PFG Private Wealth Management, LLC
Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of PFG Private Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at (813) 286-7776 or by email at: info@pfgprivatewealth.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 PFG Private Wealth Management, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. PFG Private Wealth Management, LLC's CRD number is: 282301.

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

Version Date: 3/13/2026

Item 2: Material Changes

Since the last annual updating amendment of PFG Private Wealth Management, LLC on March 3, 2025, we have the following material changes to report:

Item 4: The firm's ownership structure was updated to reflect the removal of Robert M. Perry as an owner.

Item 5: Certain previously disclosed insurance-licensed personnel were removed.

Material changes relate to PFG Private Wealth Management, LLC's policies, practices or conflicts of interests.

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Item 4: Advisory Business

A. Description of the Advisory Firm

PFG Private Wealth Management, LLC (hereinafter "PFGPWM") is a Limited Liability Company organized in the State of Florida.

The firm was formed in November 2015, and the principal owner is Jeffrey Douglas Perry.

B. Types of Advisory Services

Portfolio Management Services

PFGPWM offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. PFGPWM 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

PFGPWM evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. PFGPWM 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.

PFGPWM seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of PFGPWM's economic, investment or other financial interests. To meet its fiduciary obligations, PFGPWM attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, PFGPWM'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 PFGPWM'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.

Pension Consulting Services

PFGPWM offers ongoing consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans) based on the demographics, goals, objectives,

time horizon, and/or risk tolerance of the plan's participants.

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.

Workshops and Seminars

PFGPWM offers financial planning workshops to attendees at a charge.

Services Limited to Specific Types of Investments

PFGPWM generally limits its investment advice to mutual funds, fixed income securities, real estate funds (including REITs), insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors), commodities and non-U.S. securities, although PFGPWM primarily recommends mutual funds and ETFs to a majority of its clients. PFGPWM may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

PFGPWM 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 PFGPWM from properly servicing the client account, or if the restrictions would require PFGPWM to deviate from its standard suite of services, PFGPWM reserves the right to end the relationship.

D. Wrap Fee Programs

Wrap fee programs are investment programs where the investor pays one stated fee that includes management fees and trading fees. PGFPWM does not participate in wrap fee programs.

E. Assets Under Management

PFGPWM has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
$ 288,295,908	$ 744,023	December 31, 2025

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Fees

The following fee schedule is a TIERED fee schedule.

Total Assets Under Management	Annual Fee
$0 - $250,000	1.45%
$250,001 - $500,000	1.00%
$500,001 - $750,000	0.90%
$750,001 - $1,000,000	0.55%
$1,000,001 - And Up	0.50%

PFGPWM uses the value of the account as of the last business day of the prior billing period for purposes of determining the market value of the assets upon which the advisory fee is based. Adjustments to the Assets Under Management value will be made for deposits and withdrawals during the quarter.

In addition to our standard advisory fees, accounts with a balance below $50,000 are generally subject to a $10 quarterly fee (totaling $40 annually), deducted in advance each quarter. This fee helps offset the fixed technology and platform costs associated with servicing smaller accounts. We implement this fee to ensure we can continue to provide a consistent level of service and support across all client relationships. This fee is charged at the discretion of the Firm.

These fees are generally negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. At the option of the firm a fixed percentage or dollar amount may be charged in certain circumstances. Clients may terminate the agreement without penalty for a full refund of PFGPWM's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract with 30 days' written notice.

Pension Consulting Services Fees

Fixed Fees

The rate for creating client pension consulting plans is between $150 and $35,000.

Hourly Fees

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

Asset-Based Fees

Total Assets Under Management	Annual Fee
$0 - $1,000,000	0.50%
$1,000,001 - $2,500,000	0.35%
$2,500,001 - $15,000,000	0.25%
$15,000,001 – And Up	0.20%

Rather than "tiered" billing, PFGPWM employs "single rate" billing, meaning that a single rate is charged based on the highest (most favorable) assets under management tranche that the client's aggregate accounts qualifies for in accordance with the fee schedule above. PFGPWM uses the value of the account as of the last business day of the billing period 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 pension consulting agreement. Clients may terminate the agreement without penalty for a full refund of PFGPWM's fees within five business days of signing the pension consulting agreement. Thereafter, clients may terminate the pension consulting agreement with 30 days' written notice.

Financial Planning Fees

Fixed Fees

The negotiated fixed rate for creating client financial plans is between $150 and $15,000.

Hourly Fees

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

Clients may terminate the agreement without penalty for a full refund of PFGPWM'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 Asset-Based 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. PFGPWM selects the method in which clients are billed. Fees are paid in advance.

Payment of Asset-Based Pension Consulting Fees

Asset-based pension consulting 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. PFGPWM selects the method in which clients are billed. Fees are paid in arrears.

Payment of Fixed or Hourly Pension Consulting Services Fees

Pension consulting fees are paid via check, in arrears upon completion.

Payment of Financial Planning Fees

Financial planning fees are paid via check or credit card in advance or in arrears upon completion. PFGPWM selects the method in which clients are billed.

Payment of workshops/seminars fees

Attendees are charged $60 for a book that is provided by the workshop author. PFGPWM does not charge for providing the training and does not receive any proceeds from the sale of the books. PFGPWM also provides one-off topical financial planning seminars and does not charge for those sessions.

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 PFGPWM. Please see Item 12 of this brochure regarding broker/custodian.

D. Prepayment of Fees

PFGPWM collects certain fees in advance and certain fees in arrears, as indicated above. Refunds for fees paid in advance will be returned within fourteen days to the client via check or return deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be equal to the number of days remaining in the billing period, up to and including the day of termination, times the daily rate*. The number of days remaining in the billing period is reduced by the 30-day written notice termination policy referenced in item 5A. (*The daily rate is calculatedby dividing the annual asset-based fee rate by 365.)

E. Outside Compensation for the Sale of Securities or Other Investment Products To Clients

Nicholas R. McDevitt, Andrew Jared Whitten, Joao Augusto Teixeira, Jeffrey Douglas Perry, Jacob Perry, and Nicholas Perry in their outside business activities (see Item 10 below) are licensed to accept compensation for the sale of insurance products to PFGPWM clients.

- This presents a conflict of interest and gives the supervised person an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending insurance products for which the supervised persons receives compensation, PFGPWM will document the conflict of interest in the client file and inform the client of the conflict of interest.
- Clients always have the right to decide whether to purchase PFGPWM-recommended products and, if purchasing, have the right to purchase those products through other agents that are not affiliated with PFGPWM.
- PFGPWM is not compensated by commissions for advisory services.
- Advisory fees that are charged to clients are not reduced to offset the commissions or markups on insurance products recommended to clients.

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

PFGPWM 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

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

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Corporations or Business Entities
- ❖ Pension Plans

There is no account minimum for any of PFGPWM's services.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

PFGPWM's methods of analysis include fundamental analysis, technical analysis, quantitative analysis and modern portfolio theory.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Technical analysis involves the analysis of past market data; primarily price and volume.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

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 assets.

Investment Strategies

PFGPWM uses long term trading and short-term trading.

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

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if thesepatterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Quantitative Model Risk: Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Modern Portfolio Theory assumes that investors are risk adverse, 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.

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.

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. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed "electronic shares" not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

Real Estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Annuities are a retirement product for those who 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.

Commodities are tangible assets used to manufacture and produce goods or services.

Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain.

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

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

Neither PFGPWM nor its 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 PFGPWM 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

Some of our investment advisers are also licensed as independent insurance agents. From

time to time, they will offer clients advice or products from this activity. 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. PFGPWM always acts in the best interest of the client; including the sale of commissionable productsto advisory clients. Clients are in no way required to utilize the services of any representative of PFGPWM in connection with such individual's activities outside of PFGPWM.

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

A. Code of Ethics

As a fiduciary, it is an investment advisor's responsibility to provide fair and full disclosure of all material facts. In addition, an investment advisor has a duty of utmost good faith to act solely in the best interest of each of its clients. PFGPWM and its representatives' fiduciary duty to clients is considered the core underlying principle for PFGPWM's Code of Ethics and represents the expected basis for all representatives' dealings with clients. PFGPWM has a responsibility to ensure that the interests of clients are placed ahead of it or its representatives' own investment interests. All representatives will conduct business in an honest, ethical, and fair manner.

PFGPWM's written Code of Ethics covers the following areas: ProhibitedPurchases 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. PFGPWM's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

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

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of PFGPWM buy or sell securities for themselves that they also recommend to clients. This provides an opportunity for representatives of PFGPWM 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 create a conflict of interest. PFGPWM 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.

Additionally, representatives of PFGPWM use strategies in their own personal accounts (e.g., options) that differ from the strategies and investments PFGPWM uses for its clients. PFGPWM will ensure that this does not negatively affect client accounts and the firm, consistent with its fiduciary duty, will put its clients' best interest first.

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

From time to time, representatives of PFGPWM buy or sell securities for themselves at or around the same time as clients. This provides an opportunity for representatives of PFGPWM 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 create a conflict of interest; however, PFGPWM will never engage in trading that operates to the client's disadvantage if representatives of PFGPWM 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 PFGPWM's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and PFGPWM will also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that aid in PFGPWM's research efforts. PFGPWM will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

PFGPWM will require clients to use Charles Schwab & Co., Inc. Member FINRA/SIPC. However, for 529 Plans and SIMPLE IRA plans, PFGPWM recommends American Funds. For annuities, PFGPWM recommends Nationwide Advisory and Lincoln Financial.

1. Research and Other Soft Dollar Benefits

While PFGPWM has no formal soft dollars program in which soft dollars are used to pay for third party services, PFGPWM receives research, products, or other services from custodians and broker-dealers in the normal course of business.

Products and services available to the Firm from Schwab

Schwab Advisor Services™ is Schwab's business serving independent investment

advisory firms like us. Schwab provides PFGPWM and our clients with access to institutional brokerage – trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts while others help us manage and grow our business. Schwab's support services described below are generally available on an unsolicited basis (i.e., we do not have to request them) and at no charge to us. Below is a more detailed description of Schwab's support services:

Services that Benefit Clients Directly

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit each client.

Services that May Not Directly Benefit Clients

Schwab also makes available to us other products and services that benefit us but may not directly benefit a specific client. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We use this research to service all or a substantial number of our clients' accounts. In addition to investment research, Schwab also makes available software and other technology that:

- Provides access to client account data (such as trade confirmations and account statements);
- Facilitates trade execution and allocate aggregated trade orders for multiple client accounts;
- Provides pricing and other market data;
- Facilitates payment of our fees from our clients' accounts; and
- Assists with back-office functions, recordkeeping and client reporting.

Services that Generally Benefit Only Us

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include (among others) the following:

- Educational conferences and events
- Technology, compliance, legal, and business consulting
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants and insurance providers

Schwab will provide some of these services itself or will arrange for third-party

vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third-party's fees.

Our Interest in Schwab's Services

The availability of the services described above from Schwab benefits us because we do not have to produce or purchase them. They are not contingent upon PFGPWM committing any specific amount of business to Schwab in trading commissions or assets in custody. The fact that we receive these benefits from Schwab is an incentive for us to recommend the use of Schwab rather than making such a decision based exclusively on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that taken in the aggregate our recommendation of Schwab as a custodian and broker is in the best interest of our clients. Our selection is primarily supported by the scope, quality and price of Schwab's services, and not Schwab's services that benefit only us.

PFGPWM does not receive soft dollar benefits from American Funds, Newport Retirement Services, Nationwide Advisory, or Lincoln Financial.

2. Brokerage for Client Referrals

PFGPWM 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

PFGPWM will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

B. Aggregating (Block) Trading for Multiple Client Accounts

If PFGPWM buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, PFGPWM would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. PFGPWM would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Review of Accounts

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

All client accounts for PFGPWM's advisory services provided on an ongoing basis are reviewed at least quarterly by the investment adviser on the account with regard to clients' respective investment policies and risk tolerance levels. All accounts at PFGPWM are assigned to these reviewers.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by the investment adviser on the account. There is only one level of review for financial planning,and that is the total review conducted to create the financial plan.

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, PFGPWM's services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each client of PFGPWM's advisory services provided on an ongoing basis will receive a statement, at least quarterly, detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian. PFGPWM will also provide, at least quarterly, a separate written statement to the client.

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 Renderedto Clients (Includes Sales Awards or Other Prizes)

Other than soft dollar benefits discussed in Item 12 above, PFGPWM does not receive any economic benefit directly or indirectly from any third party for advice rendered to its clients. There is no direct link between PFGPWM's participation in Schwab Advisor Services and the investment advice it gives to its clients.

B. Compensation to Non – Advisory Personnel for Client Referrals

PFGPWM, via written arrangement, retains third parties to act as solicitors for PFGPWM's investment management services. All compensation with respect to the foregoing will be fully disclosed to each client to the extent required by applicable law. PFGPWM will ensure each solicitor is properly registered in all appropriate jurisdictions. Clients do not pay additional fees as a result of any referral arrangements.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, PFGPWM 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

PFGPWM provides discretionary and non-discretionary investment advisory services to clients. The Investment Advisory Contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, PFGPWM 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. In non-discretionary arrangements PFGPWM must obtain client approval prior to implementing recommended transactions for the client's account.

Item 17: Voting Client Securities (Proxy Voting)

PFGPWM 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

PFGPWM neither requires nor solicits prepayment of more than $1,200 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

Registered investment advisers are required to provide certain financial information or disclosures about their firms. PFGPWM has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

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