

AMFG Wealth Management LLC Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of AMFG Wealth Management LLC. If you have any questions about the contents of this brochure, please contact us at (440) 249-0397 or by email at: [aferonti@amfinancialgroup.com](mailto: aferonti@amfinancialgroup.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about AMFG Wealth Management LLC is also available on the SEC's website at www.adviserinfo.sec.gov. AMFG Wealth Management LLC's CRD number is: 292160.

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Registration does not imply a certain level of skill or training.

Version Date: 03/01/2024

Item 2: Material Changes

This is the annual updating amendment of the Form ADV Part 2A for AMFG Wealth Management, LLC dated March 1, 2024. This document replaces the last published Form ADV Part 2A dated March 1, 2023.

Update Information

AMFG Wealth Management, LLC is providing this information related to the changes made since the annual amendment of March 1, 2023.

This document contains the following changes since the last annual amendment:

- There were no material changes.

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Item 4: Advisory Business

A. Description of the Advisory Firm

AMFG Wealth Management LLC (hereinafter "AMFGWM") is a Limited Liability Company organized in the State of Ohio. The firm was formed in December 2017, and the principal owner is Al Feronti.

B. Types of Advisory Services

Portfolio Management Services

AMFGWM offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. AMFGWM creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

AMFGWM evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. AMFGWM will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

AMFGWM seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of AMFGWM's economic, investment or other financial interests. To meet its fiduciary obligations, AMFGWM attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, AMFGWM's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is AMFGWM's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent, including initial public offerings ("IPOs") and other investment opportunities that might have a limited supply, among its clients on a fair and equitable basis over time.

AMFGWM may direct clients to third-party investment advisers to manage all or a portion of the client's assets. Before selecting other advisers for clients, AMFGWM will always ensure those other advisers are properly licensed or registered as an investment adviser. AMFGWM then makes investments with a third-party investment adviser by

referring the client to the third-party adviser. AMFGWM will review the ongoing performance of the third-party adviser as a portion of the client's portfolio.

Financial Planning

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

Services Limited to Specific Types of Investments

AMFGWM generally limits its investment advice to mutual funds, fixed income securities, insurance products including annuities, equities and ETFs. AMFGWM may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

AMFGWM offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent AMFGWM from properly servicing the client account, or if the restrictions would require AMFGWM to deviate from its standard suite of services, AMFGWM reserves the right to end the relationship.

D. Wrap Fee Programs

A wrap fee program is an investment program wherein the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. AMFGWM does not participate in any wrap fee programs.

E. Assets Under Management

AMFGWM has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$38,133,518	-0-	03/01/2024

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Fees

Total Assets Under Management	Annual Fees
All Assets	1.75%

AMFGWM uses the value of the account as of the last business day of the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

These fees are generally negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Clients may terminate the agreement without penalty for a full refund of AMFGWM's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 5 days' written notice.

Selection of Other Advisers Fees

AMFGWM will be compensated via a fee share from the advisers to which it directs those clients. This relationship will be memorialized in each contract between AMFGWM and each third-party adviser. The fees shared will not exceed any limit imposed by any regulatory agency.

AMFGWM may engage in the selection of third-party money managers, but does not have any such arrangements in place at this time. This service may be canceled with 30 days' notice.

Financial Planning Fees

Hourly Fees

The negotiated hourly fee for these services is between \$150 and \$500.

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

B. Payment of Fees

Payment of Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis, or may be invoiced and billed directly to the client on a quarterly basis. Clients may select the method in which they are billed. Fees are paid in arrears.

Payment of Selection of Other Advisers Fees

The timing, frequency, and method of paying fees for selection of third-party managers will depend on the specific third-party adviser selected.

Payment of Financial Planning Fees

Financial planning fees are paid via check and wire.

Hourly financial planning fees are paid in arrears upon completion.

C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third party fees (*i.e.*, custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by AMFGWM. Please see Item 12 of this brochure regarding broker/custodian.

D. Prepayment of Fees

AMFGWM collects its fees in arrears. It does not collect fees in advance.

E. Outside Compensation For the Sale of Securities to Clients

Neither AMFGWM nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

AMFGWM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

AMFGWM generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Pension and Profit Sharing Plans
- ❖ Charitable Organizations
- ❖ Corporations or Business Entities

❖ Other Investment Advisers

There is an account minimum of \$25,000, which may be waived by AMFGWM in its discretion.

Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

A. Methods of Analysis and Investment Strategies

Methods of Analysis

AMFGWM's methods of analysis include Modern portfolio theory.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Investment Strategies

AMFGWM uses long term trading and short term trading.

Covered Call Option trading is employed by AMFGWM in some client accounts with the intention of generating profits related to an equity security owned in a client account.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Modern portfolio theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that

will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Selection of Other Advisers: AMFGWM's selection process cannot ensure that money managers will perform as desired and AMFGWM will have no control over the day-to-day operations of any of its selected money managers. AMFGWM would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulatory breaches or fraud.

Short term trading risks include liquidity, economic stability, and inflation, in addition to the long term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit

rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Covered Call Option trading carries the risk of loss of upside price appreciation above the strike price of the option. This means if the price of stock shares go above the option call price the stock can be called away at the option call price which would be lower than the current market price due to the premium received from selling the covered call.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Zachariah Spicer, an Investment Advisor Representative of the Company, is a Registered Representative of Liberty Partners Financial Services, an unaffiliated broker-dealer.

When executing transactions in the capacity as a registered representative, RRs receive commissions from the sale of securities and investment products. RRs receive a portion of the distribution/service fees (trails) for the sale of mutual funds. This relationship creates a potential conflict of interest for registered representatives in that they are compensated for recommending and selling investment products. Liberty Partners Financial Services addresses this potential conflict of interest in that broker dealer registered representatives who receive commissions from sales in brokerage accounts are to make needs-based recommendations for the best available product, transactions are reviewed by a supervisor for suitability, brokerage accounts for commissions, broker dealer clients are not charged a management fee and registered representatives receive ethics training as part of their ongoing training.

Advisor Representatives do not earn commission-based compensation on investment advisor accounts.

Neither AMFGWM nor its other representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither AMFGWM nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Al Feronti and other investment advisor representatives are independent licensed insurance agents, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. AMFGWM always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of AMFGWM in connection with such individual's activities outside of AMFGWM.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

AMFGWM may direct clients to third-party investment advisers to manage all or a portion of the client's assets. AMFGWM will be compensated via a fee share from the advisers to which it directs those clients. This relationship will be memorialized in each contract between AMFGWM and each third-party advisor. The fees shared will not exceed any limit imposed by any regulatory agency. This creates a conflict of interest in that AMFGWM has an incentive to direct clients to the third-party investment advisers that provide AMFGWM with a larger fee split. AMFGWM will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. AMFGWM will ensure that all recommended advisers are licensed or notice filed in the states in which AMFGWM is recommending them to clients.

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

A. Code of Ethics

AMFGWM has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. AMFGWM's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

AMFGWM does not recommend that clients buy or sell any security in which a related person to AMFGWM or AMFGWM has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of AMFGWM may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of AMFGWM to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. AMFGWM will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of AMFGWM may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of AMFGWM to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, AMFGWM will never engage in trading that operates to the client's disadvantage if representatives of AMFGWM buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on AMFGWM's duty to seek "best execution," which is the obligation to seek to execute securities transactions for a client on terms that are the most favorable to the client under the circumstances. The client will not necessarily pay the lowest commission or commission equivalent, and AMFGWM may also consider the market expertise and research access provided by the payment of commissions, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers to aid in the research efforts of AMFGWM. AMFGWM will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

AMFGWM will require clients to use Charles Schwab, TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC and Orion.

1. Research and Other Soft-Dollar Benefits

While AMFGWM has no formal soft dollars program in which soft dollars are used to pay for third party services, AMFGWM may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). AMFGWM may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and AMFGWM does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. AMFGWM benefits by not having to produce or pay for the research, products or services, and AMFGWM will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that AMFGWM's

acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. *Brokerage for Client Referrals*

AMFGWM receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. *Clients Directing Which Broker/Dealer/Custodian to Use*

AMFGWM may permit clients to direct it to execute transactions through a specified broker-dealer. If a client directs brokerage, then the client will be required to acknowledge in writing that the client's direction with respect to the use of brokers supersedes any authority granted to AMFGWM to select brokers; this direction may result in higher commissions, which may result in a disparity between free and directed accounts; and trades for the client and other directed accounts may be executed after trades for free accounts, which may result in less favorable prices, particularly for illiquid securities or during volatile market conditions. Not all investment advisers allow their clients to direct brokerage.

B. Aggregating (Block) Trading for Multiple Client Accounts

AMFGWM does not aggregate or bunch the securities to be purchased or sold for multiple clients. This may result in less favorable prices, particularly for illiquid securities or during volatile market conditions.

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts for AMFGWM's advisory services provided on an ongoing basis are reviewed at least annually by Al Feronti, president, with regard to clients' respective investment policies and risk tolerance levels. All accounts at AMFGWM are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Al Feronti, president. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, AMFGWM's services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each client of AMFGWM's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

Each financial planning client will receive the financial plan upon completion.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

AMFGWM receives compensation via its arrangement from the selected third party advisers via a fee split, but otherwise does not receive any economic benefit from any other third party for advice rendered to AMFGWM's clients.

AMFGWM participates in the institutional advisor program (the "Program") offered by TD Ameritrade. TD Ameritrade offers to independent investment advisor services which include custody of securities, trade execution, clearance and settlement of transactions. AMFGWM receives some benefits from TD Ameritrade through its participation in the Program.

As disclosed above, AMFGWM participates in TD Ameritrade's institutional advisor program and AMFGWM may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between AMFGWM's participation in the Program and the investment advice it gives to its clients, although AMFGWM receives economic benefits through its participation in the Program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving AMFGWM participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have AMFGWM's fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to AMFGWM by third party vendors. TD Ameritrade may also pay for business consulting and

professional services received by AMFGWM's related persons. Some of the products and services made available by TD Ameritrade through the Program may benefit AMFGWM but may not benefit its client accounts. These products or services may assist AMFGWM in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help AMFGWM manage and further develop its business enterprise. The benefits received by AMFGWM or its personnel through participation in the Program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, AMFGWM endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by AMFGWM or its related persons in and of itself creates a conflict of interest and may indirectly influence the AMFGWM's choice of TD Ameritrade for custody and brokerage services.

B. Compensation to Non – Advisory Personnel for Client Referrals

AMFGWM may use, employ, or compensate non-employee (outside) consultants, individuals, and/or entities (Solicitors) for client referrals. If your investment advisor relationship is obtained through a Solicitor, you will receive a Solicitor Disclosure Form that will describe the solicitor relationship and the compensation earned by the Solicitor. Your fee will not increase because of the Solicitor relationship. This form will require you to sign the form acknowledging this relationship.

Beyond the disclosures provided in this Brochure, we do not receive any compensation from any third party in connection with providing investment advice to you.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, AMFGWM will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

AMFGWM provides discretionary and non-discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, AMFGWM generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share.

Item 17: Voting Client Securities (Proxy Voting)

AMFGWM will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

AMFGWM neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither AMFGWM nor its management has any financial condition that is likely to reasonably impair AMFGWM's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

AMFGWM has not been the subject of a bankruptcy petition in the last ten years.

Item 19: Requirements For State Registered Advisers

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

AMFGWM currently has only one senior management person: Al James Feronti. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

C. Calculation of Performance-Based Fees and Degree of Risk to Clients

AMFGWM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

D. Material Disciplinary Disclosures for Management Persons of this Firm

No management person at AMFGWM or AMFGWM has been found liable in an arbitration claim or been found liable in a civil, self-regulatory organization, or administrative proceeding that is material to the client's evaluation of the firm or its management.

E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

See Item 10.C and 11.B.