



**RPg.**  
family  
wealth advisory

## Form ADV Part 2A – Disclosure Brochure

**Effective: March 2, 2017**

This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of RPg Family Wealth Advisory, LLC (“FWA” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (781) 547-8660.

FWA is a Registered Investment Advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about FWA to assist you in determining whether to retain the Advisor.

Additional information about FWA and its Advisory Persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 158528.

### RPg Family Wealth Advisory, LLC

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## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A* and *Part 2B*. *Part 2A* (the “Disclosure Brochure”) provides information about a variety of topics relating to an Advisor’s business practices and conflicts of interest. *Part 2B* (the “Brochure Supplement”) provides information about advisory personnel of FWA.

FWA believes that communication and transparency are the foundation of its relationship and continually strive to provide our Clients with the most complete and accurate information at all times. FWA encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Material Changes

FWA has made the following updates to its Disclosure Brochure (Form ADV 2A) and certain Brochure Supplements (Form ADV 2B).

- FWA’s Austin, TX office moved to 7509 Manchaca, Suite 101, Austin, TX 78745.
- FWA no longer votes proxies on behalf of its Clients. See Item 17 – Voting Client Securities.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of FWA.

At any time, you may view the current Disclosure Brochure on-line at the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 158528. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (781) 547-8660.

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

RPg Family Wealth Advisory, LLC (“FWA” or the “Advisor”) is a Registered Investment Advisor with the U.S. Securities and Exchange Commission (“SEC”). FWA was founded in 2011 as a wholly-owned subsidiary of Risk Paradigm Group Holdings, LLC, a privately held Limited Liability Company (“LLC”) that is organized under the laws of the State of Delaware. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by FWA.

FWA provides customized investment advisory services to individuals, high net worth individuals, trusts, estates, charities, and pension plans (each referred to as a “Client”). Our primary mission is to understand our Clients’ challenges and objectives, and to formulate comprehensive wealth management strategies that meet their individual needs. We adhere to the highest fiduciary standards, as demonstrated by always putting our Clients’ interests first and continuously striving to act in the best interest of our Clients.

Please contact Brandon Lamb, FWA’s Chief Compliance Officer (“CCO”), with any questions regarding this Disclosure Brochure. Mr. Lamb can be reached at (781) 916-8176.

### **B. Advisory Services Offered**

FWA provides comprehensive wealth advisory services for its Clients. This is achieved through a combination of (i) continuous personal Client contact and interaction, (ii) planning/consulting expertise utilized for the benefit of the Client, (iii) providing discretionary investment management services within Client accounts, and (iv) utilizing third party investment managers to achieve Client objectives. FWA works with each Client to identify their comprehensive goals as well as risk tolerance and financial situation in order initiate a strategy for supporting the Client.

#### Financial Planning and Consulting Services

As part of its comprehensive services, FWA provides its Clients with comprehensive financial planning and consulting services. Services are offered in several areas of a Client’s financial situation, depending on their goals, objectives and financial situation. FWA may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client’s financial situation, observations, and recommendations.

#### Investment Management Services

FWA will then construct a portfolio to meet the specific objectives of each Client. Portfolios are customized to the needs of each Client, but are typically constructed with a combination of individual equity securities, individual fixed income securities, mutual funds, exchange-traded funds (“ETFs”), options and limited partnerships. Limited partnerships may include hedge funds, private investment pools and other limited partnerships that are appropriate to achieve the goals of the Client. The Advisor may also utilize other securities types, as appropriate, to meet the needs of Clients.

FWA may periodically deliver investment management services through an affiliated investment manager, Risk Paradigm Group, LLC (a/k/a RPg Asset Management, “RPg Asset Management” or “RPgAM”). In this capacity, RPg Asset Management will serve as a sub-advisor to FWA to conduct “Managed Accounts” activities for FWA and will administer investment management services through the individual Client accounts. For more information pertaining to this affiliation or potential conflicts, please see Item 10 of this Disclosure Brochure.

At no time will FWA accept or maintain custody of a Client's funds or securities, except for the deduction of the Advisor's fees as authorized by the Client. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the terms of the Investment Advisory Agreement. For more information pertaining to custody, please see Item 15 of this Disclosure Brochure.

#### Selection of Third Party Investment Managers

As part of its comprehensive services, FWA may periodically recommend and refer Clients to a third-party investment manager or investment advisor (referred to herein as the "Third Party Manager") at FWA's discretion or Client's request. In this scenario, the Client will then enter into a separate agreement with that Third Party Manager for services to which that Third Party Manager will provide to the Client, most commonly the administration of a proprietary investment strategy by the respective Third Party Manager. In consideration for such services, the Third Party Manager will receive a fee, billed based on the fee schedule established in the separate agreement between the Client and the Third Party Manager.

The Client, prior to entering into an agreement with a Third Party Manager, will be provided with the manager's Form ADV 2A (or a brochure that makes the appropriate disclosures).

#### Managed Account Programs

As part of its comprehensive services, FWA may recommend to Clients that all or a portion of their portfolio be implemented by utilizing one or more Third Party Managers participating in a Managed Accounts program (a "Program") through the Client's selected Custodian or another independent platform (the "Program Sponsor"). The Client will then enter into a Program and investment advisory agreement with the Program Sponsor. FWA will assist and advise the Client in establishing investment objectives for the account[s], the investment offerings within the Program, and defining any restrictions on the account. FWA will continue to provide oversight of the Client's account[s] and ongoing monitoring of the activities through the Program.

In consideration for such services, the Program Sponsor will charge a Program fee that includes the investment advisory fee of any Third Party Managers, the administration of the Program and trading, clearance and settlement costs. The Program Sponsor will add FWA's Investment Advisory Fee (described below in Item 5) and will deduct the overall fee from the Client account, generally at the start of each calendar quarter. The asset-based Program fee is tiered and varies depending on the size of the account[s], the asset class of the underlying securities and the Third Party Managers selected by the Client. The overall fee (including the Advisor's Investment Advisory Fee as described in Item 5) will not exceed 3% annually.

**FWA does not receive any compensation from these Programs or the Program Sponsor, other than FWA's Investment Advisory Fee (described in Item 5).**

The Client, prior to entering into an agreement with a Program Sponsor, will be provided with the Program Sponsor's Form ADV Part 2A (or a brochure that makes the appropriate disclosures). In addition, FWA and its Client will agree in writing that that selected Program Sponsor will manage the Client's account[s] on a discretionary basis.

#### **C. Client Account Management**

Prior to engaging FWA to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authorities and responsibilities of the Advisor and the Client. These services may include:

- Wealth Planning – FWA provides comprehensive advice and guidance relating to the financial goals of its Clients.

- Establishing a Documented Financial Plan or Investment Policy Statement – FWA, in connection with the Client, may develop a statement that summarizes the Client’s investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives.
- Asset Allocation – FWA will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and risk tolerance for each Client.
- Portfolio Construction – FWA will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – FWA will provide investment management and ongoing oversight of the Client’s investment portfolio.

#### D. Non-Traditional Wrap Fee Programs

FWA does not manage or place Client assets into a wrap fee program.

#### E. Assets Under Management

As of December 31, 2016, FWA manages the following assets:

Discretionary	\$326,524,000
Non-discretionary	78,893,000
Total Assets Under Management	\$405,417,000

Clients may request more current information at any time by contacting the Advisor.

## Item 5 – Fees and Compensation

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign one or more agreements with the Advisor that detail the responsibilities of FWA and the Client.

#### A. Types of Fees for Advisory Services

##### Investment Advisory Fees

Investment Advisory Fees (“Advisory Fees” or “Fees”) are paid either monthly or quarterly and may be charged either in advance or arrears pursuant to the terms of the FWA Investment Advisory Agreement (herein the “Billing Period”). Advisory Fees are based on the market value of assets under management at the end of the prior Billing Period. Advisory Fees range from 2.00% to 0.85%. Fees are negotiated depending on the size and complexity of the Client relationship and/ or other factors. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged higher Fees.

The Advisory Fee in the first billing period of service is prorated to the inception date of the Client’s account[s] to the end of the first Billing Period. Fees may be negotiable at the sole discretion of the Advisor. The Client’s Fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by FWA will be independently valued by the Custodian. FWA does not have the authority to value portfolio securities. Certain Clients may be offered an alternate fee schedule pursuant to the terms of an FWA Investment Advisory Agreement.

### Third Party Investment Manager Fees

Fees charged by Third Party Managers are pursuant to the terms, conditions, and fees schedule included in a separate agreement entered into between the Client and the Third Party Manager.

### Managed Account Program Fees

Fees charged by Managed Account Programs are pursuant to the terms, conditions, and fee schedule included in a separate Program agreement entered into between the Client and the Program Sponsor.

### Limited Scope Service Agreements

Limited engagements that occur between FWA and Clients are charged at an hourly rate of up to \$500 per hour or on a fixed fee basis. Fees may be negotiated at the sole discretion of the Advisor.

## **B. Billing and Payment of Fees**

### Investment Advisory Billing

Investment Advisory Fees will be calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor or its delegate shall instruct the Custodian at the beginning of the respective billing period indicating the amount of the fees to be deducted from the Client's account[s]. The amount due is calculated by applying the pro rata daily rate (annual rate divided by the number of days in the current calendar year, respectively) to the total assets under management with FWA at the end of the previous billing period. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the Investment Advisory Fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting FWA to be paid directly from their accounts held by the Custodian as part of the Investment Advisory Agreement and separate account forms provided by the Custodian.

### Third Party Investment Manager Billing

Fees charged by Third Party Managers are pursuant to the terms, conditions, and fees schedule included in a separate agreement entered into between the Client and the Third Party Manager. In general, Third Party Manager billing will coincide with the Investment Advisory Fee billing practices.

### Managed Account Program Billing

Fees charged by Managed Account Programs are pursuant to the terms, conditions, and fee schedule included in a separate Program agreement entered into between the Client and the Program Sponsor. In general, Managed Account Program billing will coincide with the Investment Advisory Fee billing practices.

### Limited Scope Services

Financial planning and consulting fees are invoiced by the Advisor and are due upon receipt. The Advisor may charge a portion of the financial planning fee in advance of services as long as such services are to be completed in less than six months. Remaining fees will be charged either monthly in arrears or upon completion of the engagement deliverable[s].

## **C. Other Fees and Expenses**

Clients may also incur certain fees or charges imposed by third parties, other than FWA, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian and executing broker-dealer [if separate]. The investment advisory fee charged by FWA is separate and distinct from these custody and execution fees.

All fees paid to FWA for investment advisory services are separate and distinct from the expenses charged by mutual funds, exchange-traded funds ("ETFs"), options and limited partnerships to their shareholders, if

applicable. Limited partnerships may include hedge funds, private investment pools and other limited partnerships. These fees and expenses are described in each fund's prospectus, limited partnership agreement, contract, or other applicable operating document. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of FWA, but would not receive the services provided by FWA which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by FWA to fully understand the total fees to be paid.

#### **D. Advance Payment of Fees and Termination**

##### Investment Advisory Services

FWA is often compensated for its services in advance of the billing period in which investment advisory services are rendered. Certain Clients may be charged in arrears. Either party may terminate the Investment Advisory Agreement with FWA, at any time, by providing advance written notice to the other party. Upon termination, the Client shall be responsible for Investment Advisory Fees up to and including the effective date of termination and the Advisor will refund any unearned, prepaid Investment Advisory Fees from the effective date of termination to the end of the billing period. The Client's Investment Advisory Agreement with the Advisor is non-transferable without the Client's prior consent.

##### Unaffiliated Advisors

In the event that a Client should wish to terminate their relationship with an unaffiliated investment advisor, the terms for termination will be set forth in the respective agreements between the Client and those third parties. FWA will assist the Client with the termination and transition as appropriate.

#### **E. Compensation for Sales of Securities**

FWA does not buy or sell securities to generate securities commissions and does not receive any compensation for securities transactions in any Client account, other than the Investment Advisory Fees noted above. Certain Advisory Persons of FWA may be registered representatives of a broker-dealer and may receive commissions for investment implemented in their separate capacity as registered representatives (Please see Item 10).

## **Item 6 – Performance-Based Fees**

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FWA does not charge performance-based fees for its investment advisory services. The fees charged by FWA are as described in "Item 5 – Fees and Compensation" above and are not based upon the capital appreciation of the funds or securities held by any Client. FWA does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

## **Item 7 – Types of Clients**

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FWA offers investment advisory services to individuals, high net worth individuals, trusts, estates, charities, and pension plans. The relative percentage of each type of Client is available on FWA's Form ADV Part 1. These percentages will change over time. FWA generally does not impose a minimum size for establishing a relationship.

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

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### **A. Methods of Analysis**

FWA primarily employs both fundamental and technical analysis methods in developing investment strategies for its Clients. Research and analysis from FWA is derived from numerous sources, including financial media companies, third party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

FWA's investment strategy is primarily long-term outcome focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to the acceptance by the Advisor.

FWA evaluates and selects securities, strategies, managers, funds, or models for inclusion in Client portfolios only after applying their internal due diligence process. FWA may recommend, on occasion, redistributing investment allocations to diversify the portfolio. FWA may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement, which may adversely affect the portfolio. FWA may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

### **C. Risk of Loss**

Investing in securities and other financial instruments involves the risk of loss that Clients should be prepared to bear. Those risks can vary based on the nature and characteristics of the relevant investment approach and the specific securities and other financial instruments held. FWA will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the information provided. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their risk tolerance as part of the portfolio construction process. FWA may use margin in Client accounts to manage the timing of purchases and sales, as appropriate. The Advisor may hold long or short positions as appropriate for a particular strategy. FWA may employ options strategies to hedge or gain additional exposure to a particular asset class or sector. Following are some of the risks associated with Options, Margin, Short Sales and Limited Partnership transactions:

### Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

### Margin Borrowings

The use of short-term margin borrowing may result in certain additional risks to a Client. For example, if securities pledged to a broker to secure a Client's margin account declines in value, the Client could be subject to a "margin call", pursuant to which the Client must either deposit additional funds with the broker or be the subject of mandatory liquidation of the pledged securities to compensate for the decline in value.

### Short Sales

A short sale involves the sale of a security that the Client does not own in the hope of purchasing the same security at a later date at a lower price. To make delivery to the buyer, the Client must borrow the security and is obligated to return the security to the lender, which is accomplished by a later purchase of the security. The Client realizes a profit or a loss as a result of a short sale if the price of the security decreases or increases respectively between the date of the short sale and the date on which the Client covers the short position, i.e., purchases the security to replace the borrowed security. A short sale involves the theoretically unlimited risk of an increase in the market price of the security that would result in a theoretically unlimited loss.

### Alternative Investments (Limited Partnerships)

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. Such investments often have concentrated positions and may carry higher risks. An investor could lose all or a portion of their investment. Client should only have a portion of their assets in these investments. **Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

## **Item 9 – Disciplinary Information**

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**There are no legal, regulatory or disciplinary events to disclose.** FWA and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 158528.

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

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### Affiliated Entities

**Affiliation with Risk Paradigm Group Holdings, LLC:** FWA is a wholly-owned subsidiary of Risk Paradigm Group Holdings, LLC, a Delaware limited liability holding company. Risk Paradigm Group Holdings, LLC is a privately held partnership consisting of seven managing partners and two passive, non-managing investors. Risk Paradigm Group Holdings, LLC is also the parent to Risk Paradigm Group, LLC (CRD# 155870), an affiliated registered investment advisor organized under the laws of the State of Texas.

**Affiliation with Risk Paradigm Group, LLC:** FWA also utilizes its affiliated registered investment advisor Risk Paradigm Group, LLC (referred to as "RPg Asset Management" or "RPgAM") for sub-advisory services, including but not limited to, trade execution and the administration of investment models on behalf of Client

accounts. RPgAM is an investment management firm specializing in the design, delivery, and management of tactical investment strategies that primarily use Exchange Traded Funds (“ETFs”) for their underlying holdings. These strategies are commonly referred to as “Managed ETF Strategies” or “Tactical ETF Strategies” and are powered by policy based, quantitatively driven methodologies (the “Model Methodology[ies] or “Model[s]”). Please note that RPgAM manages assets for many End Clients of FWA. These clients pay separate fees to RPgAM and FWA for the management and advisory services provided by each firm respectively. Certain Advisory Persons of FWA are also Managing Members and/or Advisory Persons of RPgAM.

#### Broker-Dealer Affiliations

Certain Advisory Persons of FWA (herein “Advisory Persons”) are also registered representatives of a broker-dealer. These dually-registered Advisory Persons are registered representatives either of the registered broker-dealer Purshe Kaplan Sterling Investments, Inc. (CRD No. 35747 and (herein referred to as “PKS”. PKS is an unaffiliated member of FINRA, SIPC and registered with the SEC.

Advisory Persons, in their separate capacity as registered representatives, will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by one of our Advisory Persons. Further, ongoing investment advisory fees will not be earned by FWA or the Advisory Person in connection with any services implemented by the Advisory Person(s) in the separate capacity as a registered representative where commissions are also being earned on those investments.

PKS is not affiliated, in any way, with FWA Family Wealth Advisory, LLC. Additional details are included in the ADV2B for each Advisory Person.

#### Insurance Licensing

Certain Advisory Persons of FWA are also licensed insurance professionals. In one’s separate capacity as an insurance professional, an Advisory Person may receive customary commissions and other related revenues from the various insurance companies whose products are implemented. Commissions generated by insurance recommendations do not offset regular advisory fees. This additional compensation may result in a conflict of interest in recommending certain products of the insurance companies. Advisory Persons are not obligated to utilize the products of any particular insurance companies. Clients are under no obligation to implement any recommendations made by an Advisory Person of the Advisor.

#### Lending Relationships

FWA and its affiliated entities have received capitalization through both debt and equity investments from certain Clients of FWA. Further, Clients of FWA, some of whom participated in the initial capitalization of FWA, have loaned money to Risk Paradigm Group, LLC, and/or to RPg Advisor Financing Services LLC (“RAFS”), both affiliates of FWA.

Neither FWA, nor any of its Supervised Persons, are registered (except as stated below), or have an application pending to register as a broker-dealer, futures commission merchant, commodity trading advisor (“CTA”) or an associated person (or registered representative) of the foregoing entities.

## **Item 11 – Code of Ethics and Personal Trading**

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### **A. Code of Ethics**

FWA has implemented a Code of Ethics (the “Code”) that defines our fiduciary commitment to each Client. This Code of Ethics applies to all personnel of FWA (herein our “Supervised Persons”). The Code describes the

standard of conduct we require of our Supervised Persons and sets forth certain restrictions on activities, such as personal trading and gifts and entertainment as well as reporting of ethical violations. Compliance with the Code is a condition of employment for all Supervised Persons and a serious violation of the Code or related policies can result in dismissal.

The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. FWA and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of FWA Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that may include; general ethical principles, reporting personal securities transactions, initial public offerings and private placements, reporting ethical violations, distribution of the Code, review and enforcement processes, amendments to Form ADV and supervisory procedures. To request a copy of our Code of Ethics, please contact us at (781) 547-8660 or via email at [info@riskparadigmgroup.com](mailto:info@riskparadigmgroup.com).

#### **B. Personal Trading in Same Securities or at Same Time as Clients**

FWA allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased or sold on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you, or trading in similar securities, presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

While trading in similar securities may pose a potential for a conflict of interest, Supervised Persons will only place trades concurrently with or after Client orders have been placed and filled. At no time will FWA, or any Supervised Person, transact in any security to the detriment of any Client. FWA does not act as principal in any transactions.

## **Item 12 – Brokerage Practices**

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#### **A. Recommendation of Custodian[s]**

FWA does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/ custodian (herein the "Custodian") to safeguard Client assets and authorize FWA to direct trades to the Custodian as agreed in the Investment Advisory Agreement. Further, FWA does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where FWA does not exercise discretion over the selection of the Custodian, it may often recommend the Custodian to Clients for custody and execution services. FWA may receive compensation or other services and/or products when recommending one custodian over another. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a broker-dealer/custodian not recommended by FWA. FWA may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Advisor and Client, its reputation, and/or the location of the Custodian's offices. FWA does not receive research services, other products, or compensation as a result of recommending a particular broker-dealer/custodian that may result in the Client paying higher commissions than those obtainable through other broker-dealers/custodians.

The Advisor will generally recommend that Clients utilize the brokerage and clearing services of Fidelity Clearing & Custody Solutions and affiliated entities of Fidelity Investments, Inc. (collectively referred to as "Fidelity"), Pershing Advisor Solutions LLC, a wholly owned subsidiary of The Bank of New York Mellon ("Pershing"), and/or Charles Schwab, Inc. ("Schwab"). FWA may only implement its investment management recommendations after the Client has arranged for and furnished the Advisor with all information and authorization[s] regarding account[s] with their financial institutions. Following are additional details regarding the brokerage practices of the Advisor:

- 1. *Soft Dollars*** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with the broker-dealer/custodian in exchange for research and other services. FWA does not participate in soft dollar programs sponsored or offered by any broker-dealer-custodian. However, FWA does receive certain benefits in connection with its institutional relationships with Fidelity and Pershing as detailed in Item 14 below.
- 2. *Brokerage Referrals*** - FWA does not receive any compensation from any third party in connection with the recommendation for establishing an account.
- 3. *Directed Brokerage*** - All Clients are serviced on a "directed brokerage basis", where FWA will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account). Under certain circumstances, FWA may engage in securities cross-trades (i.e., purchase of a security into one Client account from another Client's account[s]). Please refer to item (C) below for FWA practices concerning securities cross trades. FWA will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

#### **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Unless otherwise instructed by the Client, FWA will execute its transactions through the Custodian, as directed by the Client. FWA may aggregate orders in a block trade or trades when securities are purchased or sold through the same Custodian for multiple (discretionary) accounts. If a block trade 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 in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

#### **C. Cross Trades**

Under certain circumstances, FWA may engage in securities cross-trades, whereby a Client account that is selling a particular security may be advantageous to the account(s) of one or more other Clients. In such instances, FWA will only engage in a cross trade that is in the best interests of each Client and will never engage in any transaction that favors one Client over another. FWA does not serve in the capacity as broker or agent in such transactions and does not receive any commission or compensation (aside from its investment advisory fees).

## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Accounts are monitored on a regular and continuous basis by Advisory Persons of FWA and periodically by the Chief Compliance Officer (“CCO”). Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13, each Client account shall be reviewed at least annually. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client’s financial situation, and/or large deposits or withdrawals in the Client’s account[s]. The Client is encouraged to notify FWA if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian’s website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client’s account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

## **Item 14 - Client Referrals and Other Compensation**

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### **A. Compensation Received by FWA**

FWA does not typically receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. Certain Advisory Persons of FWA, in their separate capacities, may receive compensation for securities and insurance commissions as noted in Item 10 above. While the Advisor and its Advisory Persons always act in the best interest of each Client, the receipt of additional compensation creates the potential for a conflict of interest.

#### Affiliated Entities

As noted in Item 10, certain Advisory Persons of FWA are also affiliated with Risk Paradigm Holdings, LLC and Risk Paradigm Group, LLC. These relationships will often result in the Advisory Persons receiving additional compensation. Please see the ADV2B – Brochure Supplements included with this Disclosure Brochure for details.

#### Institutional Advisory Platform

FWA has established an institutional relationship with Fidelity, Pershing and Schwab (the “**Institutional Platforms**”) to assist the Advisor in managing Client accounts. Access to these Institutional Platforms are provided at no charge to the Advisor. The Advisor receives access to software, systems support and related services without cost, because the Advisor renders investment management services to Clients that maintain assets at the Institutional Platforms. The software, systems support and related services may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware; however, that the receipt of economic benefits from an Institutional Platform (the Custodian) creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of these Custodians over those that may not furnish similar software, systems support, or services.

Additionally, the Advisor may receive the following benefits from the Institutional Platforms: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

#### **B. Client Referrals from Solicitors**

FWA may enter into referral agreements with third party advisors under which FWA pays a fee to a third party for client referrals as permitted by Rule 206(4)-3 of the Investment Advisers Act of 1940, as amended (the "Advisers Act"). FWA may pay the third parties a percentage of the revenue generated from the assets of Clients introduced to FWA by the third party. Clients referred to FWA will never be charged a higher Investment Advisory Fee than other clients to cover the third party's fee percentage.

### **Item 15 – Custody**

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FWA does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct FWA to utilize that Custodian for the Client's security transactions. FWA encourages Clients to review statements provided by the Custodian. FWA, however, will seek to safeguard client assets against unauthorized access by maintaining access controls around the systems used by trading and other FWA personnel to ensure that trades are authorized. We also periodically reconcile records of Client funds and securities to the Custodian records. For more information about custodians and brokerage practices, see "Item 12 - Brokerage Practices."

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

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FWA generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by FWA. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by FWA will be in accordance with each Client's investment objectives and goals.

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

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FWA does not vote proxies on behalf of its Clients.

### **Item 18 – Financial Information**

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Neither FWA, nor its management, has any adverse financial situations that would reasonably impair the ability of FWA to meet all obligations to its Clients. Neither FWA, nor any of its Advisory Persons, has been subject to a bankruptcy or financial compromise. FWA is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not require prepayment of fees for services to be performed six months or more in advance.

# Privacy Policy

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## Overview

RPg Family Wealth Advisory, LLC (“FWA”) is committed to safeguarding the use of your personal information that is obtained during the normal course of business. FWA’s policy is to protect the security and confidentiality of personal information and ensure that such information is used for proper business purposes in connection with the management or servicing of your account. FWA’s relationship with you is our most important asset and we understand that you have entrusted FWA with your private information, and will do everything we can to maintain that trust. This Privacy Policy has been adopted to promote the protection of client non-public information.

FWA respects the privacy of its clients and acts to meet the expectations of its clients in this regard. FWA does not sell your non-public personal information to anyone. Nor does FWA provide such information to others except for discrete and proper business purposes in connection with the servicing and management of accounts as discussed below.

Details of FWA’s approach to privacy and how your personal non-public information is collected and used are set forth in this privacy policy.

## Information FWA Collects

FWA typically receives personal information when you complete the paperwork required to become a Client. Your information may include:

• Name and address	• Assets
• E-mail address	• Income
• Phone number	• Account balance
• Social security or taxpayer identification number	• Investment activity
	• Accounts at other institutions

In addition, FWA may collect non-public information about you from the following sources:

- Information FWA receives on Brokerage Agreements, Managed Account Agreements and other Subscription and Account Opening Documents;
- Information FWA receives in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires;
- Information about your transactions with FWA or others

## Information FWA May Disclose

FWA works to provide products and services that benefit our customers. FWA typically does not share non-public client information with non-affiliated third parties (such as brokers and custodians) other than as necessary for FWA to provide agreed services and products to you consistent with applicable law. For example, FWA may disclose non-public personal information to other financial institutions with whom there are joint business arrangements for proper business purposes in connection with the management or servicing of your account. In addition, your non-public personal information may also be disclosed to you, persons FWA believes to be your authorized agent or representative, regulators in order to satisfy FWA’s regulatory obligations, and as otherwise required or permitted by law. Lastly, FWA may disclose your non-public personal information to companies FWA hires to help administrate our business. Companies hired to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. FWA limits their use of your personal information to the performance of the specific service(s) that are requested.

**To repeat, FWA does not sell your non-public personal information to anyone.**

### **Information About Former Clients**

FWA does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer clients.

### **Confidentiality and Security**

FWA Supervised Persons understand the requirement to respect the confidentiality of customers' non-public personal information and FWA periodically trains and educates Supervised Persons in the handling and safeguarding of personal information in accordance with applicable laws, rules, and regulations. Additionally, FWA maintains physical, procedural and electronic safeguards in an effort to ensure the security and confidentiality of customer records and to protect the information from access by unauthorized parties. Employees who violate these policies are subject to disciplinary action, up to and including termination.

FWA understands the need to provide a secure environment for physical and electronic non-public client information. In addition to building security provided by building management, FWA has various controls in place to protect the security of the firm's offices. Administrators in each office monitor visitors to the office and are trained on procedures for handling unauthorized individuals.

FWA regularly assesses its ability to protect the firm's network against unauthorized access to its electronic data by outside parties, and has systems designed to prevent intrusions. Systems are monitored and any potential security breaches are reviewed immediately and resolved on a high priority basis.

FWA's vendor websites utilized for reporting account information to FWA clients have security features designed to protect against unauthorized access to client information. FWA will perform assessments of the contract provisions and confidentiality and privacy policies of the service provider(s) to determine if appropriate safeguards for protecting customer information accessible to the provider are in place.

The CCO will annually test the information safeguards to ensure that they remain effective. The CCO will also attempt to annually identify reasonably foreseeable risks to information security and assess the effectiveness of existing safeguards for controlling these risks.

### **Delivery of Privacy Policy**

FWA will provide clients an initial privacy policy notice at the time the relationship is established and will also provide customers with an annual notice that accurately reflects the privacy policies and practices. Periodically, FWA may revise the privacy policy and will provide you with a revised policy if the changes materially alter the previous privacy policy. FWA will not, however, revise the privacy policy to permit the sharing of non-public personal information other than as described in this notice unless you are first notified and provided with an opportunity to prevent the information sharing. You may obtain a copy of the current privacy policy by contacting FWA at (888) 285-8600.

**Dated:** March 2, 2017



**Form ADV Part 2B – Brochure Supplement**

for

**David M. Gatti**  
**Chief Executive Officer, Chief Investment Officer**  
**Founding Partner**

**Effective: March 2, 2017**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of David M. Gatti (CRD# **2415422**) in addition to the information contained in the RPg Family Wealth Advisory, LLC (“FWA” or the “Advisor” CRD #158528) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or FWA’s Disclosure Brochure, please contact us at (781) 547-8660.

Additional information about David M. Gatti is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**RPg Family Wealth Advisory, LLC**

<b>Boston Office</b>	<b>Austin Office</b>	<b>Detroit Office</b>
<b>25 Burlington Mall Rd Suite 307 Burlington, MA 01803 Phone: (781) 547-8660 Fax: (781) 273-0333</b>	<b>7509 Manchaca Suite 101 Austin, TX 78745 Phone: (866) 726-5150 Fax: (512) 327-6044</b>	<b>255 East Brown Street Suite 101 Birmingham, MI 48009 Phone: (866) 726-5150 Fax: (781) 273-0333</b>

## Item 2 – Educational Background and Business Experience

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The Chief Executive Officer and Chief Investment Officer of RPg Family Wealth Advisory, LLC is David M. Gatti. A Founding Partner of the firm, Mr. Gatti is dedicated to serving the Clients of FWA. Mr. Gatti earned a B.S. in Business Administration from University of Massachusetts at Lowell in 1992. Additional information regarding Mr. Gatti’s employment history is included below.

### Employment History:

Chief Executive Officer and Partner, Risk Paradigm Group Holdings, LLC (parent to RPg Family Wealth Advisory, LLC and Risk Paradigm Group, LLC)	09/2011 to Present
Chief Executive Officer and Chief Investment Officer and Partner RPg Family Wealth Advisory, LLC	09/2011 to Present
Chief Executive Officer and Chief Investment Officer and Partner Risk Paradigm Group, LLC	09/2011 to Present
Registered Representative, Race Rock Capital LLC	09/2013 to 12/2014
Senior Investment Management Specialist (Registered Representative), Morgan Stanley Smith Barney	01/1996 to 09/2011
Financial Advisor (Registered Representative), Citigroup Global Markets Inc.	06/1994 to 01/1996

## Item 3 – Disciplinary Information

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Securities laws require an advisor to disclose any instances where the advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

Mr. Gatti’s U4 includes two events to disclose that were lodged against Morgan Stanley Smith Barney or predecessor entities (collectively “MSSB”) by former clients of MSSB and Mr. Gatti as a registered representative of MSSB. The disputes did not include Mr. Gatti as a named party and MSSB settled both disputes prior to any formal hearings, which had been commenced as arbitration proceedings and had referenced conduct by Mr. Gatti. As these matters were lodged against MSSB and did not include Mr. Gatti as a party, all settlement proceeds were paid by MSSB with no monetary contribution from or findings of wrongdoing by Mr. Gatti.

You may independently view the background of Mr. Gatti on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2415422.

## Item 4 – Other Business Activities

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### Affiliated Entities

Mr. Gatti also serves as the Chief Executive Officer of Risk Paradigm Group Holdings, LLC, the parent to FWA and related entities. In addition, Mr. Gatti is the Chief Investment Officer of Risk Paradigm Group, LLC. In his role as the Chief Investment Officer, Mr. Gatti is responsible for overseeing the investment policy and asset management services provided by the Risk Paradigm Group, LLC.

## **Item 5 – Additional Compensation**

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### Affiliated Entities

Mr. Gatti is also a Partner and the CEO of Risk Paradigm Group Holdings, LLC, the parent to FWA. Mr. Gatti receives compensation through Risk Paradigm Group Holdings, LLC for his role with FWA and its affiliated entities.

## **Item 6 – Supervision**

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Mr. Gatti serves is supervised by Brandon Lamb, the Chief Compliance Officer. Mr. Lamb can be reached at (781) 916-8176. FWA has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of FWA. Further, FWA is subject to regulatory oversight by various agencies. These agencies require registration by FWA and its Supervised Persons. As a registered entity, FWA is subject to examinations by regulators, which may be announced or unannounced. FWA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



**Form ADV Part 2B – Brochure Supplement**  
**for**  
**Hugh Maginnis**  
**Partner**

**Effective: March 2, 2017**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Hugh Maginnis (CRD# 2971733) in addition to the information contained in the RPg Family Wealth Advisory, LLC (“FWA” or the “Advisor” CRD #158528) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you any have questions about the contents of this Brochure Supplement or FWA’s Disclosure Brochure, please contact us at (781) 547-8660.

Additional information about Hugh Maginnis is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**RPg Family Wealth Advisory, LLC**

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## Item 2 – Educational Background and Business Experience

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Hugh Maginnis is a Partner with RPg Family Wealth Advisory, LLC. Mr. Maginnis, born in 1970, is dedicated to serving the Clients of FWA. Mr. Maginnis earned a B.S. in Finance from Villanova University in 1992. Additional information regarding Mr. Maginnis’s employment history is included below.

### Employment History:

Partner, RPg Family Wealth Advisory, LLC	09/2011 to Present
Partner, Risk Paradigm Group Holdings, LLC (parent to RPg Family Wealth Advisory, LLC)	09/2011 to Present
Registered Representative, Purshe Kaplan Sterling Investments	09/2011 to Present
Financial Advisor (Registered Representative), Morgan Stanley Smith Barney	06/2009 to 09/2011
Financial Advisor (Registered Representative), Citigroup Global Markets Inc.	08/2007 to 06/2009
Financial Advisor, Bay State Financial	04/2003 to 08/2007
Registered Representative, New England Securities	04/2003 to 08/2007
Registered Representative, Linsco/Private Ledger Corp.	04/1999 to 04/2003
Registered Representative, Fidelity Investments Institutional Services Company, Inc.	01/1998 to 04/1999

## Item 3 – Disciplinary Information

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*There are no legal, civil or disciplinary events to disclose regarding Mr. Maginnis.* Mr. Maginnis has never been involved in any regulatory, civil or criminal action. There have been no Client disputes, lawsuits, arbitration claims or administrative proceedings against Mr. Maginnis.

Securities laws require an advisor to disclose any instances where the advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Maginnis.*

You may independently view the background of Mr. Maginnis on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2971733.

## Item 4 – Other Business Activities

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### Affiliated Entities

Mr. Maginnis also serves as a Managing Member of Risk Paradigm Group Holdings, LLC, the parent to FWA and related entities.

### Broker-Dealer Affiliation

Mr. Maginnis is also a registered representative of Purshe Kaplan and Sterling Investments (“PKS”) of Albany, New York. PKS is a registered broker-dealer (CRD No. 35747), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Maginnis will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Maginnis. Neither the Advisor nor Mr. Maginnis will earn investment advisory fees in connection with any services implemented in Mr. Maginnis’ separate capacity as a registered representative where commissions are earned.

### Insurance Agency Affiliations

Mr. Maginnis is also a licensed insurance professional and may craft and implement insurance plans for asset protection, providing liquidity for the payment of estate taxes, and as income and wealth replacement vehicles. Insurance recommendations are implemented separate and apart from Mr. Maginnis' role as an Advisory Person with FWA. As an insurance professional, Mr. Maginnis may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset advisory fees paid to FWA.

This may present a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Maginnis or the Advisor. Mr. Maginnis spends less than 10% of his business time on this activity.

## **Item 5 – Additional Compensation**

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### Affiliated Entities

Mr. Maginnis is also a Partner in Risk Paradigm Group Holdings, LLC, the parent to FWA. Mr. Maginnis receives compensation through Risk Paradigm Group Holdings, LLC for his role with FWA and its affiliated entities.

### Broker-Dealer Affiliation

As noted in Item 4 above, Mr. Maginnis may serve as licensed insurance professional. As an insurance professional, Mr. Maginnis may receive customary commissions and other related revenues from the various insurance companies whose products are implemented.

### Insurance Agency Affiliations

Mr. Maginnis may serve as sales agent for various insurance companies. As an insurance agent, Mr. Maginnis may receive customary commissions and other related revenues from the various insurance companies whose products are sold.

## **Item 6 – Supervision**

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Mr. Maginnis is supervised by Brandon Lamb, the Chief Compliance Officer. Mr. Lamb can be reached at (781) 916-8176. FWA has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of FWA. Further, FWA is subject to regulatory oversight by various agencies. These agencies require registration by FWA and its Supervised Persons. As a registered entity, FWA is subject to examinations by regulators, which may be announced or unannounced. FWA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## Form ADV Part 2B – Brochure Supplement

for

**Samuel M. Kiefer, AIFA®**  
**Senior Investment Manager**  
**Partner**

**Effective: March 2, 2017**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Samuel M. Kiefer, AIFA® (CRD# 2833958) in addition to the information contained in the RPg Family Wealth Advisory, LLC (“FWA” or the “Advisor” CRD #158528) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or FWA’s Disclosure Brochure, please contact us at (781) 547-8660.

Additional information about Samuel M. Kiefer is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

RPg Family Wealth Advisory, LLC

Boston Office	Austin Office	Detroit Office
25 Burlington Mall Rd Suite 307 Burlington, MA 01803 Phone: (781) 547-8660 Fax: (781) 273-0333	7509 Manchaca Suite 101 Austin, TX 78745 Phone: (866) 726-5150 Fax: (512) 327-6044	255 East Brown Street Suite 101 Birmingham, MI 48009 Phone: (866) 726-5150 Fax: (781) 273-0333

## Item 2 – Educational Background and Business Experience

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Samuel M. Kiefer, AIFA® is a Senior Investment Management Consultant and Partner with RPg Family Wealth Advisory, LLC. Mr. Kiefer, born in 1957, is dedicated to serving the Clients of FWA. Mr. Kiefer earned a Masters in Sports Administration from Ohio University in 1981. Mr. Kiefer earned a B.S. in Education from Slippery Rock University in Pennsylvania in 1979. Additional information regarding Mr. Kiefer’s employment history is included below.

### Employment History:

Senior Investment Manager, RPg Family Wealth Advisory, LLC	02/2012 to Present
Partner, Risk Paradigm Group Holdings, LLC (parent to RPg Family Wealth Advisory, LLC)	02/2012 to Present
Financial Advisor (Registered Representative), UBS Financial Services Inc.	07/2005 to 02/2012
Financial Advisor, Solomon Smith Barney Inc.	11/1996 to 07/2005
Registered Representative, Citigroup Global Markets, Inc.	03/1997 to 07/2005

### ACCREDITED INVESTMENT FIDUCIARY ANALYST®

The Accredited Investment Fiduciary Analyst® (“AIFA®”) designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIFA® designation, individuals must complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor and agree to abide by the AIFA® Code of Ethics. In order to maintain the AIF designation, the individual must annually renew their affirmation of the AIFA® Code of Ethics and complete six hours of continuing education credits. The certification is administered by the Center for Fiduciary Studies, LLC (a Fiduciary 360 (fi360) company).

## Item 3 – Disciplinary Information

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*There are no legal, civil or disciplinary events to disclose regarding Mr. Keifer.* Mr. Kiefer has never been involved in any regulatory, civil or criminal action. There have been no Client disputes, lawsuits, arbitration claims or administrative proceedings against Mr. Kiefer.

Mr. Kiefer has never been involved in any regulatory, civil or criminal action. There have been no Client disputes, lawsuits, arbitration claims or administrative proceedings against Mr. Kiefer. Securities laws require an advisor to disclose any instances where the advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Kiefer.* You may independently view the background of Mr. Kiefer on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2833958.

## Item 4 – Other Business Activities

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### Affiliated Entities

Mr. Kiefer is also a Partner in Risk Paradigm Group Holdings, LLC, the parent to FWA. Mr. Kiefer receives compensation through Risk Paradigm Group Holdings, LLC for his role with FWA and its affiliated entities.

### Broker-Dealer Affiliation

Mr. Kiefer is also a registered representative of Purshe Kaplan and Sterling Investments (“PKS”) of Albany, New York. PKS is a registered broker-dealer (CRD No. 35747), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Kiefer will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Kiefer. Neither the Advisor nor Mr. Kiefer will earn investment advisory fees in connection with any services implemented in Mr. Kiefer’s separate capacity as a registered representative where commissions are earned. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Kiefer or the Advisor. Mr. Kiefer spends less than 10% of his business time on this activity.

### Insurance Agency Affiliations

Mr. Kiefer is also a licensed insurance professional and may craft and implement insurance plans for asset protection, providing liquidity for the payment of estate taxes, and as income and wealth replacement vehicles. Insurance recommendations are implemented separate and apart from Mr. Kiefer’s role as an Advisory Person with FWA. As an insurance professional, Mr. Kiefer may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset advisory fees paid to FWA.

The additional compensation received by an Advisory Person may result in a conflict of interest. Clients are under no obligation to implement any recommendations made by Mr. Kiefer or the Advisor.

## **Item 5 – Additional Compensation**

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### Affiliated Entities

Mr. Kiefer is also a Partner in Risk Paradigm Group Holdings, LLC, the parent to FWA. Mr. Kiefer may receive additional compensation through Risk Paradigm Group Holdings, LLC for his role with FWA and its affiliated entities.

### Broker-Dealer Affiliation

Mr. Kiefer is also a registered representative of PKS. In his separate capacity as a registered representative, Mr. Kiefer will typically receive commissions for the implementation of recommendations for commissionable transactions.

### Insurance Agency Affiliations

As noted in Item 4 above, Mr. Kiefer may serve as licensed insurance professional. As an insurance professional, Mr. Kiefer may receive customary commissions and other related revenues from the various insurance companies whose products are implemented.

## **Item 6 – Supervision**

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Mr. Kiefer is supervised by Brandon Lamb, the Chief Compliance Officer. Mr. Lamb can be reached at (781) 916-8176. FWA has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of FWA. Further, FWA is subject to regulatory oversight by various agencies. These agencies require registration by FWA and its Supervised Persons. As a registered entity, FWA is subject to examinations by regulators, which may be announced or unannounced. FWA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



**Form ADV Part 2B – Brochure Supplement**

for

**William T. Eaton, II, CIMA®**  
**Senior Director – Portfolio Management**  
**Director – Wealth Management**

**Effective: March 2, 2017**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of William T. Eaton, II (CRD# 1395701) in addition to the information contained in the RPg Family Wealth Advisory, LLC (“FWA” or the “Advisor” CRD #158528) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or FWA’s Disclosure Brochure, please contact us at (781) 547-8660.

Additional information about William T. Eaton, II is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**RPg Family Wealth Advisory, LLC**

<b>Boston Office</b>	<b>Austin Office</b>	<b>Detroit Office</b>
25 Burlington Mall Rd Suite 307 Burlington, MA 01803 Phone: (781) 547-8660 Fax: (781) 273-0333	7509 Manchaca Suite 101 Austin, TX 78745 Phone: (866) 726-5150 Fax: (512) 327-6044	255 East Brown Street Suite 101 Birmingham, MI 48009 Phone: (866) 726-5150 Fax: (781) 273-0333

## Item 2 – Educational Background and Business Experience

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William T. Eaton, II, CIMA® is a Senior Director – Portfolio Management and a Director – Wealth Management for RPg Family Wealth Advisory, LLC. Mr. Eaton has over 30 years of professional experience. Mr. Eaton is dedicated to serving the Clients of FWA. Mr. Eaton earned a Bachelor of Arts degree in Economics and Political Science from Denison University in 1984. Additional information regarding Mr. Eaton’s employment history is included below.

### Employment History:

Senior Director – Potfolio Management, Director – Wealth Management, RPg Family Wealth Advisory, LLC	06/2015 to Present
Senior Managing Director of Asset Management & Senior Vice President of Portfolio Management, Detwiler Fenton Investment Management, LLC	08/2009 to 06/2015
Senior Managing Director of Asset Management & Senior Vice President of Portfolio Management (Registered Representative), Detwiler Fenton Wealth Management, Inc.	08/2009 to 05/2015
Senior Managing Director of Asset Management & Senior Vice President of Portfolio Management (Registered Representative), Detwiler Fenton & Co.	08/2009 to 05/2015
Registered Representative, UBS Financial Services, Inc..	01/1995 to 09/2009
Registered Representative, Kidder, Peabody & Co, Inc.	09/1985 to 01/1995

### CERTIFIED INVESTMENT MANAGEMENT ANALYST®

Mr. Eaton has earned the Certified Investment Management Analyst® (CIMA®) professional designation from The Investment Management Consultants Association, Inc. As a candidate, Mr. Eaton successfully completed the curriculum through The Wharton School, University of Pennsylvania, which is one of IMCA’s three registered programs. The CIMA® certification curriculum provides the knowledge, tools, and strategies to effectively set investment objectives, evaluate and select managers, and manage an investment portfolio for individual or institutional clients. All CIMA® professionals must adhere to IMCA’s Code of Professional Responsibility. CIMA® certification stands out as the only financial services credential in the U.S. to have met an international standard for personnel certification (ISO 17024) and earned accreditation by American National Standards Institute.

## Item 3 – Disciplinary Information

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Securities laws require an advisor to disclose any instances where the advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

Mr. Eaton’s U4 includes a disclosure event that was lodged against Detwiler Fenton & Co. by a client of Detwiler Fenton & Co. Mr. Eaton was the broker of record on the account. As a result of the arbitration proceedings, Detwiler Fenton was required to pay the claimant the requested damages amount. All settlement proceeds were paid by Detwiler Fenton with no monetary contribution from or findings of wrongdoing by Mr. Eaton.

You may independently view the background of Mr. Eaton on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 1395701.

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

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Mr. Eaton's professional activities are entirely dedicated to the service of his Clients and FWA.

## **Item 5 – Additional Compensation**

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As stated in Item 4 above, Mr. Eaton's professional activities are entirely dedicated to the service of his Clients and FWA. As such, Mr. Eaton receives no additional professional compensation independent of his services to Clients and the firm.

## **Item 6 – Supervision**

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Mr Eaton is supervised by Brandon Lamb, the Chief Compliance Officer. Mr. Lamb can be reached at (781) 916-8176. FWA has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of FWA. Further, FWA is subject to regulatory oversight by various agencies. These agencies require registration by FWA and its Supervised Persons. As a registered entity, FWA is subject to examinations by regulators, which may be announced or unannounced. FWA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## Form ADV Part 2B – Brochure Supplement

for

**Mitchell A. Goldfeld, CIMA®**  
**Director – Wealth Management**  
**Director – Portfolio Management**

**Effective: March 2, 2017**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Mitchell A. Goldfeld (CRD# 1903537) in addition to the information contained in the RPg Family Wealth Advisory, LLC (“FWA” or the “Advisor” CRD #158528) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or FWA’s Disclosure Brochure, please contact us at (781) 547-8660.

Additional information about Mitchell A. Goldfeld, II is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### RPg Family Wealth Advisory, LLC

Boston Office	Austin Office	Detroit Office
25 Burlington Mall Rd Suite 307 Burlington, MA 01803 Phone: (781) 547-8660 Fax: (781) 273-0333	7509 Manchaca Suite 101 Austin, TX 78745 Phone: (866) 726-5150 Fax: (512) 327-6044	255 East Brown Street Suite 101 Birmingham, MI 48009 Phone: (866) 726-5150 Fax: (781) 273-0333

## Item 2 – Educational Background and Business Experience

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Mitchell A. Goldfeld, CIMA® is a Director – Wealth Management and a Director – Portfolio Management for RPg Family Wealth Advisory, LLC. Mr. Goldfeld has over 30 years of professional experience. Mr. Goldfeld is dedicated to serving the Clients of FWA. Mr. Goldfeld earned a Bachelor of Science degree with high honors in Economics at the State University of New York at Binghamton in 1988 as well as a Masters of Business Administration degree in Finance & Strategic Management from the Wharton School of the University of Pennsylvania in 1993. Additional information regarding Mr. Goldfeld’s employment history is included below.

### Employment History:

Director – Wealth Management, Director – Portfolio Management, RPg Family Wealth Advisory, LLC	06/2015 to Present
Managing Director of Asset Management & Senior Vice President of Wealth Management, Detwiler Fenton Investment Management, LLC	07/2010 to 06/2015
Managing Director (Registered Representative), Detwiler Fenton Wealth Management, Inc.	06/2012 to 05/2015
Managing Director (Registered Representative), Detwiler Fenton & Co.	08/2009 to 01/2012
Vice President – Investments (Registered Representative), UBS Financial Services, Inc.	12/2002 to 08/2009
Director of Business Development, Sonicbids	05/2000 to 12/2002
Founder & President, MAGI Productions	01/1996 to 12/2002
Equity Research Analyst (Registered Representative), Wellington Asset Management Co.	08/1993 to 12/1995
Junior Equity Analyst (Registered Representative), Goldman Sachs & Co.	09/1988 to 05/1991

### CERTIFIED INVESTMENT MANAGEMENT ANALYST®

Mr. Goldfeld has earned the Certified Investment Management Analyst® (CIMA®) professional designation from The Investment Management Consultants Association, Inc. As a candidate, Mr. Goldfeld successfully completed the curriculum through The Wharton School, University of Pennsylvania, which is one of IMCA’s three registered programs. The CIMA® certification curriculum provides the knowledge, tools, and strategies to effectively set investment objectives, evaluate and select managers, and manage an investment portfolio for individual or institutional clients. All CIMA® professionals must adhere to IMCA’s Code of Professional Responsibility. CIMA® certification stands out as the only financial services credential in the U.S. to have met an international standard for personnel certification (ISO 17024) and earned accreditation by American National Standards Institute.

## Item 3 – Disciplinary Information

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*There are no legal, civil or disciplinary events to disclose regarding Mr. Goldfeld.* Mr. Goldfeld has never been involved in any regulatory, civil or criminal action. There have been no Client disputes, lawsuits, arbitration claims or administrative proceedings against Mr. Goldfeld

Securities laws require an advisor to disclose any instances where the advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Goldfeld.*

You may independently view the background of Mr. Goldfeld on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 1903537.

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

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Mr. Goldfeld's professional activities are entirely dedicated to the service of his Clients and FWA.

## **Item 5 – Additional Compensation**

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As stated in Item 4 above, Mr. Goldfeld's professional activities are entirely dedicated to the service of his Clients and FWA. As such, Mr. Goldfeld receives no additional professional compensation independent of his services to Clients and the firm.

## **Item 6 – Supervision**

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Mr Goldfeld is supervised by Brandon Lamb, the Chief Compliance Officer. Mr. Lamb can be reached at (781) 916-8176. FWA has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of FWA. Further, FWA is subject to regulatory oversight by various agencies. These agencies require registration by FWA and its Supervised Persons. As a registered entity, FWA is subject to examinations by regulators, which may be announced or unannounced. FWA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## Form ADV Part 2B – Brochure Supplement

for  
**Juan Donabedian**  
 Director – Portfolio Management

**Effective: March 2, 2017**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Juan Donabedian (CRD# 4595528) in addition to the information contained in the RPg Family Wealth Advisory, LLC (“FWA” or the “Advisor” CRD #158528) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or FWA’s Disclosure Brochure, please contact us at (781) 547-8660.

Additional information about Juan Donabedian is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### RPg Family Wealth Advisory, LLC

Boston Office	Austin Office	Detroit Office
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## Item 2 – Educational Background and Business Experience

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Juan Donabedian is a Director – Portfolio Management for RPg Family Wealth Advisory, LLC. Mr. Donabedian has over 25 years of experience in the accounting and financial service industries. Mr. Donabedian is dedicated to serving the Clients of FWA. Mr. Donabedian earned a Bachelor of Science from Bentley University in 1989. He currently maintains a Series 7 and Series 66. Additional information regarding Mr. Donabedian’s employment history is included below.

### Employment History:

Director of Portfolio Management, RPg Family Wealth Advisory, LLC	06/2015 to Present
Vice President of Portfolio Management, Detwiler Fenton Investment Management, LLC	07/2010 to 06/2015
Senior Portfolio Manager (Registered Representative), Detwiler Fenton Wealth Management, Inc.	12/2011 to 05/2015
Senior Portfolio Manager (Registered Representative), Detwiler Fenton & Co.	08/2009 to 07/2014
Financial Advisor & Investment Associate (Registered Representative), UBS Financial Services, Inc.	09/2002 to 08/2009
Founder and President, Illiad XXV, Inc.	10/1994 to 09/2002
Senior Account: Taxation, Arthur Anderson & Co.	11/1991 to 10/1994
Assistant Controller, Coptech, Inc.	08/1990 to 10/1991
Staff Accountant, Tax & Audit, Herman & Herman CPA	08/1986 to 05/1990

## Item 3 – Disciplinary Information

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*There are no legal, civil or disciplinary events to disclose regarding Mr. Donabedian.* Mr. Donabedian has never been involved in any regulatory, civil or criminal action. There have been no Client disputes, lawsuits, arbitration claims or administrative proceedings against Mr. Donabedian

Securities laws require an advisor to disclose any instances where the advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Donabedian.*

You may independently view the background of Mr. Donabedian on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4595528.

## Item 4 – Other Business Activities

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Mr. Donabedian’s professional activities are entirely dedicated to the service of his Clients and FWA.

## Item 5 – Additional Compensation

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As stated in Item 4 above, Mr. Donabedian’s professional activities are entirely dedicated to the service of his Clients and FWA. As such, Mr. Donabedian receives no additional professional compensation independent of his services to Clients and the firm.

## **Item 6 – Supervision**

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Mr Donabedian is supervised by Brandon Lamb, the Chief Compliance Officer. Mr. Lamb can be reached at (781) 916-8176. FWA has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of FWA. Further, FWA is subject to regulatory oversight by various agencies. These agencies require registration by FWA and its Supervised Persons. As a registered entity, FWA is subject to examinations by regulators, which may be announced or unannounced. FWA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## Form ADV Part 2B – Brochure Supplement

for  
**Deborah B. Friend**  
 Director – Wealth Management

**Effective: March 2, 2017**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Deborah B. Friend (CRD# **4257503**) in addition to the information contained in the RPg Family Wealth Advisory, LLC (“FWA” or the “Advisor” CRD #158528) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or FWA’s Disclosure Brochure, please contact us at (781) 547-8660.

Additional information about Deborah B. Friend is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### RPg Family Wealth Advisory, LLC

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25 Burlington Mall Rd Suite 307 Burlington, MA 01803 Phone: (781) 547-8660 Fax: (781) 273-0333	7509 Manchaca Suite 101 Austin, TX 78745 Phone: (866) 726-5150 Fax: (512) 327-6044	255 East Brown Street Suite 101 Birmingham, MI 48009 Phone: (866) 726-5150 Fax: (781) 273-0333

## Item 2 – Educational Background and Business Experience

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Deborah B. Friend is a Director – Wealth Management for RPg Family Wealth Advisory, LLC. Ms. Friend has over 30 years of professional experience. Ms. Friend is dedicated to serving the Clients of FWA. Ms. Friend attended Barnard College, Columbia University in New York. She currently maintains a Series 7 and Series 66. Additional information regarding Ms. Friend’s employment history is included below.

### Employment History:

Director of Wealth Management, RPg Family Wealth Advisory, LLC	06/2015 to Present
Vice President of Portfolio Management, Detwiler Fenton Investment Management, LLC	08/2009 to 06/2015
Investment Associate, UBS Financial Services, Inc.	02/2000 to 08/2009
Registered Representative, Detwiler Fenton Wealth Management, Inc.	06/2012 to 05/2015
Registered Representative, Detwiler Fenton & Co.	08/2009 to 01/2012
Registered Representative, UBS Financial Services, Inc.	04/2001 to 08/2009

## Item 3 – Disciplinary Information

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*There are no legal, civil or disciplinary events to disclose regarding Ms. Friend.* Ms. Friend has never been involved in any regulatory, civil or criminal action. There have been no Client disputes, lawsuits, arbitration claims or administrative proceedings against Ms. Friend.

Securities laws require an advisor to disclose any instances where the advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Friend.*

You may independently view the background of Ms. Friend on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 4257503.

## Item 4 – Other Business Activities

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Ms. Friend’s professional activities are entirely dedicated to the service of her Clients and FWA.

## Item 5 – Additional Compensation

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As stated in Item 4 above, Ms. Friend’s professional activities are entirely dedicated to the service of her Clients and FWA. As such, Ms. Friend receives no additional professional compensation independent of her services to Clients and the firm.

## Item 6 – Supervision

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Ms. Friend is supervised by Brandon Lamb, the Chief Compliance Officer. Mr. Lamb can be reached at (781) 916-8176.

FWA has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of FWA. Further, FWA is subject to regulatory oversight by various agencies. These agencies require registration by FWA and its Supervised Persons. As a registered entity, FWA is subject to examinations by regulators, which may be announced or unannounced. FWA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



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## Form ADV Part 2B – Brochure Supplement

for  
**Jason McGinty**  
Founding Partner

**Effective: March 2, 2017**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Jason A. McGinty (CRD# **4499263**) in addition to the information contained in the RPg Family Wealth Advisory, LLC (“FWA” or the “Advisor” CRD #158528) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or FWA’s Disclosure Brochure, please contact us at (781) 547-8660.

Additional information about Jason McGinty is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### RPg Family Wealth Advisory, LLC

Boston Office	Austin Office	Detroit Office
25 Burlington Mall Rd Suite 307 Burlington, MA 01803 Phone: (781) 547-8660 Fax: (781) 273-0333	7509 Manchaca Suite 101 Austin, TX 78745 Phone: (866) 726-5150 Fax: (512) 327-6044	255 East Brown Street Suite 101 Birmingham, MI 48009 Phone: (866) 726-5150 Fax: (781) 273-0333

## Item 2 – Educational Background and Business Experience

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Jason McGinty is a Founding Partner of RPg Family Wealth Advisory, LLC. His primary responsibilities for FWA include research, analysis, and performing extensive due diligence—both on prospective capital with low correlation to the stock market. These include Oil & Gas, Alternative Energy Sources, Real Estate, Venture Capital Lending Programs, and Lease Equity Programs. Mr. McGinty, born in 1978, is dedicated to serving the Clients of FWA. Mr. McGinty earned a Degree in Finance from Texas State University’s McCoy School of Business in 2001 as a member of the Honors Program. Additional information regarding Mr. McGinty’s employment history is included below.

### Employment History:

Founding Partner, RPg Family Wealth Advisory, LLC	05/2011 to Present
Senior Portfolio Manager and Founding Partner, Risk Paradigm Group, LLC	05/2011 to Present
Founding Partner, Risk Paradigm Group Holdings, LLC	05/2011 to Present
Financial Advisor, RAM Financial Group	01/2002 to 05/2011

## Item 3 – Disciplinary Information

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*There are no legal, civil or disciplinary events to disclose regarding Mr. McGinty.* Mr. McGinty has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. McGinty.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. McGinty.*

However, we do encourage you to independently view the background of Mr. McGinty on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4499263.

## Item 4 – Other Business Activities

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Mr. McGinty is primarily dedicated to the portfolio management activities of FWA and to the service of his Clients and FWA.

Mr. McGinty also holds a real estate license in the state of Texas, which he maintains for personal use.

### Affiliated Entities

Mr. McGinty also serves as a Founding Partner of Risk Paradigm Group Holdings, LLC, the parent company to FWA and its affiliated entities. Mr. McGinty does not have any other business activities aside from supporting the related FWA business entities.

## **Item 5 – Additional Compensation**

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Mr. McGinty is also a Partner of Risk Paradigm Group Holdings, LLC, the parent to FWA. Mr. McGinty is compensated directly by Risk Paradigm Group Holdings, LLC for his role with FWA and its affiliated entities.

## **Item 6 – Supervision**

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Mr. McGinty serves as Founding Partner of FWA and is supervised by Brandon Lamb, the Chief Compliance Officer. Mr. Lamb can be reached at (781) 916-8176. FWA has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of FWA. Further, FWA is subject to regulatory oversight by various agencies. These agencies require registration by FWA and its Supervised Persons. As a registered entity, FWA is subject to examinations by regulators, which may be announced or unannounced. FWA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



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## Form ADV Part 2B – Brochure Supplement

for

**James F. Peters, Jr.**  
**Managing Director Wealth Management**

**Effective: March 2, 2017**

This Brochure Supplement provides information about the background and qualifications of James F. Peters, Jr. (CRD# **1543053**) in addition to the information contained in the RPg Family Wealth Advisory, LLC (“FWA” or the “Advisor” CRD #158528) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or FWA’s Disclosure Brochure, please contact us at (781) 547-8660.

Additional information about James F. Peters, Jr. is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**RPg Family Wealth Advisory, LLC**  
**CRD No: 158528**

<b>Boston Office</b>	<b>Austin Office</b>	<b>Detroit Office</b>
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## Item 2 – Educational Background and Business Experience

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James F. Peters, Jr. is a Managing Director Wealth Management for RPg Family Wealth Advisory, LLC. Mr. Peters has over 40 years of financial services experience. Mr. Peters is dedicated to serving the Clients of FWA. Mr. Peters graduated from St. Louis University with a BS in Accounting, minors in Economics and Philosophy and a Master of Science in Taxation (MST) from Walsh College. He is a Certified Public Accountant and a member of the American and Michigan Association of CPAs. Additional information regarding Mr. Peters's employment history is included below.

### Employment History:

Managing Director Wealth Management, RPg Family Wealth Advisory, LLC	07/2016 to Present
Senior Portfolio Manager, Risk Paradigm Group, LLC	07/2016 to Present
Chief Executive Officer, Tactical Allocation Group, LLC	03/2004 to Present
Investment Advisor and Registered Representative, Leonard & Company	03/2004 to 10/2006
SVP, UBS Financial Services Inc.	01/1995 to 04/2004

## Item 3 – Disciplinary Information

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Securities laws require an advisor to disclose any instances where the advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

Mr. Peters's U4 includes three events to disclose that were lodged against Morgan Stanley Smith Barney or predecessor entities and Shearson by former clients of the firms and Mr. Peters as a registered representative of the firms. The disputes did not include Mr. Peters as a named party and the firms settled the disputes prior to any formal hearings, which had been commenced as arbitration proceedings and had referenced conduct by Mr. Peters. As these matters were lodged against the firms and did not include Mr. Peters as a party, all settlement proceeds were paid by the firms with no monetary contribution from or findings of wrongdoing by Mr. Peters.

You may independently view the background of Mr. Peters on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **1543053** in the field labeled "Individual CRD Number".

## Item 4 – Other Business Activities

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### Affiliated Entities

Mr. Peters also serves as a Senior Portfolio Manager and Investment Committee Co-Chair of Risk Paradigm Group, LLC, an affiliated registered investment advisor. In his role as Investment Committee Co-Chair, Mr. Peters is responsible for overseeing the investment policy and asset management services provided by the Risk Paradigm Group, LLC.

## Item 5 – Additional Compensation

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Mr. Peters receives no additional professional compensation independent of his services to Clients and the firm.

## Item 6 – Supervision

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Mr. Peters is supervised by Brandon Lamb, the Chief Compliance Officer. Mr. Lamb can be reached at (781) 916-8176.

FWA has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of FWA. Further, FWA is subject to regulatory oversight by various agencies. These agencies require registration by FWA and its Supervised Persons. As a registered entity, FWA is subject to examinations by regulators, which may be announced or unannounced. FWA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.