



**ATWILL FINANCIAL  
CONSULTING GROUP, LLC**  
A Registered Investment Advisor

**Firm Brochure**  
(Part 2A of Form ADV)

**AFCG, LLC**  
7202 Glen Forest Drive  
Suite 101  
Richmond, VA 23226

Phone: (804) 672-0040  
Toll-free: (888) 300-2517  
Fax: (804) 672-2006  
[www.afcglc.com](http://www.afcglc.com)  
[info@afcglc.com](mailto:info@afcglc.com)

Brochure updated  
**March 31, 2017**

This brochure provides information about the qualifications and business practices of AFCG, LLC (“AFCG”). If you have any questions about the contents of this brochure, please contact us at (804) 672-0040, or by email at [info@afcglc.com](mailto:info@afcglc.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

AFCG describes its business as a registered investment adviser. By using the term “registered investment adviser” in its business practices, AFCG does not imply in any way that AFCG or its adviser representatives have attained a certain level of skill or training.

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

## **Item 2 - Material Changes**

---

### **Annual Update**

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

---

### **Material Changes since the Last Update**

On April 1, 2017, AFCG will move its sole office and place of business to:

7202 Glen Forest Drive  
Suite 101  
Richmond, VA 23226

All other contact information shall remain the same.

---

### **Full Brochure Available**

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at (804) 672-0040 or by email at [info@afcgllc.com](mailto:info@afcgllc.com).

## Item 3 - Table of Contents

### Item 1 – Cover Page

<b>Item 2 - Material Changes.....</b>	<b>i</b>
Annual Update .....	i
Material Changes since the Last Update.....	i
Full Brochure Available.....	i
<b>Item 3 - Table of Contents.....</b>	<b>1</b>
<b>Item 4 - Advisory Business .....</b>	<b>1</b>
Firm Description .....	1
Principal Owners.....	2
Tailored Relationships .....	2
Types of Services .....	2
Termination of Service Agreements .....	4
<b>Item 5 - Fees and Compensation.....</b>	<b>5</b>
Description .....	5
Fee Billing.....	5
Other Fees .....	8
<b>Item 6 - Performance-Based Fees .....</b>	<b>8</b>
Sharing of Capital Gains .....	8
<b>Item 7 - Types of Clients.....</b>	<b>9</b>
Description .....	9
Account Minimums .....	9
<b>Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss .....</b>	<b>9</b>
Methods of Analysis .....	9
Investment Strategies .....	9
Risk of Loss .....	10
<b>Item 9 - Disciplinary Information .....</b>	<b>11</b>
Legal and Disciplinary .....	11
<b>Item 10 - Other Financial Industry Activities and Affiliations.....</b>	<b>11</b>
Financial Industry Activities.....	11
Affiliations .....	11

<b>Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....</b>	<b>11</b>
Code of Ethics.....	11
Participation or Interest in Client Transactions .....	11
Block Trading .....	12
Personal Trading .....	13
<b>Item 12 - Brokerage Practices.....</b>	<b>13</b>
Selecting Brokerage Firms.....	13
Research and Other Soft Dollar Benefits .....	14
<b>Item 13 - Review of Accounts.....</b>	<b>14</b>
Periodic Reviews .....	14
Review Triggers.....	15
Regular Reports .....	15
<b>Item 14 - Client Referrals and Other Compensation .....</b>	<b>16</b>
Incoming Referrals.....	16
Referrals Out.....	16
Other Compensation .....	16
<b>Item 15 - Custody .....</b>	<b>16</b>
Account Statements .....	16
Performance Reports.....	16
<b>Item 16 - Investment Discretion.....</b>	<b>17</b>
Discretionary Authority for Trading.....	17
<b>Item 17 - Voting Client Securities.....</b>	<b>17</b>
Proxy Votes.....	17
<b>Item 18 - Financial Information .....</b>	<b>17</b>
Financial Condition.....	17
<b>Item 19 – Requirements for State Registered Advisers.....</b>	<b>17</b>
<b>Brochure Supplement (Part 2B of Form ADV) .....</b>	<b>18</b>
Education and Business Standards.....	18
Professional Certifications .....	18
Charles B. Atwill, CFP® and NAPFA-Registered Financial Advisor .....	19

## Item 4 - Advisory Business

---

### Firm Description

AFCG was founded in 2006. As of March 31, 2017, AFCG manages approximately \$8,013,656 in assets for approximately 41 client households. Approximately \$8,006,933 is managed on a discretionary basis, and \$6,723 is managed on a non-discretionary basis.

AFCG provides personalized confidential financial planning and investment management to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, and small businesses. Advice is provided through consultation with the client and may include:

- determination of financial objectives
- identification of financial problems
- cash flow management
- tax planning
- insurance review
- investment management
- education funding
- retirement planning
- estate planning

AFCG is strictly a fee-only financial planning and investment management firm. The firm does not receive commissions for purchasing or selling annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder's fees are accepted.

AFCG does not act as a custodian of client assets. The client always maintains asset control. AFCG places trades for clients under a limited power of attorney.

A written evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

On more than an occasional basis, AFCG furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be by phone at (804) 672-0040, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

---

### **Principal Owners**

Charles B. Atwill is the principal owner of AFCG.

---

### **Tailored Relationships**

The goals and objectives for each client are documented in our client relationship management system. Investment policy statements are created that reflect the stated goals and objectives. Clients may impose certain investment restrictions. For example, a client may wish to retain legacy assets that are not part of our current model investment portfolios.

---

### **Types of Services**

The following services define the typical client relationship:

#### **Financial Planning Services**

AFCG provides cash-flow based financial planning services on a modular or comprehensive basis including:

- Household Cash Flow Analysis and Net Worth Analysis
- Asset Allocation and Investment Analysis
- Risk Management and Insurance Review
- Estate/Multi-Generational Planning
- Tax Planning
- Major Goals/Purchases
- Employee Benefits Analysis

AFCG's financial planning services are coordinated with other professional advisors serving a client such as accountants, estate planning attorneys, and/or insurance agents as appropriate.

AFCG will provide financial planning services in the form of a written plan. A client purchasing financial planning services will be presented with a document that provides the client with detailed information based on client input and financial data provided to AFCG during the data gathering process. In general, the financial plan will address any or all of the follow areas of concern: personal financial history, household cash flow, financial goals and objectives, time horizon for savings and retirement goals, cost of living adjustments and inflation, tax planning, estate

planning, investment planning, asset allocation, risk management strategies, and other financial considerations.

Financial plans are based on information gathered by AFCG through in-depth personal discussions with the client. Information required includes a client's current financial status, future goals, and attitudes towards risk. Related documents supplied by the client are reviewed by AFCG. AFCG also requires a confidential questionnaire that provides personal and financial data essential to evaluating the client's needs and objectives.

Should a client choose to implement the recommendations contained in the financial plan, AFCG may suggest the client also seek the services of an attorney, accountant, insurance agent, or such professional as appropriate. Implementation of the financial plan recommendations is entirely at the client's discretion and may involve additional costs incurred from other professionals for their services.

AFCG offers periodic reviews and/or written updates to client financial plans as a separate service and encourages clients to have financial plans reviewed and updated by AFCG on at least an annual basis or when a client experiences changes in personal circumstances that may affect the financial plan.

### **Financial Consulting Services**

AFCG will provide financial consulting services to sponsors of pension and profit-sharing plans. AFCG also offers these services, as appropriate, to individuals, trusts, estates, and charitable organizations on a more limited basis. These services may include investment policy statement preparation, appropriate asset allocation and portfolio construction recommendations, selection of investments, monitoring of investment performance, and employee communications under ERISA guidelines as established in the consulting services agreement. AFCG accepts fiduciary status as an "investment manager" under ERISA Section 3(38).

### **Investment Management Services**

AFCG will provide continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal interviews for data gathering in which a client's unique financial goals, objectives, and concerns are established, AFCG will assist in developing a client's personal investment policy statement and asset allocation and then select the investments and manage the portfolio based on that investment policy.

AFCG will manage advisory accounts on a discretionary and non-discretionary basis, using a variety of generally accepted methodologies including fundamental analysis, technical analysis, macro-economic analysis, asset allocation, and global diversification. Account supervision is guided by the stated objectives of the client (i.e., maximum capital appreciation, growth, income, or growth and income). AFCG will provide advice on a variety of securities, including, but not limited to, individual equity securities, fixed income securities, mutual funds, closed-end funds, and exchange-traded funds.

When appropriate for the needs of the client, AFCG may recommend the use of trading (securities sold within 30 days), short sales, margin transactions, and/or option writing. Because these investment strategies involve certain additional degrees of risk, they will be recommended only when consistent with the client's stated objectives and risk tolerance.

AFCG will create an investment portfolio consisting of one or all of the following securities: individual equities, bonds, closed-end funds, exchange-traded funds, and open-end mutual funds using no-load, load-waived, and/or institutional class shares. AFCG will allocate the client's assets among various investments taking into consideration the client's overall stated portfolio objective.

AFCG will meet with the client at least annually or upon the client's request to review client's investment portfolio and/or discuss any changes to client's personal circumstances or financial situation that may affect the portfolio and the investment policy statement.

### **Business Consulting Services**

AFCG will provide a range of customized Business Consulting Services to non-public companies, including:

- Business Start-Up Planning
- Business Process Improvement
- Cash Management
- Strategic Planning
- Employee Benefits
- Executive Benefits
- Business Exit and Transition Strategies
- Custom Consulting

These services may be integrated with personal Financial Planning and Investment Management Services for the business owners and/or other stakeholders.

---

## **Termination of Service Agreements**

### **Financial Planning**

A financial planning services agreement may be terminated at any time, without penalty, by either the client or AFCG upon written notice to the other. If the financial planning agreement is terminated within five (5) business days of signing, no fees are due upon termination and any prepaid fees will be refunded in full. If the financial planning agreement is terminated after five (5) business days of signing and up and until plan presentation, all fees due at time of termination will be due and payable immediately by the client. AFCG will immediately refund any unearned, prepaid fees to the client.



### **Financial Consulting Services**

The consulting services agreement may be terminated at any time, without penalty, by either the client or AFCG upon written notice to the other. If the consulting services agreement is terminated within five (5) business days of signing, no fees will be due and any prepaid fees will be refunded in full. If the consulting services agreement is terminated after five (5) business days of signing and up and until presentation, all fees due at time of termination will be due and payable immediately by the client. AFCG will immediately refund any unearned, prepaid fees to the client.

### **Investment Management Services**

A client may terminate the investment management services agreement, without penalty, upon written notice to AFCG within five (5) business days after entering into the investment management agreement with AFCG. Thereafter, the advisory agreement may be terminated at any time, for any reason, by either party, upon written notice to the other, without penalty. Upon termination in any partial quarter, a client will be issued a pro-rata refund of any prepaid advisory fees from the date of termination until the end of that quarter.

### **Business Consulting Services**

The business consulting services agreement may be terminated at any time, without penalty, by either the client or AFCG upon written notice to the other. If the business consulting services agreement is terminated within five (5) business days of signing, no fees will be due and any prepaid fees will be refunded in full. If the business consulting services agreement is terminated after five (5) business days of signing and up and until presentation, all fees due at time of termination will be due and payable immediately by the client. AFCG will immediately refund any unearned, prepaid fees to the client.

## **Item 5 - Fees and Compensation**

---

### **Description**

AFCG bases its fees on a percentage of assets under management, hourly charges, and fixed fees (not including subscription fees).

Financial plans are priced according to the degree of complexity associated with the client's situation. Fees are negotiable.

---

### **Fee Billing**

#### **Investment Management**

AFCG will charge clients an investment management fee based on the value of an investment account managed by AFCG. If AFCG manages more than one account for a given household, the sum of all managed accounts is the "aggregate household

account” balance. AFCG may group certain related accounts into an aggregate household account for the purpose of achieving the most cost-effective fee structure for the client.

The value of the aggregate household accounts will be calculated as follows:

- for marketable securities, the quarter-end market value will be used,
- for non-marketable securities, the value will be determined based on the current financial information available for the underlying company, security, securities, or derivatives, and where no information is available, the purchase price, and
- for cash, the value will be the dollar value at quarter-end, including any adjustments.

Once an aggregate household account balance has been established for each client, a tiered fee structure will be applied. The annual tiered fee will be charged on a quarterly basis. The initial investment management fee will be due to AFCG upon establishment of the investment account and will be based on the value of the account at establishment. Initial fees charged for a partial quarter will be pro-rated for that quarter.

Clients will be charged in advance at the beginning of each quarter based on their account value at the end of the previous quarter according the schedule below:

<u>Annual Fee</u>	<u>Assets under Management</u>
1.00%	on the first \$999,999
0.75%	on the next \$4,000,000 (up to and including \$4,999,999)
0.50%	on the amount over \$4,999,999

AFCG fees are negotiable. Fees are calculated as described above and are not charged on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of the funds of an advisory client. The client must consent in advance to direct debiting of their investment account.

### **Financial Planning**

For financial planning services, AFCG will charge financial planning fees in one of two ways:

- As a fixed fee, typically ranging from \$1,250 to \$5,000 per plan, depending on the nature and complexity of each client's circumstances. 50% of this fee may be due upon signing the financial planning agreement with the balance due upon presentation of the plan to the client. Clients have the option of electing an annual review and update of the initial financial plan. AFCG will charge a fixed fee of \$300 per annual review. The annual review fee is charged in addition to the initial fee for the planning engagement. The fee for an annual review is due and payable upon completion of the annual review.

- On an hourly basis, billed at \$200 per hour. An estimate for total hours will be determined at the start of the planning relationship. 50% of the estimated fee may be due upon signing the financial planning agreement with the balance (based on actual hours) due upon plan presentation to the client.

Typically, the written financial plan will be presented to the client within ninety (90) days of the agreement date, provided that the client has promptly provided all information needed to prepare the plan. For clients who receive periodic plan reviews and/or updated written financial plans, the review and/or plan update will be presented to the client.

AFCG may elect to reduce or waive financial planning fees for clients who also retain AFCG for investment management services.

### **Financial Consulting**

For consulting services, AFCG will charge consulting fees in one of three ways:

- As a fixed fee, typically ranging from \$1,250 to \$5,000, depending upon the nature and complexity of each client's circumstances. 50% of this fee may be due upon signing of the consulting services agreement with the balance due upon presentation of recommendations to the client.
- On an hourly basis, billed at \$200 per hour. An estimate for total hours will be determined at the start of the consulting relationship. 50% of the estimated fee may be due upon signing the consulting services agreement with the balance (based on actual hours) due upon presentation of the recommendations to the client.
- A percentage of assets under management fee ranging from 0.25% to 1.00% depending upon the nature and complexity of each sponsor's qualified retirement plan. Determining factors include plan size, number of participants, employee education and investment committee meeting requirements, and other administrative responsibilities. The annual fee will be charged on a quarterly basis. The initial investment management fee will be due to AFCG upon establishment of the investment account and will be based on the value of the account at establishment. Initial fees charged for a partial quarter will be pro-rated for that quarter. Clients will be charged in advance at the beginning of each quarter based on their account value at the end of the previous quarter. AFCG fees are negotiable. Fees are calculated as described above and are not charged on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of the funds of an advisory client. The client must consent in advance to direct debiting of their investment account.

### **Business Consulting**

For business consulting services, AFCG will charge consulting fees in one of two ways:

- As a fixed fee, to be determined before ACFG is engaged to provide these services. The fee will be based on the nature and complexity of each client's circumstances. 50% of this fee may be due upon signing of the consulting services agreement with the balance due upon presentation of recommendations to the client.
- On an hourly basis, billed at \$200 per hour. An estimate for total hours will be determined at the start of the consulting relationship. 50% of the estimated fee may be due upon signing the consulting services agreement with the balance (based on actual hours) due upon presentation of the recommendations to the client.

---

### **Other Fees**

All fees paid to ACFG for investment management services are separate and distinct from the fees and expenses charged by mutual funds and exchanged-traded funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include an ongoing management fee, other fund expenses, and a possible distribution fee. The management fee is called an "operating expense ratio."

Mutual funds generally charge a management fee for their services as investment managers. The management fee is part of the fund's operating expense ratio. For example, an expense ratio of 0.50% means that the mutual fund company charges 0.50% for its services. These fees are in addition to the investment management fees paid by you to ACFG.

A client could invest in an equity security, bond, mutual fund or exchange-traded fund directly without the services of ACFG. In that case, the client would not receive the services provided by ACFG which are designed, among other things, to assist the client in determining which mutual fund or funds or exchange-traded funds are most appropriate for each client's financial condition and objectives.

Accordingly, the client should review both the fees charged by the funds and the fees charged by ACFG to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided. Fees charged by the funds and any other fees paid by the client for securities transactions, custodial services, and account maintenance are not shared by ACFG.

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

---

### **Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

AFCG does not use a performance-based fee structure.

## **Item 7 - Types of Clients**

---

### **Description**

AFCG generally provides investment advice to individuals, families, trusts, pension and profit-sharing plans, corporations or business entities, estates, and charitable organizations.

---

### **Account Minimums**

AFCG does not have a stated minimum account size or minimum annual fee for its services.

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

---

### **Methods of Analysis**

Investment analysis methods may include:

- charting
- fundamental analysis
- technical analysis
- cyclical analysis

The main sources of information include financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Other sources of information that AFCG may use include Morningstar Analytics/Workstation and independent research reports made available through Fidelity's Advisor Channel.

---

### **Investment Strategies**

The primary investment strategy used for client accounts is a tactical asset allocation. This means that investment exposure is blended across multiple asset classes and client accounts are primarily invested in actively-managed funds. Portfolios are globally diversified and include investments in international stocks and bonds to help manage the risks associated with limiting investments to conventional U.S. securities.

The investment strategy for a specific client is based upon the goals and objectives stated by the client during consultations. The client may change these objectives at

any time. Each client executes an investment policy statement that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, short sales, margin transactions, and option writing (including covered options, uncovered options or spreading strategies).

---

## **Risk of Loss**

All investment programs have certain risks that are borne by the investor. Investors face the following investment risks:

- **Interest Rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing the market value of the bonds to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** International investments are subject to fluctuations in the value as the U.S. dollar fluctuates against the foreign currency the investment is denominated in. This is also referred to as "Exchange Rate Risk."
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at potentially lower interest rates. This primarily relates to fixed income securities like bonds.
- **Business Risk:** This risk is associated with a particular industry or a particular company within an industry. This is the risk that a particular company may go bankrupt, or a particular industry may experience major changes due to political, economic, regulatory, or other factors that negatively affect the entire industry.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. With some types of investments, there is a risk that they will become illiquid and are not as readily convertible into cash as other types of investments.
- **Credit Risk:** The risk that an individual company or bond issuer defaults on its obligations which may result in bankruptcy and/or a declining market value including risk of loss on its publicly traded securities.

- Counterparty Risk. The risk that the other party in an agreement will default. In general, counterparty risk can be reduced by having an organization with extremely good credit act as an intermediary between the two parties.

## **Item 9 - Disciplinary Information**

---

### **Legal and Disciplinary**

The firm and its investment adviser representatives have not been involved in any legal or disciplinary events related to past or present clients.

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

---

### **Financial Industry Activities**

AFCG does not engage in any other financial industry activities.

### **Affiliations**

AFCG does not have any other affiliations.

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

---

### **Code of Ethics**

The individuals associated with AFCG have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

### **Participation or Interest in Client Transactions**

AFCG or individuals associated with AFCG may buy or sell securities identical to those recommended to clients for their personal accounts. Therefore, AFCG or individuals associated with AFCG may have a position or interest in certain securities that are also recommended and bought or sold for clients. It is the express policy of AFCG that no person employed by or associated with AFCG may purchase or sell any security prior to a transaction being implemented for a client advisory account, and therefore, preventing such individuals from benefitting from transactions placed on behalf of client advisory accounts.

As these situations may represent a conflict of interest, AFCG has established the following restrictions in order to ensure its fiduciary responsibilities to clients:

- A member and/or individuals associated with AFCG shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her association with AFCG,

unless the information is also available to the investing public on reasonable inquiry. No person of AFCG shall prefer his or her own interest to that of the advisory client;

- AFCG maintains a list of all securities holdings for itself and anyone associated with AFCG who has access to advisory recommendations. These holdings are reviewed on a regular basis by Charles B. Atwill, Chief Compliance Officer;
- AFCG emphasizes the unrestricted right of the client to decline to implement any advice rendered, except when AFCG has been given discretionary authority over the client's account;
- AFCG requires that all associated individuals must act in accordance with all applicable federal and state regulations governing registered investment advisor practices; and
- Any individual associated with AFCG who is not in observance of the above may be subject to termination.

---

### **Block Trading**

AFCG may, on occasion, place trades intended for more than one client account where possible and when advantageous to each of the clients. This is generally referred to as “block trading.” Block trading can arise in a variety of different transactions, but is always done in order to take advantage of great cost-effective and/or efficient trades. Block trading enables AFCG to gain greater leverage to obtain favorable execution, pricing, and, at times, lower brokerage commissions. Transaction costs are allocated on a *pro rata* basis among all client accounts included in such block trading. AFCG note the following with respect to its block trading practices:

- Client orders may be allocated on a basis different from that specified in the Allocation Statement if all client accounts receive fair and equitable treatment and the reason for different allocation is explained in writing and is approved by AFCG’s Chief Compliance Officer no later than one hour after the opening of the markets on the trading day following the day the order was executed;
- The books and records of AFCG will separately reflect, for each client account, the orders of which are aggregated, the securities held by, and bought or sold for that account;
- Funds and securities of clients whose orders are aggregated will be deposited with one or more banks or broker-dealers and neither the client's cash nor their securities will be held collectively any longer than is necessary to settle the purchase or sale in question on a delivery versus payment basis;
- Cash or securities held collectively for clients will be delivered out to the custodian bank or broker-dealer as soon as practicable following the settlement;
- Personal trades of individuals associated with AFCG may be included in AFCG block trades; and



- AFCG will receive no additional compensation or remuneration of any kind as a result of the proposed aggregation; and buy or sell securities that are also held by clients.

---

### **Personal Trading**

See information provided in the Participation or Interest in Client Transactions section immediately above regarding Personal Trading policies implemented by AFCG for individuals associated with AFCG.

## **Item 12 - Brokerage Practices**

---

### **Selecting Brokerage Firms**

#### **Investment Management**

AFCG does not select the broker-dealer to be used to execute trades for a client. Accordingly, the client must direct AFCG as to the brokerage firm to be used, and all trades for that client will be executed by that broker-dealer. When directing the use of a particular broker-dealer, the client must understand that AFCG will not have authority to negotiate commissions among various broker-dealers and may be prevented from obtaining volume or price discounts. Thus, best execution on trades may not be achieved. In addition, the client should recognize that, in a directed brokerage situation, there may be a disparity in commissions and transaction fees charged by brokerage firm selected by the client and those commissions and transaction fees charged to other clients of AFCG who have selected different broker-dealers.

If there are any known potentially adverse consequences that may arise from the selection of a particular broker-dealer, AFCG will disclose such adverse consequences prior to the final selection. Where AFCG believes that the use of a specified broker-dealer would hinder AFCG in meeting its fiduciary obligations, AFCG will not be able to accept the account and reserves the right to refuse the account.

#### **Financial Planning/Financial Consulting**

Clients who engage AFCG for financial planning and/or consulting services will be required to select their own broker-dealers and/or insurance companies for the implementation of any recommendations provided by AFCG. AFCG may recommend any one of several broker-dealers. However, AFCG's financial planning and consulting clients may use any broker-dealer of their choice. AFCG's clients must independently evaluate these brokers before opening an account. The factors considered by AFCG when making this recommendation are the broker-dealer's ability to provide professional services, AFCG's experience with the broker-dealer, the broker-dealer's reputation, and the broker-dealer's financial strength, among other factors.

### **Fidelity Registered Investment Adviser Group**

AFCG participates in the Fidelity Registered Investment Advisor Group (“FRIAG”) program, sponsored by Fidelity Brokerage Services, Inc., a FINRA registered broker-dealer (“Fidelity”).

AFCG will typically recommend Fidelity Brokerage Services, Inc. to clients in need of brokerage and custodial services. However, the final selection of a broker-dealer for such client’s account is up to that client. As part of the FRIAG program, AFCG receives benefits that it would not receive if it did not participate in the FRIAG program (see disclosure below under Research and Other Soft Dollars).

AFCG LLC will not be able to aggregate trades when for client that direct the use of a broker-dealer other than Fidelity Brokerage Services, Inc., and, therefore, a disparity in commission charges may exist between the commissions charged to other clients.

---

### **Research and Other Soft Dollar Benefits**

AFCG utilizes the services provided by the FRIAG program, sponsored by Fidelity. While there is no direct linkage (except in certain circumstances) between the investment advice given to clients and AFCG’s participation in the FRIAG program, economic benefits are received by AFCG which would not be received if AFCG did not participate in FRIAG program.

These benefits include: software and other technology applications that provide access to client data and facilitate trade execution and block trading, market data feeds, back-office support functions for record keeping and client reporting, the ability to have advisory fees directly debited from client accounts in accordance with federal and state requirements, access to Fidelity market research and newsletters, access to Fidelity mutual funds, access to WealthCentral.com (internet access to statements, trade confirmations, and transfer of asset status), access to over 350 mutual fund families and 4,500 mutual funds not affiliated with or managed by Fidelity, of which over 2,000 have no transaction fees, the ability to have loads waived for AFCG’s clients who purchase certain load funds, and the ability to have custody fees waived under certain circumstances when negotiated by AFCG.

The benefits received through participation in the FRIAG program may depend upon the amount of transactions directed to, or amount of assets in custody with, Fidelity Brokerage Services, Inc.

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

---

### **Periodic Reviews**

Reviews are conducted by AFCG's investment advisor representatives of record, in accordance with the services outlined above or upon the request of clients. Clients are advised to notify AFCG and its associated representatives should they experience

changes in their personal circumstances and/or financial goals and objects that may warrant an account review.

### **Investment Management Services**

While the underlying securities within the advisory accounts are continuously monitored, these accounts are reviewed at least quarterly by AFCG in the context of each client's stated investment policy, objectives, and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, a request by the client, or material shifts in the market, political, or economic environment.

### **Financial Planning Services**

AFCG will typically provide financial planning clients with reviews annually or upon client request, unless otherwise contracted for at the inception of the advisory relationship with the client.

### **Financial Consulting Services**

AFCG will provide consulting clients with reviews as contracted for at the inception of the consulting relationship.

### **Business Consulting Services**

AFCG will provide business consulting clients with reviews as contracted for at the inception of the consulting relationship.

---

## **Review Triggers**

More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, a request by the client, or material shifts in the market, political, or economic environment.

Clients are advised to notify AFCG and its associated representatives should they experience changes in their personal circumstances and/or financial goals and objects that may warrant an account review.

---

## **Regular Reports**

### **Investment Management Services**

Clients will receive account statements and trade confirmations from their respective broker-dealers and/or custodian(s) at least on a quarterly basis. In addition, AFCG's clients will receive quarterly investment performance reports that summarize account holdings, asset allocation, and the value of securities held.

**Financial Planning Services**

AFCG will provide these clients with written financial plans and/or other written reports as contracted for at the inception of the advisory relationship.

**Financial Consulting Services**

AFCG will provide these clients with reviews and/or written reports as contracted for at the inception of the consulting relationship.

**Business Consulting Services**

AFCG will provide these clients with reviews and/or written reports as contracted for at the inception of the consulting relationship.

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

---

**Incoming Referrals**

AFCG does not compensate referring parties for client referrals with referral fees.

---

**Referrals Out**

AFCG does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

---

**Other Compensation**

AFCG does not receive any other compensation.

**Item 15 - Custody**

---

**Account Statements**

All client assets are held in custody at qualified custodians of the client's selection. The custodians provide account statements directly to AFCG's clients at each client's address of record, at least quarterly.

Clients should carefully review these account statements.

---

**Performance Reports**

Clients are urged to compare the account statements received directly from their custodian to the investment performance reports provided by AFCG.

## **Item 16 - Investment Discretion**

---

### **Discretionary Authority for Trading**

AFCG accepts discretionary authority to manage securities accounts on behalf of clients upon execution of an investment management agreement with AFCG, providing a limited power of attorney trading authorization.

AFCG has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

The client selects and approves the custodian to be used and the commission rates paid to the custodian. AFCG does not receive any portion of the transaction fees or commissions paid by the client to the custodian for certain trades.

Discretionary trading authority facilitates placing trades in the client's accounts on a client's behalf, so that we may promptly implement the investment policy statement that the client has approved in writing. Any trading restrictions desired by the client are described in the investment policy statement.

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

---

### **Proxy Votes**

AFCG does not vote proxies on securities. Clients are expected to vote their own proxies.

## **Item 18 - Financial Information**

---

### **Financial Condition**

AFCG does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because AFCG does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$600 per client and six months or more in advance.

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

See Brochure Supplement on next page (Part 2B of Form ADV).

## Brochure Supplement (Part 2B of Form ADV)

---

### Education and Business Standards

AFCG requires that its investment adviser representatives who render advice to clients must possess a bachelor's degree and/or appropriate business experience and all required industry licenses. Investment adviser representatives are encouraged, but not required, to take additional industry-related coursework and pursue industry-related professional designations.

---

### Professional Certifications

Investment adviser representatives and employees have earned certifications and credentials that are required to be explained in further detail.

CERTIFIED FINANCIAL PLANNER™ (CFP®): Certified Financial Planners are licensed by the Certified Financial Planner Board of Standards, Inc. (CFP Board) to use the CFP® mark. CFP® certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board ([www.cfp.net](http://www.cfp.net)).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three years of qualifying full-time work experience.
- Successfully pass the CFP Board's *Fitness Standards for Candidates and Registrants*.
- Comply with the CFP Board's *Code of Ethics and Professional Responsibility, Rules of Conduct, and Financial Planning Practice Standards*.
- Complete ongoing renewal requirements every two years including 30 hours of continuing education.

NAPFA-REGISTERED FINANCIAL ADVISOR: The National Association of Personal Financial Advisors (NAPFA) is the country's leading professional association of Fee-Only financial advisors. Requirements to become a NAPFA-Registered Financial Advisor and receive membership benefits are:

- Agree to follow the NAPFA Fiduciary Oath.
- Bachelor's degree, in any discipline from an accredited institution.
- Hold the CERTIFIED FINANCIAL PLANNER™ (CFP®) designation.
- Submit a sample comprehensive financial plan for peer review.
- Pay annual membership dues.

- Have at least 36 months of experience providing comprehensive financial planning services, which experience must have been attained within the past 60 months and must include the most recent 12 months.
- Complete ongoing renewal requirements every two years including 60 hours of continuing education.
- Meet the NAPFA definition of a “Fee-Only” financial advisor. NAPFA defines a Fee-Only financial advisor as one who is compensated solely by the client with neither the advisor nor any related party receiving compensation that is contingent on the purchase or sale of a financial product. A NAPFA-Registered Financial Advisor may not receive commissions, rebates, award, finder’s fees, bonuses, or other forms of compensation from others as a result of a client’s implementation of the individual’s planning recommendations.
- Abide by the NAPFA Code of Ethics, Standards of Membership and Affiliation, Bylaws, resolutions adopted by the Board and all rules set forth in the NAPFA Policies and Procedures Manual.

NAPFA-Registered financial advisors are eligible to participate in NAPFA’s “Find an Advisor” consumer referral program, which is a member benefit provided to NAPFA-Registered Financial Advisors. NAPFA does not receive any portion of fees paid by clients who engage a personal financial advisor as a result of information provided by NAPFA’s “Find an Advisor” consumer referral program.

---

**Charles B. Atwill, CFP® and NAPFA-Registered Financial Advisor**

Year of Birth: 1969

Educational Background:

- Hampden-Sydney College, B.A., Political Science, 1992

Business Experience (last five years):

- AFCG, Managing Member and Investment Adviser Representative  
November 2005 to Present

Disciplinary Information: None.

Other Business Activities: None.

Additional Compensation: None.

Arbitration Claims: None.

Self-Regulatory Organization or Administrative Proceeding: None.

Bankruptcy Petition: None.