



**Part 2A of Form ADV: *Firm Brochure***

**CFG Wealth Management Services, Inc.**

9840 Westpoint Drive, Suite 150  
Indianapolis, IN 46256

Telephone: 888-234-9674

Web Address: [www.cfgwms.com](http://www.cfgwms.com)

Annual Amendment dated 03/26/2024

This brochure provides information about the qualifications and business practices of CFG Wealth Management Services, Inc. If you have any questions about the contents of this brochure, please contact us at 888-234-9674. The information in this brochure has not been approved or verified by any regulatory authority.

Additional information about CFG Wealth Management Services, Inc. also is available on the Security and Exchange Commission's (SEC) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 108351. CFG Wealth Management Services, Inc. is a Registered Investment Adviser. Registration with the SEC or any state securities authority does not imply a certain level of skill or training.

## **Item 2 Material Changes**

This section of our Firm Brochure will be used to provide our clients with a summary of new and/or updated information. We will inform clients of the revision(s) based on the nature of the updated information.

As of the date of this Annual Amendment, 03/26/2023, since our last amendment dated 03/28/2023 there have been no changes that we consider to be material to our business and contractual obligations with clients. This annual amendment includes updates to our firm's Assets Under Management ("AUM").

Consistent with the current regulations, we will ensure that clients receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. Furthermore, we will provide clients with other interim disclosures about material changes as they arise.

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#### **Item 4 Advisory Business**

CFG Wealth Management Services, Inc. ("CFG") is a Registered Investment Adviser and is under the oversight and regulation of various state securities divisions or agencies. The company's principal place of business is located in Indiana. CFG Wealth Management Services, Inc. began conducting business in 1983, under the name Consolidated Financial Group.

Listed below are the firm's principal shareholders (i.e., those individuals and/or entities controlling 25% or more of this company).

Michael D. Puckett, Chief Executive Officer

Jonathan W. Harrier, Chief Compliance Officer, Chief Investment Officer

CFG Wealth Management Services, Inc. offers the following advisory services to our clients:

#### **INVESTMENT SUPERVISORY SERVICES ("ISS") INDIVIDUAL PORTFOLIO MANAGEMENT**

Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy and create and manage a portfolio based on that policy. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. We also review and discuss a client's prior investment history, as well as family composition and background.

The investment supervisory service, also referred to as the portfolio management service, typically starts with the creation of an investment policy statement (IPS) which is customized to meet the specific goals of the client. Defining and addressing factors such as the investment time horizon, spending policy, and risk tolerance of the client are part of the IPS development process. Typically, the IPS will consist of a target broad asset class allocation covering the areas of U.S. equity, non-U.S. equity, fixed income, and cash. Allowable ranges for investment within each broad asset class are also defined in the IPS.

We manage these advisory accounts primarily on a discretionary basis, but may also provide services on a non-discretionary basis in a very limited number of circumstances. Account supervision is guided by the client's stated objectives (i.e., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations.

Regarding discretion, upon adoption of the Client Agreement and the necessary brokerage account authorizations, CFG as the Investment Adviser/Manager will have the full power and authority to supervise and direct the investment of any assets held in the Client's account. This includes the power and authority to buy, sell, exchange, convert, and otherwise effect transactions in any stocks, bonds, mutual funds, exchange traded funds, or other securities, all without prior consultation from the Client. Clients appoint CFG as attorney-in-fact for purposes of exercising the foregoing power and authority. If, and in the event that any Client wishes to have the assets managed by CFG subject to certain investment objectives and/or restrictions, it will be the Client's responsibility to notify the Adviser, in writing, of the investment objectives. Any and all Client-imposed objectives and/or restrictions, to be effective, must be acknowledged by CFG in writing. Unless any Client so notifies CFG of specific restrictions and/or investment objectives, the investments recommended for, or actions taken on behalf of the Client, shall be deemed not to be restricted (and to be in accordance with the Client's investment objectives).

Implementation of our services is not limited to any specific product or service. Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

## PENSION CONSULTING SERVICES

We also provide several advisory services separately or in combination. While the primary clients for these services will be pension, profit sharing and 401(k) plans, we offer these services, where appropriate, to individuals and trusts, estates and charitable organizations. Pension Consulting Services are comprised of four distinct services. Clients may choose to use any or all of these services.

### *Investment Policy Statement Preparation (hereinafter referred to as "IPS"):*

We will meet with the client (in person or over the telephone) to determine an appropriate investment strategy that reflects the plan sponsor's stated investment objectives for management of the overall plan. Our firm then prepares a written IPS detailing those needs and goals, including an encompassing policy under which these goals are to be achieved. The IPS also lists the criteria for selection of investment vehicles as well as the procedures and timing interval for monitoring of investment performance.

### *Selection of Investment Vehicles:*

We assist plan sponsors in constructing appropriate asset allocation models. We will then review various mutual funds (both index and managed) to determine which investments are appropriate to implement the client's IPS. The number of investments to be recommended will be determined by the client, based on the IPS.

### *Monitoring of Investment Performance:*

We monitor client investments continually, based on the procedures and timing intervals delineated in the Investment Policy Statement.

### *Employee Communications:*

For pension, profit sharing and 401(k) plan clients with individual plan participants exercising control over assets in their own account ("self-directed plans"), we may also provide quarterly educational support and investment workshops designed for the plan participants.

## FINANCIAL PLANNING

We provide financial planning services as a part of our Wealth Enhancement Service (available only to existing clients) and on a stand-alone basis.

Defined as a four-step process, the Wealth Enhancement Service culminates in the development, implementation, and management of a comprehensive financial plan. The main components of this process and financial plan development and management revolve around analyses covering a client's asset-liability structure, their cash flow, investment portfolio and risk tolerance considerations, and a financial independence assessment that attempts to model the likelihood of a client achieving financial independence based on model inputs from the previous analysis steps. A key component of this service is the continuous analysis and updating of the financial plan and action items resulting from the planning and analysis work done. The Wealth Enhancement Service can be thought of as a financial planning service coupled with the investment supervisory service detailed in the Investment Supervisory Services section.

Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. Through the financial planning process, all questions, information and analysis are considered as they impact and are impacted by the entire financial and life situation of the client.

In general, the financial plan can address any or all of the following areas:

- Personal: We review family records, budgeting, personal liability, estate information and financial goals.

- **Tax and Cash Flow:** We analyze the client's income tax and spending and planning for past, current and future years; then illustrate the impact of various investments on the client's current income tax and future tax liability.
- **Investments:** We analyze investment alternatives and their effect on the client's portfolio.
- **Insurance:** We review existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.
- **Retirement:** We analyze current strategies and investment plans to help the client achieve his or her retirement goals.
- **Death and Disability:** We review the client's cash needs at death, income needs of surviving dependents, estate planning and disability income.
- **Estate:** We assist the client in assessing and developing long-term strategies, including as appropriate, living trusts, wills, review estate tax, powers of attorney, asset protection plans, nursing homes, Medicaid and elder law.

We gather required information through in-depth personal interviews. Information gathered includes the client's current financial status, tax status, future goals, returns objectives and attitudes towards risk. Should the client choose to implement the recommendations contained in the plan, we suggest the client work closely with his/her attorney, accountant, insurance agent, and/or stockbroker. Implementation of the financial plan recommendations is entirely at the client's discretion. We also provide general non-securities advice on topics that may include tax and budgetary planning, estate planning and business planning.

Typically the financial plan is presented to the client within six months of the contract date, provided that all information needed to prepare the financial plan has been promptly provided.

Financial Planning recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. Implementation of our services is not limited to any specific product or service. Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

Financial Planning clients should note that it is possible that a conflict of interest of CFG and the interests of the client may exist as a result of providing these financial planning services. Regardless of the recommendations made as part of the financial planning services, the client is under no obligation to act upon CFG's recommendations. Also, if a client elects to act on any of the recommendations, they are under no obligation to effect the transaction or undertake the transaction through CFG.

### **CONSULTING SERVICES**

Clients can also receive investment advice on a more focused basis. This may include advice on only an isolated area(s) of concern such as estate planning, retirement planning, or any other specific topic. We also provide specific consultation and administrative services regarding investment and financial concerns of the client.

Consulting recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company.

## WRAP FEE PROGRAMS

We do not participate in any wrap fee programs at this time.

## ASSETS UNDER MANAGEMENT

As of 12/31/2023, we were actively managing \$91,602,229 of clients' assets on a discretionary basis. We have \$0 of clients' assets on a non-discretionary basis.

## DISCLOSURE REGARDING CONFLICTS OF INTEREST

Due to the nature and variety of our services, conflicts of interest between our firm, its representatives, employees, and the services we offer to our clients may exist. These conflicts may include, but are not limited to, (a) compensation arrangements connected with advisory services which are in addition to the advisory fees, (b) other financial industry activities or affiliations, or (c) participation of interest in client transactions. All material conflicts of interest under CCR Section 260.238(k) have been disclosed regarding the investment adviser, its representatives or any of its employees, which could be reasonably be expected to impair the rendering of unbiased and objective advice.

### Item 5 Fees and Compensation

#### INVESTMENT SUPERVISORY SERVICES ("ISS") INDIVIDUAL PORTFOLIO MANAGEMENT FEES

CFG's compensation for these services is determined by the amount of assets under CFG's supervision. Fees are not negotiable unless noted. Supervisory fees are payable quarterly, in advance, based on the long market value of the assets under management (securities held long and the value of cash in a client account) at the end of the prior quarter, as listed on the detail of each custodial account statement.

These fees are debited directly from the clients' accounts per the terms described within each client's agreement with CFG. The basic fee schedule for portfolio management services is depicted below.

<u>Asset Amount</u>	<u>Marginal Annual Rate</u>
First \$1 million	1.00%
Next \$1 million	0.75%
Next \$3 million	0.50%
Remaining amounts over \$5 million	0.35%

The implementation of CFG's portfolio management service may use pooled investment vehicles such as exchange traded funds (ETFs) and traditional open-end mutual funds. Each pooled investment vehicle has its own advisory fees and other expenses, which are explained in each vehicle's prospectus or other required disclosure documentation. The investment supervisory fees paid to CFG as detailed in the schedule above do not include the fees of the investment vehicles, transaction costs, or any potential custody fees that are realized as CFG provides these investment supervisory services and implements the portfolio management process.

The investment advisory contract may be terminated by any of the parties effective upon written notice to the other parties. Should the relationship terminate, the client will be entitled to a refund of any supervisory fee not already earned by CFG. Whenever possible the refund will be deposited in the client's account(s) managed by CFG up until the point of termination. If that is not possible, the refund will be given in the form of a check made payable directly to the client.

**Limited Negotiability of Advisory Fees:** Although CFG Wealth Management Services, Inc. has established the aforementioned fee schedule(s), we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs are considered in determining the fee schedule. These include the complexity of the client, assets to be placed under management, anticipated future additional assets; related accounts; portfolio style, account composition, reports, among other factors. The specific annual fee schedule is identified in the contract between the adviser and each client.

We may group certain related client accounts for the purposes of determining the annualized fee. Discounts, not generally available to our advisory clients, may be offered to family members and friends of associated persons of our firm.

#### **PENSION CONSULTING FEES**

At times CFG will provide investment consulting services to plan sponsors of retirement plans. These services generally encompass the selection of other advisors and service providers, advisory services for retirement plans, plan sponsors, and plan participants.

Retirement plan services and fees are typically detailed in a separate Client Agreement tailored to the needs of the specific Client. In general, fees for retirement plan clients are a fixed quarterly fee, negotiated at the onset of the relationship.

#### **FINANCIAL PLANNING FEES**

Our fees for Financial Planning are determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering into a contract with any client. There are different methods of delivering financial planning services. The fees associated with financial planning services are charged differently depending on the method of service delivery.

For financial planning services provided as part of our Wealth Enhancement Service (available only to existing clients), compensation for the total service (goes beyond the financial planning services alone) is determined by the size and complexity of a client's financial circumstance. Fees are payable quarterly, in advance, based on assets under management at the beginning of the prior quarter's end. These fees are debited from the client's account per the terms described within each client's agreement with CFG. The basic fee schedule for the Wealth Enhancement Service is depicted here:

<u>Asset Amount</u>	<u>Marginal Annual Rate</u>
First \$250,000	2.00%
Next \$250,000	1.50%
Next \$500,000	1.00%
Next \$1 million	0.75%
Next \$3 million	0.50%
Remaining amounts over \$5 million	0.25%

The Wealth Enhancement Service contract may be terminated by any of the parties effective upon receipt of written notice to the other party. Our Financial Planning fees for services outside the scope of the Wealth Enhancement Service are calculated and charged on an hourly basis which is currently \$250 per hour. Although the length of time it will take to provide a Financial Plan will depend on each client's personal situation, we will provide an estimate for the total hours at the start of the advisory relationship.

We may request a retainer upon completion of our initial fact-finding session with the client; however, advance payment will never exceed \$500 for work that will not be completed within six months. The balance is due upon completion of the plan.



## CONSULTING SERVICES FEES

Consulting service fees are calculated and charged on an hourly basis which is currently \$250 per hour. An estimate for the total hours is determined at the start of the advisory relationship. The client is billed in arrears based on actual hours accrued.

## GENERAL INFORMATION

**Termination of the Advisory Relationship:** A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days written notice. As disclosed above, certain fees are paid in advance of services provided. Upon termination of any account, any prepaid, unearned fees will be promptly refunded. In calculating a client's reimbursement of fees, we will pro-rate the reimbursement according to the number of days remaining in the billing period. Whenever possible the refund will be deposited in the client's account(s) managed by CFG up until the point of termination. If that is not possible, the refund will be given in the form of a check made payable directly to the client.

**Investment Company (Mutual Fund, Exchange Traded Fund) Fees:** All fees paid to CFG Wealth Management Services, Inc. for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. These fees and expenses are described in each 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, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

**Additional Fees and Expenses:** In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transactions for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

**Advisory Fees in General:** Clients should note that lower fees for comparable services may be available from other sources. Similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

**Limited Prepayment of Fees:** Under no circumstances do we require or solicit payment of fees in excess of \$500 more than six months in advance of services rendered.

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

CFG Wealth Management Services, Inc. does not charge performance-based fees.

### Item 7 Types of Clients

CFG Wealth Management Services, Inc. provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals)
- High net worth individuals
- Pension and profit sharing plans (other than plan participants)
- Corporations or other businesses not listed above

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

### METHODS OF ANALYSIS

The investment strategy used to implement advice given to clients is largely a function of each client's time horizon risk preference, taxes, and desired return. For non-profit and corporate clients, we may also consider the spending policy, current and future capital contributions, and other fiduciary constraints of the organization. Taken together, this information will determine an appropriate broad asset class allocation strategy for each client. We take an objective approach to designing and managing client portfolios.

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

**Technical Analysis.** We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement.

Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly-managed or financially unsound company may underperform regardless of market movement.

**Quantitative Analysis.** We use mathematical models in an attempt to obtain more accurate measurements of a company's quantifiable data, such as the value of a share price or earnings per share, and predict changes to that data.

A risk in using quantitative analysis is that the models used may be based on assumptions that prove to be incorrect.

**Asset Allocation.** Rather than focusing primarily on securities selection, we attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

**Mutual Fund and/or ETF Analysis.** We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in another fund(s) in the client's portfolio. We also monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the client's portfolio.

**Risks for all forms of analysis.** Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

## **INVESTMENT STRATEGIES**

We use the following strategies in managing client accounts, provided that such strategies are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

**Long-term purchases.** We purchase securities with the idea of holding them in the client's account for a year or longer. Typically we employ this strategy when we want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

**Short-term purchases.** When utilizing this strategy, we may purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase.

A short-term purchase strategy poses risks should the anticipated price swing not materialize; we are then left with the option of having a long-term investment in a security that was designed to be a short-term purchase, or potentially taking a loss.

In addition, this strategy involves more frequent trading than does a longer-term strategy, and may result in increased brokerage and other transaction-related costs, as well as less favorable tax treatment of short-term capital gains.

**Margin transactions (only at a client's request).** We will purchase stocks for your portfolio with money borrowed from your brokerage account. This allows you to purchase more stock than you would be able to with your available cash, and allows us to purchase stock without selling other holdings. Margin usage increases leverage in portfolios, thus increasing the level of risk inherent in the portfolio relative to no use of margin.

**Risk of Loss.** Securities investments are not guaranteed and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk.

### **Item 9 Disciplinary Information**

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no reportable disciplinary events to disclose.

### **Item 10 Other Financial Industry Activities and Affiliations**

Our firm and our related persons are not engaged in other financial industry activities and have no other industry affiliations.

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

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

CFG Wealth Management Services, Inc. and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code. Our Code of Ethics and policy on personal securities transactions

addresses issues such as those items involving participation or interest in client transactions in addition to qualitative issues covering integrity, objectivity, competence, fairness, confidentiality, professionalism, and diligence.

CFG Wealth Management Services, Inc.'s Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client. It is important to understand that the large majority of the securities held in client accounts are either exchange traded funds or mutual funds. These securities are not generally subject to the same risks as single-issuer securities of debt or equity.

We may aggregate our employee trades with client transactions where possible and when compliant with our duty to seek best execution for our clients. In these instances, participating clients will receive an average share price and transaction costs will be shared equally and on a pro-rata basis. In the instances where there is a partial fill of a particular batched order, we will allocate all purchases pro-rata, with each account paying the average price. Our employee accounts will be included in the pro-rata allocation.

As these situations represent actual or potential conflicts of interest to our clients, we have established the following policies and procedures for implementing our firm's Code of Ethics, to ensure our firm complies with its regulatory obligations and provides our clients and potential clients with full and fair disclosure of such conflicts of interest:

1. No principal or employee of our firm may put his or her own interest above the interest of an advisory client.
2. No principal or employee of our firm may buy or sell securities for their personal portfolio(s) where their decision is a result of information received as a result of his or her employment unless the information is also available to the investing public.
3. It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account. This prevents such employees from benefiting from transactions placed on behalf of advisory accounts.
4. We have established procedures for the maintenance of all required books and records.
5. Clients can decline to implement any advice rendered, except in situations where our firm is granted discretionary authority.
6. All of our principals and employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
7. We require delivery and acknowledgement of the Code of Ethics by each supervised person of our firm.
8. We have established policies requiring the reporting of Code of Ethics violations to our senior management.

The *Code of Ethics Principles* described below is an expression of our associates' recognition of their responsibilities to the public, to clients, to colleagues, and to their employer.

**Principle 1: Integrity:** A CFG associate shall offer and provide professional services with integrity.

CFG associates may be placed in positions of trust and confidence. The ultimate source of such public trust is the associate's personal integrity. In deciding what is right and just, an associate should rely on his or her integrity as the appropriate touchstone. Integrity demands honesty and candor, which must not be subordinated to personal gain and advantage. Within the characteristic of integrity, allowance can be made for innocent error and legitimate difference of opinion; but integrity cannot co-exist with deceit or subordination of one's principles. Integrity requires an associate of CFG to observe not only the letter but also the spirit of this Code.

**Principle 2: Objectivity:** A CFG associate shall be objective in providing professional services to clients.

Objectivity requires intellectual honesty and impartiality. It is an essential quality for any professional. Regardless of the service rendered or the capacity in which a CFG associate functions, he or she should protect the integrity of his or her work, maintain objectivity, and avoid subordination of his or her judgment that would be in violation of this Code.

**Principle 3: Competence:** A CFG associate shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which the designee is engaged.

One is competent only when he or she has attained and maintained an adequate level of knowledge and skill, and applies that knowledge effectively in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation or client referral is appropriate. In addition to assimilating the common body of knowledge required and acquiring the necessary experience, associates shall make a continuing commitment to learning and professional improvement.

**Principle 4: Fairness:** A CFG associate shall perform professional services in a manner that is fair and reasonable to clients, principles, partners and employers and shall disclose conflict(s) of interest(s) in providing such services.

Fairness requires impartiality, intellectual honesty and disclosure of conflict(s) of interest(s). It involves a subordination of one's own feelings, prejudices and desires so as to achieve a proper balance of conflicting interests. Fairness is treating others in the same fashion that you would want to be treated and is an essential trait of any professional.

**Principle 5: Confidentiality:** A CFG associate shall not disclose any confidential client information without the specific consent of the client unless in response to proper legal process, to defend against charges of wrongdoing by an associate or in connection with a civil dispute between the associate and client.

A client, by seeking the services of CFG Wealth Management Services, will be interested in creating a relationship of personal trust and confidence. This type of relationship can only be built upon the understanding that information supplied to the associates of the firm or other information will be confidential. In order to provide the contemplated services effectively and to protect the client's privacy, CFG associates shall safeguard the confidentiality of such information.

**Principle 6: Professionalism:** A CFG associate's conduct in all matters shall reflect credit upon the profession.

Because of the importance of the professional services rendered by people in the financial services industry, there are attendant responsibilities to behave with dignity and courtesy to all those who use the service, fellow professionals, and those in related professions. An associate of the firm also has an obligation to cooperate with fellow colleagues to enhance and maintain the profession's public image and to work jointly with other personnel to improve the quality of services. It is only through the combined efforts of all personnel in cooperation with other staff members that this vision can be realized.

**Principle 7: Diligence:** A CFG associate shall act diligently in providing professional services.

Diligence is the provision of services in a reasonably prompt and thorough manner. Diligence also includes proper planning for and supervision of the rendering of professional services.

## Item 12 Brokerage Practices

Although CFG does not have any authority to determine which broker or dealer to be used without obtaining specific client consent, when a client does not provide directions regarding placement of their investment holdings and related brokerage dealings, we will recommend a broker. Brokers will be selected as a result of our ongoing due research in assessing the available universe of brokerage service providers based on a variety of criteria including the reasonableness of commissions and competitiveness of commission rates relative to available alternatives, the efficiency of executions, and administrative services support. CFG and its employees are not Registered Representatives of any broker/dealer and consequently do not receive any compensation from any broker/dealer for executing security transactions.

We have recommended Charles Schwab & Co., Inc. for brokerage services for a majority of our clients' accounts. In addition to being the primary provider of brokerage services for our client accounts, Charles Schwab & Co. Inc. typically serves as custodian of client funds. Our ability to negotiate commissions and to obtain best price and execution may be limited due to our practice of entering security transactions through the client's custodian which typically also serves as broker for those security transactions.

CFG may require that clients establish brokerage accounts with the Schwab Institutional® division of Charles Schwab & Co., Inc. (Schwab), a FINRA-registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. CFG is independently owned and operated and not affiliated with Schwab.

We reserve the right to decline acceptance of any client account for which the client directs the use of a broker other than Schwab if we believe that this choice would hinder our fiduciary duty to the client and/or our ability to service the account. In directing the use of Schwab, it should be understood that CFG Wealth Management Services, Inc. will not have authority to negotiate commissions or to necessarily obtain volume discounts, and best execution may not be achieved. In addition, a disparity in commission charges may exist between the commissions charged to the client and those charged to other clients. Commission rates may vary from client to client based on criteria such as the amount of assets custodied and Schwab and whether or not the client uses electronic delivery (as opposed to paper delivery) of trade confirmations and monthly statements.

Clients should note that while CFG Wealth Management Services, Inc. has a reasonable belief that Schwab is able to obtain best execution and competitive prices, our firm will not be independently seeking best execution price capability through other brokers. Not all advisers require clients to direct it to use a particular broker-dealer.

CFG Wealth Management Services, Inc. will generally block trades (aggregate multiple client orders for the same security as one trade) when possible and advantageous to clients. This blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple client accounts.

At times, block trades of exchange traded funds are used when there is a significant number of shares to be traded. This is done in order to increase the operational efficiency of the portfolio management process across similarly structured accounts and to attempt to complete trades across client accounts at prices as close to one another as possible. "Significant" should not be interpreted to mean a specific number of shares or dollar amount, and can only be considered on a case by case basis depending on market conditions. If a block trade is used, trades will be allocated across client accounts that would have otherwise received individual trades directly and initially in those respective accounts using the average price per share received in the block trade. Block trading may allow us to execute equity trades in a timelier, more equitable manner, at an average share price. Our block trading policy and procedures are as follows:

- 1) Transactions for any client account may not be aggregated for execution if the practice is prohibited by, or is inconsistent with the client's advisory agreement with CFG Wealth Management Services, Inc.
- 2) The person placing the block trade must determine that the purchase or sale of the particular security involved

is appropriate for the client and consistent with the client's investment objectives and with any investment guidelines or restrictions applicable to the client's account.

3) The person placing the block trade must reasonably believe that the order aggregation will benefit the client, and will enable CFG Wealth Management Services, Inc. to seek best execution for each client participating in the aggregated order. This requires a good faith judgment at the time the order is placed for the execution. It does not mean that the determination made in advance of the transaction must always prove to have been correct in the light of a rear-viewing perspective. Best execution includes the duty to seek the best quality of execution, as well as the best net price.

4) If the order cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated pro rata among the participating client accounts. However, adjustments to this pro rata allocation may be made to participating client accounts in accordance with the initial order ticket or other written statement of allocation. Furthermore, adjustments to this pro rata allocation may be made to avoid having odd amounts of shares held in any client account, or to avoid excessive trade charges in smaller accounts.

5) Generally, each client that participates in the aggregated order must do so at the average price for all separate transactions made to fill the order. Under the client's agreement with the custodian/broker, transaction costs may be based on the number of shares traded for each client.

6) No client or account will be favored over another.

#### Trade Error Policy

In the rare occurrence of a trade error in a client account, CFG will correct the error by placing a canceling the trade made in error with the broker-dealer. Clients that select Schwab Institutional as their broker/custodian should be aware that Schwab will keep all trade error profits on an error regardless of who caused the error. If a trade error results in a loss, clients will be made whole by the party who caused the error.

If there is a gain and it does not remain in the Client's account upon correction, and Schwab is the custodian, Schwab will donate the amount of any gain \$100 and over to charity. If a loss occurs greater than \$100, CFG will cover the loss. Schwab will maintain the loss or gain (if such gain is not retained in your account) if it is under \$100 to minimize and offset its administrative time and expense. Generally, if related trade errors result in both gains and losses in your account, they may be netted.

### **Item 13 Review of Accounts**

#### **INVESTMENT SUPERVISORY SERVICES ("ISS") INDIVIDUAL PORTFOLIO MANAGEMENT**

**REVIEWS:** While the underlying securities within Individual Portfolio Management Services accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

Our investment supervisory service includes different review levels.

- The first level is an ongoing review of client investment activity. This review might include an assessment of current cash positions, any pending service requests, and a review of asset class positions relative to their current optimized weighting. Jonathan Harrier, as Chief Investment Officer is primarily responsible for conducting these reviews.

- CFG will generally reposition client accounts quarterly. The repositioning consists of implementing the results of the most recent optimization analysis. Typically this is a client-by-client analysis that considers various factors discussed in each client's investment policy statement. Jonathan Harrier as Chief Investment Officer is primarily responsible for repositioning client accounts according to the firm's investment management process.
- CFG will generally review and assess the appropriateness of each client's stated objectives as detailed in their respective investment policy statements on an annual basis. We determine the success of the client's investment strategy based on their measured ability to obtain their stated goal and not solely on the success of the total return of their investment holdings. Michael Puckett is primarily responsible for conducting this annual review and financial planning work.

**REPORTS:** Clients who are part of the investment supervisory services will receive monthly account statements and trade confirmations from a qualified custodian which will include changes in account values, asset composition, investment holding details, transaction details including purchase and sale information as well as deposits and withdrawals, dividends and interest, fees and charges, and asset transfers.

CFG will provide reports based on activity provided by the activity records of the custodian on a monthly and quarterly basis unless directed otherwise. These reports will generally:

- illustrate the client's asset allocation by comparing the actual portfolio allocation with the target allocation defined in each client's investment policy statement
- detail portfolio returns over different time periods and detail different components of portfolio return including the beginning value by period, net contributions, capital appreciation, income, management fees, other expenses, and the portfolio ending value and investment gain for the period.
- provide comparative performance benchmarks along with the client's portfolio performance

#### **PENSION CONSULTING SERVICES**

**REVIEWS:** CFG Wealth Management Services, Inc. will review the client's Investment Policy Statement (IPS) whenever the client advises us of a change in circumstances regarding the needs of the plan. CFG Wealth Management Services, Inc. will also review the investment options of the plan according to the agreed upon time intervals established in the IPS. Such reviews will generally occur quarterly.

Jonathan Harrier (Chief Investment Officer) and Michael Puckett (Chief Executive Officer) are primarily responsible for the development and presentation of the reviews for this service.

**REPORTS:** These client accounts will receive reports as contracted for at the inception of the advisory relationship.

#### **FINANCIAL PLANNING SERVICES**

**REVIEWS:** While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for Financial Planning clients unless otherwise contracted for and as the need for a review arises.

**REPORTS:** Financial Planning clients will receive a completed financial plan. Additional reports will not typically be provided unless otherwise contracted for and as the need for a review arises.



## CONSULTING SERVICES

**REVIEWS:** While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for Consulting Services clients unless otherwise contracted for. Such reviews will be conducted by the client's account representative.

**REPORTS:** These client accounts will receive reports as contracted for at the inception of the advisory engagement.

### Item 14 Client Referrals and Other Compensation

#### CLIENT REFERRALS

Currently CFG has no formal compensation arrangements for the receipt of client referrals. However, at CFG's discretion, small gifts or modest client appreciation events may be given or held. These items or events could be considered to be a direct or indirect form of compensation to clients for past referrals to CFG.

#### OTHER COMPENSATION OR ECONOMIC BENEFIT

CFG may require that clients establish brokerage accounts with the Schwab Advisor Services® ("Schwab") division of Charles Schwab & Co., Inc. (Schwab), a FINRA-registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although CFG may require that clients establish accounts at Schwab, it is the client's decision to custody assets with Schwab. CFG is independently owned and operated and not affiliated with Schwab.

Schwab provides CFG with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's clients' assets are maintained in accounts at Schwab Institutional. These services are not contingent upon CFG committing to Schwab any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For CFG's client accounts maintained in its custody, Schwab does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab Institutional also makes available to CFG other products and services that benefit CFG but may not directly benefit its clients' accounts. Many of these products and services may be used to service all or some substantial number of CFG accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist CFG in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of CFG fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Schwab also offers other services intended to help CFG manage and further develop its business enterprise. These services may include: (i) compliance, legal and business consulting; (ii) publications and conferences on practice management and business succession; and (iii) access to employee benefits providers, human capital

consultants and insurance providers. Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to CFG. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to CFG. Schwab Institutional may also provide other benefits such as educational events or occasional business entertainment of CFG personnel. In evaluating whether to recommend or require that clients custody their assets at Schwab, CFG may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors it considers and not solely the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

## **Item 15 Custody**

We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm directly debits advisory fees from client accounts.

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

In addition to the periodic statements that clients receive directly from their custodian, we also send account review reports directly to our clients on a monthly or quarterly basis, depending on the client's preferences. We urge our clients to carefully compare the information provided on these statements to ensure that all account history, holdings and values are correct and current.

In addition to custody related to debiting of fees from client accounts, a number of our clients (currently 57 accounts) maintain standing letters of authorization (SLOAs) with their custodian that also gives our firm authorization to complete transfers from client accounts to other accounts outside those under the direct supervision of the advisor. The Indiana Secretary of State and the Securities Commission, which we are primarily regulated by, initiated a policy as of October 4, 2018 which provides requirements for Investment Advisers with standing letters of authorization ("SLOA) arrangements.

Starting with the date of that Statement of Policy and until it is vacated by the Commissioner, if an investment adviser has custody of client funds or securities solely as a result of a third-party SLOA arrangement with a client, the Securities Division will not pursue an enforcement action against that investment adviser on the basis that they failed to file an audited balance sheet under

710 Ind. Admin. Code 4-9-12(a) and (c), and/or conduct an annual surprise audit under 710 Ind. Admin. Code 4-9-13(a)(6), if all of the following conditions are met:

1. The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number with a custodian to which the transfer should be directed.
2. The client authorizes the investment adviser, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time as directed by the terms of the SLOA arrangement.
3. The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization.

4. The investment adviser provides a written transfer of funds notice to the client promptly after each third-party transfer pursuant to the SLOA arrangement; the notice should indicate the amount, date, receiving party, and reason(s) for the transfer.
5. The client has the ability to terminate or change the instruction to the client's qualified custodian.
6. The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
7. The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.
8. The client's qualified custodian sends the client, in writing, an initial notice confirming the existence and terms of the SLOA and an annual notice reconfirming this information.
9. In addition to including the client funds and securities that are subject to a SLOA that result in custody in its response to Item 9 of Form ADV and explaining the arrangement(s) in Item 15 of Form ADV Part 2, the investment adviser must include in Schedule D-Miscellaneous of Form ADV Part 1 and Item 15 of Form ADV Part 2: (a) both the amount and number of clients included in the Item 9 custody figures solely because of the SLOA(s); and (b) an attestation that the investment adviser is complying with each of the requirements and conditions enumerated in this Statement of Policy.

The Statement of Policy does not waive the requirements of 710 Ind. Admin. Code 4-9-12(b) for any investment adviser. Any investment adviser relying on this Statement of Policy to eliminate the requirement of filing an audited balance sheet under 710 Ind. Admin. Code 4-9-12(a) and (c), and/or conducting an annual surprise audit under 710 Ind. Admin. Code 4-9-13(a)(6), must be able to provide documentation, upon request, that the conditions set forth above are met.

At the time of this ADV filing, we attest that all of requirements detailed in the Statement of Policy are being met, in part through actions and confirmations of our client's custodian (items 1, 2, 3, 5, 6, and 8 in the list above). We do provide a written (emailed confirmation) written transfer of funds notice to the client promptly after each third-party transfer pursuant to the SLOA arrangement indicating the amount, date, receiving party, and reason(s) for the transfer as directed in item #4. Regarding item 7 of the policy, we attest to the fact that no third party names on any client's SLOA is a related party of CFG or located at the same address as our firm. Finally, we also fulfil the requirements listed in item #9 above through our attestation in our form ADV Part 1 and this item (15) of form ADV Part 2A.

#### **Item 16 Investment Discretion**

Clients may hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission. In almost all cases, this is the type of arrangement we have with our clients. Discretionary authority is considered crucial to the effective implementation of our investment advisory services.

Clients give us discretionary authority when they sign a discretionary agreement with our firm, as well as on each brokerage account application. Clients may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

To be more specific, upon adoption of the Client Agreement and the necessary brokerage account authorizations, CFG as the Investment Adviser/Manager will have the full power and authority to supervise and direct the investment of any assets held in the Client's account. This includes the power and authority to buy, sell, exchange, convert, and otherwise effect transactions in any stocks, bonds, mutual funds, exchange traded funds, or other securities, all without prior consultation from the Client.

Clients appoint CFG as attorney-in-fact for purposes of exercising the foregoing power and authority. This is typically accomplished by the client granting us a limited power of attorney during the brokerage account setup process. If, and in the event that any Client wishes to have the assets managed by CFG subject to certain investment objectives and/or restrictions, it will be the Client's responsibility to notify us, in writing (hard copy or electronic communication), of the investment objectives of any account and of any changes or modifications.

Any and all Client-imposed objectives and/or restrictions, to be effective, must be acknowledged by CFG in writing. Unless any Client so notifies CFG of specific restrictions and/or investment objectives, the investments recommended for, or actions taken on behalf of the Client, shall be deemed not to be restricted and to be in accord with the Client's investment objectives.

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

As a matter of firm policy, we do not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Clients are responsible for instructing each custodian of the assets, to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets. We do not offer any consulting assistance regarding proxy issues to clients.

### **Item 18 Financial Information**

Under no circumstances do we require or solicit payment of fees in excess of \$500 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

As an advisory firm that maintains discretionary authority for clients we are also required to disclose any financial condition that is reasonable likely to impair our ability to meet our contractual obligations. CFG Wealth Management Services, Inc. has no additional financial circumstances to report.

CFG Wealth Management Services, Inc. has not been the subject of a bankruptcy petition at any time during the past ten years, or ever.

### **Item 19 Requirements for State-Registered Advisers**

- A. Information on our principal executive officers (Michael D. Puckett and Jonathan W. Harrier) and other management persons (none) is found in the Brochure Supplements for in part 2B of this document.
- B. Description of any business in which our principal executive officers and other management persons are actively engaged (other than giving investment advice) and the approximate amount of time spent on that business:
- C. 

<u>Principal Executive Officer/Management Person</u>	<u>Outside Business Activities</u>
Michael D. Puckett	MDP Professional Services, LLC – outsourced financial planning services to CFG Wealth Management Services; 80-120 hours/month
Jonathan W. Harrier	none
- D. No member of CFG, nor the firm itself is compensated for advisory services with performance based fees.

E. Neither Michael D. Puckett, nor Jonathan W. Harrier have been involved in any of the events listed below:

1. An award or otherwise being *found* liable in an arbitration claim alleging damages in excess of \$2,500, *involving* any of the following:

- (a) an investment or an *investment-related* business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

2. An award or otherwise being *found* liable in a civil, *self-regulatory organization*, or administrative proceeding *involving* any of the following:

- (a) an investment or an *investment-related* business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

F. Description of any relationship or arrangement that CFG or any of its management persons have with any issuer of securities that is not listed in Item 10.C. of Part 2A.

<u>Principal Executive Officer/Management Person</u>	<u>Relationships/Arrangements</u>
Michael D. Puckett	None
Jonathan W. Harrier	None

**Part 2B of Form ADV: *Brochure Supplement***

Michael D. Puckett  
9840 Westpoint Blvd. Suite 150  
Indianapolis, IN 46256  
888-234-9674

CFG Wealth Management Services, Inc.  
9840 Westpoint Drive, Suite 150  
Indianapolis, IN 46256

This brochure supplement provides information about Michael D. Puckett that supplements the CFG Wealth Management Services, Inc. brochure. You should have received a copy of that brochure. Please contact Jonathan Harrier at 888-234-9674 if you did not receive CFG Wealth Management Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Michael D. Puckett is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

## Item 2 Educational Background and Business Experience

**Full Legal Name:** Michael D. Puckett      **Born:** 1952

### Education

Ball State University; A.A., General Studies; 1973

### Business Experience

CFG Wealth Management Services, Inc.; President, CEO; from 01/01/1983 to Present

### Designations

Mr. Puckett has earned the following designation(s) and is in good standing with the granting authority:

#### **Certified Financial Planner; Certified Financial Planner Board of Standards, Inc.; 1987**

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.

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.

### **Item 3 Disciplinary Information**

Mr. Puckett has no reportable disciplinary history.



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

##### **A. Investment-Related Activities**

Mr. Puckett is not engaged in any other investment-related activities.

Mr. Puckett does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

##### **B. Non Investment-Related Activities**

Mr. Puckett is the managing member of MDP Professional Services, LLC which provides outsourced financial planning services; 80-120 hours/month

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

Mr. Puckett does not receive any economic benefit from a non-advisory client for the provision of advisory services.

#### **Item 6 Supervision**

Supervisor: Jonathan W. Harrier  
Title: Chief Compliance Officer  
Phone #: 888-234-9674

#### **Item 7 Requirements for State Registered Advisers**

Mr. Puckett has never been involved in any of the events listed below:

1. An award or otherwise being *found* liable in an arbitration claim alleging damages in excess of \$2,500, *involving* any of the following:
  - (a) an investment or an *investment-related* business or activity;
  - (b) fraud, false statement(s), or omissions;
  - (c) theft, embezzlement, or other wrongful taking of property;
  - (d) bribery, forgery, counterfeiting, or extortion; or
  - (e) dishonest, unfair, or unethical practices.
2. An award or otherwise being *found* liable in a civil, *self-regulatory organization*, or administrative *proceeding involving* any of the following:
  - (a) an investment or an *investment-related* business or activity;
  - (b) fraud, false statement(s), or omissions;
  - (c) theft, embezzlement, or other wrongful taking of property;
  - (d) bribery, forgery, counterfeiting, or extortion; or
  - (e) dishonest, unfair, or unethical practices.

**Part 2B of Form ADV: *Brochure Supplement***

Jonathan W. Harrier  
9840 Westpoint Drive, Suite 150  
Indianapolis, IN 46265  
888-234-9674

CFG Wealth Management Services, Inc.  
9840 Westpoint Drive, Suite 150  
Indianapolis, IN 46256

This brochure supplement provides information about Jonathan Wayne Harrier that supplements the CFG Wealth Management Services, Inc. brochure. You should have received a copy of that brochure. Please contact Jonathan Harrier at 888-234-9674 if you did not receive CFG Wealth Management Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Jonathan W. Harrier is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

## Item 2 Educational Background and Business Experience

**Full Legal Name:** Jonathan W. Harrier      **Born:** 1976

### Education

Indiana University; M.B.A, Finance; 2003

Olivet Nazarene University; B.S., Economics; 1998

### Business Experience

CFG Wealth Management Services, Inc.; Chief Investment Officer; from 03/2002 to Present

Merrill Lynch, Pierce, Fenner, Smith, Inc.; Investment Associate; from 05/1998 to 03/2002

### Designations

Mr. Harrier has earned the following designation(s) and is in good standing with the granting authority:

#### **Certified Financial Planner; Certified Financial Planner Board of Standards, Inc.; 2010**

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.

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.

### **Chartered Market Technician (CMT®); CMT Association; 2021**

- The Chartered Market Technician (CMT®) designation is a professional credential granted by the CMT Association.
- It is earned by those who can demonstrate extensive knowledge and aptitude in technical analysis and trading.
- To earn the designation, candidates must complete an intensive self-study program and pass a series of three comprehensive exams.
- Administered by the CMT Association, this program aims not only to develop technical and professional skills but also to provide a code of ethics and an ethical framework to work within.

### **Item 3 Disciplinary Information**

Mr. Harrier has no reportable disciplinary history.

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

#### **A. Investment-Related Activities**

Mr. Harrier is not engaged in any other investment-related activities.

Mr. Harrier does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

#### **B. Non Investment-Related Activities**

none

### **Item 5 Additional Compensation**

Mr. Harrier does not receive any economic benefit from a non-advisory client for the provision of advisory services.

## Item 6 Supervision

Supervisor: Michael D. Puckett  
Title: Chief Executive Officer  
Phone #: 888-234-9674

## Item 7 Requirements for State Registered Advisers

Mr. Harrier has never been involved in any of the events listed below:

1. An award or otherwise being *found* liable in an arbitration claim alleging damages in excess of \$2,500, *involving* any of the following:

- (a) an investment or an *investment-related* business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

2. An award or otherwise being *found* liable in a civil, *self-regulatory organization*, or administrative *proceeding involving* any of the following:

- (a) an investment or an *investment-related* business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

## **CFG Wealth Management Services, Inc. Client Privacy Notice**

CFG Wealth Management Services, Inc., an independent investment advisory and money management firm, is committed to safeguarding the confidential information of its clients. We hold all personal information provided to our firm in the strictest confidence. These records include all personal information that we collect from you in connection with any of the services provided by CFG. We will not disclose client-related information to nonaffiliated third parties, except as authorized by you in the performance of our services or as required by state or federal laws.

CFG may use health and financial information provided us with other client advisors or outside professionals who have an ongoing professional relationship with CFG when performing our services. In doing so, we will guard against any real or perceived infringements of a client's right and expectation for privacy. Our policy with respect to personal information is listed below.

- CFG limits employee and agent access to information only to those who have a business or professional reason for knowing, and only to nonaffiliated parties as permitted by law. (For example, federal regulations permit us to share a limited amount of information about you with a custodial firm in order to execute securities transactions on your behalf, or so our firm can discuss your financial situation with your accountant or lawyer.)
- CFG maintains a secure office and computer environment to ensure that client information is not placed at unreasonable risk.
- The categories of nonpublic personal information that CFG collects from a client depends upon the scope of the engagement. This information may include a financial statement, income tax return(s), health information, financial agreements and estate documents and information from consumer financial reporting agencies.
- In the performance of our services we may deal with unaffiliated third parties who require your personal information, such as financial service companies, consultants and auditors, we also require they maintain strict confidentiality regarding this information in our working agreements.
- CFG is a Registered Investment Adviser. Regulators may review firm records from time to time, as permitted under law, when performing oversight responsibilities.
- CFG does not provide your personal information to mailing list vendors or solicitors for any purpose.
- Personally identifiable information about you will be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws. After this required period of record retention, all such information will be destroyed.

CFG reserves the right to change the details of this notice. However, CFG will first notify clients of any changes to be made. If there are any questions concerning this privacy notice, please contact us at 888-234-9674 or by mail at 9840 Westpoint Drive., Ste. 150, Indianapolis, IN 46256.