FORM ADV PART 2A — DISCLOSURE BROCHURE

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This brochure provides information about the qualifications and business practices of Asset Guidance Group, LLC ("AGG"). Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact Wallace R. Nichols at 404-602-0040 or 470-201-6905, or Jarod W. Nichols at 404-348-4120. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Asset Guidance Group, LLC (CRD #291448) is available on the SEC's website at www.adviserinfo.sec.gov.

AGG is registered as an investment adviser with the State of Georgia. AGG is notice filed with the Texas State Securities Board pursuant to the de minimis exemption under Rule 116.1(b)(2)(A)(iv) of the Texas Administrative Code.

FILING DATE: 2026-11-02

Item 2: Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur between annual updates.

Material Changes Since the Last Update

This other-than-annual amendment, dated 2026-11-02, reflects the following material change since the last brochure, dated October 27, 2026:

Use of artificial intelligence tools. Item 4 now describes how AGG uses artificial intelligence ("AI") software tools in its operations: to help write and test the software AGG uses, check calculations, prepare records, draft plans, letters, and other written materials, assist with compliance reviews, organize tax documents, and help enter trades that AGG's Chief Investment Officer has approved. AI tools do not make investment decisions, and AGG personnel review work prepared with them. Item 8 adds the related risks, including the risk of errors, reliance on a third-party vendor, and data privacy. The Automated Discretionary Management service continues not to use AI. The supervision descriptions in Part 2B have been amended accordingly.

A full copy of this brochure is available upon request.

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Item 4: Advisory Business

Firm Description

Asset Guidance Group, LLC ("AGG") was formed in 2012 and was used initially as a d/b/a for investment adviser representative services and insurance activities. In 2017, AGG applied for registration as an investment adviser. Wallace R. Nichols, MBA, JD, CFP®, is the sole Managing Member and 100% owner.

AGG is a fee-based financial planning and investment management firm. AGG also publishes weekly investment research through a subscription publication. Jarod W. Nichols is a licensed insurance agent and offers insurance services and products in his individual capacity, as a separate outside business activity. AGG receives no insurance commissions or other insurance-related compensation. Wallace R. Nichols is no longer a licensed insurance agent.

AGG does not act as a custodian of client assets. AGG's qualified custodian for client assets is Interactive Brokers, LLC.

Each client receives an evaluation of the client's initial situation, often in the form of a net worth statement, risk analysis, risk-reduction report, or similar document. Periodic reviews are communicated to provide reminders of specific actions to be taken. More frequent internal reviews occur and are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (lawyers, accountants, tax preparers, insurance agents, and others) are engaged directly by the client on an as-needed basis and may charge their own fees. AGG discloses any material conflicts of interest that arise.

Types of Advisory Services

Asset Management

AGG offers discretionary and non-discretionary asset management services. AGG determines the client's investment goals, time horizon, objectives, and risk tolerance, and builds investment strategies, selections, allocations, and monitoring around those factors.

AGG's investment universe consists of traditional financial instruments including equities, fixed income, mutual funds, exchange-traded funds ("ETFs"), options, and cash equivalents. ETF exposure may include ETFs that provide indirect exposure to digital assets (for example, spot bitcoin or ether ETFs) or to commodities. These ETFs trade on U.S. equity exchanges, settle through ordinary brokerage accounts at AGG's qualified custodians, and are treated as equity-ETF positions within the client's portfolio. AGG does not provide separately-managed digital asset advisory services, DeFi strategies, direct cryptocurrency trading, or custody of digital assets for clients.

Discretionary. A client granting AGG discretionary authority signs a limited trading authorization or equivalent. AGG has authority to execute transactions without seeking

client approval on each transaction. AGG offers volatility-mitigated strategies and hedging strategies using options and other derivatives, including inverse ETFs.

Non-discretionary. A client electing non-discretionary service receives AGG's recommendations as to securities to be bought or sold and the amounts of each, but AGG obtains client approval on each and every transaction before executing.

Private Placements

AGG may provide investment advice and due diligence regarding certain privately-issued securities for clients who represent they are accredited investors and otherwise meet investor-suitability standards. An accredited investor generally must (i) have a net worth, excluding primary residence, of at least $1 million, or (ii) have had income exceeding $200,000 in each of the two most recent years (or joint income with a spouse exceeding $300,000) and a reasonable expectation of the same income level in the current year.

For private placements, AGG collects marketing materials, audits, balance sheets, offering memoranda, subscription agreements, and historical records; prepares and asks due-diligence questions; interviews managers or makes site visits; and evaluates the time horizon and sponsor strength. Due diligence continues throughout the duration of the investment, and AGG meets with the client at least annually for the duration of the investment.

Fees for private-placement advisory services are included as part of the client's portfolio and are captured under Asset Management in Item 5.

Financial Planning

Retirement clients. Beginning October 27, 2026, every new client who engages AGG to manage retirement assets (for example, individual retirement accounts and other retirement savings) receives a financial plan, and the plan is completed before the client's portfolio is selected. The plan sets the objectives against which the client's portfolio is managed; clients with similar plans may be managed in like allocations for efficiency. Clients with less than $1,000,000 under AGG management subscribe to an AGG financial planning subscription (see Item 5) for its initial term; after the initial term, planning continues at no additional charge for as long as the client maintains an investment-management relationship with AGG. For clients with $1,000,000 or more under AGG management, financial planning is incorporated into the asset-management relationship and is included in the asset-management fee. For these thresholds, assets under AGG management are measured across a household's accounts when those accounts are aggregated in the client's plan, and otherwise by the client's own accounts. Continued planning at either level is contingent on the client remaining an AGG investment-management client. Accounts that a client designates for speculative or aggressive-growth objectives are managed toward those objectives and are not subject to this requirement. Clients who engaged AGG before October 27, 2026 continue under the terms of their existing agreements, under which a client engaging in Investment Management Services either engaged in Comprehensive Financial Planning or met a $250,000 minimum of assets under management.

Financial planning services, when applicable, cover Investments, Taxes, Qualified Plans, Roth Conversions, Insurance, Retirement Income Planning, Social Security, Education, and Wills/Estate Plans/Trusts. If a conflict of interest exists between AGG's interests and the client's interests, the client is under no obligation to act on AGG's recommendation. If a client elects to act on a recommendation, the client is under no obligation to implement the transaction through AGG.

Financial planning subscriptions are paid in equal monthly payments over the subscription term (six months for the Foundations tier; twelve months for all other tiers); fees are earned upon receipt (see Item 5). AGG completes and delivers planning on an ongoing basis as described below. All planning milestones are contingent upon timely client delivery of required documentation.

AGG uses the following systematic consulting process:

1. **Discovery Meeting.** An initial interview to identify the challenges in achieving what is important to the client, the client's current situation, and the client's goals.
2. **Investment Plan Meeting.** AGG presents its diagnosis and recommendations. This plan forms the foundation for further work.
3. **Mutual Commitment Meeting.** A mutual decision whether AGG can add substantial value and whether to proceed. If yes, the parties execute the documents to put the plan in motion.
4. **45-Day Follow-up Meeting.** AGG helps the client organize paperwork, answers questions, and confirms understanding.
5. **Regular Progress Meetings.** At intervals convenient to the client, AGG reviews changes in the client's circumstances and progress toward long-term financial goals, and implements advanced planning recommendations systematically.

The planning process serves as a framework. AGG serves as the client's personal chief financial officer and addresses components of the client's financial picture as needed. With the wealth management plan to guide the work, AGG focuses on four broad areas:

1. **Wealth enhancement** — investment returns consistent with risk tolerance and minimized tax impact on those returns.
2. **Wealth transfer** — tax-efficient transfer of assets to succeeding generations consistent with the client's wishes.
3. **Wealth protection** — protection of wealth against potential creditors, litigants, and related claims.
4. **Charitable giving** — fulfillment of charitable goals, most effective when coordinated with the three areas above.

AGG raises these issues during Regular Progress Meetings in accordance with the client's stated priorities and makes recommendations over time to address advanced planning needs. To support the personal-CFO role, AGG works with a network of professional advisers selected for knowledge and skill in key aspects of the client's finances.

Automated Discretionary Management

AGG offers a proprietary, rules-based, automated discretionary management service for client securities accounts held at AGG's qualified custodian. The service is delivered through a single proprietary engine that AGG operates internally. The engine applies deterministic, rules-based screening, allocation, position-sizing, and order-routing logic to each managed account. Investment decisions are made automatically by the engine in accordance with parameters and configurations established and maintained by AGG personnel; the service does not employ artificial intelligence, machine learning, or other forms of self-tuning logic. Use of any AGG proprietary model in a client account requires that the advisory agreement and the client's Investment Policy Statement affirmatively authorize the model and the asset classes it employs.

The service is offered in two account-tier configurations:

Standard configuration. The standard configuration is available to advisory accounts generally and is the configuration through which AGG manages most of its client base. Within the standard configuration, the engine is run in two parallel modes appropriate to the asset composition of the account: an equity mode applied to a broad U.S. large- and mid-capitalization equity universe supplemented by a smaller exchange-traded fund universe, and a fixed-income mode applied to an investment-grade and high-yield fixed-income exchange-traded fund universe with conditional exposure to precious-metals exchange-traded funds. Leveraged and inverse exchange-traded products are permanently excluded from both. Both modes are subject to a common volatility-based defensive overlay, and the size at which equity positions are established in this configuration is set by a separate volatility-responsive adjustment. Screening is performed on a weekly cadence, with intra-week monitoring for individual position-level exit conditions and for the defensive overlay. The methods of analysis applied through the engine, including the defensive overlay and the position-sizing adjustment, and the material risks of each, are described in Item 8.

High net-liquidation-value configuration. The high net-liquidation-value configuration is available to advisory accounts of sufficient size that the account's strategic allocation supports separate, sleeved management of fixed-income and equity exposure within a single account. The high net-liquidation-value configuration is implemented through the same proprietary engine as the standard configuration, applied to two account-internal sleeves: a fixed-income sleeve managed for income optimization across a fixed-income exchange-traded fund universe with tax-aware adjustments derived from the client's documented tax profile (including federal and state marginal rates and any Alternative Minimum Tax exposure); and an equity sleeve managed under the same selection methodology used in the standard configuration. The sleeve allocation between fixed-income and equity is set at the account level pursuant to the client's documented Investment Policy Statement and is reviewed periodically. The same volatility-based defensive overlay applicable to the standard configuration applies to the equity sleeve. The volatility-responsive position-sizing adjustment described in Item 8 does not apply to this configuration.

The engine and its configurations are operated by AGG. Order generation, order routing, and order execution against the qualified custodian's trading interface are performed by the engine on a discretionary basis pursuant to the client's advisory agreement and Investment Policy Statement.

Manual override and Chief Investment Officer discretion. AGG personnel retain manual override capability and the ability to halt automated execution at any time. In addition, AGG's Chief Investment Officer exercises investment discretion over the engine's output on an ongoing basis: he may decline to enter positions the engine has selected, may retain positions the engine would exit, and may place trades in client accounts directly, independently of the automated process. Portfolio composition in an account managed under this service therefore reflects both the engine's output and the exercise of that discretion. See Items 8 and 16.

AGG receives fees pursuant to the asset-management fee schedule described in Item 5; the fee schedule is the same for both configurations. Methods of analysis, investment strategies, and material risks associated with the service are described in Item 8. The specific parameters, thresholds, model weights, lookback windows, security selection rules, position-sizing parameters, and source code of the engine are proprietary and confidential to AGG and are not disclosed in this brochure or in marketing materials.

Not all AGG advisory accounts are managed through the Automated Discretionary Management service. AGG also manages accounts on a discretionary basis outside the service, including accounts managed manually and accounts invested in short-duration U.S. Treasury or other cash-equivalent instruments. Accounts managed outside the service are not subject to the screening, defensive-positioning, or position-sizing processes described in Item 8.

Client-directed positions. An account, whether or not managed through the service, may hold a position in an individual security at the client's request rather than as a result of AGG's selection process. A position held on that basis is not selected, ranked, or monitored under the methodology described in Item 8; it is excluded from the service's automated sell logic and from the calculations used to size the account's other positions; and it is retained until the client withdraws the request. A client-directed position is not an AGG recommendation. Such a position may represent a significant portion of the account, may be inconsistent with the strategy otherwise applied to the account or with the account's stated objectives, and exposes the client to the risks of holding an individual security, including the risk of substantial or total loss. Clients should discuss any client-directed position with AGG before it is established and periodically thereafter.

Use of Artificial Intelligence Tools in AGG's Operations

AGG uses generative artificial intelligence ("AI") software tools, provided by a third-party vendor, to support its operations. AGG personnel use these tools to help write, test, and review the software AGG uses for financial planning and account administration; to check calculations in financial plans, advisory-fee billing, and account records; to prepare and maintain dated internal records; to draft and edit written materials, including financial plans, client letters, and marketing materials, in plain language; to assist in preparing

compliance reviews and compliance records; to help organize client documents for tax-return preparation; and, after AGG's Chief Investment Officer has approved a specific trade, to help prepare and enter that approved order with the qualified custodian and confirm its execution.

What AI tools do not do. AI tools do not exercise investment discretion and do not make investment decisions for client accounts. They do not select securities, set allocations, or decide whether or when to trade. No order is entered with the assistance of an AI tool unless the Chief Investment Officer has first approved it. AI tools do not communicate with clients on their own: AGG personnel review any client communication drafted with the assistance of an AI tool before it is sent, and clients who call or meet with AGG speak with AGG personnel.

Human review. AGG personnel review work prepared with the assistance of AI tools before it is used. Financial plans and client letters are reviewed before delivery, and compliance determinations are made and signed by AGG's Chief Compliance Officer. AI output is checked against source records, custodian data, or independent calculation where practicable. Human review reduces, but does not eliminate, the risk of error (see Item 8).

Relationship to the Automated Discretionary Management service. The Automated Discretionary Management service described above is deterministic and rules-based, and its engine does not use AI in its operation. AGG personnel use AI tools to help write and test the engine's software. Changes to that software are reviewed and approved by AGG personnel before they are deployed.

Client information. When AGG personnel use AI tools, client information needed for the task may be processed by the AI vendor. AGG treats the AI vendor as a service provider under its privacy policy and information-security program, uses the vendor's services under terms and settings under which the vendor does not use AGG's data to train its AI models, limits the client information used with AI tools to what the task requires, and uses abbreviated account identifiers in internal records where practicable. AGG reviews the AI vendor as part of its oversight of service providers.

Changes. AGG's use of AI tools may change over time. AGG will amend this brochure before using AI tools in making investment decisions for client accounts, and otherwise if its use of AI tools changes materially.

GrowthVector Aggressive Growth Strategy

Current status — strategy suspended. AGG is not currently offering the GrowthVector strategy. The strategy's selection engine and screening methodology are under redesign and are the subject of ongoing statistical evaluation. Pending completion of that work, AGG is not authorizing any new account for the strategy and is not generating new trade tickets under it. **No client account currently holds any position established under the strategy.**

The description below reflects the strategy as previously operated and is retained because AGG intends to resume offering it. If the redesign results in a material change to the

methodology described below, AGG will amend this brochure to describe the change before the strategy is offered again. The account-level authorization requirements in Item 16 remain in effect and continue to govern which accounts may participate if and when the strategy resumes.

GrowthVector is an AGG-managed strategy designed to operate alongside Automated Discretionary Management as a satellite/speculative sleeve within authorized advisory accounts. GrowthVector is a systematic, signal-driven aggressive-growth strategy that seeks capital appreciation through quantitatively scored selection of high-momentum exposures using:

- **U.S. equities** — large-capitalization and high-growth mid-capitalization U.S. equities meeting market-capitalization, average-daily-volume, options-availability, and operational-status pre-filters;
- **Commodity exchange-traded funds** — broad-commodity, precious-metals, and energy-sector ETFs. Leveraged and inverse ETFs are prohibited within the strategy; and
- **Equity options** — limited to defined-risk strategies only: long calls, long puts, bull call spreads, and bear put spreads. Naked or uncovered options positions are prohibited within the strategy at the firm level and are blocked at the code-enforcement layer of the firm's signal pipeline.

The strategy is operationalized as a weekly, internal trade-ticket process. AGG's signal pipeline produces internal trade tickets that are executed by the firm's Investment Adviser Representative through AGG's qualified custodian. The trade tickets are not client deliverables and are not distributed to clients. Clients receive disclosure of the strategy through this brochure and through the specific authorization recorded in their advisory agreement and Investment Policy Statement (see Item 16).

The strategy is suitable for advisory accounts where (i) the advisory agreement grants AGG full investment discretion; (ii) the Investment Policy Statement affirmatively authorizes aggressive-growth and, where applicable, options-inclusive strategies, with the account's options trading authority level documented; (iii) the account's documented objectives, time horizon, and risk tolerance align with the GrowthVector profile; and (iv) the account holds sufficient total assets such that the GrowthVector sleeve represents a satellite/speculative allocation that can be absorbed at full loss without material harm to the client's overall financial plan. The strategy is not a core holding strategy and is not appropriate for all clients.

AGG does not charge a separate fee or any performance-based fee for the strategy. The strategy is managed within the asset-management fee schedule described in Item 5. The specific parameters, thresholds, weights, and selection rules of the GrowthVector signal pipeline are proprietary and confidential to AGG and are not disclosed in this brochure or in marketing materials.

Publication of Investment Research

AGG publishes one weekly investment research publication, PulseSignal Weekly, distributed to subscribers via Substack at https://assetguidancegroup.substack.com.

The publication provides impersonal investment research and market commentary on a regular schedule. Content may include discussion of equity securities, equity exchange-traded funds (including ETFs providing indirect exposure to digital assets or commodities), and options strategies. The publication is prepared by AGG personnel as AGG research and is distributed to subscribers on the same terms, whether or not the subscriber is an AGG advisory client.

The publication is not personalized investment advice. Content does not take into account the individual financial situation, investment objectives, or risk tolerance of any subscriber. Subscribers should consult their own investment adviser before making investment decisions. AGG advisory clients who are also subscribers receive the same published content as other subscribers, without modification based on the advisory relationship.

Publication revenue accrues to AGG. The publication is a promotional communication for AGG's advisory services and is treated as an advertisement under AGG's Marketing Rule framework (see Item 14).

AGG previously published a second weekly research publication, RegimeSignal Weekly. That publication has been discontinued and AGG is no longer accepting subscriptions to it.

Seminars and Workshops

AGG holds seminars, webinars, and workshops to educate the public about different types of investments and AGG's service offerings. The seminars are educational; no specific investment or tax advice is provided. AGG may offer some seminars or webinars for a disclosed fee (see Item 5). AGG most frequently offers such programs through a 501(c)(3) non-profit organization, the Center for Holistic Education in Retirement Planning, Inc. ("CHERP"). When AGG offers programs through CHERP, only generic information is provided for educational purposes. Client-specific recommendations are reserved for AGG's office consultations, and no client-specific information is solicited or discussed during seminars.

Client-Tailored Services and Client-Imposed Restrictions

Each client's goals and objectives are documented in AGG's client files. Investment strategies reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. Restrictions must be provided to AGG in writing.

Advisory agreements may not be assigned without the client's written consent.

Wrap Fee Programs

AGG does not sponsor any wrap fee programs.

Client Assets Under Management

As of August 24, 2026, AGG's regulatory assets under management are approximately $15.1 million ($15,092,211.64), held across 58 funded securities-portfolio accounts, all managed on a discretionary basis. AGG maintains additional client accounts that are open but unfunded.

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

Financial Planning

Financial planning services are offered by subscription at $130 to $565 per month ($780 to $6,780 for the full subscription term). Although the full fee may be paid lump-sum at the client's option, AGG's standing practice is to offer four tiered-pricing subscriptions:

- **Foundations** — $130/month for six months (available to clients under age 35 with less than $25,000 in investable assets)
- **Essential** — $260/month
- **Family Retirement** — $315/month
- **Entrepreneur** — $565/month

Because financial analysis, investment planning, and retirement planning are front-loaded and because the monthly subscription rates are relatively low, all monthly subscription fees are earned upon receipt for the complete subscription term: six months for the Foundations tier and twelve months (one year) for all other tiers. Fees are due upon signing of the Strategic Planning and Investment Advisory Subscription Agreement. For retirement clients with less than $1,000,000 under AGG management, financial planning continues after the initial subscription term at no additional charge for as long as the client maintains an investment-management relationship with AGG. For retirement clients with $1,000,000 or more under AGG management, no separate financial planning fee is charged; planning is included in the asset-management fee described below.

Planning services by tier:

Foundations — For clients under age 35 with less than $25,000 in investable assets: values and vision; budget and cash flow; investment strategy.

Essential — values and vision; budget and cash flow; tax projections; investment strategy.

Family Retirement — Retirement planning; college education funding; Social Security maximization/optimization; insurance planning; investment strategy; estate planning; gifting strategies; tax return analysis, optimization, and (if requested) filing through AGG's back-office collaboration; access to legal and tax specialists; everything in the Essential tier.

Entrepreneur — Exit and succession planning; business continuation (buy/sell); cash flow and distribution planning; key-employee compensation; valuation; insurance audit; legal audit; asset protection strategies; retirement plan creation and/or overview; everything in the Family Retirement tier.

The financial planning subscription includes access to a secure client portal and a secure document repository for sharing confidential information.

A client may cancel within five business days of signing the Agreement with no obligation and without penalty. If the client cancels after five business days, any unearned fees are refunded. AGG reserves the right to waive the fee if the client implements the plan through AGG.

Services are completed and delivered in accordance with the systematic consulting process described in Item 4, contingent upon timely client delivery of required documentation.

Fees paid for financial planning do not obligate the client to move investment assets to AGG. The Strategic Planning and Investment Advisory Subscription Agreement specifically excludes any such obligation as a prerequisite to engaging AGG for financial planning. AGG generally charges separate fees for financial planning and investment management, which AGG believes supports unbiased advice consistent with its fiduciary obligations. For retirement clients, however, planning after the initial subscription term, and all planning for retirement clients with $1,000,000 or more under AGG management, is provided without a separate fee only while the client remains an AGG investment-management client. This links the client's planning and investment-management relationships and gives AGG an incentive to retain the client's assets under management. A client who ends investment management may continue financial planning under a new or amended agreement at the applicable subscription fee.

During the financial planning process, a client may be referred to Jarod W. Nichols, a licensed insurance agent acting in his individual capacity, for insurance products. Mr. Jarod Nichols may receive insurance commissions in that individual capacity, separate from and in addition to the fees charged under the Subscription Agreement; AGG receives no insurance commissions or other insurance-related compensation. This arrangement presents a conflict of interest because the individual agent has a financial incentive to recommend insurance products. AGG mitigates the conflict through disclosures, procedures, and its fiduciary obligation. The client is under no obligation to act on any recommendation and may effect any transaction through another firm or agent of the client's choosing.

Asset Management

AGG offers direct asset management services. AGG charges an annual, negotiable investment advisory fee not to exceed 2.0% based on total assets under management.

AGG's standard fee schedule is:

Assets Under Management	Annual Advisory Fee

Assets Under Management	Annual Advisory Fee
Up to $500,000	1.45%
Amount above $500,000	1.00%

The annual AUM fee is negotiable based on criteria including historical relationship, type of assets, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, and negotiation with the client.

AUM fees are billed monthly in arrears based on the average daily balance in the account during the billing period. The qualified custodian deducts fees from the client's account and pays AGG monthly following the close of the billing period. The client must consent in advance to direct debit of the client's investment account.

The asset-management fee schedule is the same fee schedule that applies to accounts managed under the Automated Discretionary Management service described in Item 4 (in either the standard or the high net-liquidation-value configuration) and to accounts using the GrowthVector strategy described in Item 4. AGG does not charge a separate fee for those services and does not charge any performance-based fee.

Clients may terminate their account within five business days of signing the Investment Advisory Agreement with no obligation and without penalty. Clients may terminate advisory services with thirty days' written notice. For accounts opened or closed mid-billing period, fees are prorated based on the portion of the billing period during which the account was under management. All billing is based on a 360-day year.

AGG gives clients thirty days' prior written notice of any fee increase. A fee increase will be acknowledged in writing by both parties before taking effect.

Lower fees for comparable services may be available from other sources.

Held-Away Assets

AGG provides an additional service for accounts not held in custody by AGG's custodians but over which AGG has discretion. AGG may leverage an Order Management System to implement tax-efficient asset location and opportunistic rebalancing strategies. These are primarily 401(k) accounts, Health Savings Accounts (HSAs), and other assets AGG does not custody. AGG reviews available investment options, monitors holdings, and rebalances and implements its strategies using the tools available in each account.

Participant Account Management (Discretionary). AGG uses a third-party platform to facilitate management of held-away assets such as defined-contribution plan participant accounts, on a discretionary basis. The platform allows AGG to avoid being considered to have custody of client funds because AGG does not have direct access to client log-in credentials to effect trades. AGG is not affiliated with the platform and receives no compensation from it. A link is provided to the client to connect the client's account to the platform. After connection, AGG reviews current allocations. When appropriate, AGG rebalances the account in view of the client's investment goals and risk tolerance,

considering economic and market trends. Held-away accounts are reviewed at least quarterly.

Held-away accounts are billed on the same fee schedule applicable to other client assets. Because fees cannot be directly debited from held-away accounts, fees are assigned to the client's taxable accounts on a pro-rata basis. If the client has no taxable account, fees are billed directly to the client. Accounts initiated or terminated during a billing period are pro-rated. An account may be terminated with fifteen days' written notice.

Research Publication (PulseSignal Weekly)

AGG publishes one weekly investment research publication for paid subscription as described in Item 4. Current subscription rates are published at https://assetguidancegroup.substack.com. Subscription payments are processed through the Substack platform and subscription revenue accrues to AGG.

Subscribers may cancel at any time in accordance with Substack's standard subscription terms. AGG does not refund partial billing periods.

Advisory clients and non-clients subscribe on the same terms. AGG advisory clients are not required to subscribe to the publication, and publication subscribers are not required to become advisory clients.

AGG's discontinued publication, RegimeSignal Weekly, is no longer accepting subscriptions and AGG no longer receives subscription revenue from it.

Seminars and Workshops

AGG holds seminars and workshops to educate the public. Seminars are educational; no specific investment or tax advice is given. AGG may charge $49 for certain seminars. More commonly, AGG offers educational programs through CHERP (see Item 4).

Client Payment of Fees

Investment management fees are billed monthly in arrears. AGG invoices clients through the qualified custodian following the close of each billing period. Fees are generally deducted from a designated client account. The client must consent in advance to direct debit of the client's investment account.

AGG, in its sole discretion, may charge a lesser investment advisory fee based on the criteria described above.

Additional Client Fees Charged

Qualified custodians may charge transaction fees on purchases or sales of certain mutual funds, bonds, equities, and exchange-traded funds. Charges may include mutual fund transaction fees, postage and handling, and miscellaneous fees.

For more on brokerage practices, see Item 12.

Prepayment of Client Fees

Investment management fees are billed in arrears, so no prepayment applies.

Financial planning fees are due upon signing the Strategic Planning and Investment Advisory Subscription Agreement. If a client cancels after five business days, any unearned fees are refunded, and any unpaid earned fees are due to AGG.

External Compensation for the Sale of Securities to Clients

Neither AGG nor any AGG investment adviser representative receives external compensation for the sale of securities, including Structured Notes, to clients.

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

AGG does not currently charge performance-based fees to any client. No AGG client is currently subject to a performance-based fee arrangement, and no performance-fee addendum is currently in place.

AGG may in the future offer performance-based fee arrangements to qualified clients as defined in Rule 205-3 under the Investment Advisers Act of 1940. By order issued April 28, 2026, the Securities and Exchange Commission has adjusted the Rule 205-3 dollar-amount thresholds for inflation. The adjusted thresholds become effective June 29, 2026 and apply to advisory contracts entered into on or after that date.

For advisory contracts entered into before June 29, 2026, a qualified client is a person who either (i) has at least $1,100,000 in assets under management with AGG immediately after entering into the advisory contract, or (ii) is reasonably believed by AGG, immediately prior to entering into the contract, to have a net worth in excess of $2,200,000 (excluding primary residence and related debt).

For advisory contracts entered into on or after June 29, 2026, a qualified client is a person who either (i) has at least $1,400,000 in assets under management with AGG immediately after entering into the advisory contract, or (ii) is reasonably believed by AGG, immediately prior to entering into the contract, to have a net worth in excess of $2,700,000 (excluding primary residence and related debt).

These thresholds are adjusted for inflation periodically by order of the Securities and Exchange Commission. Any future performance-based fee arrangement would be documented in a separately-executed written addendum, would be available only to qualified clients, and would be disclosed through an amendment to this brochure before being offered.

Because no performance-based fee arrangement is currently in place, side-by-side management of performance-fee and non-performance-fee accounts is not a current practice. If AGG begins offering performance-based fees in the future, this brochure will be

amended to describe the side-by-side management conflicts and AGG's mitigation procedures.

Item 7: Types of Clients

Description

AGG provides investment advice to individuals, high-net-worth individuals, and business entities. AGG's boutique focuses primarily on individuals and families, including those qualifying as accredited investors.

Client relationships vary in scope and length.

Account Minimums

AGG generally requires a minimum of $50,000 in assets under management for an account to be on the standard fee schedule, waivable at AGG's discretion. The minimum is most commonly waived for accounts opened by family members of existing AGG advisory clients, including adult children of clients.

Accounts that fall below $50,000 are accommodated either by (i) a flat rate of $50 per month, reflecting the additional per-account effort required to allocate smaller balances within individual-stock models consistent with the client's risk tolerance, or (ii) ETF-only allocation, which permits full investment without the flat-fee structure.

The $250,000 threshold referenced in Item 4 under Financial Planning applies only to clients who engaged AGG before October 27, 2026; it determined whether such a client was required to engage in Comprehensive Financial Planning alongside investment management. New retirement clients are subject to the planning requirement described in Item 4. Neither is a minimum to open an asset-management account.

The high net-liquidation-value configuration of the Automated Discretionary Management service described in Item 4 is available to advisory accounts of sufficient size that the account's strategic allocation supports separate, sleeved management of fixed-income and equity exposure within a single account. Eligibility for the high net-liquidation-value configuration is determined by AGG on a per-account basis based on the client's documented objectives, risk tolerance, and Investment Policy Statement.

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

Methods of Analysis

Security analysis methods include fundamental and technical analysis. Investing in securities involves risk of loss that clients should be prepared to bear. Past performance does not guarantee future results.

Fundamental analysis concentrates on the factors that determine a company's value and expected future earnings. This approach tends to encourage equity purchases in stocks that are undervalued. The risk: the market may fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market patterns and trends. The assumption: markets follow discernible patterns. The risk: markets do not always follow patterns, and reliance on technical methods alone may miss emerging patterns.

For financial planning, AGG's analysis may include cash-flow analysis, investment planning, risk management, tax planning, retirement and income planning, and estate planning. As part of these services, AGG may prepare illustrative projections and scenario analyses — including retirement-sufficiency, healthcare and long-term-care funding, Social Security timing, survivor-needs, and education-funding projections — using client-provided data and reasonable, disclosed assumptions. Such projections are hypothetical and illustrative, depend on assumptions that may not be realized, and are not guarantees of future results. A detailed strategy is tailored to the client's specific situation based on the information gathered.

Monte Carlo and Other Projection Analyses. In financial planning and portfolio analysis, AGG may use Monte Carlo simulation and other quantitative projection techniques to illustrate a range of potential outcomes. These analyses are hypothetical, rely on assumptions regarding returns, volatility, correlations, inflation, and other inputs that may not reflect actual future conditions, and do not guarantee any result. Projected outcomes are not a promise of future performance; actual results will differ and a client may incur loss. AGG documents the assumption set underlying each analysis and provides the governing assumptions on request. Where such a projection is used in connection with an offer of new or expanded advisory services, AGG treats the communication as an advertisement under its Marketing Rule framework (see Item 14).

Primary information sources include financial newspapers and magazines, third-party research, corporate rating services, annual reports, prospectuses, and SEC filings. AGG also develops, maintains, and operates proprietary quantitative models and automated trading systems that AGG uses both for internal research and to manage client portfolios.

Methods of Analysis — Automated Discretionary Management

The Automated Discretionary Management service described in Item 4 applies deterministic, rules-based screening, allocation, position-sizing, and order-routing logic operated through a single proprietary engine. The service does not use artificial

intelligence, machine learning, or other forms of self-tuning logic; all parameters and configurations are set and changed only through deliberate action by AGG personnel. The methods of analysis applied through the engine include:

Risk-adjusted equity screening. A factor-based screen applied to a U.S. large- and mid-capitalization equity universe (drawn from a published index, with documented instrument exclusions) supplemented by a smaller exchange-traded fund universe. The screen ranks candidates on trailing return measured relative to trailing volatility, evaluated across multiple time horizons rather than a single lookback period, and constructs the target book from the resulting ranking. Ranking on return per unit of volatility is intended to avoid rewarding a security that produced its return through large price swings; evaluating multiple horizons is intended to reduce the dependence of the screen on any one measurement window. Diversification limits are applied at the category level for correlated assets (for example, multiple bitcoin exchange-traded funds, multiple gold exchange-traded funds).

Fixed-income yield-and-regime allocation. A yield-based ranking framework applied to an investment-grade and high-yield fixed-income exchange-traded fund universe. For accounts with a documented tax profile, the framework includes a tax-equivalent yield calculation that converts municipal-bond yields to a comparable taxable-equivalent basis using the client's federal and applicable state marginal rates, and applies an Alternative Minimum Tax exclusion for clients flagged as subject to it. The framework also incorporates a regime overlay derived from yield-curve and credit-spread data sourced from public economic-data feeds. In stress regimes the eligible universe may be restricted and a portion of the allocation shifted toward short-duration U.S. Treasury exposures. The specific restrictions applied vary by regime and by the composition of the eligible universe at the time; where a category is already absent from the eligible universe, a restriction directed at that category has no effect. Clients should not assume that any particular category of holding will be reduced in any particular stress regime.

Volatility-based defensive overlay. A volatility input derived from a published market-volatility index is monitored on a regular intra-day cadence. When the input crosses a documented entry threshold, the engine rotates positioning into a pre-defined defensive allocation constructed from short-duration U.S. Treasury, investment-grade fixed-income, and broadly-diversified bond exchange-traded funds. A separate, more conservative allocation applies at a higher threshold of stress. The exit threshold is set below the entry threshold rather than at the same level, creating an intermediate band in which no regime change occurs in either direction, and exit is further gated by a minimum period in defensive positioning and by a fresh re-screen. This asymmetry is intended to reduce the frequency of repeated rotations into and out of defensive positioning, each of which incurs transaction costs and, in taxable accounts, realized gains. The engine's regime state is recorded as changed only where the corresponding rotation has actually completed.

Position-level exit monitoring. Open equity positions are monitored intra-day for individual exit conditions based on per-position momentum measurement; positions breaching the exit threshold are closed without waiting for the next weekly screening cycle.

Volatility-responsive position sizing. Security selection and position sizing are separate processes within the equity component of the service. The screen determines which securities the account will hold; a separate volatility-responsive adjustment determines what proportion of the account's equity allocation is deployed into them.

The adjustment measures the strategy's own recently realized volatility and compares it to the level of volatility the strategy is designed to deliver. Where recent realized volatility is elevated relative to that level, the adjustment proportionally reduces the size of every equity position and holds the undeployed remainder in cash.

The adjustment governs how much of an account is deployed. It is not an exit mechanism and is not the service's response to market stress. It is recalculated and applied at the periodic rebalance and does not act between rebalances. It sets the size at which positions are established; where an existing holding stands above the resulting target by more than the account's ordinary rebalancing tolerance, that holding is trimmed to the target and continues to be held at the smaller size. The adjustment does not liquidate the account's holdings, does not move an account to cash, and does not reduce deployment to zero. It never increases exposure above a fully invested position and never employs leverage. Rounding resolves toward less exposure rather than more. Where the volatility measurement is unavailable, the adjustment defaults to its most conservative setting rather than to full investment. Exposure is restored automatically, without human intervention, as measured volatility subsides.

Selection and sizing answer different questions, and the adjustment does not override selection. The screen determines whether a security merits a place in the portfolio. The adjustment does not revisit that determination, cannot remove a security the screen has selected, and does not substitute another security for it. Its function is to set how much capital is committed to a selection the screen has already made. A security may satisfy the selection criteria on its own merits and nonetheless be exposed to broader market conditions capable of overwhelming the circumstances on which the selection was based; committing full size into such conditions risks turning a sound selection into a poor entry. The adjustment therefore reduces the amount committed rather than declining the selection. It is bounded below for the same reason — so that it reduces the size of a position rather than negating the selection — and the account remains positioned in the securities the screen has identified, at a smaller size, for as long as those securities continue to qualify.

The position-level exit monitoring described above operates independently of this adjustment and on its own thresholds. A reduction in position sizing neither suspends nor delays the sale of a position that meets an exit condition. Reduced deployment is a statement about the size at which the strategy is willing to commit capital in prevailing conditions; it is not a statement that the strategy is holding positions it would otherwise sell.

Relationship to the other processes described above. Three distinct mechanisms operate at different levels and on different cadences: position-level exit monitoring closes an individual holding that meets its exit condition, checked several times each trading day; the defensive overlay changes the positioning of the whole account in response to market

stress, monitored intra-day; and the volatility-responsive adjustment calibrates deployment within ordinary market conditions, applied at the periodic rebalance. The adjustment and the defensive overlay are mutually exclusive by design: when the defensive overlay is engaged, the adjustment is not applied, and the two cannot act on the same cycle. A client should not read the adjustment as the service's protection against a market decline; that function belongs to the defensive overlay and to position-level exit monitoring.

The proportion of an account actually deployed also reflects the exercise of investment discretion described in Item 4 and Item 16, and may be lower than the volatility-responsive adjustment alone would produce. Clients in the equity component of the service should expect that during periods of elevated volatility a substantial portion of the account may be held in cash for extended periods.

Scope. This adjustment applies to the equity component of the standard configuration only. It does not apply to the equity sleeve of the high net-liquidation-value configuration, to accounts managed on an exchange-traded-fund-only basis, or to accounts managed on a fixed-income-only mandate, and no sizing decision made in one is transmitted to or applied within another. AGG evaluated applying the adjustment to the high net-liquidation-value configuration and determined, on the basis of measurement against those accounts' actual holdings, that it would call for no reduction in exposure; that determination is documented and will be revisited if the relevant mandates or measured volatility change materially.

The engine generates internal trade tickets pursuant to these methods and routes orders to AGG's qualified custodian on a discretionary basis. The trade tickets are not client deliverables and are not distributed to clients.

The engine is operated identically in both the standard and the high net-liquidation-value account-tier configurations described in Item 4, except as to the volatility-responsive position-sizing adjustment described above. In the high net-liquidation-value configuration, the same engine is applied to a fixed-income sleeve and an equity sleeve within a single account, sized in accordance with the client's documented Investment Policy Statement.

Confidentiality of proprietary parameters. The specific parameters, thresholds, model weights, lookback windows, security selection rules, position-sizing parameters, and source code of the Automated Discretionary Management engine are proprietary and confidential to AGG. AGG does not disclose this information in this brochure or in marketing materials. AGG maintains internal documentation of the engine's design, parameters, and configurations as part of the firm's books and records.

Methods of Analysis — GrowthVector

GrowthVector is not currently offered and no client account holds any position established under the strategy (see Item 4). The following describes the strategy as previously operated and is subject to change as a result of the redesign described in Item 4.

The GrowthVector strategy described in Item 4 employs a multi-component composite signal score combining: (i) a price-momentum component; (ii) an options-cost component derived from the implied-volatility rank of the underlying instrument; (iii) a technical-breakout component using the position of price relative to short- and intermediate-term moving averages and to a Bollinger-Band reference; (iv) an unusual-volume component using current volume relative to a 20-day average; and (v) a macro-regime component derived from the level of a published market-volatility index. The composite score is calculated weekly. No instrument is included in the strategy unless its composite score meets or exceeds a documented internal minimum threshold and the macro-environment conditions described under "Investment Strategy" below are satisfied.

The specific component weights, thresholds, and selection rules of the GrowthVector signal pipeline are proprietary and confidential to AGG and are not disclosed in this brochure or in marketing materials.

Investment Strategy

The investment strategy for a specific client is based on the objectives stated by the client during intake meetings, consultations, strategy sessions, and other communications with AGG. A client may change those objectives at any time by written notice. Each client completes a client profile or similar form documenting objectives and desired strategy.

Strategies may include long-term purchases, short-term purchases, trading, and option writing (covered options, naked options, or spread strategies). Investment instruments include equities, fixed income, mutual funds, exchange-traded funds (ETFs, including equity ETFs providing indirect exposure to digital assets or commodities), options, and cash equivalents.

Security-Specific Material Risks

All investment programs carry risks borne by the investor. Clients should discuss the following risks with AGG:

- **Market Risk.** Prices of securities held by mutual funds or ETFs in which clients invest may decline in response to world events, company-specific conditions, general economic conditions, market changes, political or social instability, and currency, interest-rate, or commodity-price fluctuations. Investors should have a long-term perspective and be able to tolerate sharp declines in market value.
- **Interest-Rate Risk.** Fluctuations in interest rates cause investment prices to fluctuate. When interest rates rise, yields on existing bonds become less attractive and their market values decline.
- **Inflation Risk.** When inflation is present, purchasing power erodes at the rate of inflation.
- **Currency Risk.** Overseas investments fluctuate against the dollar; also called exchange-rate risk.
- **Reinvestment Risk.** Future proceeds may have to be reinvested at lower rates of return, primarily in fixed income.

- **Liquidity Risk.** The ability to convert an investment to cash varies; standardized, widely-traded products are more liquid than, for example, real estate.
- **Management Risk.** The adviser's investment approach may fail to produce the intended results.
- **Equity Risk.** Equities tend to be more volatile than other investment choices. Small- and mid-cap companies carry additional risk — greater volatility, higher failure rates, more limited markets and product lines, less financial resources, less management experience, and lower trading volume.
- **Fixed Income Risk.** An issuer may not make interest and principal payments when due. Lower credit ratings imply greater default risk. Rising nominal interest rates generally reduce the value of existing fixed-income securities.
- **Investment Companies Risk.** Clients investing in open-end mutual funds or ETFs indirectly bear a pro-rata share of those funds' fees and expenses. Clients bear the risks of the underlying funds' investment practices, including derivatives. ETFs carry additional risks including premium/discount to net asset value, halts in trading, delisting, and circuit-breaker activations.
- **Digital-Asset ETF Exposure Risk.** ETFs providing indirect exposure to digital assets (for example, spot bitcoin or ether ETFs) carry all the risks of equity ETFs plus the price volatility of the underlying digital asset. Digital-asset prices are highly volatile, subject to regulatory change, cybersecurity threats affecting custody at the fund level, and liquidity conditions in the underlying markets. Investors should expect significantly higher short-term volatility than for traditional equity ETFs.
- **REIT Risk.** REITs are subject to risks of real estate ownership (declines in real-estate value, local economic conditions, mortgage availability, interest-rate changes, environmental issues), plus structure-specific risks (management dependency, limited diversification, financing risk, cash-flow dependency, borrower default, self-liquidation costs, exemption-maintenance risk, and small market cap with associated liquidity concerns).
- **Long-Term Purchase Risk.** Investments held more than one year are subject to volatility in the financial markets.
- **Short-Term Purchase Risk.** Investments held for one year or less may be subject to purchasing-power risk — returns may not keep up with inflation.
- **Structured Notes (SNs).** SNs are offered by large commercial banks (for example, Bank of Montreal, Barclays, JPMorgan Chase, and Citi). SNs are typically sold in $1,000 units, linked to an "Underlier" to measure performance, may be FDIC-insured, offer partial downside protection using "Buffers," have a stated term (for example, 6 or 18 months), may include call features, and come in two general types (accumulation/growth or income).

SNs use the following Buffer structures:

- **Hard Buffer.** Absorbs a fixed percentage of the Underlier's loss; beyond that point, losses are one-for-one with the market. Generally more conservative than Geared Buffers or Barriers.

- **Geared Buffer.** Absorbs a fixed percentage of the Underlier's decline; beyond that point, losses are leveraged (more than one-for-one). Riskier than a Hard Buffer with the same buffer amount because investors may lose full principal in a steep downturn at maturity.
- **Deleveraged Buffer.** Absorbs a certain percentage of losses; investors take losses at a rate less than one-for-one with losses in the Underlier.
- **Barrier.** Absorbs a fixed percentage of the Underlier's decline; if the Underlier declines beyond a specified level, the protection disappears and losses are one-for-one from the Underlier's initial level. Barriers may be observed continuously, daily, or at maturity. Generally the riskiest type of Buffer.

Additional SN concepts:

- **Observation Date** — the date on which the Underlier is measured to determine whether the Buffer has been triggered. Generally the Initial Trade Date.
- **Underlier** — the reference asset or index to which the SN is linked (equities, commodities, interest rates, currencies).
- **Market-Linked CD** — SN structure in which principal is FDIC-insured up to applicable limits in the event of Issuer default. Potential to earn more than traditional fixed-rate CDs, but the investor foregoes traditional CD interest.

SNs carry the risk of 100% loss of principal when using a Barrier that disappears after the Underlier moves below the stated level. **Example.** Stated Barrier: 35%. Client buys one $1,000 SN. Underlier initial value: 100%. Underlier falls 34% — principal is still worth $1,000. Underlier then falls an additional 2% (total 36% below initial) — Barrier disappears, principal is now worth $640 (current percentage loss of the Underlier). Client is repaid the SN's value at maturity relative to the Underlier's performance at maturity (for example, a 90% recovery returns $900; full recovery returns $1,000).

- **Trading Risk.** Investing involves risk, including possible loss of principal. No investment objective is assured.
- **Options Trading.** Options are time-sensitive. A contract typically lasts a few months. An options buyer may lose the entire investment even with a correct directional prediction if the price change does not occur in time. Options are "book-entry only" investments without paper certificates of ownership.
- **Private Equity / Placement Risk.** Exempt offerings have not been reviewed by a regulator to confirm the adequacy of risk disclosure. Private placement securities are generally illiquid, with limited resale opportunities. Risks may be significantly higher than publicly-traded investments.

Risks Associated with the Automated Discretionary Management Service

The Automated Discretionary Management service described in Items 4 and 8 carries risks beyond the security-specific risks identified above. Clients in advisory accounts where the service is employed should consider the following additional risks, in addition to the Market Risk, Equity Risk, Fixed Income Risk, Investment Companies Risk, Digital-Asset ETF

Exposure Risk (where applicable), Long-Term Purchase Risk, and Short-Term Purchase Risk disclosures above:

- **Quantitative model risk.** The service is rules-based and signal-driven. The screening factors, allocation framework, and defensive overlay reflect historical and current market data and may fail to anticipate regime changes, structural market shifts, or company- or sector-specific events. A factor or rule that performed well historically may underperform in any given period, including extended periods. AGG re-evaluates the design, components, and thresholds of the service at least annually; any changes are made through deliberate code modifications by AGG personnel under internal change-management procedures.

- **Reduced-participation and cash-drag risk.** The volatility-responsive position sizing described above deliberately reduces market exposure during periods of elevated volatility. Sharp market recoveries frequently begin while volatility remains elevated. An account subject to the adjustment will therefore participate only partially in such a recovery and will underperform a fully invested portfolio in that circumstance. This is an intended consequence of the design, not a malfunction: the strategy gives up participation in volatile advances in exchange for reduced exposure to large declines. It is a real cost and it is not free.

  Cash held as a result of the adjustment, or as a result of the exercise of investment discretion described in Item 16, is not currently swept into a yield-bearing instrument in all cases. **Clients should not assume that uninvested cash in an account earns a money-market or comparable rate.**

  The adjustment relies on recently observed historical volatility as an estimate of near-term volatility. Historical volatility is not a reliable predictor of future volatility or of loss. The adjustment is recalculated at the periodic rebalance and does not respond to conditions arising between rebalances; deployment set at one rebalance remains in effect until the next regardless of intervening market movement. The adjustment may reduce deployment after a decline has already occurred and may restore it before volatility has fully subsided. It is designed to moderate the depth of drawdowns; it cannot prevent losses and may itself detract from returns.

- **Concentration and breadth risk.** The equity component of the service may, in low-signal regimes, hold a smaller number of positions than in normal regimes, with the remainder of the equity allocation parked in short-duration fixed-income exposures. The service is not designed to maintain a fixed minimum number of positions in all market environments. The fixed-income component of the service may, when stress-regime restrictions or yield-comparison rules are triggered, concentrate exposure within a narrower subset of the eligible universe (for example, in high-yield and floating-rate instruments rather than across high-yield, floating-rate, and municipal exposures). Concentration in any of these forms is part of the design; clients should be prepared to bear the resulting drawdown profile.

Separately, the number of positions actually held may be lower than the number the screen has selected, where AGG has declined to enter one or more selected positions in the exercise of its investment discretion. Weight not deployed as a result is held in cash and is not redistributed among the remaining holdings. The combined effect of volatility-responsive sizing and the exercise of discretion may leave a materially larger proportion of an account in cash than either would produce alone.

- **Defensive-overlay timing risk.** The volatility-based defensive overlay can produce two distinct timing-related risks. First, the overlay may rotate accounts into defensive positioning shortly before a market recovery, causing the account to miss part of the recovery move; and confirmation requirements before re-entry from defensive positioning may delay re-exposure to recovering markets. Second, the overlay may fail to engage in time to avoid a sharp drawdown that resolves before the next regular monitoring run. Whipsaws — back-to-back rotations into and out of defensive positioning over short windows — are a possible result of the overlay's design.

- **Fixed-income regime-detection risk.** The fixed-income component of the service classifies the prevailing macro regime using yield-curve and credit-spread inputs sourced from public economic-data feeds. The classification mechanism is distinct from the volatility-based defensive overlay described above and is operated independently of it. The classification can mistime a regime transition, misclassify the current regime, or fail to detect a transition altogether. A delayed classification can leave fixed-income positions exposed to a stress regime longer than the model would have preferred; an early or false-positive classification can move positions into a stress allocation that does not materialize. The regime model is deterministic and based on historical statistical patterns; it is not predictive of future regime durations or transitions. Re-classification is gated by documented persistence and confirmation conditions intended to reduce whipsaw risk but does not eliminate it.

- **Technology and operational risk.** The service operates on cloud-hosted virtual-machine infrastructure that connects to the qualified custodian's trading interface through the custodian's published programming interface. The service depends on the continuous availability of the cloud provider, the custodian's interface, internet connectivity, and the third-party data feeds used to generate signals and price information. Hardware or network failures, custodian-side outages or maintenance windows, data-feed errors or delays, authentication failures, and other operational disruptions are risks inherent to any automated, cloud-based trading system regardless of the broker or platform used. AGG implements monitoring, watchdog services, retry logic, multi-source data fallbacks, and alerting designed to mitigate these risks but cannot eliminate them. AGG takes every measure practicable under the circumstances to maintain the availability and integrity of automated execution, including a monitoring cadence designed to identify and respond to such disruptions promptly. During an outage, account positioning may not reflect the most current screening output, and the defensive overlay may not engage on its

normal cadence; AGG retains manual override capability to reach the qualified custodian's trading interface directly during such windows.

Certain automated controls are designed to fail toward the conservative outcome rather than toward continued full exposure. In particular, where the data feed supporting volatility-responsive position sizing is unavailable, the adjustment defaults to its most conservative setting. **A data-feed interruption can therefore reduce an account's market exposure in the absence of any market event.** AGG regards this as the appropriate failure direction, and clients should understand that exposure may change for operational rather than market reasons.

- **Execution risk.** Order generation and routing are automated. Most orders are placed as market orders during regular market hours. In illiquid market conditions, around major news events, or during periods of extreme volatility, market orders may execute at prices materially different from the most recent quote. Pre-trade buying-power checks, trim-sell rebalancing, and deferred order catch-up are designed to mitigate execution issues but do not eliminate them.

- **Data-source risk.** The service depends on third-party market data, economic data, and yield data. Data outages, errors, or revisions could result in screening or allocation decisions different from what fully accurate data would have produced. Multi-source fallbacks reduce, but do not eliminate, this risk.

- **Key-person and parameter-change risk.** The service's parameters and configurations are established, reviewed, and changed by AGG's Chief Investment Officer under the firm's internal change-management procedures. The unavailability of the Chief Investment Officer for an extended period could delay scheduled parameter reviews or reactive changes that the firm might otherwise make. Succession planning and the firm's overall governance are addressed in AGG's compliance program.

Risks Associated with the GrowthVector Strategy

GrowthVector is not currently offered (see Item 4). The following risks applied to the strategy as previously operated and will be reviewed, and amended if necessary, before the strategy is offered again.

The GrowthVector strategy described in Items 4 and 8 carries risks beyond the security-specific risks identified above. Clients in advisory accounts where the strategy is employed should consider the following additional risks, in addition to the Market Risk, Equity Risk, Investment Companies Risk, Options Trading risk, Long-Term Purchase Risk, and Short-Term Purchase Risk disclosures above:

- **Aggressive-growth orientation; potential for full loss.** The strategy is designed for satellite/speculative allocation only. Any client allocation to the strategy may be lost in full. A client should be in a financial position to absorb a complete loss of the sleeve without material harm to their overall financial plan.

- **Quantitative model risk.** The strategy is signal-driven. Signal components reflect historical and current market data and may fail to anticipate regime changes, structural market shifts, or company-specific events. A signal that performed well historically may underperform in any given period, including extended periods. AGG re-evaluates the strategy's design, components, and thresholds at least annually; component weights and thresholds are subject to revision with CCO approval.
- **Concentration risk.** The strategy may select a small number of positions in any given week. The sleeve is therefore more concentrated than a broadly diversified core allocation and is more sensitive to single-name, single-sector, and single-factor outcomes. Concentration is constrained by the firm's position-sizing tiers and maximum-simultaneous-positions limit, but the sleeve is by design a concentrated allocation.
- **Defined-risk options time-decay risk.** Long options and debit spreads carry the risk of complete loss of premium paid. Options positions held to or near expiration without a favorable underlying move may expire worthless. The strategy's exit rules — including profit-target, stop-loss, and pre-expiration management thresholds — mitigate but do not eliminate this risk.
- **Macro defensive override risk.** When the macro defensive override is in effect, the strategy declines to enter new positions. If markets recover during such a period, the strategy may miss the recovery move entirely. Conversely, the strategy may enter positions immediately ahead of an unanticipated volatility event and may incur losses on those positions before the override engages on the next signal run.
- **Manual execution risk.** GrowthVector trade tickets are executed manually by the firm's Investment Adviser Representative through the qualified custodian. Manual execution introduces the possibility of timing variance, partial fills, missed fills, and operational error. AGG uses limit orders and disciplined order-entry timing to mitigate execution-quality risk but does not eliminate it.
- **Signal-cadence risk.** The strategy generates signals weekly. Conditions in any individual security, sector, or in the broader market may change materially between signal runs. The strategy does not respond intraday to such changes other than through the documented stop-loss and exit rules.
- **Internal-execution model and personal-trading control.** Personal accounts of AGG's principals participate in GrowthVector executions on the same terms as participating client accounts, executed simultaneously through the qualified custodian's account-group/financial-advisor allocation framework. This control is designed so that client accounts receive trading priority equal to that of personal accounts and to eliminate the opportunity for personal trading ahead of client orders within the strategy. The firm's Code of Ethics framework described in Item 11 — including Rule 204A-1 holdings and transaction reporting, pre-clearance where applicable, access-person designations, and quarterly Chief Compliance Officer review — applies to GrowthVector-eligible instruments. See Item 11 for the firm's general analysis of signal-publication and personal-trading risk; the GrowthVector strategy is not a publication and the simultaneous-execution control governs personal trading by principals within the strategy.

Risks Associated with Financial Planning

- **Risk of Loss.**
- The client fails to follow AGG's recommendations and sustains a loss.
- The client follows AGG's recommendations and sustains a loss.
- The client's financial status or lifestyle changes and the plan recommendations are no longer valid.

Risks Associated with Publication Subscriptions

- **Risk of Reliance Without Professional Consultation.** Content in AGG's research publication is general in nature and does not take into account the individual financial situation, investment objectives, or risk tolerance of any subscriber. A subscriber acting on published content without consulting a personal investment adviser may make decisions unsuited to the subscriber's circumstances.
- **Hypothetical and Backtested Content Risk.** Where the publication references past signal performance, backtested results, or hypothetical "if you had followed" outcomes, such content is hypothetical in nature, reflects assumptions about trading conditions that may not be achievable in practice, and does not guarantee future outcomes. Past performance is not indicative of future results.

Risks Associated with AI-Assisted Operations

AGG's use of AI tools in its operations, described in Item 4, carries the following risks:

- **Accuracy risk.** AI tools can produce output that is inaccurate, incomplete, or out of date, and can present errors with confidence. AGG's review may not catch every error. An error in a calculation, record, document, or software change could affect a financial plan, a fee calculation, an account record, or the operation of AGG's software until it is identified and corrected. Because the same tools are used across AGG's work, a recurring error may affect more than one document or account before it is detected.
- **Vendor and availability risk.** AGG relies on a third-party vendor for its AI tools. An outage, a change in the vendor's service or terms, or the discontinuation of the service could delay AGG's work. AGG personnel can perform these functions without AI tools, although more slowly.
- **Data privacy and security risk.** Client information used with AI tools is transmitted to and processed on the vendor's systems and is subject to the vendor's security controls as well as AGG's. A security incident at the vendor or at AGG could expose client information. See "Client information" in Item 4.
- **Reliance risk.** AGG's operations depend in part on AI tools for capacity. AGG's controls are designed so that AI tools support, but do not replace, the judgment of AGG personnel. AI tools do not make investment decisions and cannot promise any result.

Item 9: Disciplinary Information

Criminal or Civil Actions

None. Neither AGG nor its management has been involved in any criminal or civil action.

Administrative Enforcement Proceedings

None. Neither AGG nor its management has been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

None. Neither AGG nor its management has been involved in legal or disciplinary events material to a client's or prospective client's evaluation of AGG or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

No affiliated representative of AGG is a registered representative of a broker-dealer.

Futures or Commodity Registration

Neither AGG nor its affiliated representatives is registered — or has an application pending to register — as a futures commission merchant, commodity pool operator, or commodity trading adviser.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Clients are not required to use affiliated services; all AGG recommendations are made consistent with AGG's fiduciary duty.

- **Insurance — Wallace R. Nichols.** Wallace R. Nichols is no longer a licensed insurance agent. Approximately 0% of Mr. Nichols's current time is spent on insurance activities.
- **Insurance — Jarod W. Nichols.** Jarod W. Nichols is a licensed insurance agent and sells insurance products and services in his individual capacity, as a separate outside business activity. AGG receives no insurance commissions or other insurance-related compensation. Approximately 15% of Mr. Jarod Nichols's time is spent on insurance activities. Clients may be referred to Mr. Jarod Nichols, in his individual capacity, for insurance services when appropriate.

- **Legal services.** Wallace R. Nichols is a licensed attorney. He no longer maintains a separate law practice; WR Nichols Law, LLC has been dissolved. Mr. Nichols continues to provide estate-planning legal services to AGG advisory clients in connection with the firm's wealth-transfer and estate-planning advice, and serves as in-house legal counsel to AGG. Approximately 0.5% of Mr. Nichols's time is spent on these legal-services activities.
- **Tax preparation.** Wallace R. Nichols prepares taxes for select clients in conjunction with financial planning services. Approximately 7% of Mr. Nichols's time is spent on tax preparation.
- **CHERP — 501(c)(3).** Wallace R. Nichols serves as Chief Financial Officer and Secretary of the Center for Holistic Education in Retirement Planning, Inc. ("CHERP"), a 501(c)(3) non-profit dedicated to adult financial literacy. CHERP's mission is to promote unbiased, current educational presentations, workbooks, and other training materials aimed at adults approaching retirement (ages 50–75) in all areas of financial planning. The IRS has recognized CHERP as a 509(a)(2) public charity exempt from federal income tax under IRC § 501(c)(3). Approximately 0.5% of Mr. Nichols's time is spent on CHERP activities.
- **CHERP — Jarod W. Nichols.** Jarod W. Nichols serves as Chief Executive Officer and Chief Operating Officer of CHERP. Approximately 10% to 15% of Mr. Jarod Nichols's time is spent on CHERP activities.

These outside activities represent conflicts of interest because they may create incentives to recommend products based on compensation received. AGG receives no insurance commissions or other insurance-related compensation. AGG mitigates these conflicts through disclosures, procedures, and the firm's fiduciary obligation to place the client's best interest first. Clients are not required to purchase any product or service through AGG and may engage another insurance agent, attorney, tax preparer, or other professional of their choosing.

Recommendations or Selections of Other Investment Advisers

AGG does not currently recommend or select other investment advisers for its clients and does not currently maintain referral arrangements with third-party investment advisers. AGG may reintroduce such arrangements in the future and will amend this brochure accordingly if it does.

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

Code of Ethics Description

The affiliated persons of AGG (including employees and independent contractors) are subject to a written Code of Ethics (the "Code"). The Code sets forth standards of conduct

for AGG affiliated persons, addresses conflicts that may arise, and reflects AGG's responsibility to act in the best interest of its clients.

The Code is foundational on two pillars: (i) the CFP Board's Code of Ethics and Standards of Conduct, applicable to the CFP® professionals at AGG, and (ii) Rule 204A-1 under the Investment Advisers Act of 1940, the federal Code-of-Ethics rule for investment advisers. AGG has voluntarily adopted Rule 204A-1 standards in full even while state-registered.

One area the Code addresses is personal securities trading by affiliated persons and the potential conflict with client interests. AGG does not allow any affiliated person to use material non-public information for personal profit or to use AGG's internal research for personal benefit in conflict with client interests.

AGG's policy prohibits any person from acting upon or otherwise misusing material non-public information. No advisory representative or other employee, officer, or director of AGG may recommend any transaction in a security or its derivative to clients, or engage in personal securities transactions in a security or its derivative, if the person possesses material non-public information regarding the security.

AGG's Code rests on the principle that client interests are AGG's top priority. AGG's officers, directors, advisers, and affiliated persons have a fiduciary duty to clients and must diligently perform that duty to maintain client trust and confidence. When a conflict arises, AGG is obligated to place client interests ahead of firm or personal interests.

The Code applies to "access persons" — affiliated persons who (i) have access to non-public information regarding client purchases or sales of securities or non-public information regarding portfolio holdings of any reportable fund, (ii) are involved in making securities recommendations to clients, or (iii) have access to such non-public recommendations. Access persons file initial and annual holdings reports and quarterly transaction reports, and the Chief Compliance Officer reviews these filings.

AGG will provide a copy of the Code of Ethics to any client or prospective client upon request.

Signal Publication and Personal Trading

AGG publishes signal-based investment research to the public through PulseSignal Weekly, distributed via Substack. The Chief Investment Officer selects the signal outputs. The analysis below applied equally to RegimeSignal Weekly while that publication was active.

Firm position on client front-running. Client assets under management are predominantly retirement assets allocated to risk-averse strategies. The securities identified by the firm's published signals are generally risk-on candidates. The client AUM universe and the signal universe do not materially overlap. Client front-running — personal trading ahead of client orders in the same securities — is not a live risk at AGG given the composition of client portfolios. AGG confirms this policy finding as part of each annual compliance review by reconciling the signal universe against the actual composition of client portfolios during the review period.

Signal publication workflow. PulseSignal Weekly outputs are generated by automated screener runs during pre-market hours on Monday and published to subscribers via an automated publication job during the same pre-market window — before U.S. equity and equity-options markets open. Because markets are closed during the interval between screener output and publication, neither supervised persons of AGG nor subscribers have any opportunity to trade named securities during that interval. At the regular market open following publication, the signal is available to every subscriber simultaneously, and supervised persons may trade on the same terms as any other subscriber. AGG's personal-account trading volume is not of a magnitude that could materially affect the market price of any signal-named security.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

AGG and its affiliated persons do not recommend to clients securities in which AGG has a material financial interest.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

AGG and its affiliated persons may buy or sell securities also held by clients. To mitigate conflicts of interest — including trading ahead of client transactions — affiliated persons disclose all reportable securities transactions and provide AGG with copies of their brokerage statements.

The Chief Compliance Officer of AGG is Wallace R. Nichols. He reviews all affiliated-person trades each quarter. Personal-trading reviews are designed to confirm that affiliated-person trading does not disadvantage clients and that clients receive preferential execution over affiliated persons' transactions.

Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

AGG does not maintain a firm proprietary trading account and does not have a material financial interest in any recommended securities. Affiliated persons are required to disclose all reportable securities transactions and provide AGG with copies of their brokerage statements. The CCO reviews these each quarter.

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

AGG may recommend a particular broker-dealer or may utilize a broker-dealer of the client's choosing. AGG selects appropriate brokers based on factors including relatively low

transaction fees and reporting capability. AGG relies on its broker to provide execution services at the best prices available. Lower fees for comparable services may be available elsewhere. Clients pay any and all custodial fees in addition to AGG's advisory fee.

AGG's qualified custodian for client assets is Interactive Brokers, LLC. The custodian meets SEC safekeeping rules; AGG monitors for best execution.

Directed Brokerage. When a client directs AGG to use a specific broker-dealer, AGG continues to owe a fiduciary duty to the client. Directed brokerage may limit AGG's ability to negotiate commissions, obtain volume discounts, or equalize commission charges across clients, and may create conflicts of interest arising from brokerage-firm referrals.

Best Execution. Investment advisers who manage or supervise client portfolios have a fiduciary obligation of best execution. The determination of best execution and price is multi-factor and at least partly subjective. Factors include overall direct net economic result, the efficiency with which the transaction is effected, the ability to effect large-block transactions, the broker-dealer's operational facilities, the value of an ongoing broker relationship, and the broker's financial strength and stability. AGG does not receive any portion of trading fees.

Soft Dollar Arrangements. AGG does not participate in any soft-dollar arrangement. AGG does not direct client transactions to any broker-dealer in exchange for research or other products or services, and receives no research or other economic benefit from any broker-dealer in consideration of client order flow. Any market commentary or analyst material made generally available to accountholders by AGG's qualified custodian is available on the same terms to every accountholder of that custodian, is not obtained in exchange for directed transactions, and is not a factor in AGG's selection of a custodian.

AGG uses custodial broker-dealers. Services received from the qualified custodian in the ordinary course include a dedicated trading desk, a dedicated service group, account-services support dedicated to AGG's accounts, the ability to conduct block client trades, electronic download of trades, balances, and positions, duplicate and batched client statements, and the ability to deduct advisory fees directly from client accounts.

Aggregating Securities Transactions for Client Accounts

AGG is authorized, in its discretion, to aggregate purchases, sales, and other transactions for one client's account with those of other AGG clients. All clients participating in an aggregated order receive the average share price; transaction costs are shared on a pro-rata basis.

Item 13: Review of Accounts

Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

Account reviews are performed at least quarterly by the Chief Compliance Officer. Reviews are performed more frequently when market conditions warrant.

Financial plans for retirement clients are updated as part of the ongoing planning relationship described in Item 4, when the client's circumstances change and as the client requests. Other financial plans are updated as requested by the client and pursuant to a new or amended agreement. AGG suggests updating at least annually.

Review of Client Accounts on Non-Periodic Basis

Other conditions that may trigger a review include changes in tax law, new investment information, and changes in a client's own situation.

Content of Client Provided Reports and Frequency

Clients receive written account statements at least quarterly for managed accounts, issued by AGG's qualified custodian. Clients receive confirmations of each transaction and an additional monthly statement during any month in which a transaction occurs.

Item 14: Client Referrals and Other Compensation

AGG's Marketing Rule Framework

AGG applies the standards of SEC Rule 206(4)-1 (the "Marketing Rule") as the firm's framework for referral arrangements, testimonials, endorsements, third-party ratings, and other advertising communications. Georgia rule 590-4-4-.19(15), adopted under O.C.G.A. § 10-5-51, provides that an investment adviser in Georgia shall not publish, circulate, or distribute any advertisement that does not comply with Rule 206(4)-1 under the Investment Advisers Act of 1940. The Marketing Rule standards are accordingly applicable to AGG through Georgia law. Where a state rule is stricter than the Marketing Rule in a state where AGG is registered or notice filed, AGG complies with the stricter rule.

Under the Marketing Rule framework, referral arrangements — historically described as "solicitor" arrangements — are described below in terms of "promoters" (which includes both testimonial-givers and endorsement-givers).

AGG's research publication, PulseSignal Weekly, is treated as an advertisement under the Marketing Rule because it promotes AGG's advisory services, directly or indirectly, to persons who may or may not be clients. Accordingly, publication content is subject to the Marketing Rule's general prohibitions and substantiation requirements, and any historical-

performance, backtested, or hypothetical "if you had followed" content is subject to the Rule's hypothetical-performance conditions. AGG applied the same treatment to RegimeSignal Weekly while that publication was active and retains records of its content in accordance with the firm's books-and-records obligations.

Advisory Firm Payments for Client Referrals — Promoter Arrangements

AGG may enter into written promoter arrangements with individuals or organizations — whether or not affiliated with AGG — that refer clients to AGG in exchange for cash or non-cash compensation. All such arrangements comply with applicable federal and state laws and with the Marketing Rule's promoter requirements, including:

- **Written agreement.** Each promoter compensated in an amount more than de minimis (as defined by the Marketing Rule) enters into a written agreement with AGG describing the scope of activities and compensation.
- **Disclosures.** Each client referred by a compensated promoter receives clear and prominent disclosure of (i) that the promoter is a client or a non-client (as applicable); (ii) whether cash or non-cash compensation was paid; (iii) material terms of the compensation; and (iv) any material conflict of interest arising from the compensation.
- **Oversight.** AGG maintains reasonable oversight of its promoters to confirm compliance with the Marketing Rule and the firm's policies.
- **Ineligibility.** AGG does not enter into promoter arrangements with persons subject to disqualifying events under the Marketing Rule.

Each prospective client referred to AGG under a promoter arrangement receives a copy of this brochure and a separate written disclosure document describing the nature of the relationship and the compensation paid or to be paid. Compensation is paid from AGG's advisory fee and is not an additional charge to the client.

Testimonials, Endorsements, and Third-Party Ratings

To the extent AGG uses testimonials (statements by clients) or endorsements (statements by non-clients), AGG complies with the Marketing Rule's conditions, including the written-agreement, disclosure, oversight, and ineligibility requirements above. AGG does not use third-party ratings unless each rating's methodology, period, sponsorship, and any compensation paid are disclosed as required by the Marketing Rule.

Item 15: Custody

Account Statements

All client assets are held at qualified custodians. Qualified custodians provide account statements directly to clients at their address of record at least quarterly. Clients are urged

to compare the account statements they receive directly from their qualified custodians to any documentation or reports prepared by AGG.

AGG does not maintain custody of client funds or securities. AGG does not take physical possession of client assets, does not hold client log-in credentials for any custodial account, does not manage pooled investment vehicles, and does not hold client digital assets. Advisory fees are calculated by AGG and deducted from client accounts by the qualified custodian pursuant to each client's written authorization in the advisory agreement; client statements from the qualified custodian reflect each fee deduction.

Item 16: Investment Discretion

Discretionary Authority for Trading

AGG may require discretionary authority to manage securities accounts on behalf of clients. AGG has authority to determine, without obtaining specific client consent on each trade, the securities to be bought or sold and the amount of each. If applicable, the client grants AGG discretionary authority to execute selected investment-program transactions in the Investment Advisory Agreement.

Clients may place restrictions on AGG's discretion, as outlined in the client's Investment Policy Statement or similar document. Such restrictions could include limitations to socially-conscious investments. Restrictions must be provided to AGG in writing.

The client approves the qualified custodian to be used and the commission rates paid. AGG does not receive any portion of transaction fees or commissions paid by the client to the custodian.

Discretion Over Automated Output

Where an account is managed through the Automated Discretionary Management service described in Item 4, the discretionary authority granted to AGG extends to the exercise of judgment over the automated engine's output. AGG may decline to enter one or more positions the engine has selected; may retain a position the engine's rules would otherwise close, including for tax-related reasons; may honor a client's written request that a named position not be sold, in which case that position is excluded from the automated sell logic and from allocation calculations while the request remains in effect; and may place trades in the account directly, independently of the automated process.

Weight not deployed as a result of any of the foregoing is generally held in cash rather than redistributed among remaining holdings. Portfolio composition and the proportion of an account deployed therefore reflect both the automated engine's output and the exercise of AGG's investment discretion, and results are dependent in part on AGG's judgment rather than on the automated process alone.

A position retained under this authority is exempt from the automated exit logic for so long as it is retained and is reviewed manually rather than automatically.

Clients may place written restrictions on AGG's discretion as described above.

GrowthVector Account-Level Authorization

GrowthVector is not currently offered (see Item 4). The following requirements remain in effect and will govern authorizations if and when the strategy is offered again.

Use of the GrowthVector strategy described in Items 4 and 8 requires affirmative account-by-account authorization beyond the general grant of investment discretion in the advisory agreement. For each client account considered for the strategy, AGG documents the following before any GrowthVector activity occurs in the account:

- The account's Investment Policy Statement affirmatively authorizes aggressive-growth strategies and, where applicable, options-inclusive strategies;
- The options trading authority level for the account (Level 1, Level 2, Level 3, Level 4, or equity-only), determined consistent with the account's documented objectives, time horizon, and risk tolerance. AGG applies an internal firm-level cap that restricts GrowthVector options activity to defined-risk strategies regardless of the account's nominal options authority level;
- The proportion of the account's total assets allocated to the GrowthVector sleeve, consistent with the satellite/speculative-sleeve framing described in Item 4; and
- Chief Compliance Officer authorization of the account for the strategy.

Authorized accounts are recorded in AGG's internal discretionary account registry. The strategy's signal-generation pipeline is constrained at the code-enforcement layer so that no internal trade ticket is generated for any account not present in the registry with documented authorization.

A client may revoke GrowthVector authorization at any time by written notice to AGG. Revocation is implemented promptly through removal of the account from the discretionary account registry. Revocation of GrowthVector authorization does not by itself terminate the underlying advisory relationship.

Item 17: Voting Client Securities

Proxy Votes

AGG does not vote proxies on client securities. Clients are expected to vote their own proxies and receive proxies directly from the custodian of their account or from a transfer agent.

When a client requests assistance on proxy voting, AGG provides recommendations. Any conflict of interest in AGG's recommendation is disclosed to the client.

Item 18: Financial Information

Balance Sheet

A balance sheet is not required to be provided because AGG does not serve as a custodian for client funds or securities, does not require prepayment of fees of more than $500 per client six or more months in advance, and bills investment management fees in arrears.

Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

AGG has no financial condition reasonably likely to impair its ability to meet contractual commitments to clients.

Bankruptcy Petitions During the Past Ten Years

None. AGG has not had any bankruptcy petitions in the last ten years.

Item 19: Requirements for State-Registered Advisers

AGG is registered as an investment adviser with the State of Georgia (Secretary of State, Securities Division) and is notice filed with the Texas State Securities Board pursuant to the de minimis exemption at Texas Administrative Code Rule 116.1(b)(2)(A)(iv). AGG has no place of business in Texas and serves five or fewer Texas-resident clients. In the event AGG obtains a sixth Texas-resident client, AGG will transition to full registration with the Texas State Securities Board before accepting that client.

Education and business background, including any outside business activities for all management and supervised persons, is provided in the Brochure Supplements (Part 2B of Form ADV) attached to this brochure.

Material Relationship Maintained by this Advisory Business or Management Persons with Issuers of Securities

None to report.

Arbitration Claims; Self-Regulatory or Administrative Proceedings

None to report for AGG or its management persons.

Bankruptcy Petitions (Management Persons, Past Ten Years)

None to report.

FORM ADV PART 2B — BROCHURE SUPPLEMENT

Wallace R. Nichols, MBA, JD, CFP® Professional

Jarod W. Nichols, BA, IAR

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This brochure supplement provides information about Wallace R. Nichols and Jarod W. Nichols, supplementing the Asset Guidance Group, LLC brochure. You should have received a copy of that brochure. If you did not, or if you have questions about the contents of this supplement, please contact Wallace R. Nichols.

Additional information about Wallace R. Nichols (CRD #5988582, CFP® Professional #260236) and Jarod W. Nichols (CRD #7529151) is available on the SEC's website at www.adviserinfo.sec.gov.

FILING DATE: 2026-11-02

Wallace R. Nichols, MBA, JD, CFP® Professional

Year of birth: 1959

Item 2 — Educational Background and Business Experience

Educational background:

- University of New Mexico School of Law; Juris Doctor; 1992
- Texas Tech University; MBA — Statistics; 1987
- Angelo State University; BBA — Accounting; 1984

Business experience:

- Asset Guidance Group, LLC; Investment Adviser Representative; 01/2018 – Present
- Asset Guidance Group, LLC; Managing Member; 01/2012 – Present
- Insurance Agent (individual capacity); 01/2012 – 04/2025

- WR Nichols Law, LLC (formerly WR Nichols & Associates, PC); Attorney at Law; 11/2007 – 09/2025
- First American National Investment Advisors, LLC d/b/a Asset Guidance Group, LLC; Investment Adviser Representative; 08/2016 – 12/2017
- Cetera Advisor Networks LLC; Investment Adviser Representative / Registered Representative; 09/2014 – 08/2016
- CSSC Investment Advisory Services, Inc.; Investment Adviser Representative; 11/2011 – 10/2014
- CSSC Brokerage Services, Inc.; Registered Representative; 10/2011 – 10/2014

Item 3 — Disciplinary Information

- Criminal or civil action: None.
- Administrative proceeding: None.
- Self-regulatory proceeding: None.

Item 4 — Other Business Activities Engaged In

Mr. Nichols spends approximately 92% of his time on AGG advisory activities, encompassing his duties as Chief Executive Officer, Chief Compliance Officer, Chief Investment Officer, and Investment Adviser Representative. AGG duties include investment research and portfolio management, client advisory work, development and maintenance of proprietary quantitative models and automated trading systems including backtesting and performance improvement, authorship of AGG's research publication (PulseSignal Weekly), compliance program administration, oversight of the firm's use of AI tools, and firm management.

The following represent outside business activities, listed with approximate current time allocations:

- **Insurance agent (individual capacity).** Mr. Nichols is no longer a licensed insurance agent. Approximately 0% of Mr. Nichols's current time is spent on this activity. Clients seeking insurance services may be referred to Jarod W. Nichols, in his individual capacity, when appropriate.
- **Legal services for AGG and AGG clients.** Mr. Nichols is a licensed attorney. He no longer maintains a separate law practice; WR Nichols Law, LLC has been dissolved. He continues to provide estate-planning legal services to AGG advisory clients in connection with the firm's wealth-transfer and estate-planning advice, and serves as in-house legal counsel to AGG. Approximately 0.5% of time.
- **Tax preparation.** Mr. Nichols prepares taxes for select clients in conjunction with the firm's financial planning activities. Approximately 7% of time.
- **CHERP — Chief Financial Officer and Secretary.** Mr. Nichols serves as CFO and Secretary of the Center for Holistic Education in Retirement Planning, Inc. ("CHERP"), a 501(c)(3) non-profit dedicated to adult financial literacy. CHERP is an IRS-recognized 509(a)(2) public charity exempt from federal income tax under IRC § 501(c)(3). Approximately 0.5% of time.

These outside activities create conflicts of interest because each may offer an incentive to recommend products or services based on compensation received. These conflicts are mitigated through disclosures, procedures, and AGG's fiduciary obligation to place client interests first. Clients are not required to purchase any product or service through AGG and may engage another insurance agent, attorney, tax preparer, or other professional of their choosing.

Item 5 — Additional Compensation

Mr. Nichols receives fees for financial planning and asset management services through AGG and revenue associated with AGG's research publication. Mr. Nichols does not currently receive any performance-based fees, and no AGG client is currently subject to a performance-based fee arrangement. Legal services Mr. Nichols provides to AGG clients in connection with their advisory engagement are performed in his capacity as a licensed attorney and are not separately compensated outside of AGG's advisory fees.

Item 6 — Supervision

Mr. Nichols is Chief Compliance Officer of AGG and is also an investment adviser representative of AGG. He oversees the firm's advisory activities through quarterly reviews and is ultimately responsible for supervision, formulation, and monitoring of investment advice offered to clients. In addition to the periodic reviews described above, Mr. Nichols reviews the firm's trading on an ongoing basis, including the output of AGG's automated engine and the exercise of investment discretion over that output described in Items 4, 8, and 16 of the brochure. That review occurs on a daily, weekly, and monthly cadence corresponding to the operating cycles of the firm's investment processes. He is responsible for ensuring all firm members, agents, and investment advisers adhere to the policies and procedures described in the firm's Compliance Manual. He also reviews work prepared with the assistance of AI tools, as described in Item 4 of the brochure. He can be reached at wnichols@assetguidancegroup.company, 404-602-0040, or 470-201-6905.

Item 7 — Requirements for State-Registered Advisers

- Arbitration claims: None to report.
- Self-regulatory organization or administrative proceeding: None to report.
- Bankruptcy petition: None to report for the last 10 years.

Jarod W. Nichols, BA, IAR

Year of birth: 1988

Item 2 — Educational Background and Business Experience

Educational background:

- Arizona State University; BA — Hugh Downs School of Communications; 2011
- University of Georgia; certificate for completion of Executive Program in Financial Planning

Business experience:

- Asset Guidance Group, LLC; Investment Adviser Representative; 03/2022 – Present
- Insurance Agent (individual capacity); 08/2021 – Present
- Asset Guidance Group, LLC; Staff; 07/2021 – 08/2021
- Shellpoint Mortgage Servicing; 02/2020 – 02/2021; Relationship Manager
- Ditech Financial; 10/2015 – 02/2020; Relationship Manager

Item 3 — Disciplinary Information

- Criminal or civil action: None.
- Administrative proceeding: None.
- Self-regulatory proceeding: None.

Item 4 — Other Business Activities Engaged In

- **Insurance agent (individual capacity).** Mr. Nichols is a licensed insurance agent and sells insurance products and services in his individual capacity, as a separate outside business activity. AGG receives no insurance commissions or other insurance-related compensation. Approximately 15% of time.
- **Notary public — Fulton County, Georgia.** Mr. Nichols is a notary public in Fulton County, Georgia. He does not charge for notary services, which are offered as a courtesy to AGG clients. Approximately 0.5% of time.
- **CHERP — Chief Executive Officer and Chief Operating Officer.** Mr. Nichols serves as CEO and COO of CHERP, the 501(c)(3) described above. Approximately 10% to 15% of time.

These activities create conflicts of interest because each creates an incentive to recommend products based on compensation received. These conflicts are mitigated through disclosures, procedures, and AGG's fiduciary obligation to place client interests first. Clients are not required to purchase any product or service through AGG and may engage another insurance agent or other professional of their choosing.

Item 5 — Additional Compensation

Mr. Nichols receives commissions on insurance he sells in his individual capacity as a licensed insurance agent, under his own insurance producer authority; these commissions are not paid to or shared with AGG. Mr. Nichols does not currently receive any performance-based fees, and no AGG client is currently subject to a performance-based fee arrangement.

Item 6 — Supervision

Wallace R. Nichols is Chief Compliance Officer and Chief Investment Officer of AGG, and is also an investment adviser representative of AGG. He is solely responsible for supervision, formulation, and monitoring of the investment advice offered to clients. In addition to the periodic reviews described above, Mr. Nichols reviews the firm's trading on an ongoing basis, including the output of AGG's automated engine and the exercise of investment discretion over that output described in Items 4, 8, and 16 of the brochure. That review

occurs on a daily, weekly, and monthly cadence corresponding to the operating cycles of the firm's investment processes. He ensures all firm members, agents, and investment advisers adhere to the policies and procedures described in the firm's Compliance Manual. He also reviews work prepared with the assistance of AI tools, as described in Item 4 of the brochure. He can be reached at wnichols@assetguidancegroup.company, 404-602-0040, or 470-201-6905.

Item 7 — Requirements for State-Registered Advisers

- Arbitration claims: None to report.
- Self-regulatory organization or administrative proceeding: None to report.
- Bankruptcy petition: None to report for the last 10 years.