Terms for Financial Planning & Consulting Services**

Any investment advisory fees owed for the financial planning services referenced above may be paid by submitting payment directly to the firm (for example, by check).

You should notify PMG within ten (10) days of receipt of an invoice if you have questions about or dispute any billing entry.

To the extent PMG engages an outside professional (i.e. attorney, independent investment adviser or accountant) while providing financial planning and consulting services to you, PMG will be responsible for the payment of the fees for the services of such an outside professional, and you will not be required to reimburse PMG for such payments. To the extent that you personally engage such an outside professional, you will be responsible for the payment of the fees for the services of such an outside professional, and PMG will not be required to reimburse Client for such payments. Fees for the services of an outside professional (i.e. attorney, independent investment adviser or accountant) will be in addition to and separate from the fees charged by PMG, and you will be responsible for the payment of the fees for the services of such an outside professional. In no event will the services of an outside professional be engaged without your express approval.

All fees paid to PMG for services are separate and distinct from the commissions, fees and expenses charged by insurance companies associated with any disability insurance, life insurance and annuities subsequently acquired by you. If you sell or liquidate certain existing securities positions to acquire any insurance or annuity, you may also pay a commission and/or deferred sales charges in addition to the financial planning and consulting fees paid to PMG and any commissions, fees and expenses charged by the insurance company for subsequently acquired insurance and/or annuities.

If you elect to have your investment adviser representative, in his or her separate capacity as an insurance agent, implement the recommendations of PMG, your investment adviser representative at his

or her discretion may waive or reduce the investment advisory fee or financial planning and consulting fee charged for those services by a portion of the amount of the commissions received by your investment adviser representative as an insurance agent. Any reduction of the investment advisory fee will not exceed 100% of the insurance commission received.

All fees paid to PMG for advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each mutual fund's prospectus. These fees will generally include a management fee, other fund expenses and a possible distribution fee. If the fund also imposes sales charges, you may pay an initial or deferred sales charge.

If you retain PMG to implement the recommendations provided under this service, PMG may recommend load or no-load mutual funds that charge you 12(b)-1 fees. Your investment adviser representative may receive a portion of these 12(b)-1 fees in his or her separate capacity as a registered representative of a securities broker-dealer. The receipt of 12(b)-1 fees could represent an incentive for PMG or your investment adviser representative to recommend mutual funds with 12(b)-1 fees or higher 12(b)-1 fees over mutual funds with no 12(b)-1 fees or lower 12(b)-1 fees and therefore creates a conflict of interest. In general PMG utilizes load waived funds foregoing any up-front commission. Clients are under no obligation to purchase investment products through persons affiliated with PMG Wealth Management and are free to choose any broker dealer they may want.

All fees paid to PMG for financial planning and consulting services are separate and distinct from the commissions charged by a broker-dealer or asset management fees charged by an investment adviser to implement such recommendations. Investment Advisor representatives of PMG Wealth Management may receive 50% or more of their total compensation from the sales of investment products.

If you elect to have your investment adviser representative, in his or her separate capacity as a registered representative, implement the recommendations of PMG, your investment adviser representative at his or her discretion may waive or reduce the investment advisory fee charged by the amount of the commissions received as a registered representative. Any reduction of the investment advisory fee will not exceed 100% of the commission received as a registered representative.

If you elect to implement the recommendations of PMG through our other investment advisory programs, PMG may waive or reduce a portion of the investment advisory fees for such investment advisory program(s). Any reduction will be at the discretion of your investment adviser representative and disclosed to you prior to contracting for additional investment advisory services.

It should be noted that lower fees for comparable services may be available from other sources.

### **Third-Party Money Managers**

Third-party managers generally have account minimum requirements that will vary among third-party money managers. Account minimums are generally higher on fixed income accounts than for equity based accounts. A complete description of the third-party money manager's services, fee schedules and account minimums will be disclosed in the third-party money manager's disclosure brochure which will be provided to you prior to or at the time an agreement for services is executed and the account is established.



The actual fee charged to you will vary depending on the third-party money manager. All fees are calculated and collected by the third-party money manager who will be responsible for delivering our portion of the fee paid by you to us.

Under this program, you may incur additional charges including but not limited to, mutual fund sales loads, 12b-1 fees and surrender charges and IRA and qualified retirement plan fees.

We have a conflict of interest by only offering those third-party money managers that have agreed to pay a portion of their advisory fee to us and have met the conditions of our due diligence review. There may be other third-party money managers that may be suitable for you that may be more or less costly. No guarantees can be made that your financial goals or objectives will be achieved. Further, no guarantees of performance can be offered.

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

Performance-based fees are defined as fees based on a share of capital gains on or capital appreciation of the assets held in a client's account. *Item 6* is not applicable to this Disclosure Brochure because we do not charge or accept performance-based fees.

## **Item 7 – Types of Clients**

PMG generally provides investment advice to the following types of clients:

- Individuals
- High net worth individuals
- Pension and profit sharing plans
- Trusts, estates, or charitable organizations
- Corporations or business entities other than those listed above

You are required to execute a written agreement with PMG specifying the particular advisory services in order to establish a client arrangement with PMG.

### **Minimum Investment Amounts Required**

PMG typically requires a minimum investment amount of between \$10,000 and \$50,000 in order to open an account dependent upon the investment strategy selected. Please refer to ***Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss*** for more specific information. To reach these account minimums, clients are allowed to aggregate all household accounts.

The minimum fee generally charged for financial planning services provided on an hourly basis is \$500.

The minimum hourly fee generally charged for consulting services is \$300.

Third-party money managers may have minimum account and minimum fee requirements in order to participate in their programs. Each-third party money manager will disclose its minimum account size and fees in its Form ADV Part 2A Disclosure Brochure.

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

### **Methods of Analysis**

PMG uses the following methods of analysis in formulating investment advice:

Charting - This is a set of techniques used in technical analysis in which charts are used to plot price movements, volume, settlement prices, open interest, and other indicators, in order to anticipate future price movements. Users of these techniques, called chartists, believe that past trends in these indicators can be used to extrapolate future trends.

Charting is likely the most subjective analysis of all investment methods since it relies on proper interpretation of chart patterns. The risk of reliance upon chart patterns is that the next day's data can always negate the conclusions reached from prior days' patterns. Also, reliance upon chart patterns bears the risk of a certain pattern being negated by a larger, more encompassing pattern that has not shown itself yet.

Fundamental – This is a method of evaluating a security by attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and individually specific factors (like the financial condition and management of a company). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short). Fundamental analysis is considered to be the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

The risk associated with fundamental analysis is that it is somewhat subjective. While a quantitative approach is possible, fundamental analysis usually entails a qualitative assessment of how market forces interact with one another in their impact on the investment in question. It is possible for those market forces to point in different directions, thus necessitating an interpretation of which forces will be dominant. This interpretation may be wrong, and could therefore lead to an unfavorable investment decision.

Technical – This 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. Technical analysts believe that the historical performance of stocks and markets are indications of future performance.

Technical analysis is even more subjective than fundamental analysis in that it relies on proper interpretation of a given security's price and trading volume data. A decision might be made based on a historical move in a certain direction that was accompanied by heavy volume; however, that heavy volume may only be heavy relative to past volume for the security in question, but not compared to the future trading volume. Therefore, there is the risk of a trading decision being made incorrectly, since future trading volume is an unknown. Technical analysis is also done through observation of various market sentiment readings, many of which are quantitative. Market sentiment gauges the relative degree of bullishness and bearishness in a given security, and a contrarian investor utilizes such sentiment advantageously. When most traders are bullish, then there are very few traders left in a position to buy the security in question, so it becomes advantageous to sell it ahead of the crowd. When most traders are bearish, then there are very few traders left in a position to sell the security in question, so it becomes advantageous to buy it ahead of the crowd. The risk in utilization of such sentiment technical measures is that a very bullish reading can always become more bullish, resulting in lost opportunity if the money manager chooses to act upon the bullish signal by selling out of a position. The reverse is also true in that a bearish reading of sentiment can always become more bearish, which may result in a premature purchase of a security.

There are risks involved in using any analysis method.

To conduct analysis, PMG gathers information from research materials prepared by others, inspection of corporate activities, corporate rating services, charting and timing services, annual reports, prospectuses and filings with the SEC, financial newspapers and magazines, and company press releases.

### **Investment Strategies**

PMG uses the following investment strategies when managing client assets and/or providing investment advice:

- PMG's Advance and Protect Strategy: Flagship strategy which includes the use of cash as a specific asset class and will increase or decrease such cash based on the advisor's evaluation of the market and current risk management. This strategy utilizes a global macro approach and would be considered a "go anywhere" type strategy. This portfolio may include the use of exchange-traded funds (ETFs), mutual funds, individual stocks, individual bonds, and cash. The use of technical analysis is used to assist with the management of this strategy.
  - Account Minimum: \$50,000
- PMG's Advance and Protect "Plus" Strategy: Expands on the original Advance and Protect strategy above by including a 20% sleeve of individual equities. This is a newer strategy, but has been used as part of the Custom Portfolio Strategy for some time and works better with a higher minimum due to the 20% equity sleeve.
  - Account Minimum \$250,000

- PMG's Conservative Dividend Growth Strategy: One of the flagship strategies created for clients looking for conservative dividend growth who are also interested in the characteristics of the Advance & Protect strategy which adds the risk management protection based on longer term market trends. The protection triggers on this strategy may be longer term as compared to the original Advance & Protect Strategy.
  - Account Minimum: \$100,000
- PMG's Jump Start Strategy: This strategy was created for clients who may be starting out or working with a smaller part of a larger portfolio. This strategy follows the same risk management process of Advance & Protect using ETF's and Mutual Funds only. This strategy has a smaller amount of holdings.
  - Account Minimum: \$10,000
- PMG's Moderate Growth and Income Strategy is a newer model which combines strategic allocation along with technical analysis. This model takes on a more traditional long term allocation approach and expands on the size of the Jump Start Strategy.
  - Account Minimum: \$50,000
- PMG's Fully Customized Portfolio Strategy: This strategy is completely custom to you based on your overall situation. It may include portions of other PMG strategies as core portions of the account. In addition, PMG will build satellite positions that will better help you achieve your specific situation. Examples of why one may choose this strategy include risk-based decisions, income needs for retirement, fixed income only portfolios, longer term growth objectives, tax planning issues, or trading objectives with a particular sector.
  - Account Minimum: No minimum due to potential cash flow needs.
- PMG's Strategic Balanced Portfolio: For longer term investors looking to blend equities and fixed income into one portfolio. Equity and fixed income weightings will be based on intermediate outlooks taking on a more strategic longer-term approach.
  - Account Minimum: \$100,000
- PMG's Balanced "Plus" Strategy: Built for larger accounts who can further diversify amongst asset classes and sectors. This portfolio can include up to 50% individual equities depending on market conditions. This model will typically have between 15 and 20 holdings, made up of ETF's (Exchange Traded Funds), Mutual Funds, and individual equities.
  - Account Minimum: \$500,000 Recommended

The PMG Investment Strategies are generally implemented by using the following trading philosophies:

Long term purchases. Investments held at least a year.

Short term purchases. Investments sold within a year.

Frequent trading. This strategy refers to the practice of selling investments within 30 days of purchase.

### **Primarily Recommend One Type of Security**

We do not primarily recommend one type of security to clients. Instead, we recommend any product that may be suitable for each client relative to that client's specific circumstances and needs.

### **Risk of Loss**

Past performance is not indicative of future results. Therefore, you should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds, etc.) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. You should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, our firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated with investing in securities through our investment management program, as described below:

- **Market Risk** – Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- **Equity (stock) market risk** – Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.
- **Company Risk**. When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.
- **Fixed Income Risk**. When investing in bonds, there is the risk that the issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- **Options Risk**. Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.

- ETF and Mutual Fund Risk – When investing in a an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. You will also incur brokerage costs when purchasing ETFs.
- Management Risk – Your investment with our firm varies with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our investment strategies do not produce the expected returns, the value of the investment will decrease.

## Item 9 – Disciplinary Information

*Item 9* is not applicable to this Disclosure Brochure because there are no legal or disciplinary events that are material to a client's or prospective client's evaluation of our business or integrity.

## Item 10 – Other Financial Industry Activities and Affiliations

PMG is **not** and does **not** have a related person that is currently or have a pending application to become a broker/dealer, municipal securities dealer, government securities dealer or broker, an investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund), another investment adviser or financial planner, a futures commission merchant, commodity pool operator, or commodity trading advisor, a banking or thrift institution, an accountant or accounting firm, a lawyer or law firm, an insurance company or agency, a pension consultant, a real estate broker or dealer, and a sponsor or syndicator of limited partnerships.

We are an independent registered investment registered adviser and only provide investment advisory services. We are not engaged in any other business activities and offer no other services except those described in this Disclosure Brochure. However, while we do not sell products or services other than investment advice, our representatives may sell other products or provide services outside of their role as investment adviser representatives with us.

### **Registered Representative of a Broker-Dealer**

Our representatives are also registered representatives of LPL Financial, a securities broker-dealer. You may work with your investment adviser representative in his or her separate capacity as a registered representative of LPL Financial.

As a result of this relationship, LPL Financial may have access to certain confidential information (e.g., financial information, investment objectives, transactions and holdings) about clients of PMG, even if a client does not establish any account through LPL Financial. If you would like a copy of the privacy policy of LPL Financial, please contact your investment adviser representative.

When acting in his or her separate capacity as a registered representative, your investment adviser representative may sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, and variable annuity and variable life products to you. As such, your investment adviser representative may suggest that you implement investment advice by purchasing securities products through a commission-based brokerage account in addition to or in lieu of a fee-based investment-advisory account. This receipt of commissions creates an incentive to recommend those products for which your investment adviser representative will receive a commission in his or her separate capacity as a registered representative of a securities broker-dealer. Consequently, the objectivity of the advice rendered to you could be biased. This conflict of interest is addressed by only recommending investments that are suitable for each client and disclosing the fact that clients are free to utilize any broker dealer of their choosing to purchase any recommended investments.

You are under no obligation to use the services of our representatives in this separate capacity or to use LPL Financial and can select any broker/dealer you wish to implement securities transactions. If you select our representatives to implement securities transactions in their separate capacity as registered representatives, they must use LPL Financial. Prior to effecting any such transactions, you are required to enter into a new account agreement with LPL Financial. The commissions charged by LPL Financial may be higher or lower than those charged by other broker/dealers. In addition, the registered representatives may also receive additional ongoing 12b-1 fees for mutual fund purchases from the mutual fund company during the period that you maintain the mutual fund investment.

### **Third-Party Money Managers**

PMG has developed programs, previously described in *Item 5* of this disclosure brochure, designed to allow us to recommend and select third-party money managers for you. PMG will only enter in to agreements with other investment advisory firms that are properly registered in the state of client residence. Once you select the third-party money manager to manage all or a portion of your assets, the third-party money manager will pay us a portion of the fees you are charged. We have a conflict of interest by only offering those third-party money managers that have agreed to pay a portion of their advisory fee to us and have met the conditions of our due diligence review. This conflict of interest is addressed by only recommending investments that are suitable for each client. There may be other third-party money managers that may be suitable for you that may be more or less costly. Please refer to *Items 4 and 5* for full details regarding the programs, fees, conflicts of interest and materials arrangements when PMG selects other investment advisers.

### **Dually Registered as an Investment Adviser Representative**

To ensure the efficient transition of client accounts the representatives of PMG will temporarily remain licensed as investment adviser representatives with LPL Financial, LLC. PMG and LPL Financial, LLC are not affiliated. Through LPL Financial, LLC, the representatives provide asset management services as well as referrals to sub-advisors. They earn advisory fees when providing these services through LPL Financial, LLC. Therefore, you could receive advisory services from one individual acting as an investment adviser representative on behalf of two separate registered investment advisors. If the representatives of PMG provide services to you, you will be given the disclosure brochure of LPL Financial, LLC describing the services provided, fees charged and other information. You are encouraged to read and review the disclosure brochures for both PMG and LPL Financial, LLC and direct questions to your representative.

This dual registration status is temporary in nature and was established solely to provide continuity in the services we are able to provide to our clients. Once all client assets have been transferred under the management of PMG or no later than after 90 days (whichever comes first) the dual registration status will be terminated by LPL Financial. Clients being transferred under PMG will be provided with an explanation of the benefits or potential disadvantages of moving to PMG and always have the option of making the decision to work with another investment advisory firm.

### **Insurance Agent**

You may work with your investment adviser representative in his or her separate capacity as an insurance agent. When acting in his or her separate capacity as an insurance agent, the investment adviser representative may sell, for commissions, general disability insurance, life insurance, annuities, and other insurance products to you. As such, your investment adviser representative in his or her separate capacity as an insurance agent, may suggest that you implement recommendations of PMG by purchasing disability insurance, life insurance, annuities, or other insurance products. This receipt of commissions creates an incentive for the representative to recommend those products for which your investment adviser representative will receive a commission in his or her separate capacity as an insurance agent. Consequently, the advice rendered to you could be biased. You are under no obligation to implement any insurance or annuity transaction through your investment adviser representative.

## **Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading**

### **Code of Ethics Summary**

An investment adviser is considered a fiduciary and has a fiduciary duty to all clients. PMG has established a Code of Ethics to comply with the requirements of the securities laws and regulations that reflects its fiduciary obligations and those of its supervised persons. The Code of Ethics also requires compliance with federal securities laws. PMG's Code of Ethics covers all individuals that are classified as "supervised persons". All employees, officers, directors and investment adviser representatives are classified as supervised persons. PMG requires its supervised persons to consistently act in your best interest in all advisory activities. PMG imposes certain requirements on its affiliates and supervised persons to ensure that they meet the firm's fiduciary responsibilities to you. The standard of conduct required is higher than ordinarily required and encountered in commercial business.

This section is intended to provide a summary description of the Code of Ethics of PMG. If you wish to review the Code of Ethics in its entirety, you should send us a written request and upon receipt of your request, we will promptly provide a copy of the Code of Ethics to you.

### **Affiliate and Employee Personal Securities Transactions Disclosure**

PMG or associated persons of the firm may buy or sell for their personal accounts, investment products identical to those recommended to clients. This creates a potential conflict of interest. It is the express policy of PMG that all persons associated in any manner with our firm must place clients' interests ahead of their own when implementing personal investments. PMG and its associated persons will not buy or



sell securities for their personal account(s) where their decision is derived, in whole or in part, by information obtained as a result of employment or association with our firm unless the information is also available to the investing public upon reasonable inquiry.

We are now and will continue to be in compliance with applicable state and federal rules and regulations. To prevent conflicts of interest, we have developed written supervisory procedures that include personal investment and trading policies for our representatives, employees and their immediate family members (collectively, associated persons):

- Associated persons cannot prefer their own interests to that of the client.
- Associated persons are prohibited from trading or recommending clients purchase investments in which you or a related person has a material financial interest. However the firm may recommend the purchase of no-load mutual funds that pay 12(B) 1 trail commissions. The possible receipt of these payments presents a conflict of interest which is address by only recommending funds that are in the best interest of our clients.
- Associated persons cannot purchase or sell any security for their personal accounts prior to implementing transactions for client accounts.
- Associated persons cannot buy or sell securities for their personal accounts when those decisions are based on information obtained as a result of their employment, unless that information is also available to the investing public upon reasonable inquiry.
- Associated persons are prohibited from purchasing or selling securities of companies in which any client is deemed an "insider".
- Associated persons are discouraged from conducting frequent personal trading.
- Associated persons are generally prohibited from serving as board members of publicly traded companies unless an exception has been granted to the Chief Compliance Officer of PMG.

Any associated person not observing our policies is subject to sanctions up to and including termination.

## **Item 12 – Brokerage Practices**

Clients are under no obligation to act on the recommendations of PMG. If the firm assists in the implementation of any recommendations, we primarily recommend the use of LPL Financial, LLC as the account custodian and we are responsible to ensure that the client receives the best execution possible. Best execution does not necessarily mean that clients receive the lowest possible commission costs but that the qualitative execution is best. In other words, all conditions considered, the transaction execution is in your best interest. When considering best execution, we look at a number of factors besides prices and rates including, but not limited to:

- Execution capabilities (e.g., market expertise, ease/reliability/timeliness of execution, responsiveness, integration with our existing systems, ease of monitoring investments)
- Products and services offered (e.g., investment programs, back office services, technology, regulatory compliance assistance, research and analytic services)
- Financial strength, stability and responsibility
- Reputation and integrity
- Ability to maintain confidentiality

We exercise reasonable due diligence to make certain that best execution is obtained for all clients when implementing any transaction by considering the back office services, technology and pricing of services offered. PMG does not receive client referrals from any Broker Dealer.

**Directed Brokerage**

Clients should understand that not all investment advisors require the use of a particular broker/dealer or custodian. Some investment advisors allow their clients to select whichever broker/dealer the client decides. By requiring clients to use a particular broker/dealer, PMG may not achieve the most favorable execution of client transactions and the practice requiring the use of specific broker/dealers may cost clients more money than if the client used a different broker/dealer or custodian. However, for compliance and operational efficiencies, PMG has decided to require our clients to use broker/dealers and other qualified custodians determined by PMG.

**Broker/Dealer Affiliation (LPL Financial)**

If you wish to implement our advice you are free to select any broker you wish. If you wish to have our representatives implement the advice in their separate capacity as registered representatives, LPL is used. Our representatives are registered representatives of LPL and we are required to use the services of LPL when acting in this capacity. LPL has a wide range of approved securities products for which it performs due diligence prior to selection. LPL's registered representatives are required to adhere to these products when implementing securities transactions through LPL. Commissions charged for these products may be higher or lower than commissions clients may be able to obtain if transactions were implemented through another broker/dealer.

Because our representatives are also registered representatives of LPL, LPL provides compliance support to them. LPL also provides our representatives, and therefore us, with back-office operational, technology and other administrative support.

If you wish to implement our advice through any of the programs described in this Disclosure Brochure, LPL will be used as the broker/dealer and/or custodian. LPL will be the primary broker/dealer and custodian recommended due to the relationship our representatives have with LPL. We recommend broker/dealers and custodians that we feel provide services in a manner and at a cost that will allow us to meet our duty of best execution. However, we may be limited in the broker/dealer or custodians that we are allowed to use due to our representatives' relationship with LPL.

LPL may limit or restrict the broker/dealer or custodial platforms for its registered representatives that are also independently licensed due to its duty to supervise the transactions implemented by these individuals. In addition, LPL limits the universe of available mutual funds available to advisors utilizing tier platform, the available mutual funds on the LPL platform may not be the least expensive share class available to clients, and clients may be able to get a less expensive mutual fund share classes by utilizing an investment adviser that is not limited in its investment selection.

While there is no direct linkage between the investment advice given to you and our recommendation of LPL, economic benefits may be provided to us by LPL that are not provided if you select another broker/dealer or account custodian. These benefits may include:

- Negotiated costs for transaction implementation
- A dedicated trade desk that services LPL Financial participants exclusively
- A dedicated service group and an account services manager dedicated to our accounts
- Access to a real-time order matching system
- Electronic download of trades, balances and position information
- Access, for a fee, to an electronic interface with the account custodian's software
- Duplicate and batched client statements, confirmations and year-end reports

Please also see *Item 5, Fees and Compensation*, for additional information about advisory services and implementing recommendations.

### **Soft Dollar Benefits**

An investment adviser receives soft dollar benefits from a broker-dealer when the investment adviser receives research or other products and services in exchange for client securities transactions or maintaining an account balance with the broker-dealer.

PMG does not have a soft dollar agreement with a broker-dealer or a third-party.

### **Handling Trade Errors**

PMG has implemented procedures designed to prevent trade errors; however, trade errors in client accounts cannot always be avoided. Consistent with its fiduciary duty, it is the policy of PMG to correct trade errors in a manner that is in the best interest of the client. In cases where the client causes the trade error, the client is responsible for any loss resulting from the correction. Depending on the specific circumstances of the trade error, the client may not be able to receive any gains generated as a result of the error correction. In all situations where the client does not cause the trade error, the client is made whole and any loss resulting from the trade error is absorbed by PMG if the error is caused by PMG. If the error is caused by the broker-dealer, the broker-dealer is responsible for handling the trade error. If an investment gain results from the correcting trade, the gain remains in the client's account unless the same error involved other client account(s) that should also receive the gains. It is not permissible for all clients to retain the gain. PMG may also confer with a client to determine if the client should forego the gain (e.g., due to tax reasons).

PMG will never benefit or profit from trade errors.

### **Block Trading Policy**

We may elect to purchase or sell the same securities for several clients at approximately the same time. This process is referred to as aggregating orders, batch trading or block trading and is used by our firm when PMG believes such action may prove advantageous to clients. If and when we aggregate client orders, allocating securities among client accounts is done on a fair and equitable basis. Typically, the process of aggregating client orders is done in order to achieve better execution, to negotiate more favorable commission rates or to allocate orders among clients on a more equitable basis in order to avoid differences in prices and transaction fees or other transaction costs that might be obtained when orders are placed independently.

PMG uses the pro rata allocation method for transaction allocation.

Under this procedure, pro rata trade allocation means an allocation of the trade at issue among applicable advisory clients in amounts that are proportional to the participating advisory client's intended investable assets. PMG will calculate the pro rata share of each transaction included in a block order and assigns the appropriate number of shares of each allocated transaction executed for the client's account.

If and when we determine to aggregate client orders for the purchase or sale of securities, including securities in which PMG or our associated persons may invest, we will do so in accordance with the parameters set forth in the SEC No-Action Letter, *SMC Capital, Inc.* Neither we nor our associated persons receive any additional compensation as a result of block trades.

### **Agency Cross Transactions**

Our associated persons are prohibited from engaging in agency cross transactions, meaning we cannot act as brokers for both the sale and purchase of a single security between two different clients and cannot receive compensation in the form of an agency cross commission or principal mark-up for the trades.

## **Item 13 – Review of Accounts**

### **Account Reviews and Reviewers**

Managed accounts are reviewed at least quarterly. While the calendar is the main triggering factor, reviews can also be conducted at your request. Account reviews will include investment strategy and objectives review and making a change if strategy and objectives have changed. Reviews are conducted by Phillip Guerrero, with reviews performed in accordance with your investment goals and objectives.

Accounts established and maintained with other third-party money managers are reviewed at least quarterly, usually when statements and/or reports are received from the money manager.

Our financial planning services terminate upon the presentation of the written plan. Our financial planning and consulting services do not include monitoring the investments of your account(s), and therefore, there is no ongoing review of your account(s) under such services.

### **Statements and Reports**

For our asset management services, you are provided with transaction confirmation notices and regular quarterly account statements in writing directly from the qualified custodian.

Account managed by outside money managers will receive reports directly from the outside money manager as disclosed in their ADV Part 2A Brochure. Reports may be written of electronic.

Financial planning clients do not receive any report other than the written plan originally contracted for and provided by PMG.

You are encouraged to always compare any reports or statements provided by us, a sub-adviser or third-party money manager against the account statements delivered from the qualified custodian. When you have questions about your account statement, you should contact our firm and the qualified custodian preparing the statement.

## Item 14 – Client Referrals and Other Compensation

PMG does not directly or indirectly compensate any person for client referrals.

The only compensation received from advisory services is the fees charged for providing investment advisory services as described in *Item 5* of this Disclosure Brochure. PMG receives no other forms of compensation in connection with providing investment advice.

As referenced in Item 4, Advisory Services, Item 5, Fees and Compensation and Item 10, Other Financial Industry Activities and Affiliations PMG may refer clients to other investment advisory firms and receive a portion of the advisory fees charged. *Please see Item 5, Fees and Compensation, Item 10, Other Financial Industry Activities and Affiliations and Item 12, Brokerage Practices, for additional discussion concerning other compensation and the conflicts of interest created.*

## Item 15 – Custody

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented. Since LPL Financial is responsible for calculating and deducting the advisory fee from client accounts PMG is not considered to have custody.

Client will receive account statements directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. Clients should carefully review those statements and are urged to compare the statements against correspondence or reports received from PMG Wealth. When clients have questions about their account statements, they should contact PMG Wealth or the qualified custodian preparing the statement.

## Item 16 – Investment Discretion

When providing asset management services, PMG maintains trading authorization over your Account and can provide management services on a **discretionary** basis. When discretionary authority is granted, we will have the authority to determine the type of securities and the amount of securities that can be bought or sold for your portfolio without obtaining your consent for each transaction.

If you decide to grant trading authorization on a **non-discretionary** basis, we will be required to contact you prior to implementing changes in your account. Therefore, you will be contacted and required to accept or reject our investment recommendations including:

- The security being recommended
- The number of shares or units
- Whether to buy or sell

Once the above factors are agreed upon, we will be responsible for making decisions regarding the timing of buying or selling an investment and the price at which the investment is bought or sold. If your accounts are managed on a non-discretionary basis, you need to know that if we are not able to reach you or you are slow to respond to our request, it can have an adverse impact on the timing of trade implementations and we may not achieve the optimal trading price.

You will have the ability to place reasonable restrictions on the types of investments that may be purchased in your Account. You may also place reasonable limitations on the discretionary power granted to PMG so long as the limitations are specifically set forth or included as an attachment to the client agreement.

Client will grant PMG discretionary authority (without first consulting with Client) to establish and/or terminate a relationship with a Sub-Adviser for purposes of managing the Account or a portion of the Account determined by PMG. Client will also grant the Sub-Adviser selected by PMG with the discretionary authority (in the sole discretion of the Sub-Adviser without first consulting with Client) to make all decisions to buy, sell or hold securities, cash or other investments for such portion of the Account managed by the Sub-Adviser. Client will also grant the Sub-Adviser selected by PMG with the power and authority to carry out these decisions by giving instructions, on behalf of Client, to brokers and dealers and the qualified custodian(s) of the Account. Client authorizes PMG to provide a copy of this Agreement to the qualified custodian or any broker or dealer, through which transactions will be implemented on behalf of Client, as evidence of Sub-Adviser's authority under this Agreement.

## **Item 17 – Voting Client Securities**

### **Proxy Voting**

PMG does not vote proxies on behalf of Clients. We have determined that taking on the responsibilities for voting client securities does not add enough value to the services provided to you to justify the additional compliance and regulatory costs associated with voting client securities. Therefore, it is your responsibility to vote all proxies for securities held in Account.

You will receive proxies directly from the qualified custodian or transfer agent; we will not provide you with the proxies. You are encouraged to read through the information provided with the proxy-voting documents and make a determination based on the information provided.

With respect to assets managed by a third-party money manager, we will not vote the proxies associated with these assets. You will need to refer to each third-party money manager's disclosure brochure to determine whether the third-party money manager will vote proxies on your behalf. You may request a

complete copy of third-party money manager's proxy voting policies and procedures as well as information on how your proxies were voted by contacting the third-party money manager or by contacting PMG at the address or phone number indicated on Page 1 of this disclosure document.

## **Item 18 – Financial Information**

This *Item 18* is not applicable to this brochure. PMG does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for the most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, PMG has not been the subject of a bankruptcy petition at any time.

### **Business Continuity Plan**

PMG has a business continuity and contingency plan in place designed to respond to significant business disruptions. These disruptions can be both internal and external. Internal disruptions will impact our ability to communicate and do business, such as a fire in the office building. External disruptions will prevent the operation of the securities markets or the operations of a number of firms, such as earthquakes, wildfires, hurricanes, terrorist attack or other wide-scale, regional disruptions.

Our continuity and contingency plan has been developed to safeguard employees' lives and firm property, to allow a method of making financial and operational assessments, to quickly recover and resume business operations, to protect books and records, and to allow clients to continue transacting business.

The plan includes the following:

- Alternate locations to conduct business;
- Hard and electronic back-ups of records;
- Alternative means of communications with employees, clients, critical business constituents and regulators; and
- Details on the firms' employee succession plan

Our business continuity and contingency plan is reviewed and updated on a regular basis to ensure that the policies in place are sufficient and operational.

## Customer Privacy Policy Notice

**Commitment to Your Private Information:** PMG Wealth Management has a long standing policy of protecting the confidentiality and security information we collect about our clients. We do not, and will not, share nonpublic personal information about you (“Information”) with outside third parties without your consent, except for the specific purposes described below. This notice has been provided to you to describe the Information we may gather and the situations under which we may need to share it.

**Why We Collect and How We Use Information.** We limit the collection and use of Information within our firm to only those individuals associated or employed with us that must have Information to provide financial services to you. Such services include maintaining your accounts, processing transaction requests, providing financial planning, financial consultation, and other services described in our Form ADV.

**How We Gather Information.** We get most Information directly from you when you provide us with information from any of the following sources:

- Applications or forms (for example: name, address, social security number, birth date, assets, income, financial history)
- Transactional activity in your account (for example: trading history and account balances)
- Information services and consumer reporting sources (for example: to verify your identity or to assess your credit history)
- Other sources with your consent (for example: your insurance professional, attorney, or accountant)

**How We Protect Information.** Our employees and affiliated persons are required to protect the confidentiality of Information and to comply with our stated policies. They may access Information only when there is an acceptable reason to do so, such as to service your account or provide you with financial services. Employees who violate our Privacy Policy are subject to disciplinary action, up to and including termination from employment with us. We also maintain physical, electronic, and procedural safeguards to protect information, which comply with applicable SEC, state, and federal laws.

**Sharing Information with Other Companies Permitted Under Law.** We do not disclose Information obtained in the course of our practice except as required or permitted under law. Permitted disclosures include, for instance, providing information to unrelated third parties who need to know such Information in order to assist use with the providing services to you. Unrelated third parties may include broker/dealers, mutual fund companies, insurance companies, and the custodian with which your assets are held. In such situations, we stress the confidential nature of information being shared.

**Former Customers.** Even if we cease to provide you with financial products or services, our Privacy Policy will continue to apply to you and we will continue to treat your nonpublic information with strict confidentiality.



## FORM ADV PART 2B BROCHURE SUPPLEMENT - Phillip Guerrero

### **Item 1 – Cover Page**

Phillip Guerrero  
PMG Wealth Management, Inc.  
60 Landover Parkway, Suite D  
Hawthorn Woods, IL 60047  
847-550-6100

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

Date of Supplement: February 2024

**This brochure supplement provides information about Phillip Guerrero that supplements the PMG Management, Inc. (“PMG”) disclosure brochure. You should have received a copy of that brochure. Please contact Phillip Guerrero at 847-550-6100 or at [phil@pmgwealth.com](mailto:phil@pmgwealth.com) if you did not receive PMG’s brochure or if you have any questions about the contents of this supplement.**

**Additional information about Phillip Guerrero is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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

#### **Phillip Guerrero**

Born 1975, CRD # 2896913

#### ***Post-Secondary Educational Background:***

Illinois State University, BSBA - Finance: 1997

#### ***Business Background:***

PMG Wealth Management Inc., Investment Advisor Representative, 01/2017 to Present;

PMG Wealth Management, President, 10/2007 to Present

LPL Financial, LLC, Registered Representative, 10/2007 to Present

A.G. Edwards & Sons, Financial Consultant, 01/1997 to 10/2007

#### ***Professional Designations***

#### **Certified Financial Planner (CFP)**

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

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

and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

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

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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

CFP Acknowledgment: (ADVISOR) acknowledges his responsibility as a CFP® Certificant to adhere to the standards that have been established in the CFP Board’s Standards of Professional Conduct. If you become aware that (ADVISOR)’s conduct may violate the Standards of Professional Conduct, you may file a complaint with the CFP Board at [www.CFP.net/complaint](http://www.CFP.net/complaint).

### **Code of Ethics for CFP**

The following disclosure has been included in the COE section of the 2A.

In addition to abiding by our Code of Ethics, some of our representatives are Certified Financial Planners™ (CFP®) and also abide by the Code of Ethics and Responsibility Code of the Certified Financial Planner™ Board of Standards, Inc. The Code of Ethics and Responsibility Code requires CFP® designees to not only comply with all applicable laws and regulations but to also act in an ethical and professional responsible manner in all professional services and activities. The principles guiding CFP® designees are:

- Integrity
- Objectivity
- Competence (in providing services and maintaining knowledge and skills to do so)
- Fairness (to clients, principals, partners and employers and disclosing any conflicts of interest in providing services)
- Confidentiality (keeping all client information confidential without the specific client consent unless in response to legal process or in defense of charges of wrongdoing or civil dispute)
- Professionalism
- Diligence

You can obtain a copy of the Code of Ethics and Responsibility Code by requesting a copy from one of our representatives.

### **Item 3 – Disciplinary Information**

Phillip Guerrero has no legal or disciplinary events to report.

### **Item 4 – Other Business Activities**

#### **Registered Representative of a Broker-Dealer**

Phillip Guerrero is separately licensed as a registered representative with LPL Financial, LLC, a registered securities broker/dealer, member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investors Protection Corporation (SIPC). When acting in his separate capacity as a registered representative of LPL Financial, LLC, Phillip Guerrero may sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, and variable annuity and variable life products to advisory clients. As such, Phillip Guerrero may suggest that advisory clients implement investment advice by purchasing securities products through a commission-based LPL Financial, LLC account in addition to a PMG advisory account.

The receipt of commissions creates an incentive for Phillip Guerrero to recommend those products for which he will receive a commission. Consequently, the objectivity of the advice rendered to clients could be biased. Phillip Guerrero controls for this potential conflict of interest by discussing with clients the advantages and disadvantages of establishing a fee-based account through PMG versus establishing a commission-based account through LPL Financial, LLC. PMG does not require its advisor representatives to encourage clients to implement investment advice through LPL Financial, LLC.

Phillip Guerrero does not earn commissions in fee-based accounts.

Phillip Guerrero will receive 12b-1 fees from certain mutual fund companies as outlined in the fund's prospectus. 12b-1 fees come from fund assets, therefore, indirectly from client assets. The receipt of such fees could represent an incentive for Phillip Guerrero to recommend funds with 12b-1 fees over funds that have no fees or lower fees. Typically, Phillip Guerrero will receive 12b-1 fees only in commission-based brokerage accounts. However, such fees can be earned in fee-based accounts managed by Phillip Guerrero if 12b-1 fee paying mutual funds are held in the managed account. For ERISA accounts, there is an offset for any amount of 12b-1 fees. In such a situation, Phillip Guerrero discusses with clients the selection of a 12b-1 or other trail paying mutual funds. LPL Financial, LLC maintains records of all 12b-1 fee payments to Phillip Guerrero which may be viewed by clients upon request.

Clients are never obligated or required to establish accounts through PMG or LPL Financial, LLC. However, if a client does not choose to accept Phillip Guerrero's advice or decides not to establish an account through LPL Financial, LLC, Phillip Guerrero may not be able to provide management and advisory services to the client. Clients should understand that, due to certain regulatory constraints, Phillip Guerrero, in his capacity as an LPL Financial, LLC. Phillip Guerrero must place all purchases and sales of securities products in commission-based brokerage accounts through LPL Financial, LLC or its other approved institutions.

### **Insurance Agent**

Phillip Guerrero is independently licensed to sell insurance and annuity products through various insurance companies. When acting in this capacity, Phillip Guerrero will receive commissions for selling insurance and annuity products.

Phillip Guerrero may also receive other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of compensation and other incentive benefits may affect the judgment of Phillip Guerrero when recommending products to its clients. While Phillip Guerrero endeavors at all times to put the interest of his clients first as a part of PMG's overall fiduciary duty to clients, clients should be aware that the receipt of commissions and additional compensation itself creates a conflict of interest, and may affect Phillip Guerrero's decision making process when making recommendations.

Clients are never obligated or required to purchase insurance products from or through Phillip Guerrero and may choose any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

### **Notary Public**

Mr. Guerrero is also a Notary Public with the state of Illinois.

### **Item 5 – Additional Compensation**

In addition to the description of additional compensation provided in Item 4, Phillip Guerrero can receive additional benefits.

Certain product sponsors may provide Phillip Guerrero with other economic benefits from LPL Financial as a result of his recommendation or sale of the product sponsors' investments. The economic benefits received by Phillip Guerrero from product sponsors can include but are not limited to, financial assistance or the sponsorship of conferences and educational sessions, marketing support, incentive awards, payment of travel expenses, and tools to assist Phillip Guerrero in providing various services to clients.

This potential additional compensation creates a conflict of interest. PMG and Phillip Guerrero endeavor at all times to put the interest of its clients ahead of its own or those of its officers, directors, or representatives ("affiliated persons"), these arrangements could affect the judgment of Phillip Guerrero when recommending investment products. These situations present a conflict of interest that may affect the judgment of affiliated persons including Phillip Guerrero.

#### **Item 6 – Supervision**

Phillip Guerrero is the Chief Compliance Officer of PMG. He is responsible for overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives. Phillip Guerrero can be contacted at 847-550-6100.

## FORM ADV PART 2B BROCHURE SUPPLEMENT - Daniel R. Dame

### **Item 1 – Cover Page**

Daniel R. Dame  
PMG Wealth Management, Inc.  
3720 SW 11<sup>th</sup> Court  
Cape Coral, FL 33914  
239-257-1803

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

Date of Supplement: February 2024

**This brochure supplement provides information about Daniel R. Dame that supplements the PMG Management, Inc. (“PMG”) disclosure brochure. You should have received a copy of that brochure. Please contact Phillip Guerrero at 847-550-6100 or at [phil@pmgwealth.com](mailto:phil@pmgwealth.com) if you did not receive PMG’s brochure or if you have any questions about the contents of this supplement.**

**Additional information about Daniel R. Dame is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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

#### **Daniel R. Dame**

Born 1947; CRD # 1206871

#### ***Post-Secondary Educational Background:***

Taylor University, Bachelor’s Degree – Business Administration: 1969

#### ***Business Background:***

PMG Wealth Management Inc., Investment Advisor Representative, 01/2017 to Present;

LPL Financial, LLC. Registered Representative, 10/2009 to Present

Dame Financial Services, President, 12/2009 to Present

Mutual Service Corp, Registered Representative, 02/2009 to 09/2009

MetLife Securities, Inc. Registered Representative, 08/1999 to 02/2009

### **Item 3 – Disciplinary Information**

In March 2017 Daniel R. Dame entered a Consent Order with the state of Florida to settle a regulatory matter that alleged that he conducted investment advisory services from a location within the state of Florida without being lawfully registered in Florida from September 1, 2015, through December 2016. In the settlement Mr. Dame agreed to the entry of a Cease and Desist order and a monetary penalty.

Ultimately Mr. Dame's broker dealer, LPL Financial, paid the penalty as its registration department failed to notify Florida after Mr. Dame's request to update his licenses. Once all was corrected Mr. Dame was successfully approved in the state of Florida.

#### **Item 4 – Other Business Activities**

##### **Registered Representative of a Broker-Dealer**

Daniel R. Dame is separately licensed as a registered representative with LPL Financial, LLC, a registered securities broker/dealer, member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investors Protection Corporation (SIPC). When acting in his separate capacity as a registered representative of LPL Financial, LLC, Daniel R. Dame may sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, and variable annuity and variable life products to advisory clients. As such, Daniel R. Dame may suggest that advisory clients implement investment advice by purchasing securities products through a commission-based LPL Financial, LLC account in addition to a PMG advisory account.

The receipt of commissions creates an incentive for Daniel R. Dame to recommend those products for which he will receive a commission. Consequently, the objectivity of the advice rendered to clients could be biased. Daniel R. Dame controls for this potential conflict of interest by discussing with clients the advantages and disadvantages of establishing a fee-based account through PMG versus establishing a commission-based account through LPL Financial, LLC. PMG does not require its advisor representatives to encourage clients to implement investment advice through LPL Financial, LLC.

Daniel R. Dame does not earn commissions in fee-based accounts.

Daniel R. Dame will receive 12b-1 fees from certain mutual fund companies as outlined in the fund's prospectus. 12b-1 fees come from fund assets, therefore, indirectly from client assets. The receipt of such fees could represent an incentive for Daniel R. Dame to recommend funds with 12b-1 fees over funds that have no fees or lower fees. Typically, Daniel R. Dame will receive 12b-1 fees only in commission-based brokerage accounts. However, such fees can be earned in fee-based accounts managed by Daniel R. Dame if 12b-1 fee paying mutual funds are held in the managed account. For ERISA accounts, there is an offset for any amount of 12b-1 fees. In such a situation, Daniel R. Dame discusses with clients the selection of a 12b-1 or other trail paying mutual funds. LPL Financial, LLC maintains records of all 12b-1 fee payments to Daniel R. Dame which may be viewed by clients upon request.

Clients are never obligated or required to establish accounts through PMG or LPL Financial, LLC. However, if a client does not choose to accept Daniel R. Dame's advice or decides not to establish an account through LPL Financial, LLC, Daniel R. Dame may not be able to provide management and advisory services to the client. Clients should understand that, due to certain regulatory constraints, Daniel R. Dame, in his capacity as a LPL Financial, LLC. Daniel R. Dame must place all purchases and sales of securities products in commission-based brokerage accounts through LPL Financial, LLC or its other approved institutions.

## **Insurance Agent**

Daniel R. Dame is independently licensed to sell insurance and annuity products through various insurance companies. When acting in this capacity, Daniel R. Dame will receive commissions for selling insurance and annuity products.

Daniel R. Dame may also receive other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of compensation and other incentive benefits may affect the judgment of Daniel R. Dame when recommending products to its clients. While Daniel R. Dame endeavors at all times to put the interest of his clients first as a part of PMG's overall fiduciary duty to clients, clients should be aware that the receipt of commissions and additional compensation itself creates a conflict of interest, and may affect Daniel R. Dame 's decision making process when making recommendations.

Clients are never obligated or required to purchase insurance products from or through Daniel R. Dame and may choose any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

## **Item 5 – Additional Compensation**

In addition to the description of additional compensation provided in Item 4, Daniel R. Dame can receive additional benefits.

Certain product sponsors may provide Daniel R. Dame with other economic benefits from LPL Financial as a result of his recommendation or sale of the product sponsors' investments. The economic benefits received by Daniel R. Dame from product sponsors can include but are not limited to, financial assistance or the sponsorship of conferences and educational sessions, marketing support, incentive awards, payment of travel expenses, and tools to assist Daniel R. Dame in providing various services to clients.

This potential additional compensation creates a conflict of interest. PMG and Daniel R. Dame endeavor at all times to put the interest of its clients ahead of its own or those of its officers, directors, or representatives ("affiliated persons"), these arrangements could affect the judgment of Daniel R. Dame when recommending investment products. These situations present a conflict of interest that may affect the judgment of affiliated persons including Daniel R. Dame.

## **Item 6 – Supervision**

Phillip Guerrero is the Chief Compliance Officer of PMG. He is responsible for overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives. Phillip Guerrero can be contacted at 847-550-6100.



## FORM ADV PART 2B BROCHURE SUPPLEMENT – George Maroudas

### **Item 1 – Cover Page**

George Maroudas  
PMG Wealth Management, Inc.  
60 Landover Parkway, Suite D  
Hawthorn Woods, IL 60047  
847-550-6100

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

Date of Supplement: February 2024

**This brochure supplement provides information about George Maroudas that supplements the PMG Management, Inc. (“PMG”) disclosure brochure. You should have received a copy of that brochure. Please contact Phillip Guerrero at 847-550-6100 or at [phil@pmgwealth.com](mailto:phil@pmgwealth.com) if you did not receive PMG’s brochure or if you have any questions about the contents of this supplement.**

**Additional information about George Maroudas is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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

#### **George Maroudas**

Born 1996, CRD # 6950499

#### ***Post-Secondary Educational Background:***

Michigan State University, BSBA - Finance: 2019

#### ***Business Background:***

PMG Wealth Management Inc., Investment Advisor Representative, 01/2020 to Present  
LPL Financial, LLC, Registered Representative, 1/20 to Present  
PMG Wealth Management, Wealth Management Coordinator, 5/19-1/20

#### ***Professional Designations***

George Maroudas has no additional professional designations at this time.

### **Item 3 – Disciplinary Information**

George Maroudas has no legal or disciplinary events to report.

## **Item 4 – Other Business Activities**

### **Registered Representative of a Broker-Dealer**

George Marounas is separately licensed as a registered representative with LPL Financial, LLC, a registered securities broker/dealer, member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investors Protection Corporation (SIPC). When acting in his separate capacity as a registered representative of LPL Financial, LLC, George Maroudas may sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, and variable annuity and variable life products to advisory clients. As such, George Maroudas may suggest that advisory clients implement investment advice by purchasing securities products through a commission-based LPL Financial, LLC account in addition to a PMG advisory account.

The receipt of commissions creates an incentive for George Maroudas to recommend those products for which he will receive a commission. Consequently, the objectivity of the advice rendered to clients could be biased. George Maroudas controls for this potential conflict of interest by discussing with clients the advantages and disadvantages of establishing a fee-based account through PMG versus establishing a commission-based account through LPL Financial, LLC. PMG does not require its advisor representatives to encourage clients to implement investment advice through LPL Financial, LLC.

George Maroudas does not earn commissions in fee-based accounts.

George Maroudas will receive 12b-1 fees from certain mutual fund companies as outlined in the fund's prospectus. 12b-1 fees come from fund assets, therefore, indirectly from client assets. The receipt of such fees could represent an incentive for George Maroudas to recommend funds with 12b-1 fees over funds that have no fees or lower fees. Typically, George Maroudas will receive 12b-1 fees only in commission-based brokerage accounts. However, such fees can be earned in fee-based accounts managed by George Maroudas if 12b-1 fee paying mutual funds are held in the managed account. For ERISA accounts, there is an offset for any amount of 12b-1 fees. In such a situation, Phillip Guerrero discusses with clients the selection of a 12b-1 or other trail paying mutual funds. LPL Financial, LLC maintains records of all 12b-1 fee payments to Phillip Guerrero which may be viewed by clients upon request.

Clients are never obligated or required to establish accounts through PMG or LPL Financial, LLC. However, if a client does not choose to accept George Maroudas' advice or decides not to establish an account through LPL Financial, LLC, George Maroudas may not be able to provide management and advisory services to the client. Clients should understand that, due to certain regulatory constraints, George Maroudas, in his capacity as a LPL Financial, LLC. George Maroudas must place all purchases and sales of securities products in commission-based brokerage accounts through LPL Financial, LLC or its other approved institutions.

### **Insurance Agent**

George Maroudas is independently licensed to sell insurance and annuity products through various insurance companies. When acting in this capacity, George Maroudas will receive commissions for selling insurance and annuity products.

George Maroudas may also receive other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of compensation and other incentive benefits may affect the judgment of George Maroudas when recommending products to its clients. While George Maroudas endeavors at all times to put the interest of his clients first as a part of PMG's overall fiduciary duty to clients, clients should be aware that the receipt of commissions and additional compensation itself creates a conflict of interest, and may affect George Maroudas' decision making process when making recommendations.

Clients are never obligated or required to purchase insurance products from or through George Maroudas and may choose any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

#### **Item 5 – Additional Compensation**

In addition to the description of additional compensation provided in Item 4, George Maroudas can receive additional benefits.

Certain product sponsors may provide George Maroudas with other economic benefits from LPL Financial as a result of his recommendation or sale of the product sponsors' investments. The economic benefits received by George Maroudas from product sponsors can include but are not limited to, financial assistance or the sponsorship of conferences and educational sessions, marketing support, incentive awards, payment of travel expenses, and tools to assist George Maroudas in providing various services to clients.

This potential additional compensation creates a conflict of interest. PMG and George Maroudas endeavor at all times to put the interest of its clients ahead of its own or those of its officers, directors, or representatives ("affiliated persons"), these arrangements could affect the judgment of George Maroudas when recommending investment products. These situations present a conflict of interest that may affect the judgment of affiliated persons including George Maroudas.

#### **Item 6 – Supervision**

George Maroudas is supervised by Phillip Guerrero, Chief Compliance Officer of PMG. Phillip Guerrero is responsible for overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives. Phillip Guerrero can be contacted at 847-550-6100.