

This part of FORM ADV gives information about the Investment Adviser and its business for the use of clients. A *Brochure Supplement* is included at the end of this document as a requirement for state registered advisors.

**Item 1-Cover Page**

Registered As

**Financial Consultants Group, Inc.**

Investment Adviser

5840 Rock Springs Circle Buford GA 30518

(770) 650-9392

(770) 650-1740

[www.financialconsultantsgroup.net](http://www.financialconsultantsgroup.net)

**NOTICE TO PROSPECTIVE CLIENTS: READ THIS DISCLOSURE BROCHURE IN ITS ENTIRETY**

All the material within this Brochure must be reviewed by those who are considering becoming a client of our firm. This Brochure provides information about the qualifications and business practices of Financial Consultants Group, Inc. If you have any questions about the contents of this Brochure, please contact us at 770-650-9392. Our e-mail address is [darcy@financialconsultantsgroup.net](mailto:darcy@financialconsultantsgroup.net). In accordance with federal and state regulations, this Brochure is on file with the appropriate securities regulatory authorities as required. The information provided within this Brochure is not to be construed as an endorsement or recommendation by state securities authorities in any jurisdiction within the United States, or by the United States Securities and Exchange Commission. 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.

Financial Consultants Group, Inc. is a state of Georgia registered investment adviser. Registration of a registered investment adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser. Additional information about Financial Consultants Group, Inc. also is available on the SEC's Web Site at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## **Item 2 – Material Changes**

On July 28, 2010, the United States Securities and Exchange Commission published “Amendments to Form ADV” which amends the Disclosure Document that we provide to clients as required by SEC Rules. This Brochure dated March 1, 2011 is a new Document prepared according to the SEC’s new requirements and rules. As such, this Document is materially different in structure and requires certain new information that our previous Brochure did not require.

In the future, this Item number will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our Brochure.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Disclosure Brochure may be requested by contacting Darcy Searl, President at (770) 650-9392. Our e-mail address is [darcy@financialconsultantsgroup.net](mailto:darcy@financialconsultantsgroup.net). We welcome visitors to our Web Site for a comprehensive overview of our firm and the professional services we offer. Prospective clients may download a copy of our Disclosure Brochure directly from our Web Site at their convenience, without charge. The Web address of Financial Consultants Group, Inc. is [www.financialconsultantsgroup.net](http://www.financialconsultantsgroup.net).

Additional information about Financial Consultants Group, Inc. is also available via the SEC’s Web Site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC’s Web Site also provides information about any persons affiliated with Financial Consultants Group, Inc. who are registered, or are required to be registered, as investment adviser representatives of Financial Consultants Group, Inc.

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**Item 4 – Advisory Business**

Financial Consultants Group, Inc. is a Georgia registered investment adviser. The firm's founding Member(s), Darcy and Kenneth Searl organized the firm in 1996.

Darcy and Kenneth Searl are investment advisory representatives and have served as in this capacity since the inception of the firm in 1996. Darcy Searl has over Thirty (30) years of financial industry experience and Kenneth Searl has over Twenty-five (25) years. The firm currently has over \$23,300,000 assets under management. The amount of the total assets supervised as of the firm's annual amendment dated July 20, 2010 on a non-discretionary basis was at \$23,313,206.00.

Financial Consultants Group, Inc. provides investment supervisory services primarily to non high net-worth individuals (75%); and up to 10% of high-net worth individuals and up to 10% for corporations and other businesses.

**Introduction**

Financial Consultants Group, Inc. (hereinafter referred to as "FCG") is a Registered Investment Adviser regulated by the State of Georgia's Department of Securities. The Adviser provides fee-based Investment Management and Financial Planning Services.

The individuals associated with FCG are appropriately licensed, qualified and authorized to provide advisory services on behalf of FCG. These individuals are known as Investment Adviser Representatives ("IAR's").

FCG has been registered as an investment advisor since March 1997.

FCG advisor representatives are restricted to providing services and charging fees based in accordance with the descriptions detailed in this document. However, the exact service and fees charged to a particular client are dependent upon the FCG advisor representative that is working with the client. Fees may also vary depending on the geographic location of the client and/or FCG advisor representative. FCG advisor representatives are instructed to consider the individual needs of each client when recommending an advisory platform. Investment strategies and recommendations are tailored to the individual needs of FCG clients, and clients may impose reasonable restrictions on investing in certain securities or types of securities.

Individuals associated with FCG are also registered representatives of Cambridge Investment Research, Inc. ("Cambridge"), a registered broker/dealer, a member of the Financial Regulatory Authority ("FINRA") and the Securities Investors Protection Corporation ("SIPC"). Should the client utilize brokerage services offered through FCG, all securities transactions shall be directed to Cambridge for execution. FCG and Cambridge are not affiliated.

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### **Advisory Services and Fees**

FCG provides fee based financial planning and investment supervisory services. Clients choosing any of the following services shall be given recommendations and investment advice based on the individualized needs and objectives of the client. The following is a description of the business background that is FCG.

### **Financial Planning**

Financial Planning services will typically involve the review of a client's overall financial situation, personal and financial goals, risk tolerance and objectives. Financial planning services offered through FCG may include, but are not limited to, one of more of the following:

- Portfolio Review and Evaluation
- Retirement Account Analysis
- Cash Flow and Net Worth Analysis
- Risk Management Analysis
- Budgeting
- Special Needs Planning (Family Members)
- Tax Projections
- Tax Planning
- Retirement Planning
- Consulting with a Qualified Plan Sponsor
- Education Funding Planning
- Estate Analysis and Estate Planning
- Review of Medical Disability and Other Insurance
- Negotiation of the purchase of substantial assets (i.e., home, auto, vacation residence, etc)
- Development of a Comprehensive Financial Plan

The Plan will provide recommendations as to the allocation of present financial resources among different types of assets, investments, savings and insurance with a vision to accomplishing the client's goals and objectives. The fee charged for the Financial Plan will be a fixed fee per plan, to be determined by the Directors of FCG, based on their determination of the time and effort the Plan will require. Typically, fees may range from \$250 to \$4000 depending upon the Plan's complexity. The fee shall be paid in part, upon the signing of the Agreement to draw the Plan, with the balance of the fee to be paid upon the completion of the Plan.

Management fees, set-up fees and other costs associated with purchasing and owning certain securities, including mutual funds and variable insurance products, may be more or less than fees, charges and costs of similar financial plans and investment management services offered by other financial professionals and product sponsors, including other investment advisers.

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As part of preparing a Financial Plan, IAR's of FCG, in their separate capacities as registered representatives, are securities licensed through Cambridge Investment Research, Inc., a registered broker dealer, and as such will share in commissions should the client execute any transactions through the IAR. As well, IAR's of FCG may be licensed as insurance agents with various insurance agencies, and should the client execute any insurance transactions through the IAR, in their separate capacity as insurance agent, the IAR will share in commissions with those various agencies.

All financial planning fees described above do not include fees incurred by the client with other professionals (i.e. personal attorney, independent investment adviser, or accountant) in connection with the financial planning process.

From time to time, FCG may hold public seminars for the purpose of disseminating general information about the services that FCG provides. There is no fee associated for individuals attending these seminars.

The Agreement to provide the Financial Plan may be terminated within five (5) business days from the date it was signed, via written notice to FCG, without penalty. The Agreement may be terminated at any time upon thirty (30) days written notice. Upon such request, all fees will be reviewed and all unearned prepaid fees will be returned to the client. On a case-by-case basis, FCG may charge \$100 per hour for consulting and/or specific needs analysis. These rates may vary at the discretion of FCG.

Client should be aware that they are free to implement the financial plan through whomever the client so chooses. However, should client choose to implement the securities recommendations made by FCG, the broker-dealer will be Cambridge.

### **Investment Management Services Program**

The Investment Management Services (“IMS”) Program is designed to offer suitable participants brokerage and asset allocation services, portfolio supervision, consolidated reporting, and periodic recommendations pursuant to investment objectives chosen by the client. Typically, FCG offers to manage investment advisory accounts on a non-discretionary basis, and all transactions are executed at the direction of the client.

Cambridge ordinarily acts as broker for transactions and processes all transactions through National Financial Services, LLC (“NFS”). Similarly, NFS ordinarily acts as custodian for all IMS Program accounts. Cambridge may provide various administrative services for the program.

The client, FCG and, if applicable, FCG's IAR, enter into an Investment Management Services (“IMS”) Agreement in which the client opens a brokerage account with Cambridge and an advisory account with FCG. FCG provides asset management services that include an initial consultation and the completion of a client profile to determine the client's circumstances and investment objectives. Based upon the consultation and the client profile, FCG manages the

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client's account by purchasing and/or selling securities in the account. Those securities may include individual stocks, bonds, no-load mutual funds, closed-end mutual funds, certificates of deposit, money market instruments and no-load variable annuities. Certain “front-end load waived” mutual funds and unit investment trusts may also be acquired at net asset value subject to a transaction charge. FCG's IAR's discuss with the client, at least on an annual basis, whether the management of the account continues to reflect the investment objectives and financial requirements of the client.

The client is charged an advisory fee as a percentage of assets under management, as well as an administrative fee every calendar quarter (the “Management Fee”). The Management Fee charged to the account is payable quarterly in advance, and will be due the first business day of the current calendar quarter. The Management Fee is based on the fair market value of the assets in the account on the last business day of the preceding calendar quarter as calculated by NFS. The Management Fee may be negotiable and is set forth in the “Actual Management Fee Charged” section of the IMS Agreement. The Management Fee charged may be higher or lower than the cost of similar services offered through other financial firms. No fee is ever based upon capital gains or capital appreciation of assets. The amount of the annualized Management Fee is as follows:

<u>Portfolio Value</u>	<u>Maximum Fee</u>
\$0 - \$249,999	2.25%
\$250,000 - \$499,999	2.00%
\$500,000 - \$1,999,999	1.75%
\$2,000,000 - up	1.50%

All of these fees are subject to discount based on various criteria.

The Management Fee covers the asset management and administrative services provided by Cambridge and/or FCG. Among other things, the Management Fee is used to compensate FCG or IAR for asset management and investment advice provided. Cambridge retains a portion of the Management Fee, generally subject to a maximum of .10% of the total portfolio value, to cover administrative and miscellaneous costs. FCG may share its portion of the Management Fee with Cambridge and NFS. The Management Fee does not cover charges imposed by third-parties for investments held in the account, such as contingent deferred sales charges on mutual funds purchased prior to their contribution to the account. FCG may allow its IAR's to absorb Individual Retirement Account (“IRA”) annual fees at the IAR's discretion.

All Management Fees will be noted on the client's brokerage statements or confirmations. Management Fees are payable, first from free credit balances, if any, in the account, and second, from the liquidation or withdrawal of the client's shares of any money market funds or balances in any money market account. To the extent that such assets are insufficient to satisfy payment of such fees, a portion of the account assets will be liquidated to cover the fees. Such liquidation may affect the relative balance of an account.

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Clients may make additions to the account at any time. If assets are deposited into the account after the inception of a quarter, the Management Fee payable with respect to such assets is prorated based on the number of days remaining in the quarter. Clients may withdraw account assets on notice, subject to usual and customary securities settlement procedures. No fee adjustment is made for partial withdrawals within a billing period.

Under the IMS Agreement, clients authorize Cambridge to invoice NFS for all transaction charges charged to the account. NFS debits all such charges and fees directly from the account to pay such charges and fees to Cambridge. All transaction charges are noted on the client's brokerage statements or confirmations. The Management Fees and transaction charges will continue until thirty (30) days after FCG has notified the client in writing of any change in the amount of the fees and/or charges applicable to the account. At that time, the new fees and/or charges will become effective unless the client notifies FCG in writing that the account is to be closed.

The Management Fee and other charges may be higher or lower than the cost of purchasing the services provided under the IMS Program in other programs or through other parties. Factors that may bear upon the cost of the IMS Program in relation to the cost of the same services purchased separately include, among other things, the type and size of the account, the historical and/or expected size or number of trades for the account, and the number and range of supplementary advisory and client related services provided to the account.

All fees paid to FCG for advisory services are separate from the fees and expenses charged to shareholders of mutual fund shares by the mutual funds, or by the investment adviser managing the portfolios. A complete explanation of the expenses charged by the mutual funds is contained in each mutual fund's prospectus, and clients are encouraged to read the fund prospectuses.

FCG shall never take custody or possession of any client funds or securities. As well, FCG does not vote proxies. Clients retain the authority to vote proxies and clients are responsible for ensuring that proxy materials are sent directly to them or to their designated third party representative.

The IMS Agreement may be terminated by any party to the agreement at any time upon written notice to the other party. The client is entitled to a pro rata refund of any prepaid quarterly fees based upon the number of days remaining in the quarter after the date upon which notice of termination is received. Termination of the Agreement does not affect liabilities or obligations incurred or arising from transactions initiated under the Agreement before such termination.

Upon termination, Adviser will have securities and funds held in the account delivered as instructed by the client, unless the client requests that the account be liquidated. Once the Agreement has been terminated, transactions will be processed at prevailing brokerage rates. Upon termination, it is the client's responsibility to monitor his or her assets, and neither Cambridge nor the Adviser has further obligation to act or advise with respect to those assets. The procedures and conditions for termination are described in the agreement.

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Additionally, should the client receive a copy of the Adviser's ADV Part II less than 48 hours before entering into an agreement with the Adviser, the client may terminate the IMS Agreement, via written notice, within five (5) business days of its signing without penalty.

### **Cambridge Asset Allocation Platform (“CAAP”)**

FCG may utilize a wrap fee platform sponsored by Cambridge's affiliated Investment Adviser, Cambridge Investment Research Advisors, Inc. (“CIRA”) known as CAAP. Under this platform, FCG or its IAR will recommend a portfolio based on one of several asset allocation models designed to meet the individual client's financial needs, investment objectives, time horizon and risk tolerance. Portfolios comprised of Load-Waived Mutual Funds, No-Load Mutual Funds, Sector Funds, Inverse Index Funds, Leveraged Index Funds or Exchange Traded Funds (“ETF”) (referred to collectively as either “Fund” or “Funds”) Traditional CAAP, ETF CAAP, Dynamic CAAP, Premier CAAP, and Select CAAP (referred to collectively as “CAAP”) are selected through a comprehensive due diligence process by Consultants selected by but not affiliated with CIRA. Consultants who are registered investment advisers select Funds using a screening process that looks at various investment criteria, including risk adjusted performance, management continuity, portfolio composition, investment style, expense structure, turnover rate, asset growth rate, asset site, and various risk measurements.

### **Cambridge Managed Account Platform (“CMAP”)**

CMAP is an investment management program that enables FCG and its IAR's to actively manage client investment portfolios in accordance with the client's individual needs, objectives and risk tolerance. CMAP accounts are custodied at National Financial Services, LLC (“NFS”). NFS is a broker-dealer and member of the New York Stock Exchange (“NYSE”). Cambridge Investment Research, Inc., registered broker-dealer, member FINRA/SIPC, clears these securities transactions on a fully disclosed basis through NFS. Clients participating in CMAP and utilizing NFS may pay higher account-related fees and execution charges than if their Adviser/IAR had selected another Clearing Firm. Annual management fees are negotiable. Unless there are other arrangements between the client and IAR, fees will be charged on a quarterly basis.

In general, advisory matters may include the following: Generally providing investment advice to: Individuals; Pension and profit sharing plans; Trusts, estates, or charitable organizations and Corporations or other business entities.

### **Conditions for Managing Accounts**

The applicant provides investment advisory services, manages investment advisory accounts or holds itself out as providing financial planning or some similarly termed services *and* imposes a minimum dollar value of assets or other condition for starting or maintaining an account.

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### **Conditions for Managing Accounts**

Minimum investments for CAAP accounts are disclosed in the CAAP Schedule H - Wrap Fee Brochure. Clients investing in CAAP should read fully the CAAP Schedule H for account minimum information. The minimum investment for CMAP accounts is \$25,000. However, clients may be permitted to invest less than \$25,000 in a CMAP account if, based on information provided by the client to FCG, that investing a lower amount is appropriate for the client, or the client has established additional managed accounts with FCG.

Third party advisers to whom FCG refers client assets may set account minimums. Such minimums will be clearly disclosed in the disclosure documents provided to the client by the referred third party adviser.

Services provided to Financial Consultants Group, Inc.'s clients include: providing investment supervisory services, which accounts for about 75% of the business. Approximately 15% of the services provided include such services as life insurance and equity transactions. The remaining 5% of services amounts to such accommodations, without charge, as furnishing services to clients on matters not involving securities such as joining them during a meeting with their accountant to help explain the clients investment portfolio.

The above types of services provided to clients can include the following types of investments: Equity securities including exchange-listed securities and securities traded over-the-counter; warrants; corporate debt securities (other than commercial paper); certificates of deposit; municipal securities; investment company securities including variable life insurance, variable annuities and mutual fund shares; United States government securities; interests in partnerships investing in real estate; oil and gas interests. Options contracts on securities are generally not used as part of an investment strategy but they are sometimes used as a hedge if a client brings over an equity position;

The core business involves mutual funds and variable contracts.

### **Types of Investments**

FCG may offer general advice in relation to such limited partnerships as equipment leasing and fast food franchising. Advice regarding Real Estate Investment Trusts ("REITS") may also be given.

The professional services described above will be offered to all prospective clients and will be provided on an hourly fee basis between \$250 -\$400 depending on complexity. Clients who engage Financial Consultants Group, Inc. for this service must have a minimum net worth of \$500,000.00 excluding their primary residence.

### **Item 5 – Fees and Compensation**

ALL CLIENT FEES ARE SUBJECT TO NEGOTIATION

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The specific manner in which fees are charged by our firm is established in a client's written agreement between the client and Financial Consultants Group, Inc.

### **Fees**

For investment advisory services offered by Financial Consultants Group, Inc., the company is able to collect fees for: A percentage of assets under management; Hourly charges; Fixed fees (not including subscription fees); Commissions. Financial Consultants Group, Inc. will invoice the client according to the firm's billing policy.

Our firm's fees may differ dependent on the facts, scope and complexity of the contracted service(s) that are to be provided. When the scope of the service has been agreed upon, a determination will be made as to the type, and the amount of the applicable fee. Our firm believes that its professional advisory service offerings are competitively priced. Those considering an advisory relationship with us should be aware that the probability does exist of being able to procure similar advisory services at a higher or lower price if acquired elsewhere. The professional fees assessed by our firm are negotiable; consequently clients may pay more or less than others who may be receiving similar offerings. Financial Consultants Group, Inc. does not require clients to implement or act upon any general advisory matter that may be rendered. Clients may act upon our recommendations by placing assets with a custodian of their choice.

### **Compensation**

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All of these fees are subject to discount based on various criteria.

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All Management Fees will be noted on the client's brokerage statements or confirmations. Management Fees are payable, first from free credit balances, if any, in the account, and second, from the liquidation or withdrawal of the client's shares of any money market funds or balances in any money market account. To the extent that such assets are insufficient to satisfy payment of such fees, a portion of the account assets will be liquidated to cover the fees. Such liquidation may affect the relative balance of an account.

Clients may make additions to the account at any time. If assets are deposited into the account after the inception of a quarter, the Management Fee payable with respect to such assets is prorated based on the number of days remaining in the quarter. Clients may withdraw account assets on notice, subject to usual and customary securities settlement procedures. No fee adjustment is made for partial withdrawals within a billing period.

Under the IMS Agreement, clients authorize Cambridge to invoice NFS for all transaction charges charged to the account. NFS debits all such charges and fees directly from the account to pay such charges and fees to Cambridge. All transaction charges are noted on the client's brokerage statements or confirmations. The Management Fees and transaction charges will continue until thirty (30) days after FCG has notified the client in writing of any change in the amount of the fees and/or charges applicable to the account. At that time, the new fees and/or charges will become effective unless the client notifies FCG in writing that the account is to be closed.

The Management Fee and other charges may be higher or lower than the cost of purchasing the services provided under the IMS Program in other programs or through other parties. Factors that may bear upon the cost of the IMS Program in relation to the cost of the same services purchased separately include, among other things, the type and size of the account, the historical

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and/or expected size or number of trades for the account, and the number and range of supplementary advisory and client related services provided to the account.

All fees paid to FCG for advisory services are separate from the fees and expenses charged to shareholders of mutual fund shares by the mutual funds, or by the investment adviser managing the portfolios. A complete explanation of the expenses charged by the mutual funds is contained in each mutual fund's prospectus, and clients are encouraged to read the fund prospectuses.

FCG shall never take custody or possession of any client funds or securities. As well, FCG does not vote proxies. Clients retain the authority to vote proxies and clients are responsible for ensuring that proxy materials are sent directly to them or to their designated third party representative.

The IMS Agreement may be terminated by any party to the agreement at any time upon written notice to the other party. The client is entitled to a pro rata refund of any prepaid quarterly fees based upon the number of days remaining in the quarter after the date upon which notice of termination is received. Termination of the Agreement does not affect liabilities or obligations incurred or arising from transactions initiated under the Agreement before such termination.

Upon termination, Adviser will have securities and funds held in the account delivered as instructed by the client, unless the client requests that the account be liquidated. Once the Agreement has been terminated, transactions will be processed at prevailing brokerage rates. Upon termination, it is the client's responsibility to monitor his or her assets, and neither Cambridge nor the Adviser has further obligation to act or advise with respect to those assets. The procedures and conditions for termination are described in the agreement.

Additionally, should the client receive a copy of the Adviser's ADV Part II less than 48 hours before entering into an agreement with the Adviser, the client may terminate the IMS Agreement, via written notice, within five (5) business days of its signing without penalty.

### **Cambridge Asset Allocation Platform ("CAAP")**

FCG may utilize a wrap fee platform sponsored by Cambridge's affiliated Investment Adviser, Cambridge Investment Research Advisors, Inc. ("CIRA") known as CAAP. Under this platform, FCG or its IAR will recommend a portfolio based on one of several asset allocation models designed to meet the individual client's financial needs, investment objectives, time horizon and risk tolerance. Portfolios comprised of Load-Waived Mutual Funds, No-Load Mutual Funds, Sector Funds, Inverse Index Funds, Leveraged Index Funds or Exchange Traded Funds ("ETF") (referred to collectively as either "Fund" or "Funds") Traditional CAAP, ETF CAAP, Dynamic CAAP, Premier CAAP, and Select CAAP (referred to collectively as "CAAP") are selected through a comprehensive due diligence process by Consultants selected by but not affiliated with CIRA. Consultants who are registered investment advisers select Funds using a screening process that looks at various investment criteria, including risk adjusted performance, management continuity, portfolio composition, investment style, expense structure, turnover rate, asset growth rate, asset site, and various risk measurements.

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### **Cambridge Managed Account Platform (“CMAP”)**

CMAP is an investment management program that enables FCG and its IAR's to actively manage client investment portfolios in accordance with the client's individual needs, objectives and risk tolerance. CMAP accounts are custodied at National Financial Services, LLC ("NFS"). NFS is a broker-dealer and member of the New York Stock Exchange (“NYSE”). Cambridge Investment Research, Inc., registered broker-dealer, member NASD/SIPC, clears these securities transactions on a fully disclosed basis through NFS. Clients participating in CMAP and utilizing NFS may pay higher account-related fees and execution charges than if their Adviser/IAR had selected another Clearing Firm. Annual management fees are negotiable. Unless there are other arrangements between the client and IAR, fees will be charged on a quarterly basis.

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

Financial Consultants Group, Inc. has arrangements, oral or in writing, in which additional compensation may be collected cash or otherwise including commissions, equipment, or non-research services from a non-client in connection with giving advice to clients. Financial Consultants Group, Inc. directly or indirectly compensates individuals for client referrals.

Financial Consultants Group, Inc. may enter into performance fee arrangements with “qualified clients” or accredited investors only. Such fee arrangements are subject to individualized negotiation with each such client. Financial Consultants Group, Inc. will structure any performance or incentive fee arrangement subject to Section 205(a)(1) of the Investment Advisors Act of 1940 (The Advisors Act) in accordance with the available exemptions, including the exemption set forth in Rule 205-3.

### **Item 7 – Types of Clients**

Financial Consultants Group, Inc. provides investment supervision of assets for: Individuals. Individuals are their primary clients but in the past they have worked with: Pension Funds, Trusts, Estates and/or Charitable Organization; and, Corporations or other Business Entities. The firm is currently not working with such clients or pursuing them as prospects but would not turn away any opportunities that may arise.

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

Financial Consultants Group, Inc. strives to produce investment returns that will meet or exceed major indices within the large capitalization equities market. Our management process takes into account risk tolerance and investment time horizon. In order to facilitate investment decisions we may obtain information from a variety of sources including but not limited to; financial publications and the media; corporate activities; filings with the Securities and Exchange Commission; rating services; and research materials available within the public domain. Those who are considering any investment program should be aware that investing in

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securities involves risks that one should be prepared to take on. Our methods for analyzing securities include(s): The firm uses a financial planning software (IAS) that incorporates charting; fundamental; technical; cyclical methods of analysis and generates daily reports to evaluate positions and performance. An email is sent if a portfolio deviates outside of an established tolerance.

Darcy Searl has 35 Household Clients and Kenneth Searl has 25. Darcy and Kenneth Searl are the only two IARs, and they do not have any immediate plans to expand.

The main sources of information used by the firm are: financial newspapers and magazines; research materials prepared by others; corporate rating services; annual reports, prospectuses, filings with the Securities and Exchange Commission; company press releases; CNBC is also a source of information that is on all day in the office. The firm also uses Morning Star reports and resources provided by the fund companies and wholesalers.

### **Methods of Analysis, Sources of Information, and Investment Strategies**

FCG uses various sources of information for its analysis and investment strategies. These sources may or may not be publicly available. In addition, FCG considers the general overall economic climate and its potential positive or negative effects on the client's financial condition. Information sources may include, but are not limited to, prospectuses, press releases, financial newsletters, newspapers, magazines, commercially available databases, etc.

As well, FCG may consult periodically with the home office at Cambridge regarding financial planning, mutual funds, variable annuities and due diligence.

The investment strategies used to implement any investment advice given to the clients include: long term purchases (securities held at least a year); short term purchases (securities sold within a year); margin transactions. Long term purchases are the primary focus. The firm does not engage in active trading.

The firm does not advice on using margin to purchase additional positions but sometimes for clients who have a short term need for cash and do not want the tax consequences of liquidating a position. The firm does not actively advice on option writing, including covered options, uncovered options or spreading strategies, but may use options as a hedging position for equity positions brought over by a client.

Performance is subject to substantial market fluctuations. Past performance is not indicative of future results, nor is there any assurance that the selected managers will achieve the investment objectives sought.

### **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of an advisory firm or the integrity

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of a firm's management. Financial Consultants Group, Inc. does not have applicable information regarding this item. Any such disciplinary information for the company and the company's investment advisor representatives would be available upon request or publicly accessible by selecting the Investment Advisor Search option at <http://www.adviserinfo.sec.gov>.

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

Our firm will inform clients of other business activities that may differentiate from advisory matters so as to avoid the potentiality of any conflict of interest. We do not recommend or render other services for clients.

Investment Advisor Representatives of Financial Consultants Group, Inc. may participate in other business activities as insurance agents and registered representatives of a broker/dealer.

### **Other Business Activities**

IAR's associated with FCG are licensed as insurance agents with various insurance companies. IAR's of FCG are also securities licensed as Registered Representatives through Cambridge Investment Research, Inc. ("Cambridge"), a registered broker dealer, member FINRA/SIPC. Individuals of FCG may spend as much as 20% of their time engaged in these other related business activities.

### **Item 11 – Code of Ethics**

Financial Consultants Group, Inc. has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, insider trading, rumor mongering, gifts and entertainment policy, and personal securities trading procedures, among other things.

All client transactions are on a non-discretionary basis. Investment Advisory Representatives or a related person may buy or sell for itself securities it also recommended to clients. Personal trading is subject to the Cambridge surveillance system.

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

IAR's associated with FCG are Registered Representatives ("RR's") of Cambridge Investment Research, Inc., registered broker dealer, member FINRA/SIPC. Cambridge is a diversified financial services company engaged in the sale of specialized investment products. IAR's, in their separate capacities as RR's are licensed to sell general securities products, and as such may recommend securities or insurance products offered through Cambridge to its advisory clients. In the event advisory clients elect to purchase these products through Cambridge, FCG's IAR's, in their capacities as RR's, will receive normal and customary commission compensation in connection with the specific product purchased. Thus, a conflict of interest may exist between the interests of FCG and its IAR's and those of the client. The client is under no obligation to

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purchase products recommended by FCG or its IAR's, and is free to implement investment advice through any broker dealer or product sponsor the client may select, however, should the client choose to implement investment advice through FCG, the IAR, in their capacity as a registered representative, will place all purchases and sales of securities through Cambridge or other institutions approved by Cambridge.

Section 204A-1 of the Investment advisers Act of 1940 requires all investment advisers to establish, maintain and enforce a Code of Ethics. FCG has established a Code of Ethics that will apply to all of its supervised persons. An investment adviser is considered a fiduciary according to the Investment Advisors Act of 1940. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of its clients at all times. FCG has a fiduciary duty to all clients. This fiduciary duty is considered the core underlying principle for FCG' s Code of Ethics which also covers Trading and Personal Securities Transactions Policies and Procedures. FCG requires all of its supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and when changes occur, all supervised persons will sign an acknowledgement that they have read, understand and agree to comply with FCG' s Code of Ethics. FCG has the responsibility to make sure that the interests of all clients are placed ahead of FCG' s or its supervised person's own investment interest. Full disclosure of all material facts and potential conflicts of interest will be provided to clients prior to any services being conducted. FCG and its supervised persons must conduct business in an honest, ethical and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of FCG' s Code of Ethics. Clients may review the FCG Code of Ethics in their entirety by written request.

From time to time IAR's or employees of FCG may purchase or own the same securities or variable insurance products that FCG or its IAR's recommend to the client. When the recommendation to the client involves individual stocks, stock options or bonds there could be a conflict of interest with the client. FCG has adopted policies and procedures to ensure that such conflicts are fully disclosed and that neither FCG nor its IARs or employees may trade ahead of or otherwise against the interest of clients.

FCG has also established policies and procedures to ensure that its IARs and employees comply with applicable provisions of The Insider Trading and Securities Fraud Enforcement Act of 1988 ("ITSFEA").

To avoid actual conflicts of interest with clients and to ensure compliance with ITSFEA, FCG, among other things, does the following:

- Provides ongoing continuing education regarding avoiding conflicts of interest and complying with ITSFEA.
- Requires IARs and employees to report quarterly securities trading in personal accounts (except mutual funds and government securities), to FCG's President, Darcy P. Searl.

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- Prohibits IARs and employees from executing securities transactions for clients or on their personal accounts based on information that is not available to the public or reasonable inquiry.
- Informs clients that they are not required to purchase securities through CIRA or its IARs, although if they choose to purchase securities through their IAR the transaction must be affected through Cambridge and one of Cambridge's clearing firms.

All supervised persons at Financial Consultants Group, Inc. must acknowledge the terms of the Code of Ethics annually, or as amended. There are general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients.

### **Education and Business Standards**

FCG requires a minimum of two years of college and/or four years of related business, finance or investments experience, passing of certain FINRA securities examinations, NASAA examinations, professional designations such as the Certified Financial Planner™ (CFP®) designation, or any combination thereof.

Our Code of Ethics is designed to assure that transactions, activities and interests of any staff and supervisory personnel associated with our firm will not interfere with making decisions in the best interests of advisory clients. The Code of Ethics Financial Consultants Group, Inc. is available for public viewing on our Web Site. Clients or prospective clients may also request a copy of the firm's Code of Ethics by contacting our office.

### **Item 12 – Brokerage Practices**

Financial Consultants Group, Inc. strives to obtain/provide favorable costs under the circumstances of each particular transaction, but more importantly best overall execution. The RIA's of Financial Consultants Group are registered representative of Cambridge Investment Research, Inc. (CIR). When placing securities transactions through CIR in his/her capacity as a registered representative, the advisor may earn sales commissions. Clients wishing to implement the advisor's advice are free to select any broker they wish and are so informed. If clients wish to have the advisor implement the advice in his capacity as a registered representative, then his broker/dealer, CIR, will be used.

CIR has a wide range of approved securities products for which it performs due diligence prior to selection. CIR's registered representatives are required to adhere to these products when implementing securities transactions through CIR. Commissions charged for these products may be higher or lower than commissions clients may be able to obtain if transactions were implemented through another broker/dealer. Because the advisor is a registered representative of CIR, CIR provides compliance and supervision support to the advisor. In addition, CIR provides the advisor with back office operational, technological and other administrative support.

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### **Investment or Brokerage Discretion**

IARs of FCG are licensed to sell securities in the capacity of an RR through FCG's broker dealer, Cambridge Investment Research, Inc. IAR's who are securities licensed are restricted by certain FINRA rules and policies from maintaining client accounts at or executing client transactions in such client accounts through any broker/dealer or custodian that is not approved by Cambridge.

Clients should consider, in light of Cambridge's limited approved trading platforms for investment advisory accounts and the fact that only some of the approved trading platforms may accommodate the investment strategy recommended by FCG or its IAR's, that IARs may be limited in their ability to obtain the best execution price and lowest execution costs for each transaction, or the product with the lowest internal expenses. Therefore, clients may pay higher commissions or trade execution charges through the trading platforms approved by Cambridge than through broker-dealers that have not been approved by Cambridge as trading platforms for its investment advisory accounts.

As an investment advisory firm, we feel that there is a required fiduciary standard and fundamental duty to seek best execution for client transactions.

### **Item 13 – Review of Accounts**

Financial Consultants Group, Inc. provides investment advisory service, manage investment advisory accounts and hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other condition for starting or maintaining an account.

### **Conditions for Managing Accounts**

Minimum investments for CAAP accounts are disclosed in the CAAP Schedule H - Wrap Fee Brochure. Clients investing in CAAP should read fully the CAAP Schedule H for account minimum information. The minimum investment for CMAP accounts is \$25,000. However, clients may be permitted to invest less than \$25,000 in a CMAP account if, based on information provided by the client to FCG, that investing a lower amount is appropriate for the client, or the client has established additional managed accounts with FCG.

Third party advisers to whom FCG refers client assets may set account minimums. Such minimums will be clearly disclosed in the disclosure documents provided to the client by the referred third party adviser.

Client portfolios are reviewed internally at least weekly but mostly on a daily basis. They are reviewed with clients at least annually but preferably on a quarterly basis. Reviews are performed by the Investment Adviser Representative responsible for the client's account.

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Triggering factors include changing market conditions, or a change in the client's investment goals, risk tolerance or investment objectives.

Financial Plans are reviewed by the President of FCG, Darcy P. Searl on at least an annual basis. Reviews shall be performed promptly should there be excessive changes to the client's financial situation.

Clients are provided with account statements on a quarterly basis by the account custodian, or as requested by the client. Financial Planning clients are provided with an updated financial statement on an annual basis, or more frequently if required.

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

Financial Consultants Group, Inc. directly or indirectly compensates individuals for client referrals and such additional compensation in the form of 12(b)(1) fees.

#### **Additional Compensation**

The firm does not utilize the services of a solicitor. However, under the supervision of Cambridge, IAR's of FCG may at some later date act in the capacity of a solicitor when referring clients to third party money managers. If and when such activity is conducted, full disclosure shall be provided at the time of solicitation pursuant to Rule 206(4)-3 of the Investment Advisers Act of 1940 and appropriate updates will be made to the firm's ADV II disclosure document in advance of such activity.

IAR's in their capacity as RR's may receive 12b-1 fees as a result of placing clients with certain mutual funds. Full disclosure will be made prior to such a sale.

The firm does not have a solicitor but this is that they would do it they had any. All solicitor agreements are in compliance with Rule 206(4)-3 of the Investment Advisers Act of 1940. In addition, all applicable federal and state laws will be observed. All clients procured by solicitors will be given full written disclosure describing the terms and fee arrangements between FCG and the solicitor.

No payment for fees, securities or any other items should be made payable to the IAR. Fee payments are to be made payable to Cambridge Investment Research, Inc. Fees for Financial Planning may be made payable to Financial Consultants Group, Inc. The client should be sure to keep a copy of this Form ADV Part II, any prospectuses received, and documents completed or signed by client in their permanent file. In order to ensure that the client received receives the most effective investment advice, the client must notify FCG or client's IAR of any changes to client's investment objectives, risk tolerance, suitability or time horizons.

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Our firm will use its best judgment when recommending any such contract on behalf of any client. We will use prudence and good faith when recommending issuers of these contracts. Additional compensation may differ based on the unique circumstances of each client as well as the nature and scope of the engagement.

**Item 15 – Custody**

The firm has determined that they do not maintain custody of funds pursuant to Rule 206(4)-2. The firm will not receive or forward stock certificates. Instead, FCG will advise clients of their responsibility to forward them directly to the custodian.

**Item 16 – Investment Discretion**

Financial Consultants Group does not maintain the right to determine the specific securities to be bought or sold or the amount without obtaining specific client consent.

**Item 17 – Voting Client Securities**

FCG shall never take custody or possession of any client funds or securities. As well, FCG does not vote proxies. Clients retain the authority to vote proxies and clients are responsible for ensuring that proxy materials are sent directly to them or to their designated third party representative.

**Item 18 – Financial Information**

Registered Investment Advisory firms are required in this Item number to provide you with certain financial information regarding the financial condition of the firm. Financial Consultants Group, Inc. does not require payment of more than \$500 in fees per client and 6 or more months in advance. Financial Consultants Group, Inc. does not] have custody of client funds or securities. As such, a balance sheet is not required to be provided and available for the most recent fiscal year.

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

SUPPLEMENTAL BROCHURE INFORMATION PART 2B

**Item 1 Part 2B**

This brochure supplement provides information about Darcy and Kenneth Searl, supervised individual that accompanies the Financial Consultants Group, Inc. Disclosure Brochure herein. Additional information about Darcy and Kenneth Searl is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



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### **Item 3 Part 2B**

#### **Disciplinary Information**

This Disclosure Brochure and its supplement, is delivered electronically through the Investment Advisor Public Disclosure System. (IAPD) Darcy and Kenneth Searl, supervised individual(s) of Financial Consultants Group, Inc. and disclosure information can be found on the disclosure reporting page, the details of which can be found by accessing the IAPD link at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### **Item 4 Part 2B**

#### **Other Business Activities**

IAR's associated with FCG are licensed as insurance agents with various insurance companies. IAR's of FCG are also securities licensed as Registered Representatives through Cambridge Investment Research, Inc. ("Cambridge"), a registered broker dealer, member FINRA/SIPC. Individuals of FCG may spend as much as 20% of their time engaged in these other related business activities. In addition, Kenneth Searl has the ability to do mortgages but does not actively pursue them.

### **Item 5 Part 2B**

#### **Additional Compensation**

The only form of compensation provided to IARs of Financial Consultants Group, Inc. is through the client. An economic benefit is not provided by another source.

### **Item 6 Part 2B**

#### **Supervision**

Darcy and Kenneth Searl, supervised individuals of Financial Consultants Group, Inc., must adhere to the firm's established Code of Ethics. Supervised individuals of the firm are also required to participate in continuing education on an annual basis relative to practice management, industry standards and compliance. Darcy and Kenneth Searl are also both subject to supervisory review by Cambridge Investment Research, a FINRA member firm.

### **Item 7 Part 2B**

#### **Additional Requirements for State-Registered Advisors**

This item requires disclosure of material facts relative to a supervised individual being a party to or the subject of any arbitration claims, administrative proceedings and legal actions by a civil, or self-regulatory organization.

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Darcy and Kenneth Searl, supervised individuals of Financial Consultants Group, Inc., have no applicable information relative to this Item. Required disclosure information for these supervised individuals is available through the Investment Advisor Public Disclosure System and may be accessed at the following link [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### **Important Firm Policies**

#### **Addressing Conflicts**

A “conflict” generally refers to any activity or relationship in which the interests of the firm compete with the interests of its clients. Common conflicts include dealing with affiliates, the receipt of compensation or other benefits from third parties that may affect the independence of the advice provided, the firm’s potential financial interest in a transaction (such as; acting as principal), client referral arrangements and personal and proprietary trading by the firm and its related persons.

While we do not receive special monetary incentives or rebates that could potentially come about as a result of directing an existing or prospective client to a particular company, vendor or service provider, certain activities should be clarified so as not to give way to the presumption of a conflict, whether inherent or potential. Among these activities may include the following:

#### **Management of Other Accounts**

Financial Consultants Group, Inc. may manage other accounts and provide investment advice to other parties. Should the firm so desire or see fit, it may form an entity that it controls as an affiliate and may decide to invest funds of one or more other accounts, or recommend funds by other parties, that may differ from the recommendations provided to an alternate client under their particular advisory agreement.

The firm and its respective affiliate may decide to invest the funds of one or more other accounts or recommend the investment of funds by other parties that may have different strategies or security positions than that of another client's account. Financial Consultants Group, Inc. may give advice or take such other action with respect to the these “affiliated accounts” which may differ from the advice given or the timing or nature of actions taken with respect to the account of an alternate client under their advisory agreement, provided that the firm acts in good faith. All clients acknowledge this as such within their particular advisory agreement so as to avoid any possible conflict that may be inferred from such activity.

#### **Disclosures to Plan Sponsors under 408(b) (2) and Form 5500**

Incentive type compensation has often been structured as reimbursements to some financial intermediaries and service providers for referring business to an affiliate of the intermediary that is an investment advisor. Such activity may pose a conflict of interest, based on the fact that the intermediary receiving such remuneration failed to place the interests of the plan beneficiaries

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with respect to the investment of the fiduciary assets. The Employee Retirement Income Security Act of 1974 ("ERISA") prohibits self-dealing between a plan fiduciary or other parties in interest. A common exemption relied upon is ERISA Section 408(b)(2), which permits certain service contracts or arrangements (including investment management agreements) between plans and parties in interest, if the contract or arrangement is reasonable, the services are necessary for the establishment or operation of the plan and no more than reasonable compensation is paid for the services. All service providers are required to disclose annually the amount of compensation received directly or indirectly for services provided to the plan on Form 5500. In addition to the extensive fees disclosures, regulations also require service providers to disclose information relating to possible conflicts that may be relevant to a plan fiduciary's assessment of the objectivity of a service provider's decisions.

Financial Consultants Group, Inc. will identify any material conflicts that exist between the interests of any Plan Sponsor client by reviewing the relationship the firm has with the potential service provider that is being considered for use in connection with the plan. Given the fact that ERISA generally prohibits fee arrangements between a fiduciary and third parties with limited exceptions and that the firm has no affiliate that is a third party administrator or any other entity that could be construed as a party in interest, the firm sees no potential conflict with respect to assets governed by ERISA. The service providers utilized by our firm have no affiliation. [The Company] neither receives nor provides any incentive based compensation as a result of working with any ERISA plan service provider. In addition, [The Company] clearly discloses within its' advisory agreement, the firm's Fiduciary responsibility and duty to Plan Sponsors who have oversight of ERISA assets.

### **Anti-Money Laundering**

As part of the anti-money laundering program, Financial Consultants Group, Inc. has established procedures to ensure that all client identities have been verified before an account is opened. Before opening an account for an individual client, the firm will require satisfactory documentary evidence of a client's name, address, date of birth, social security number or, if applicable, tax identification number. Before opening an account for a corporation or other legal entity, the firm will require satisfactory evidence of the entity's name, address and that the acting principal has been duly authorized to open the account.

Financial Consultants Group, Inc. will not open accounts or accept funds or securities from, or on behalf of, any person or entity whose name appears on the List of Specially Designated Nationals and Blocked Persons maintained by the U.S. Office of Foreign Assets Control, from any Foreign Shell Bank, or from any other prohibited persons or entities as may be mandated by applicable law or regulation.

### **Privacy**

In compliance with the Gramm-Leach-Bliley Act ("GLB"), Public Law 106-102 (1999), this notice contains the privacy policy of Financial Consultants Group, Inc. The GLB Act was enacted to provide greater protection for an individual's private information. This notice is

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meant to provide you with information regarding how we use your personal information and what your rights are with regard to your non-public personal information. In the course of providing its services, Financial Consultants Group, Inc. may gather non-public personal information from its business relationships and clients including but not limited to: pre-existing relationships; initial consultations; confidential questionnaires; account forms and statements; containing an individuals' name; address; social security number; investment preferences; risk tolerance; securities positions and balances. If you correspond with us or transact business through our computer web sites, your browser may provide information to us as you interact with us via the internet.

The firm may also obtain non-public personal information from electronic, telephonic, and written correspondence. Individuals and clients interacting with the Financial Consultants Group, Inc., its' Directors, Employees or Officers or any of its Affiliates should be advised that some correspondence in all of its forms may be retained as required by law or regulation.

If you are currently not a client of Financial Consultants Group, Inc., do not include information in any electronic correspondence that you or someone else considers to be confidential in nature. It is our responsibility to meet your expectations for privacy while still providing you with the desired financial services sought. In order to provide our services to you, your information may be shared with other service providers. To complete applications and forms, we may need to provide your non-public information to affiliated and nonaffiliated persons or entities involved in the processing, servicing, and marketing of financial products and services.

Our privacy policy does not permit us to provide any nonaffiliated third party with your non-public information unless we have an agreement with the third party that they will protect the confidentiality of your non-public information. There are times when we are required by law to provide such information to authorized persons and entities. These occasions include:

- complying with a subpoena or summons by federal, state or local authorities
- responding to judicial process
- responding to regulatory authorities
- other purposes as required by law to provide your non-public information to authorized persons or entities

The firm will not disclose any of your non-public personal information to anyone except as permitted by law. All employees and affiliates of our company with access to personal information about our clients are required to follow this policy. Our privacy policy applies to all personally identifiable non-public information about you that is obtained in connection with providing you our services. Our privacy policy will continue to cover information we collect about you during the course of our relationship, as well as after it has ended. If it comes to our attention that an item of personal information that we possess is inaccurate or false, we will make a reasonable effort to re-verify its accuracy and correct any error as appropriate. Financial

This part of FORM ADV gives information about the Investment Adviser and its business for the use of clients. A *Brochure Supplement* is included at the end of this document as a requirement for state registered advisors.

Consultants Group, Inc. has adopted this privacy to policy to protect the integrity and confidentiality of the firm's business and client relationships.

Financial Consultants Group, Inc. has measures in place to protect any unauthorized attempt to access client sensitive data. With the proliferation of the internet and increased web based technologies, it is possible that web browsing usage, including pages visited and any data provided may be tracked. Those who visit our web site agree to acknowledge the firm's Web Site Terms of Use, and should also be aware that by using our site, information concerning web browsing habits can be collected through the use of cookies. Cookies are small web text files that web sites can create on your computer for the purpose of storing data obtained from web site visits. This may include specific areas that were visited, any actions performed and personal data that may have been provided.

The Web Site of Financial Consultants Group, Inc. will have access only to personal information provided by the user, and gathers data only pertaining to steps taken within the site so that any visitor remains anonymous. Users should be aware that our site contains external links to third party web sites providing marketing and advertising data. It is possible that these external links may place third party cookies on a user's computer. Users of our web site should be aware that Financial Consultants Group, Inc. is not responsible for links to any external web site. The firm suggests that an individual use proper discretion in instances where external links are utilized. Users should also review the privacy practices of a particular link or web page prior to the divulgence of any personal information whatsoever.

It is the policy of Financial Consultants Group, Inc. to carry out its affirmative duty to act in utmost good faith and provide full and fair disclosure of all material facts. With respect to this duty of good faith to provide full and fair disclosure is the principle that, unless the client agrees, Financial Consultants Group, Inc. may not act for individuals or entities whose interests' conflict with the firm's clients or deal with its' clients as an adverse party in connection with any services provided relative to the advisory relationship.

For additional information concerning the Policies of Financial Consultants Group, Inc., please feel free to send your request in writing to the address of the firm.

**End of Firm Brochure ADV Part 2A and 2B**