Disclosure Brochure

Part 2A & 2B of Form ADV

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This Form ADV 2A ("Disclosure Brochure") provides information about the qualifications and business practices of Pinnacle Advisory Group, Inc. ("Pinnacle"). If you have any questions about the contents of this Disclosure Brochure, please contact us at: 410-995-6630, or by email at: compliance@pinnacleadvisory.com. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission ("SEC"), or by any state securities authority. References herein to Pinnacle as a "registered investment advisor" or any reference to being "registered" does not imply a certain skill level or training. Additional information about Pinnacle Advisory Group, Inc. is available on the SEC's website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 107757.

ITEM 2. - Material Changes

Since the last annual update of this form on March 30, 2017, Pinnacle Advisory Group, Inc. has had the following material changes:

1. Pinnacle has updated our fee schedule with new billing tiers for assets exceeding $5M (Item 5).
2. Pinnacle has introduced a new program called WISE that compliments the Market Series portfolio strategies with investments that are environmentally friendly, socially conscious, responsive to governance and forward thinking with regards to the participation of women in corporate management (Item 8).
3. Pinnacle has welcomed a new Chief Compliance Officer, Erin Wendell. Further detail on her educational background and business experience can be found at the Brochure Supplement Section.
4. The Pinnacle sub-advisory agreement with Transamerica Financial Advisors ("TFA") for assets held outside of the Transamerica ONE Wealth Management Platform has terminated as of March 31, 2018 (Item 10).

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ITEM 4 - Advisory Business

Firm Description

Pinnacle Advisory Group, Inc., ("Pinnacle" or "Firm") was founded in 1993 by the three senior partners, John R. Hill, Kenneth R. Solow and Dwight A. Mikulis. Pinnacle is a comprehensive wealth management firm that provides financial planning and continuous investment management for affluent individual clients and a small number of institutional clients (e.g. charities, foundations, private company pension plans).

Principal Owners

John Hill, Kenneth Solow and Dwight Mikulis are the firm's principal shareholders, each controlling 25% or more of the Firm. Additional shareholders include: Debra Kriebel, Rick Vollaro, Michael Kitces, Joshua Mason, David Kauffman and Jeffrey Troll.

Advisory Services

Pinnacle offers a variety of risk-managed strategies, each with a unique approach to investment management which are described in further detail in Item 8. A full suite of financial planning services is included, at no additional charge, to clients with household assets exceeding the suggested minimum of $500,000 (fee schedule further detailed at Item 5 and suggested minimum household size at Item 7). Financial planning advice may include but is not limited to: a statement of net worth and cash flow, review of investment accounts, including asset allocation and repositioning recommendations, strategic tax planning, review of retirement accounts, estate planning, review of insurance policies, including recommendations for changes, and education funding planning and recommendations. This service is tailored to meet the individual needs of each client.

Pinnacle provides investment management services only for clients with household assets below the suggested minimum and clients not seeking investment management services through our Pinnacle Investment Management (PIM) program. Financial planning services may be offered to PIM program participants, separately, through an hourly or fixed fee arrangement. Pinnacle also provides investment management services alone through a wrap investment management program sponsored by Transamerica Financial Advisors ("TFA"). Pinnacle receives a portion of the wrap fee for our services. Additional information on this program is also located at Item 10 of this Disclosure Brochure.

Pinnacle Advisor Solutions was launched as a division of Pinnacle in 2011 with a mission to support other independently registered investment advisors who care for clients on a fiduciary basis by providing a comprehensive suite of business solutions without forfeiting their independence. These solutions may include outsourced investment management, access to our institutional technology, back-office support, management consulting and business continuity planning solutions.

As of December 31, 2017, Pinnacle manages approximately $2,050,400,000 in assets on a discretionary basis.

Our Process

The first part of our process is to identify, in light of client's risk tolerance and financial goals, the most suitable investment strategy for the accounts being brought under management. An Investment Policy Statement ("IPS") may be executed to establish the general parameters and range of discretion applicable to Pinnacle's oversight of the client's portfolio. All new clients also execute an Investment Management Agreement that details the terms of the engagement.

<u>Types of Securities in Client Portfolios</u>

Assets are invested primarily in exchange-traded funds ("ETFs"), no-load mutual funds, money markets and other similar public securities and are traded through three primary custodians: Charles Schwab & Co. Inc. ("Schwab"), Fidelity Brokerage Services LLC ("Fidelity"), and TD Ameritrade, Inc. ("TD Ameritrade"). The securities in our portfolios represent a variety of asset classes, including U.S. and international equities, U.S. fixed income and international bonds, and unique classes such as commodity futures, international real estate, and emerging markets. We may also use nontraditional asset classes that utilize various hedge fund strategies.

Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities, variable life insurance, variable annuities, mutual funds shares, U. S. Government securities, options contracts, futures contracts, and interests in partnerships. Clients may impose restrictions on investing in certain securities or types of securities. Initial public offerings ("IPOs") are not available through Pinnacle. Pinnacle does not accept any commissions, referral fees or other fees from financial product sales.

<u>Financial Planning Advice</u>

Pinnacle offers a comprehensive range of planning and wealth management services and has processes in place to assist clients in a deeper understanding of their financial picture, regardless of how complex or unique it may appear. Our Wealth

Managers have many years of experience, collectively, and share best practices on a regular basis to enhance their knowledge on an ongoing basis.

Additionally, Pinnacle has developed specific processes and planning tools to assist clients in post-retirement cash flow and tax management issues, including required minimum distribution selection, asset location that may mitigate taxes and a host of other strategies intended to help a client manage their financial life in retirement. PIM program participants who have assets below $500,000 and clients not seeking investment management services are offered financial planning advice through a separate agreement.

Retirement Plan Advisory Services

Pinnacle provides advisory services on behalf of the retirement plans (each a "Plan") and the company (the "Plan Sponsor"). The Advisor's retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan. Each engagement is customized to the needs of the Plan and Plan Sponsor. Services may include:

- Employee Enrollment and Education Tracking
- Investment Policy Statement ("IPS") Design and Monitoring
- Investment Management
- Performance Reporting
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance
- Vendor Analysis

Certain of these services are provided by Pinnacle serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of Pinnacle's fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

Pinnacle Advisor Solutions

Each year, Pinnacle Advisor Solutions actively seeks a group of independently registered investment advisors to become Strategic Partners. Typically, these firms are planning-oriented and committed to offering exceptional client service. As a Strategic Partner, the independently registered investment advisor will continue to own 100% of their brand and equity but will now have an important outsourcing partner so they may choose to focus on value-added, client facing activities. Our Strategic Partners may enjoy the benefits of providing small firm attention to clients while leveraging the resources of a larger firm. Pinnacle Advisor Solutions provides two fundamental sets of services to independently registered investment advisors: Strategic Partnership outsourcing solutions and PRISM continuity and succession solutions.

<u>Outsourcing Solutions (Strategic Partnership)</u>

Recognizing that smaller independently registered investment advisors run by solo practitioners and small ensembles often do not possess the resources or the scale needed to best serve clients, Pinnacle Advisor Solutions offers a Strategic Partnership which provides independent RIAs with the opportunity to utilize many of the same resources that Pinnacle has developed to serve its own wealth management clients. Importantly, Strategic Partners can access these resources without forfeiting their independence.

Level 1 Investment Services. Pinnacle may serve as a sub-advisor to clients of registered investment advisors with Level 1 Strategic Partnerships.

Level 2 Operations Services. Level 2 Strategic Partners may leverage many of the same service and technology platforms that Pinnacle employs to service its own wealth management teams and their clients. Services may also include access to strategic business consulting (practice management) services, certain marketing content and financial planning research.

<u>Continuity & Succession Solutions (PRISM)</u>

PRISM is a simple continuity planning solution designed for independently registered investment advisors in the event of death or disability. Should the unthinkable happen, clients of the independently registered investment advisor will be given the opportunity to become clients of Pinnacle. The registered investment advisor's beneficiaries will be compensated for the value of those clients that choose to transition. This agreement is revocable at any time, for any reason.

PRISMPLUS is our succession planning solution designed for retirement planning. PRISMPlus pairs a PRISM continuity planning solution with our Strategic Partnership.

ITEM 5 - Fees and Compensation

Description and Fee Schedule

Investment management fees are charged on a tri-annual basis, in advance, for our services. Annual fee percentages are prorated for the billing period and are calculated on the assets under management at the time of billing (April, August & December). Fees are typically deducted from client's account[s] at the Custodian. Investment management fees paid to Pinnacle are generally not negotiable.

Our schedule for new clients is:

1.30% for $0-$500,000 Assets Under Management (AUM),

0.85% for $500,000.01-$1,500,000 AUM,

0.80% for $1,500,000.01-$2,500,000 AUM,

0.75% for $2,500,000.01-$ 3,500,000 AUM,

0.70% for $3,500,000.01-$5,000,000 AUM,

0.60% for $5,000,000.01-$7,500,000 AUM,

0.50% for $7,500,000.01-$10,000,000 AUM,

0.40% for $10,000,000.01-$15,000,000 AUM, and

0.30% above $15,000,000 AUM.

Example: A client with $1,000,000 in assets under management would pay $10,750 on an annual basis or 1.075%. Clients authorize Pinnacle to deduct advisory fees directly from their brokerage accounts. Clients should be aware of their responsibility to verify the accuracy of the fee amount submitted to the Custodian by Pinnacle, as the Custodian will not determine whether the fee has been properly calculated. Legacy clients of Pinnacle or, in some situations, clients of firms that Pinnacle acquired, pay fees as determined by the schedule in place when they became clients.

Financial Planning Advice Fees

Clients with household assets that exceed $500,000 receive financial planning advice at no additional cost. A fixed fee of $5,000 is usually charged to those clients who are only seeking financial planning advice with no investment management services. Clients with less than $500,000 in household assets under management are offered financial planning advice on a limited basis charged at an hourly rate that depends on the advisor and staff involved. The typical hourly rate is $300/hr. Fixed and hourly fees are determined upon engagement. They are somewhat negotiable and are affected by the size, composition, and complexity of the investments and objectives of the client. In the event of a fixed fee, 50% is payable in advance, with the balance due upon the lesser of completion of planning or 120 days. Any fees collected in advance will be retained at the discretion of Pinnacle for any expenses incurred to begin work. Clients are billed for fees incurred.

If the client's situation is substantially different than disclosed at the initial meeting, a revised fee will be provided to the client. The client must approve the change of scope in advance of any additional work being performed if a fee increase is necessary.

Retirement Plan Advisory Services

Fees for retirement plan advisory services are charged an annual asset-based fee of up to 1.00%. Fees may be negotiable depending on the size and complexity of the Plan. Fees are billed either in advance or arears of each month, quarter, or tri-annual period pursuant to the terms of the Retirement Plan Advisory Agreement. Fees may be deducted from the accounts of the Plan Participants or paid directly by the Plan Sponsor.

Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds, ETFs, stocks and bonds. These fees are in addition to the fees paid by you to Pinnacle. Transaction fees are usually incidental to the purchase or sale of a security and in our opinion, the selection of the security is more important than the transaction fee charged by the Custodian. Pinnacle does not receive any compensation from transaction fees charged by the Custodians. For further information on Brokerage Practices, please see Item 12 of this brochure.

Mutual fund companies and ETF issuers charge their shareholders an investment management fee, or expense ratio, that is disclosed in the fund or ETF prospectus. For example, an expense ratio of 0.25 means that the mutual fund or ETF charges 0.25% for their investment management services. These fees are in addition to the fees paid by you to Pinnacle. Pinnacle does not receive any compensation for management fees charged by a mutual fund/ETF provider.

Termination of Agreement

Either party may terminate the Investment Management Agreement, at any time, by providing advance written notice to the other party (writing can be by regular mail, fax, or email; instant message or other like services are not permissible). In the event of termination, where Pinnacle has received appropriate written notification, the client will receive a pro-rata refund of any prepaid and unearned advisory fees. The portfolio value at the completion of the prior full billing period is used as the basis for the fee computation. Such refund will be calculated from the date of receipt of the written notice or other agreed upon date adjusted for the number of days during the current billing period prior to termination. The client's Investment Management Agreement with the Advisor is non-transferable without the Client's prior consent.

Either party may terminate the Financial Planning Agreement, at any time, by providing advance written notice to the other party (writing can be by regular mail, fax, or email; instant message or other like services are not permissible). Upon termination, the client shall be responsible for planning fees based on the hours incurred or in the event of a fixed fee, the percentage of the engagement completed. In the event of termination, where Pinnacle has received appropriate written notification, the client will receive a pro-rata refund of any prepaid and unearned planning fees. The client's Financial Planning Agreement with the Advisor is non-transferable without the Client's prior consent.

Either party may terminate the Retirement Plan Advisory Agreement, at any time, by providing advance written notice to the other party (writing can be by regular mail, fax, or email; instant message or other like services are not permissible).
In the event of termination, where Pinnacle has received appropriate written notification, the client will receive a pro-rata refund of any prepaid and unearned advisory fees. The value of the Plan Assets at the completion of the prior full billing period is used as the basis for the fee computation. Such refund will be calculated from the date of receipt of the written notice or other agreed upon date adjusted for the number of days during the current billing period prior to termination. The client's Retirement Plan Advisory Agreement with the Advisor is non-transferable without the Client's prior consent.

Past Due Accounts

Pinnacle reserves the right to stop work on any account that is more than ninety (90) days overdue. In addition, Pinnacle reserves the right to terminate any engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in Pinnacle's judgment, to providing proper financial advice.

ITEM 6 - Performance-Based Fees and Side-by-Side Management

Description

Pinnacle does not charge performance-based fees. We do not have a conflict of interest with side-by-side management, as each pool of investment funds are managed by the same investment team with no favorable allocation of expenses.

ITEM 7 - Types of Clients

Description

Pinnacle primarily provides discretionary investment management and financial planning advice to its affluent individual clients and a small number of institutional clients (charities, foundations, private company retirement plans). Pinnacle also serves as a sub-advisor to other registered investment advisors and enters into agreements with investors of those entities.

Minimum Household Size

The suggested minimum household size is $500,000 of assets under management. Households with assets below the minimum size requirement may receive investment management services under the PIM program described in Item 4. Exceptions could apply, such as Pinnacle employees and their relatives or relatives of existing clients.

ITEM 8 - Methods of Analysis, Investment Strategies and Risk of Loss

Investment Strategies

Prime Series

Prime Series Portfolios are designed for investors that want an actively managed, globally diversified portfolio. Prime portfolios attempt to deliver risk adjusted returns over a full market cycle by allowing the fund managers the freedom and flexibility to change portfolio construction depending on their view of market conditions. Portfolio decisions are made by the Pinnacle investment team that assesses five investment disciplines and employs a 'weight of the evidence' approach to *formulate a view that translates into portfolio allocations. The Prime Series is structured to allow the managers to pursue value anywhere in the world. Rather than being constrained by asset class, these portfolios are constrained by policy portfolio volatility. This series should appeal to clients that desire an active strategy that blends the best of qualitative judgment and quantitative tools.*

Dynamic Conservative (DC)

This portfolio is designed to conserve principal, but still grow in excess of inflation over a long-term investment horizon. Investments for capital appreciation will be limited and will be evaluated carefully to balance the added risk to principal with the potential for return. The returns of this portfolio would typically be compared to a diversified portfolio of stocks and bonds, with a significant weighting in bonds and other fixed-income investments. This portfolio is generally suitable for investors that have a short time horizon, a heavy dependence on sustaining withdrawals, are risk averse, and do not need to take on the added principal risk inherent in higher volatility policies to achieve their financial goals.

Dynamic Conservative Growth (DCG)

This portfolio has a heavy emphasis on principal protection and the ability to sustain withdrawals. In addition, the portfolio will be managed with modest exposure to assets that are purchased to generate capital appreciation. The returns of this portfolio would typically be compared to a diversified portfolio of stocks and bonds, with a tilt towards bonds and other fixed-income investments. This portfolio is generally suitable for investors who have a short-to medium-term time horizon, are dependent on portfolio stability to generate sustainable withdrawals, are somewhat risk averse, and do not need or want to take on the added principal risks inherent in higher volatility policies to achieve their financial goals.

Dynamic Moderate Growth (DMG)

This portfolio has a balanced approach between capital appreciation and the ability to sustain withdrawals. This portfolio is managed with an emphasis on creating a higher inflation-adjusted return than the more conservative models and will generally have a significant percentage of assets that are intended to capture capital appreciation rather than income generation or principal protection. The returns of this portfolio would typically be compared to a portfolio containing a mixture of stocks and bonds with a tilt towards stocks. This portfolio is generally suitable for clients who have a medium to long- term time horizon, are less dependent on sustaining withdrawals from the portfolio, are not overly risk averse, and need or want to take on a moderate level of principal risk to achieve their financial goals.

Dynamic Appreciation (DA)

This portfolio has a heavy emphasis on capital appreciation and limited exposure to income-generating and principal-protecting assets. This portfolio is managed to achieve a higher inflation-adjusted total return than more conservative portfolios and will take on more volatility in order to achieve those targeted returns. The returns of this portfolio would typically be compared to a portfolio primarily containing stocks with a modest exposure to bonds. This portfolio is generally suitable for clients who have a long- term time horizon, are not dependent on sustaining withdrawals from the portfolio, are not risk averse, and need or want to take on a high level of short-term principal risk to achieve their financial goals.

Dynamic Ultra Appreciation (DUA)

Capital appreciation is paramount in this portfolio. The portfolio is managed to have very little exposure to assets that are purchased to generate income or preserve principal and is invested primarily in assets that have the potential for significant capital appreciation. The returns of this portfolio would typically be compared to a portfolio comprised entirely of stocks. This portfolio is generally suitable for investors who have a very long-term time horizon, have no need to take withdrawals from the portfolio, are risk inclined, and have a need or strong desire to take on a very high level of short-term principal risk in order to achieve their financial goals.

Market Series

Market Series Portfolios are designed to allow investors to capture market returns for the majority of the time they are invested, but also offer a limited amount of active management for times that markets trade to extremes or fall out of technical favor. The portfolios are split between a 70% strategic allocation, and a 30% tactical allocation. The strategic allocation is designed to capture long term returns in a tax and cost-efficient manner and consists of a diversified portfolio of institutional quality asset classes that are systematically rebalanced to retain targeted allocations over time. The tactical allocation offers the protection of active management at those times when markets are trading to valuation extremes or are out of technical favor and consists of three assets classes that can rotate depending on market conditions. Blended together, market series portfolios should appeal to clients who desire a strategic asset allocation approach, with some ability to protect against markets that are extremely overvalued or have broken important technical trends.

Dynamic Market Conservative (DMC)

The portfolio is designed to conserve principal, but still grow in excess of inflation over a long-term time horizon. Investments for capital appreciation will be limited and will be evaluated carefully to balance the added risk to principal with the potential for return. The returns of this portfolio would typically be compared to a diversified portfolio of stocks and bonds, with a significant weighting in bonds and other fixed-income investments. This portfolio is generally suitable for investors who have a short time horizon, are heavily dependent on sustained withdrawals, are risk averse, and do not need to incur the added principal risk inherent in higher volatility policies to achieve their financial goals

Dynamic Market Moderate Growth (DMMG)

This portfolio has a balanced approach between capital appreciation and the ability to sustain withdrawals. This portfolio is managed with an emphasis on creating a higher inflation-adjusted return than the more conservative model and will generally have a significant percentage of assets that are intended to capture capital appreciation rather than income generation or principal protection. The returns of this portfolio would typically be compared to a portfolio containing a mixture of stocks and bonds with a slightly higher weighting to stocks over bonds. This portfolio is generally suitable for clients who have a medium to long-term time horizon, are less dependent on sustaining withdrawals from the portfolio, are not overly risk averse, and need or want to incur a moderate level of principal risk to achieve their financial goals.

Dynamic Market Appreciation (DMA)

This portfolio has a heavy emphasis on capital appreciation and limited exposure to income-generating and principal-protecting assets. This portfolio is managed to achieve a higher inflation-adjusted total return than more conservative portfolios and will take on more volatility in order to achieve those target returns. The returns of this portfolio would typically be compared to a portfolio primarily containing stocks with a modest exposure to bonds. This portfolio is generally suitable for clients who have a long- term time horizon, are not dependent on sustaining withdrawals from the portfolio, are not risk averse, and need or want to take on a high level of short-term principal risk in order to achieve their financial goals.

Quantitative Series

Quantitative Series is designed for investors that desire a material portion of the portfolio to run on a rules-based engine. We currently offer only one model in this series, and it uses Pinnacle's Dynamic Moderate Growth (DMG) portfolio (described above) as the chassis, and then adds on a purely quantitative allocation of the portfolio. The DMG's actively managed portfolio is 62.5% of the total portfolio, while the quantitative allocation makes up 37.5%. The Quantitative allocation rotates between ten U.S. equity sectors and fixed income, depending on how the quantitative model evaluates current market conditions based on a set of valuation and technical indicators. This series should appeal to clients that desire a heavily rules-based approach, and that are willing to make aggressive allocation changes depending on market conditions.

Dynamic Quant (DQ)

This portfolio has a heavy emphasis on capital appreciation and limited exposure to income-generating and principal-protecting assets. This portfolio is managed to achieve a higher inflation-adjusted total return than more conservative portfolios and will take on more volatility in order to achieve those target returns. The returns of this portfolio would typically be compared to a portfolio containing primarily stocks with a modest exposure to bonds. This portfolio is generally suitable for clients that have a long- term time horizon, are not dependent on sustaining withdrawals from the portfolio, are not risk averse, and need or want to take on a high level of short-term principal risk in order to achieve their financial goals.

Strategic Market Series

The Strategic Series portfolios are designed to allow investors to passively capture market returns in a tax and cost-efficient manner while attempting to maximize the risk-reduction benefits of diversification. The allocation of the Strategic Series portfolios consists of a diversified mix of twenty institutional quality asset classes that are systematically rebalanced to retain the predefined targeted allocations over time. The Strategic Series portfolios will remain fully invested and managed to the predefined targeted allocations. The Strategic Series portfolios should appeal to clients who desire a purely strategic allocation approach, are comfortable riding through market volatility and achieving market returns and seek low transaction costs and high tax efficiency.

Strategic Market Conservative (SMC)

This portfolio is designed to conserve principal, but still grow in excess of inflation over a long-term investment horizon. Investments for capital appreciation will be limited and will be evaluated carefully to balance the added risk to principal with the potential for return. The returns of this portfolio would typically be compared to a diversified portfolio of stocks and bonds, with a significant weighting in bonds and other fixed-income investments. This portfolio is generally suitable for investors that have a short time horizon, a heavy dependence on sustaining withdrawals, are risk averse, and do not need to take on the added principal risk inherent in higher volatility policies to achieve their financial goals.

Strategic Market Conservative Growth (SMCG)

This portfolio has a heavy emphasis on principal protection and the ability to sustain withdrawals. In addition, the portfolio will be managed with modest exposure to assets that are purchased to generate capital appreciation. The returns of this portfolio would typically be compared to a diversified portfolio of stocks and bonds, with a tilt towards bonds and other fixed-income investments. This portfolio is generally suitable for investors that have a short-to medium-term time horizon, a dependence on portfolio stability to generate sustainable withdrawals, are somewhat risk averse, and do not need or want to take on the added principal risks inherent in higher volatility policies to achieve their financial goals.

Strategic Market Moderate Growth (SMMG)

This portfolio has a balanced approach between capital appreciation and the ability to sustain withdrawals. This portfolio is managed with an emphasis on creating a higher inflation-adjusted return than the more conservative models and will generally have a significant percentage of assets that are intended to capture capital appreciation rather than income generation or principal protection. The returns of this portfolio would typically be compared to a portfolio containing a mixture of stocks and bonds with a tilt towards stocks. This portfolio is generally suitable for clients that have a medium to long-term time horizon, are less dependent on sustaining withdrawals from the portfolio, are not overly risk averse, and need or want to take on a moderate level of principal risk to achieve their financial goals.

Strategic Market Appreciation (SMA)

This portfolio has a heavy emphasis on capital appreciation and limited exposure to income-generating and principal-protecting assets. This portfolio is managed to achieve a higher inflation-adjusted total return than more conservative portfolios and will take on more volatility to achieve those target returns. The returns of this portfolio would typically be compared to a portfolio containing primarily stocks with a modest exposure to bonds. This portfolio is generally suitable for clients who have a long-term time horizon, are not dependent on sustaining withdrawals from the portfolio, are not risk averse, and need or want to take on a high level of short-term principal risk to achieve their financial goals.

Strategic Market Ultra Appreciation (SMUA)

Capital appreciation is paramount in this portfolio. The portfolio is managed to have very little exposure to assets that are purchased to generate income or preserve principal and is invested primarily in assets that have the potential for significant capital appreciation. The returns of this portfolio would typically be compared to a portfolio comprised entirely of stocks. This portfolio is generally suitable for investors who have a very long-term time horizon, have no need to take withdrawals from the portfolio, are risk inclined, and have a need or strong desire to take on a very high level of short-term principal risk to achieve their financial goals.

Alpine Series

The Alpine Series portfolios are designed to allow investors to passively capture market returns in a tax and cost-efficient manner while attempting to maximize the risk-reduction benefits of diversification. The allocation of the Alpine Series portfolios consists of a diversified mix of five institutional quality asset classes that are systematically rebalanced to retain the predefined targeted allocations over time. Such limited number of holdings is intended to make the strategy investable even for small size portfolios. The Alpine Series portfolios will remain fully invested and managed to the predefined targeted allocations. The Alpine Series portfolios should appeal to clients that desire a purely strategic allocation approach, are comfortable riding through market volatility and achieving market returns, seek low transaction costs and high tax efficiency.

Alpine Conservative Growth (ACG)

This portfolio has a heavy emphasis on principal protection and the ability to sustain withdrawals. In addition, the portfolio will be managed with modest exposure to assets that are purchased to generate capital appreciation. The returns of this portfolio would typically be compared to a diversified portfolio of stocks and bonds, with a tilt towards bonds and other fixed-income investments. This portfolio is generally suitable for investors who have a short-to medium-term time horizon, a dependence on portfolio stability to generate sustainable withdrawals, are somewhat risk averse, and do not need or want to take on the added principal risks inherent in higher volatility policies to achieve their financial goals.

Alpine Moderate Growth (AMG)

This portfolio has a balanced approach between capital appreciation and the ability to sustain withdrawals. This portfolio is managed with an emphasis on creating a higher inflation-adjusted return than the more conservative models and will generally have a significant percentage of assets that are intended to capture capital appreciation rather than income generation or principal protection. The returns of this portfolio would typically be compared to a portfolio containing a mixture of stocks and bonds with a tilt towards stocks. This portfolio is generally suitable for clients who have a medium to long-term time horizon, are less dependent on sustaining withdrawals from the portfolio, are not overly risk averse, and need or want to take on a moderate level of principal risk to achieve their financial goals.

Alpine Appreciation (AA)

This portfolio has a heavy emphasis on capital appreciation and limited exposure to income-generating and principal-protecting assets. This portfolio is managed to achieve a higher inflation-adjusted total return than more conservative portfolios and will take on more volatility to achieve those target returns. The returns of this portfolio would typically be compared to a portfolio containing primarily stocks with a modest exposure to bonds. This portfolio is generally suitable for clients who have a long-term time horizon, are not dependent on sustaining withdrawals from the portfolio, are not risk averse, and need or want to take on a high level of short-term principal risk to achieve their financial goals.

Alpine Ultra Appreciation (AUA)

Capital appreciation is paramount in this portfolio. The portfolio is managed to have very little exposure to assets that are purchased to generate income or preserve principal and is invested primarily in assets that have the potential for significant capital appreciation. The returns of this portfolio would typically be compared to a portfolio comprised entirely of stocks. This portfolio is generally suitable for investors who have a very long-term time horizon, have no need to take withdrawals from the portfolio, are risk inclined, and have a need or strong desire to take on a very high level of short-term principal risk to achieve their financial goals.

WISE Strategic Market Series

The WISE Strategic Market Series portfolios are designed to allow investors to passively capture market returns in a tax and cost-efficient manner while attempting to maximize the risk-reduction benefits of diversification. In addition, the WISE Strategic Market Series portfolios are designed to invest a portion of their assets in companies that demonstrate greater gender diversity within senior leadership and/or have positive environmental, social and governance (ESG) characteristics. The allocation of the WISE Strategic Market Series portfolios consists of a diversified mix of twenty institutional quality asset classes that are systematically rebalanced to retain the predefined targeted allocations over time. The WISE Strategic Market Series portfolios will remain fully invested and managed to the predefined targeted allocations. The WISE Strategic Market Series portfolios should appeal to clients who want a purely strategic allocation approach, who are comfortable riding through market volatility and achieving market returns, who seek low transaction costs and high tax efficiency, and who seek to invest in companies with positive environmental, social and governance (ESG) characteristics.

WISE Strategic Market Conservative (W-SMC)

This portfolio is designed to conserve principal, but still grow in excess of inflation over a long-term investment horizon. Investments for capital appreciation will be limited and will be evaluated carefully to balance the added risk to principal with the potential for return. The returns of this portfolio would typically be compared to a diversified portfolio of stocks and bonds, with a significant weighting in bonds and other fixed-income investments. This portfolio is generally suitable for investors that have a short time horizon, a heavy dependence on sustaining withdrawals, are risk averse, and do not need to take on the added principal risk inherent in higher volatility policies to achieve their financial goals.

WISE Strategic Market Conservative Growth (W-SMCG)

This portfolio has a heavy emphasis on principal protection and the ability to sustain withdrawals. In addition, the portfolio will be managed with modest exposure to assets that are purchased to generate capital appreciation. The returns of this portfolio would typically be compared to a diversified portfolio of stocks and bonds, with a tilt towards bonds and other fixed-income investments. This portfolio is generally suitable for investors that have a short-to medium-term time horizon, a dependence on portfolio stability to generate sustainable withdrawals, are somewhat risk averse, and do not need or want to take on the added principal risks inherent in higher volatility policies to achieve their financial goals.

WISE Strategic Market Moderate Growth (W-SMMG)

This portfolio has a balanced approach between capital appreciation and the ability to sustain withdrawals. This portfolio is managed with an emphasis on creating a higher inflation-adjusted return than the more conservative models and will generally have a significant percentage of assets that are intended to capture capital appreciation rather than income generation or principal protection. The returns of this portfolio would typically be compared to a portfolio containing a mixture of stocks and bonds with a tilt towards stocks. This portfolio is generally suitable for clients that have a medium to long-term time horizon, are less dependent on sustaining withdrawals from the portfolio, are not overly risk averse, and need or want to take on a moderate level of principal risk to achieve their financial goals.

WISE Strategic Market Appreciation (W-SMA)

This portfolio has a heavy emphasis on capital appreciation and limited exposure to income-generating and principal-protecting assets. This portfolio is managed to achieve a higher inflation-adjusted total return than more conservative portfolios and will take on more volatility in order to achieve those target returns. The returns of this portfolio would typically be compared to a portfolio containing primarily stocks with a modest exposure to bonds. This portfolio is generally suitable for clients that have a long- term time horizon, are not dependent on sustaining withdrawals from the portfolio, are not risk averse, and need or want to take on a high level of short-term principal risk in order to achieve their financial goals.

WISE Strategic Market Ultra Appreciation (W-SMUA)

Capital appreciation is paramount in this portfolio. The portfolio is managed to have very little exposure to assets that are purchased to generate income or preserve principal and is invested primarily in assets that have the potential for significant capital appreciation. The returns of this portfolio would typically be compared to a portfolio comprised entirely of stocks. This portfolio is generally suitable for investors that have a very long-term time horizon, have no need to take withdrawals from the portfolio, are risk inclined, and have a need or strong desire to take on a very high level of short-term principal risk in order to achieve their financial goals.

WISE Dynamic Market Series

WISE Market Series Portfolios are designed to allow investors to capture market returns for the majority of the time they are invested, but also offer a limited amount of active management for times that markets trade to extremes or fall out of technical favor. In addition, the WISE Strategic Market Series portfolios are designed to invest a considerable portion of their assets in companies that demonstrate greater gender diversity within senior leadership and/or have positive environmental, social and governance (ESG) characteristics. The WISE Market Series Portfolios are split between a 70% strategic allocation, and a 30% tactical allocation. The strategic allocation is designed to capture long term returns in a tax and cost-efficient manner and consists of a diversified portfolio of institutional quality asset classes that are systematically rebalanced to retain targeted allocations over time. The tactical allocation offers the protection of active management at those times when markets are trading to valuation extremes or are out of technical favor and consists of three asset classes that can rotate depending on market conditions. Blended together, the WISE Market Series Portfolios should appeal to clients who desire a strategic asset allocation approach with some ability to protect against markets that are extremely overvalued or have broken important technical trends, and who seek to invest in companies with positive environmental, social and governance (ESG) characteristics.

WISE Dynamic Market Conservative (W-DMC)

The portfolio is designed to conserve principal, but still grow in excess of inflation over a long-term time horizon. Investments for capital appreciation will be limited and will be evaluated carefully to balance the added risk to principal with the potential for return. The returns of this portfolio would typically be compared to a diversified portfolio of stocks and bonds, with a significant weighting in bonds and other fixed-income investments. This portfolio is generally suitable for investors who have a short time horizon, are heavily dependent on sustained withdrawals, are risk averse, and do not need to incur the added principal risk inherent in higher volatility policies to achieve their financial goals.

WISE Dynamic Market Moderate Growth (W-DMMG)

This portfolio has a balanced approach between capital appreciation and the ability to sustain withdrawals. This portfolio is managed with an emphasis on creating a higher inflation-adjusted return than the more conservative model and will generally have a significant percentage of assets that are intended to capture capital appreciation rather than income generation or principal protection. The returns of this portfolio would typically be compared to a portfolio containing a mixture of stocks and bonds with a slightly higher weighting to stocks over bonds. This portfolio is generally suitable for clients who have a medium to long-term time horizon, are less dependent on sustaining withdrawals from the portfolio, are not overly risk averse, and need or want to incur a moderate level of principal risk to achieve their financial goals.

WISE Dynamic Market Appreciation (W-DMA)

This portfolio has a heavy emphasis on capital appreciation and limited exposure to income-generating and principal-protecting assets. This portfolio is managed to achieve a higher inflation-adjusted total return than more conservative portfolios and will take on more volatility in order to achieve those target returns. The returns of this portfolio would typically be compared to a portfolio primarily containing stocks with a modest exposure to bonds. This portfolio is generally suitable for clients who have a long-term time horizon, are not dependent on sustaining withdrawals from the portfolio, are not risk averse, and need or want to take on a high level of short-term principal risk in order to achieve their financial goals.

Risk of Loss

Investment management services may include the purchase and sale of securities which involves a certain level of inherent risk. The risk may include the potential loss of principal value. Pinnacle's investment service is based on a process that provides two separate kinds of risk management: asset class diversification and traditional value investing strategies.

1. Asset Class Diversification - Pinnacle tactically changes the portfolio asset allocation to reflect our views of market value on an ongoing basis. All portfolios are diversified in terms of global asset classes. Pinnacle has complete discretion in securities chosen, amounts of securities in client accounts and choice of broker dealer to execute trades.

2. Value Investing - As a value manager, a key factor to managing risk is our selling technique, which requires constant reevaluation of the value proposition of the securities we hold as prices fluctuate and other opportunities present themselves. This constant monitoring is carried out by an experienced investment team. By utilizing a team approach to the decision-making process, we feel that we are adding another layer of risk protection in volatile markets.

All investing involves some level of risk, including but not limited to the following:

1. Asset Valuation: The identification of securities and other assets believed to be undervalued is a difficult task and there are no assurances that such opportunities will be successfully recognized or acquired.

2. Stock Market Risk: The chance that stock prices overall will decline. Stock markets tend to move in cycles, with periods of rising prices and periods of falling prices.

3. Technical Risk: This type of analysis utilizes statistics to determine trends in security prices. Technical analysis tends to focus on but is not limited to factors such as trading volume, demand, and volatility. Technical chart analysis is also used which involves the assessment of historical charts and graphs.

4. Sector Risk: The chance that significant problems will affect a particular sector, or that returns from that sector will trail returns from the overall stock market. Daily fluctuations in specific market sectors are often more extreme than fluctuations in the overall market.

5. Non-Diversification Risk: The chance that performance may be hurt disproportionately by poor performance of relatively few stocks or even a single stock.

6. Foreign Security Risk: Foreign securities are subject to the same market risk as US securities and involve risk of loss due to political, economic, legal, regulatory and currency risk. There are also differences in accounting and financial reporting standards.

7. Interest Rate Risk: Bonds experience market risk because of changes in interest rates. The general rule is that if interest rates rise, bond prices will fall. The reverse is also true, if interest rates fall, bond prices will generally rise. A bond with a longer maturity will typically fluctuate more in price than a shorter-term bond. Shorter term money market instruments carry less interest rate risk.

8. Mutual Fund Securities: The major risk of investing in a mutual fund include the quality and experience of the mutual fund portfolio management team and their ability to create fund value by investing in securities that have growth, the amount of individual company diversification, the type and amount of industry diversification, and the type amount of sector diversification within specific industries.

9. Exchange Traded Funds (ETFs): ETFs are investments whose shares are bought and sold on security exchange. An ETF holds a portfolio of securities designed to track a particular market segment or index. Some ETFs are SPDRs, Power Shares and I Shares. Our investment strategies could purchase ETFs to gain exposure to a portion of the US or foreign markets, sectors, industry or commodities. Our investment strategies investing in another investment company will bear their pro rata share of the other investment company's advisory fee and other expenses, in addition to their own. Specifically, ETFs, depending on the underlying portfolio and its size, can have a wide price (Bid and Ask) spreads, thus diluting or negating any upward price movements of the ETF or enhancing any downward price movement. Also, ETFs, require more frequent portfolio reporting by regulators and are thereby more susceptible to actions by hedge funds that could have a negative impact on the price of an ETF. Certain ETFs employ leverage, which creates additional volatility and price risk depending on the amount of leverage utilized, collateral, and liquidity of the supporting collateral. The use of leverage increases interest rate cost to the ETF as well as increase the level of volatility.

10. Commodities: Commodities include soft assets such as crops and coffee that are generally extracted from the ground, as well as hard assets such as minerals and metals that are mined. Investing in commodities carries significant risks, including price, credit and market risk. Many physical commodities, as well as intangible commodities (such as security or fixed income indices) serve as the underlying to commodity futures contracts.

11. US Government Securities: U.S. government securities include securities issued by the U.S. Treasury and by U.S. government agencies and instrumentalities. U.S. government securities may be supported by the full faith and credit of the United States.

ITEM 9 - Disciplinary Information

Legal and Disciplinary

The Firm and its Supervised Persons have not been involved in legal or disciplinary events related to past or present investment clients.

ITEM 10 - Other Financial Industry Activities and Affiliations

Affiliations

Pinnacle does not recommend other investment advisors or services firms to its clients in exchange for direct or indirect compensation.

From time to time, Pinnacle Advisory Group, Inc. Wealth Managers may serve on the Schwab Advisory Board for two-year terms. For details on which Wealth Managers are currently active board members, see the brochure supplement. The Board consists of approximately 20 representatives of independent investment advisory firms who have been invited by Schwab management to participate in meetings and discussions of Schwab Advisor Services' services for independent investment advisory firms and their clients. Board members enter nondisclosure agreements with Schwab under which they agree not to disclose confidential information shared with them. This information generally does not include material nonpublic information about the Charles Schwab Corporation, whose common stock is listed for trading on the New York Stock Exchange and the NASDAQ stock market (symbol SCHW). The Board meets in person approximately twice per year and has periodic conference calls scheduled as needed. Board members are not compensated by Schwab for their service, but Schwab does pay for or reimburse Board members' travel, lodging, meals and other incidental expenses incurred in attending Board meetings.

Transamerica ONE Wealth Management Platform

Pursuant to a written agreement between Pinnacle and TFA, Pinnacle acts in a sub-advisor capacity on the TFA sponsored Transamerica ONE Wealth Management Platform ("Platform"). The terms and conditions of this agreement are determined by TFA. TFA is solely responsible for the selection of the client's Custodian. Pinnacle provides discretionary investment advice on any portion of funds delegated to Pinnacle as determined suitable by the TFA representative. This power and authority is granted by the client in an agreement between TFA and the client. Pinnacle provides trading instructions to TFA, who is responsible for trade execution.

ITEM 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

Pinnacle has adopted a Code of Ethics that is predicated on the principle that we owe a fiduciary duty to our clients. Accordingly, all persons associated with Pinnacle (our "Supervised Persons") must avoid activities, interests and relationships that run contrary or appear to run contrary to the best interests of our clients. At all times, Pinnacle places client interests ahead of our own. Pinnacle's Supervised Persons must engage in personal investing that is in full compliance with Pinnacle's Code of Ethics and Federal Securities Laws. Should you wish to review Pinnacle's Code of Ethics, you may contact us at 410-995-6630.

Participation or Interest in Client Transactions

Pinnacle, its Supervised Persons and related parties may buy or sell securities that are also held by clients. Supervised Persons may not trade their own securities ahead of client trades. Supervised Persons must comply with all provisions of our Compliance Program.

Personal Trading

The personal trading restrictions are included in our Compliance Program and Supervised Persons are educated through an annual compliance meeting. Personal trading reviews ensure that the personal trading of Supervised Persons does not affect the markets and that clients of the Firm receive preferential treatment. Supervised Persons are required to submit to the Chief Compliance Officer ("CCO") quarterly reports detailing transaction history and annual holdings list at year-end.

ITEM 12 - Brokerage Practices

Selecting Custodians

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

Pinnacle does not have any affiliation with product sales firms. Pinnacle does maintain institutional relationships with various Custodians. Pinnacle will likely suggest that clients establish their accounts with Charles Schwab & Co., Inc. ("Schwab"), Fidelity Brokerage Services LLC and related entities (“Fidelity”), or TD Ameritrade, Inc. (“TD Ameritrade”) as the “qualified custodian” for client assets. Schwab, Fidelity and TD Ameritrade (collectively the “Custodians”) offer to independently registered investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions.

Pinnacle is independently owned and operated and is not affiliated with Schwab, Fidelity, or TD Ameritrade. Pinnacle participates in the institutional platforms at these Custodians and may also receive investor referrals (additional disclosure located at Item 14 of this Disclosure Brochure). Pinnacle considers the Custodian’s respective financial strength, reputation, execution, pricing, research and service when providing a recommendation to a client. Pinnacle receives some benefits from Schwab, Fidelity and TD Ameritrade through participation in the institutional platforms and referral programs such as attainment of many mutual funds without transaction charges and other securities at nominal transaction charges. Pinnacle also receives soft dollar benefits as further described below.

Best Execution

As part of our fiduciary duty, we seek to obtain the best price and execution of client securities transactions. The analysis of execution quality involves several factors, both qualitative and quantitative, which include consideration of the full range of a Custodian services, execution capability, transaction rates and the value of research or other soft dollar products provided. Thus, a client may pay a transaction fee higher than another qualified Custodian if Pinnacle determines, in good faith, that the commission is reasonable in relation to the value of the brokerage and research services received.

A client may direct Pinnacle, in writing, to use a Custodian to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that Custodian and will not seek better execution services or prices from other custodians nor will we be able to use order aggregation (as described below). Thus, Pinnacle’s clients may pay higher transaction fees, greater spreads, or receive less favorable net prices than would otherwise be the case. Subject to its best execution, Pinnacle may decline a client’s request to use a Custodian if such arrangements would result in additional operational difficulties.

Pinnacle will execute trades within the account[s] established by the client at Custodian, unless otherwise instructed. Pinnacle believes the recommended Custodians provide best execution on behalf of clients. Pinnacle does not evaluate execution quality on a trade-by-trade basis. Pinnacle does believe that the recommended Custodians will provide proper execution quality. Pinnacle shall periodically and systematically review its policies and procedures regarding recommending Custodians to its clients in light of its duty to obtain best execution. We also follow procedures further described in our Compliance Manual to ensure that we are seeking the best execution available on client trades.

Soft Dollars

The arrangement under which Pinnacle receives research or services from Schwab, Fidelity, or TD Ameritrade free of cost is considered a “soft dollar” arrangement under Section 28(e) of the Securities and Exchange Act of 1934. Investment research and brokerage services received through soft dollars may be used by Pinnacle in servicing its clients but not all services will benefit all our clients. Although the soft dollar allocation from Schwab, Fidelity and TD Ameritrade is based upon the transaction and other fees paid to the Custodians, clients are not charged higher rates as a result of this arrangement.

Schwab, Fidelity, and TD Ameritrade provide Pinnacle with access to institutional trading, operational services, computer software and third-party research services, typically not available to retail investors. These services generally are available to independent advisors on an unsolicited basis, at no charge, if at least $10 million of the advisor’s assets are maintained at the Custodian. Soft dollars are not contingent upon Pinnacle committing to any specific volume of trading.

Specifically, Pinnacle benefits from the following operational services: receipt of duplicate client trade confirmations, bundled duplicate statements, access to a trading desk that exclusively services Registered Investment Advisors, access to block trading which provides the ability to aggregate securities transactions and allocate the appropriate shares to client accounts, access to an electronic communication network for client order entry and account information and facilitation of the payment of Pinnacle fees from clients’ accounts. Research and other technology products are provided through BCA, Bloomberg, Ned Davis Research, Asbury Research, Louis Yamata, and Cornerstone Macro and allow us to research pricing information and market data. Other services provided may include consulting, proprietary research publications, conferences and other continuing education on a variety of topics including practice management, information technology, business succession, regulatory compliance, and marketing.

These soft dollar products provide a benefit to our Firm because we would otherwise acquire them at a higher cost, thus creating a potential conflict of interest and may indirectly influence our choice of a Custodian. In addition, the firm could have an incentive to cause clients to engage in more securities transactions than would otherwise be optimal in order to generate brokerage compensation with which to acquire products and services. As part of our fiduciary duty to clients, Pinnacle endeavors at all times to put the interests of its clients first. The Firm's use of soft dollars is intended to comply with the requirements of Section 28(e) of the Securities Exchange Act of 1934, wherein a “safe harbor” exists for investment advisors who use commissions or transaction fees paid by their accounts under management to obtain services that provide lawful and appropriate assistance in performing investment decision-making responsibilities. As required, the Firm will make a good faith determination that the fees paid are reasonable in relation to the value of the brokerage and research services provided. In some cases, the transaction fees charged by a Custodian on a transaction or set of transactions may be greater than the those at another Custodian who did not provide research services or products.

Order Aggregation

Transactions for each client will generally be executed independently, unless Pinnacle decides to purchase or sell the same securities for several clients at approximately the same time. Pinnacle may, but is not obligated to, combine or "batch" such orders to obtain best execution and negotiate more favorable transaction rates. Pinnacle may, but is not obligated to, allocate equitably among Pinnacle's clients, any differences in prices or other transaction costs that might have been charged had such orders been placed independently. Under this procedure, transactions will be averaged as to price and allocated among pro rata to the purchase and sale orders placed for each client on any given day. To the extent that Pinnacle aggregates client orders, we shall do so in accordance with applicable rules promulgated under the Investment Advisers Act of 1940 (the "Advisers Act") and no-action guidance from the staff of the U. S. Securities and Exchange Commission.

Pinnacle shall not receive any additional compensation or remuneration as result of client order aggregation. In the event that a prorated allocation is not appropriate under a particular circumstance, an allocation to client accounts will be made based upon other relevant factors, which may include: (i) when small percentage of the order is executed, shares may be allocated to the account with the smallest position or to an account that is out of line with respect to security to sector weightings relative to other portfolios, with small mandates, (ii) allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts, (iii) if an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account's assets after an order is placed), (iv) with respect to sale allocations, allocations may be given to accounts low in cash, (v) in cases when a pro-rata allocation of a potential execution would result in a *de minimis* allocation in one or more accounts, Pinnacle may exclude the accounts(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts, or (vi) in cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis.

ITEM 13 - Review of Accounts

Periodic Reviews

Investment security reviews are performed daily by the trading staff. Portfolio allocations and trades are reviewed in the weekly Investment Team meetings and communicated monthly in a formal Investment Committee meeting attended by all Wealth Managers.

Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment and economic information, or changes in a client's situation.

Regular Reports

Clients receive updated performance reports for their portfolios three times a year and upon request. Performance reports are available on the client file-sharing cloud platform as of the prior day's close of business. Clients also receive monthly investment updates, quarterly market reviews and have access to daily blogs by the Investment Team. Custodian websites allow clients to access account and performance information daily.

ITEM 14 - Client Referrals and Other Compensation

Referrals

Pinnacle has been fortunate to receive many client referrals over the years. These referrals originate from current clients, estate planning attorneys, employees, personal friends or relatives of employees and other similar sources. Pinnacle has also created a referral program with independent certified public accounting firms in exchange for revenue sharing. We also participate in programs with Schwab, Fidelity, and TD Ameritrade.

Independent Certified Public Accounting Firms

Pinnacle receives client referrals from unaffiliated and independent certified public accounting firms ("CPA Solicitors") to provide investment management and financial planning services. In accordance with Rule 206(4)-3 of the Advisers Act, registered investment advisers are permitted to pay a cash fee to a solicitor for referring clients pursuant to a written agreement. Pinnacle has written agreements with each CPA Solicitor and has agreed to pay CPA Solicitor a percentage of the referred client fees paid to Pinnacle tri-annually. Our written agreement stipulates that CPA Solicitor must provide a separate written disclosure document, in addition to the adviser's disclosure document, to prospective clients at the time of the solicitation/referral. Pinnacle makes a bona fide effort to determine whether the CPA Solicitor has complied with our agreement, so that we have a reasonable basis for believing the CPA Solicitor has complied with the Rule. Pinnacle has agreed not to charge these referred client's fees or costs greater than the fees or costs Pinnacle charges its advisory clients who were not introduced by a CPA Solicitor and who have similar portfolios under our management.

Schwab Advisory Network

Pinnacle receives client referrals from Schwab through our participation in Schwab Advisor Network ("Service"). The Service is designed to help investors find an independent investment advisor. Schwab is a Custodian independent of and unaffiliated with Pinnacle. Schwab does not supervise Pinnacle and has no responsibility for Pinnacle's management of clients' portfolios or Pinnacle's other advice or services. Pinnacle pays Schwab fees to receive referrals through the Service. Pinnacle's participation in the Service may raise potential conflicts of interest described below.

Pinnacle pays Schwab a Participation Fee on all referred client's accounts that are maintained in custody at Schwab and a Non-Schwab Custody Fee on all accounts that are maintained at, or transferred to, another Custodian. The Participation Fee paid by Pinnacle is a percentage of the fees the client owes to Pinnacle or a percentage of the value of the assets in the client's account, subject to a minimum Participation Fee.

Pinnacle pays Schwab the Participation Fee for so long as the referred client's account remains at Schwab. The Participation Fee is billed to Pinnacle quarterly and may be increased, decreased or waived by Schwab from time to time. The Participation Fee is paid by Pinnacle and not by the client. Pinnacle has agreed not to charge clients referred through the Service, fees or costs greater than the fees or costs Pinnacle charges clients with similar portfolios who were not referred through the Service.

Pinnacle generally pays Schwab a Non-Schwab Custody Fee if custody of a referred client's account is not maintained by, or assets in the account are transferred from Schwab. This fee does not apply if the client was solely responsible for the decision not to maintain custody at Schwab. The Non-Schwab Custody Fee is higher than the Participation Fees Pinnacle generally would pay in a single year. Thus, Pinnacle will have an incentive to recommend that client accounts referred from the Service continue to be held in custody at Schwab.

The Participation and Non-Schwab Custody Fees will be based on assets in accounts of Pinnacle's clients who were referred by Schwab and those referred clients' family members living in the same household. Thus, Pinnacle will have incentives to encourage household members of clients referred through the Service to maintain custody of their accounts at Schwab.

For accounts of Pinnacle's clients maintained in custody at Schwab, Schwab generally does not charge the client separately for custody but receives compensation from Pinnacle clients in the form of commissions or other transaction-related compensation on securities trades Schwab executes for the client's accounts. Clients also pay Schwab a fee for clearance and settlement of trades executed through broker dealers other than Schwab. Schwab's fees for trades executed at other Custodians are in addition to the other Custodian fees. Thus, Pinnacle may have an incentive to cause trades to be executed through Schwab rather than another broker. Pinnacle nevertheless, acknowledges its duty to seek best execution of trades for client accounts. Trades for clients' accounts held in custody at Schwab may be executed through a different Custodian than trades for Pinnacle's other clients. Thus, trades for accounts custodied at Schwab may be executed at different times and different prices than trades for other accounts that are executed at other custodians.

Fidelity Wealth Advisor Solutions Program

Pinnacle participates in the Fidelity Wealth Advisor Solutions Program ("WAS Program"), through which Pinnacle receives referrals from Strategic Advisers, Inc. ("SAI"), a registered investment adviser and subsidiary of FMR LLC, the parent company of Fidelity Investments. Pinnacle is independent and not affiliated with SAI or FMR LLC. SAI does not supervise or control Pinnacle, and SAI has no responsibility or oversight for Pinnacle's provision of investment management or other advisory services.

Under the WAS Program, SAI acts as a solicitor for Pinnacle, and Pinnacle pays referral fees to SAI for each referral received based on Pinnacle's assets under management attributable to each client referred by SAI or members of each client's household. The WAS Program is designed to help investors find an independent investment advisor, and any referral from SAI to Pinnacle does not constitute a recommendation or endorsement by SAI of Pinnacle's particular investment management services or strategies. More specifically, Pinnacle pays the following amounts to SAI for referrals: for referrals made prior to April 1, 2017, an annual percentage of 0.20% of any and all assets in client accounts; for referrals made after April 1, 2017, the sum of (i) an annual percentage of 0.10% of any and all assets in client accounts where such assets are identified as "fixed income" assets by SAI and (ii) an annual percentage of 0.25% of all other assets held in client accounts. For referrals made prior to April 1, 2017, these fees are payable for a maximum of seven years. Fees with respect to referrals made after that date are not subject to the seven-year limitation. In addition, Pinnacle has agreed to pay SAI a minimum annual fee amount in connection with its participation in the WAS Program. These referral fees are paid by Pinnacle and not the client.

To receive referrals from the WAS Program, Pinnacle must meet certain minimum participation criteria, but Pinnacle may have been selected for participation in the WAS Program as a result of its other business relationships with SAI and its affiliates, including Fidelity Brokerage Services, LLC ("FBS"). As a result of its participation in the WAS Program, Pinnacle may have a potential conflict of interest with respect to its decision to use certain affiliates of SAI, including FBS, for execution, custody and clearing for certain client accounts, and Pinnacle may have a potential incentive to suggest the use of FBS and its affiliates to its advisory clients, whether or not those clients were referred to Pinnacle as part of the WAS Program. Under an agreement with SAI, Pinnacle has agreed that Advisor will not charge clients more than the standard range of advisory fees disclosed in its Form ADV 2A Brochure to cover solicitation fees paid to SAI as part of the WAS Program. Pursuant to these arrangements, Pinnacle has agreed not to solicit clients to transfer their brokerage accounts from affiliates of SAI or establish brokerage accounts at other custodians for referred clients other than when Pinnacle's fiduciary duties would so require, and Pinnacle has agreed to pay SAI a one-time fee equal to 0.75% of the assets in a client account that is transferred from SAI's affiliates to another custodian; therefore, Pinnacle may have an incentive to suggest that referred clients and their household members maintain custody of their accounts with affiliates of SAI. However, participation in the WAS Program does not limit Pinnacle's duty to select brokers on the basis of best execution.

TD Ameritrade AdvisorDirect

Pinnacle participates in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC ("TD Ameritrade "), an unaffiliated SEC-registered broker-dealer and FINRA member. Pinnacle may receive client referrals from TD Ameritrade through its participation in TD Ameritrade AdvisorDirect. There is no direct link between Pinnacle's participation in the program and the investment advice it gives to its clients, although Pinnacle receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. The benefits received by Pinnacle, or its related persons, do not depend on the amount of brokerage transactions directed to TD Ameritrade. In addition to meeting the minimum eligibility criteria for participation in AdvisorDirect, Pinnacle may have been selected to participate in AdvisorDirect based on the amount and profitability to TD Ameritrade of the assets in, and trades placed for, client accounts maintained with TD Ameritrade. TD Ameritrade is a discount broker-dealer independent of and unaffiliated with Pinnacle and there is no employee or agency relationship between them. TD Ameritrade has established AdvisorDirect as a means of referring its brokerage customers and other investors seeking fee-based personal investment management services or financial planning services to independent investment advisors. TD Ameritrade does not supervise Pinnacle and has no responsibility for Pinnacle's management of client portfolios or Pinnacle's other advice or services. Pinnacle pays TD Ameritrade an on-going fee for each successful client referral. This fee is usually a percentage (not to exceed 25%) of the advisory fee that the client pays to Pinnacle ("Solicitation Fee"). Pinnacle will also pay TD Ameritrade the Solicitation Fee on any advisory fees received by Pinnacle from any of a referred client's family members, including a spouse, child or any other immediate family member who resides with the referred client and hired Pinnacle on the recommendation of such referred client. Pinnacle will not charge clients referred through AdvisorDirect any fees or costs higher than its standard fee schedule offered to its clients or otherwise pass Solicitation Fees paid to TD Ameritrade to its clients. For information regarding additional or other fees paid directly or indirectly to TD Ameritrade, please refer to the TD Ameritrade AdvisorDirect Disclosure and Acknowledgement Form.

Potential conflicts of interest may arise from Pinnacle's participation in AdvisorDirect. TD Ameritrade will most likely refer clients through AdvisorDirect to investment advisors that encourage their clients to custody their assets at TD Ameritrade and whose client accounts are profitable to TD Ameritrade. Consequently, in order to obtain client referrals from TD Ameritrade, Pinnacle may have an incentive to recommend to clients that the assets under management by Pinnacle be held in custody with TD Ameritrade and to place transactions for client accounts with TD Ameritrade. In addition, Pinnacle has agreed not to solicit clients referred to it through AdvisorDirect to transfer their accounts from TD Ameritrade or to establish brokerage or custody accounts at other custodians, except when its fiduciary duties require doing so. Pinnacle's participation in AdvisorDirect does not reduce or eliminate its fiduciary duty to obtain best execution when selecting brokers to execute securities transactions on behalf of Referred Clients.

ITEM 15 - Custody

Account Statements

Pinnacle is authorized to deduct our advisory fees from client accounts and is therefore considered to have deemed custody over these accounts. This relationship does not require heightened compliance oversight.

If the client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements in these cases, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the client's instructions.

We are considered to have deemed custody over our employee's retirement accounts, as certain members of our Executive Team serve as trustees to the plan. In addition, Pinnacle has custody over a limited number of annuity and retirement accounts through online account access provided to us by clients. All client accounts are held in actual custody at unaffiliated Custodians. Custodians send statements directly to the account owners at least quarterly and clients should carefully review and compare these statements to any account information and reports provided by Pinnacle. These client relationships and employee retirement accounts are subject, each year, to a surprise audit examination conducted by an independent public accountant registered with the PCAOB.

ITEM 16 - Investment Discretion

Discretionary Authority for Trading

Pinnacle accepts discretionary authority to manage securities accounts on behalf of our clients through a Limited Power of Attorney. Pinnacle has the authority to determine, without obtaining specific client consent, the selection and amount of securities to be bought or sold. Pinnacle does not receive any portion of the transaction fees paid by the client to the Custodian on trades. Discretionary trading authority makes order aggregation possible and facilitates prompt implementation of the investment policy approved by the client in writing.

ITEM 17 - Voting Client Securities

Proxy Votes

Pinnacle's clients shall maintain all proxy voting authority over securities managed by Pinnacle. Clients will receive their proxy notices and solicitations directly from the Custodian or transfer agent. On rare occasions, Pinnacle may share its thoughts to all clients regarding a proxy vote, if it deems such communication beneficial to assisting its clients.

ITEM 18 - Financial Information

Financial Condition

Pinnacle does not require or solicit payment of fees in excess of $1,200 per client more than six months in advance of services rendered and therefore, financial information is not required to be disclosed in this section.

Pinnacle maintains discretionary authority for client accounts and is required to disclose any financial condition that is reasonably likely to impair our ability to meet our contractual commitments to clients. Pinnacle has no such conditions to report. We have never been subject to a bankruptcy petition at any time during our history.

Other Disclosures

Disaster Recovery Plan

Pinnacle has a Disaster Recovery Plan in place which is described in detail in our Compliance Manual. It provides steps to mitigate and recover from the loss of office space, communications, services or key people.

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving to an alternate office location.

Electronic files are backed up daily and archived offsite.

Pinnacle has several Senior Managers and an Executive Team. It also maintains $1,000,000 each of life insurance on its three senior partners. All partners are subject to a Stockholder's Agreement that limit the ownership and transferability of Pinnacle stock.

Information Security

Pinnacle maintains an information security program to reduce the risk that your personal and confidential information may be breached.

Privacy Notice

Pinnacle is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us. We collect personal information from you in the course of providing planning and investment management services that include your family's names, addresses, phone numbers, email addresses, social security numbers, other information about personal finances, health, transactions with third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

We do not sell your personal information to anyone. We do not disclose any nonpublic information about our customers or former customers to anyone, except as permitted by law. In accordance with Section 248.13 of Regulation S-P, in limited circumstances where we believe, in good faith, that disclosure is required or permitted by law, we may disclose information to certain nonaffiliated third parties such as attorneys, accountants, auditors and persons or entities that are assessing our compliance with industry standards. We enter into contractual agreements with all nonaffiliated third parties that prohibit them from disclosing or using your information other than to carry out the purposes for which we disclose the information. Outside of this exception, we will not share your personal information with third parties unless you have specifically asked us to do so.

We protect the confidentiality and security of your personal information. We restrict access to personal information to our staff and for business purposes only. We maintain physical, electronic and procedural safeguards to protect your personal information.

We continue to evaluate our efforts to protect personal information and make every effort to keep your personal information accurate and up to date.

We will notify you in advance if our privacy policy is expected to change. We are required by law to provide this *Privacy Notice* to you annually, in writing and this is typically received via email or in your client portal online.

Part 2B: Brochure Supplements

The following Form ADV 2B ("Brochure Supplements") provide information about Pinnacle Advisory Group, Inc.'s team who formulates investment advice for a client or who has individual discretionary authority over a client's assets. It supplements Pinnacle's Disclosure Brochure. Additional information about our team is available on the SEC's website at www.adviserinfo.sec.gov.

Executive Committee

JOHN R. HILL, CFP®

Born: 1954

Educational Background and Professional Designations: Bachelor of Arts in Business Administration and Economics from Elon College (1976) and Certified Financial Planner™ (1988).

Business Experience:
Co-founder and Chief Executive Officer of Pinnacle Advisory Group, Inc. 1993 - Present

Disciplinary Information: None

Other Business Activities: Former President of the Financial Planning Association of Maryland and is on the board of Maryland School for the Blind.

Supervision: Review is performed through frequent interactions and quarterly meetings by the Executive Team whose nine members are identified in this section of the brochure. All Executive Team members can be reached at our main phone number, which is 410-995-6630.

DWIGHT A. MIKULIS, CFP®

Born: 1957

Educational Background and Professional Designations: Bachelor of Science in Marketing from the University of Maryland (1979), Master of Science in Finance from Loyola College (1985) and Certified Financial Planner™ (1990).

Business Experience:
Co-founder and Chief Financial Officer, Pinnacle Advisory Group, Inc. 1993 - Present
Chief Compliance Officer, Pinnacle Advisory Group, Inc. 2016 – 2017

Disciplinary Information: None

Other Business Activities: Former President of the Board of Directors of the Financial Planning Association of Maryland, Member of the Financial Planning Association, Maryland Representative of RRCA and is past President of the Howard County Striders.

Supervision: Review is performed through frequent interactions and quarterly meetings by the Executive Team whose nine members are identified in this section of the brochure. All Executive Team members can be reached at our main phone number, which is 410-995-6630.

KENNETH R. SOLOW, CFP®

Born: 1957

Educational Background and Professional Designations: Bachelor of Science in Finance from Towson State University (1979) and Certified Financial Planner™ (1998).

Business Experience:
Co-founder of Pinnacle Advisory Group, Inc. 1993 - Present
Chairman of Investment Committee for Pinnacle Advisory Group, Inc. 2014 - Present

Disciplinary Information: None

Other Business Activities: District Governor for Rotary District 7620 during 2015-2016, serves on the HCC Educational Endowment Board and on the HCC Finance Committee, member of the Financial Planning Association, former President of the Columbia Patuxent Rotary Club, and served on the Howard County Budget and Affordability Committee.

Supervision: Review is performed through frequent interactions and quarterly meetings by the Executive Team whose nine members are identified in this section of the brochure. All Executive Team members can be reached at our main phone number, which is 410-995-6630.

MICHAEL E. KITCES, CFP®, CLU®, ChFC®, RHU®, REBC®, CASL®, CWPP™

Born: 1977

Educational Background and Professional Designations: Bachelor of Science in Psychology from Bates College (2000), Master of Science in Financial Services from American College (2003), Master of Taxation from the University of Tulsa (2006), Certified Financial Planner™ (2003), Chartered Life Underwriter (2002), Chartered Financial Consultant (2002), Registered Health Underwriter (2004), Registered Employee Benefits Consultant (2004), Chartered Advisor of Senior Living (2004), and Certified Wealth Preservation Planner (2005).

Business Experience:
Director of Wealth Management of Pinnacle Advisory Group, Inc. 2002 – Present; Partner since 2012

Disciplinary Information: None

Other Business Activities: Co-Founder/Partner AdvicePay, fpPathfinder, and New Planner Recruiting. Speaker, consultant, and publisher of the Nerd's Eye View through Kitces.com. Advisory Board with Starburst Labs/Wealthbox CRM. Board member of the Washington Improv Theater. Co-founder and partner of XY Planning Network, LLC, and indirect owner of its subsidiaries FA Bean Counters, and XY Investment Solutions, LLC ("XYIS"), a Montana-registered investment advisory firm. He does not serve as an IAR of XYIS, does not have any day-to-day duties, nor is there any direct business relationship between Pinnacle and XYPN or XYIS.

Supervision: Review is performed through frequent communications and quarterly meetings by the Executive Team whose nine members are identified in this section of the brochure. All Executive Team members can be reached at our main phone number, which is 410-995-6630.

DEBRA C. KRIEBEL, CFP®

Born: 1958

Educational Background and Professional Designations: Bachelor of Science in Chemistry from Pennsylvania State University (1980), Master of Business Administration in Finance and Marketing from the University of Florida (1985) and Certified Financial Planner™ (1999).

Business Experience:
Wealth Manager of Pinnacle Advisory Group, Inc. 1996 – Present; Partner since 2002

Disciplinary Information: None

Other Business Activities: Currently serves on the Schwab Advisor Services Advisory Board (as described under Item 10 of this form ADV). Member of the Financial Planning Association, Member of the Baltimore Estate Planning Council.

Supervision: Review is performed through frequent office interactions and quarterly meetings by the Executive Team whose nine members are identified in this section of the brochure. All Executive Team members can be reached at our main phone number, which is 410-995-6630.

RICHARD D. VOLLARO, CPA

Born: 1970

Educational Background and Professional Designations: Bachelor of Science in Accounting from Fairfield College (1992) and Certified Public Accountant in Maryland (1996).

Business Experience:
Chief Investment Officer for Pinnacle Advisory Group, Inc. 2014 – Present; Partner since 2008
Managing Partner of Pinnacle Advisory Group, Inc. 2016 - Present

Disciplinary Information: None

Supervision: Review is performed through frequent office interactions and quarterly meetings by the Executive Team whose nine members are identified in this section of the brochure. All Executive Team members can be reached at our main phone number, which is 410-995-6630.

JOSHUA A. MASON, CFP®

Born: 1972

Educational Background and Professional Designations: Bachelor of Science in International Finance from Georgetown University (1994), Certificate in Political and Economic Studies from L'Universite Lumiere in Lyon, France, and Certified Financial Planner™ (2007).

Business Experience:
Wealth Manager of Pinnacle Advisory Group, Inc. 2007 – Present; Partner since 2013

Disciplinary Information: None

Other Business Activities: Member of the National Capital Area Financial Planning Association and a charter member of the Wealth Advisor Institute.

Supervision: Review is performed through frequent office interactions and quarterly meetings by the Executive Team whose nine members are identified in this section of the brochure. All Executive Team members can be reached at our main phone number, which is 410-995-6630.

DAVID B. KAUFFMAN, CFP®, J.D. CTS™

Born: 1968

Educational Background and Professional Designations: Bachelor of Science in Business Administration from James Madison University (1991), Jurist Doctorate degree from The Widener University of Law (1995) and Certified Financial Planner™ (2003).

Business Experience:
Wealth Manager of Pinnacle Advisory Group, Inc. 2004 – Present; Partner since 2016

Disciplinary Information: None

Other Business Activities: Member of Maryland Bar, Member of Washington DC Bar, Member of Maryland Bar Estate and Trust Law Section, Member of Bar Association of Montgomery County, Md., Member of the Financial Planning Association, Member of the National Capital Area Financial Planning Association, Member of Montgomery County, Md. Estate and Trust Law Section.

Supervision: Review is performed through frequent office interactions and quarterly meetings by the Executive Team whose nine members are identified in this section of the brochure. All Executive Team members can be reached at our main phone number, which is 410-995-6630.

JEFFREY K. TROLL, CFP®, CFA, CPA

Born: 1966

Educational Background and Professional Designations: Bachelor of Science in Accounting from Penn State University (1988), Certified Financial Planner™ (2005), Chartered Financial Analyst (2000), and Certified Public Accountant in Maryland (2000).

Business Experience:
Wealth Manager of Pinnacle Advisory Group, Inc. 2005 – Present; Partner since 2016

Disciplinary Information: None

Other Business Activities: Member of the CFA Institute, American Institute for Certified Public Accountants and the Financial Planning Association.

Supervision: Review is performed through frequent office interactions and quarterly meetings by the Executive Team whose nine members are identified in this section of the brochure. All Executive Team members can be reached at our main phone number, which is 410-995-6630.

Other Officers

ERIN WENDELL, CPA

Born: 1984

Educational Background and Professional Designations: Bachelor of Business Administration in Accountancy from the University of Notre Dame (2006), Masters of Professional Accountancy from Kelley School of Business at Indiana University in Bloomington (2007), and Certified Public Accountant in Colorado (2008).

Business Experience:
Chief Compliance Officer of Pinnacle Advisory Group, Inc. 2018 - Present
Controller of Pinnacle Advisory Group, Inc. 2017 – Present
Financial Consultant of McKesson Corporation 2011 - 2017

Disciplinary Information: None

Other Business Activities: Member of the American Institute for Certified Public Accountants

Supervision: Review is performed through frequent office interactions by Rick Vollaro, Managing Partner, who can be reached at our main phone number, which is 410-995-6630.

Maryland Based Wealth Managers

CARRIE E.D. BEREN, CFP®

Born: 1983

Educational Background and Professional Designations: Bachelor of Arts in Spanish Language and Literature from University of Maryland (2005), Citation in Business & Management from University of Maryland (2005) and Certified Financial Planner™ (2018).

Business Experience:
- Wealth Manager of Pinnacle Advisory Group, Inc. 2014 - Present
- Private Advisor / Assistant Vice President, BB & T Wealth 2012 - 2014
- Client Service Representative & Portfolio Advisor, Durbin Financial Advisors 2005 - 2012

Disciplinary Information: None

Supervision: Review performed by Kelly Wright, Director of Financial Planning, through frequent office interactions. He can be contacted at our main office phone 410-995-6630

MINDY GASTHALTER, CFP®

Born: 1960

Educational Background and Professional Designations: Bachelor of Science in Business Management from the State University of New York at Plattsburgh (1982), MBA in Personal Financial Planning from Golden Gate University (1985), and Certified Financial Planner™ (1998).

Business Experience:
- Wealth Manager of Pinnacle Advisory Group, Inc. 2004 - Present

Disciplinary Information: None

Other Business Activities: Member of the National Capitol Chapter of the Financial Planning Association.

Supervision: Review is performed through frequent office interactions by the Executive Team whose nine members are identified in this section of the brochure. All Executive Team members can be reached at our main phone number, which is 410-995-6630

MICHAEL K. GREEN, JR., CFP®, CTFA®, CCPS™, CAP®, JD

Born: 1970

Educational Background and Professional Designations: Bachelor of Arts in Politics from The Catholic University of America (1992), Juris Doctorate from the University of Notre Dame (1996), Certified Trust and Financial Advisor (2000), Executive Certificate in Financial Planning from Georgetown University (2008), and Certified Financial Planner™ (2011).

Business Experience:
- Wealth Manager of Pinnacle Advisory Group, 2012 - Present

Disciplinary Information: None

Other Business Activities: Estate Planning Council of Maryland; Financial Planning Association; Maryland State Bar Association, Business, Elder Law, Trust & Estate, and Tax sections; Partnership for Philanthropic Planning

Supervision: Review is performed through frequent office interactions by the Executive Team whose nine members are identified in this section of the brochure. All Executive Team members can be reached at our main phone number, which is 410-995-6630

MICHAEL A. HAMOLIA, CFP®

Born: 1974

Educational Background and Professional Designations: Bachelor of Science in Business from University of Maryland (1998) and Certified Financial Planner™ (2011).

Business Experience:
- Client Advisor of Pinnacle Advisory Group, Inc. 2011 - Present
- Operations Associate of Pinnacle Advisory Group, Inc. 2005 - 2011

Disciplinary Information: None

Other Business Activities: Member of the Financial Planning Association of Maryland.

Supervision: Review performed by Kelly Wright, Director of Financial Planning, through frequent office interactions. He can be contacted at our main office phone 410-995-6630

J. TIMOTHY MASCARI

Born: 1979

Educational Background and Professional Designations: Bachelor of Arts in History from McDaniel College (2003).

Business Experience:
- Investment Specialist at Pinnacle Advisory Group, Inc. 2009 - Present
- Investment Operations Specialist at Horan Capital Management, 2008 - 2009
- Sales Assistant at Legg Mason, 2004 - 2006

Disciplinary Information: None

Supervision: Review performed by John Hill, CEO, through frequent office interactions and remote meetings. He can be contacted at our main office phone 410-995-6630.

JOSHUA K. RIVERS, CFP®

Born: 1974

Educational Background and Professional Designations: Bachelor of Arts in English from University of Maryland (1997) and Certified Financial Planner™ (2011).

Business Experience:
- Wealth Manager of Pinnacle Advisory Group, Inc. 2017 - Present
- Head of Investments for Charter Financial Group 2012 - 2016
- Family Representative of Keel Point Advisors 2008 - 2012

Disciplinary Information: None

Other Business Activities: Board Member of Unitas Classical Christian Cooperative, Advisory Board Plimhimmon Group

Supervision: Review performed by Kelly Wright, Director of Financial Planning, through frequent office interactions. He can be contacted at our main office phone 410-995-6630

MICHAEL E. SHIRES, CFP®

Born: 1982

Educational Background and Professional Designations: Bachelor of Science in Finance from Salisbury University (2004), Master of Science in Finance from Loyola University Maryland (2011) and Certified Financial Planner™ (2014).

Business Experience:
- Wealth Manager of Pinnacle Advisory Group, Inc. 2017 - Present
- Planning Associate of Pinnacle Advisory Group, Inc. 2015 - 2017
- Wealth Manager of Young & Company Wealth Management Services, LLC 2014 - 2015
- Assistant Vice President/Risk Management Analyst of PNC Capital Advisors, LLC 2010 - 2014

Disciplinary Information: None

Other Business Activities: Member of the Financial Planning Association of Maryland.

Supervision: Review performed by Kelly Wright, Director of Financial Planning, through frequent office interactions. He can be contacted at our main office phone 410-995-6630

KELLY R. WRIGHT, CFP®

Born: 1961

Educational Background and Professional Designations: Bachelor of Science in Mechanical Engineering from University of Maryland (1984), Master of Business Administration with a Concentration in Finance (1992), and Certified Financial Planner™ (1992).

Business Experience:
  Director of Financial Planning for Pinnacle Advisory Group, Inc. 2016 - Present
  Vice-president in charge of Financial Planning for Armstrong, Fleming & Moore, Inc. 2010 - 2016

Disciplinary Actions: None

Other Business Activities: None

Supervision: Review performed by Rick Vollaro, Managing Partner, through frequent office interactions. He can be contacted at our main office phone 410-995-6630

Florida Based Wealth Managers

MAY CHEUNG, CFP®

Born: 1955

Educational Background and Professional Designations: Bachelor of Arts in Accounting from York University, Toronto Canada (1979), and Certified Financial Planner™ (1995).

Business Experience:
  Wealth Manager of Pinnacle Advisory Group, Inc. 2015 - Present
  Financial Advisor at The Enrichment Group, Inc. 1998 - 2015
  Assistant to Financial Advisor at The Enrichment Group, Inc. 1992 - 1998

Disciplinary Information: None

Other Business Activities: Board Member Financial Planning Association of Miami, 1996 - Present

Supervision: Review performed by John Hill, CEO, through frequent office interactions and remote meetings. He can be contacted at our main office phone 410-995-6630

ANDREW KRONE, CPA

Born: 1952

Educational Background and Professional Designations: Bachelor of Arts in Mathematics and Economics from Boston College (1974), MBA in Finance from New York University (1976), and Certified Public Accountant in Virginia (2001).

Business Experience:
  Regional Director of Pinnacle Advisory Group, Inc. (Naples Office) 2009 - Present

Disciplinary Information: None

Supervision: Review performed by John Hill, CEO, through frequent office interactions and remote meetings. He can be contacted at our main office phone 410-995-6630

RAOUL B. RODRIGUEZ, CFP®

Born: 1964

Educational Background and Professional Designations: Bachelor of Arts in Economics from the University of Texas at Austin (1989), Master in Science in Financial Planning from the College of Financial Planning (2004), Certified Financial Planner™ (2004), and Enrolled Agent (2013).

Business Experience:
  Wealth Manager of Pinnacle Advisory Group, Inc. 2016 - Present
  President of Mexico Advisor 1998 - 2016
  Partner of Rodriguez and Shah 2012-2016

Disciplinary Information: None

Other Business Activities: Member of the Financial Planning Association of Florida

Supervision: Review performed by John Hill, CEO, through frequent office interactions and remote meetings. He can be contacted at our main office phone 410-995-6630

STEPHEN O. WRIGHT, CFP®

Born: 1966

Educational Background and Professional Designations: Bachelor of Arts in Finance from the University of West Florida (1987), MBA from the University of West Florida (1990), Master of Divinity from the Southeastern Baptist Theological Seminary (2001) and Certified Financial Planner™ (2013).

Business Experience:
Wealth Manager of Pinnacle Advisory Group, Inc. 2015 - Present
Financial Planner at The Enrichment Group 2012 - 2015

Disciplinary Information: None

Other Business Activities: Member of the Miami Chapter of the Financial Planning Association. Member of the Estate Planning Council of Greater Miami.

Supervision: Review performed by John Hill, CEO, through frequent office interactions and remote meetings. He can be contacted at our main office phone 410-995-6630

Description of Minimum Qualifications for Professional Designations

Certified College Planning Specialist (CCPS™)

- Pre-qualify with a professional Designation (CFP®)
- Successful completion of the exam

Certified Financial Planner (CFP®)

Certified Financial Planners are licensed by the CFP Board to use the CFP mark. CFP certification requirements:

- Bachelor’s degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board (www.cfp.net).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.

Certified Public Accountant (CPA)

Colorado Education and Certification Requirements:

- Bachelor Degree in a related field from an accredited college or university.
- Completion of 45 semester credit hours in a combination of undergraduate and graduate accounting courses and 36 semester credit hours in business administration courses.
- Successful completion of all four sections of the CPA license exam.
- Successful completion of an AICPA Professional ethics course.

Maryland Education and Certification Requirements:

- Bachelor Degree in a related field from an accredited college or university.
- Completion of 27 semester credit units in accounting related subjects plus additional coursework.
- Successful completion of all four sections of the CPA license exam.
- Two years of general accounting experience under the direction of an actively licensed CPA.
- Successful completion of an ethics course.

Virginia Education and Certification Requirements:

- Bachelor Degree in a related field from an accredited college or university with at least 24 semester hours of accounting courses and 24 semester hours of business courses.
- Completion of 150 semester hours of education at an accredited program with concentration in accounting.
- Successful completion of all four sections of the CPA license exam.
- Two thousand hours of general accounting experience during a period that spans at least one year but not more than three years.
- Successful completion of an ethics course.

Certified Tax Specialist (CTS™)

- Bachelor Degree from an accredited college or university.
- Successfully pass three exams and one open book case study

Certified Trust & Financial Advisor (CTFA®)

Certification in trust and estate administration through the Institute of Certified Bankers within the American Banking Association.

- Three years of professional experience in wealth management, and a letter of reference
- Completion of an ICB approved wealth management training program
- Successful completion of exam covering the topics of Fiduciary and Trust Administration, Financial Planning, Tax Law and Planning, Investment Management and Ethics

Certified Wealth Preservation Planner (CWPP™)

- Candidates must pass a multiple choice and essay exam with a pass rate of at least 70%.
- Candidates are required to pass a three question essay every three years to maintain their certification.

Chartered Advisor of Senior Living (CASL®)

- Candidates must pass an exam for five required courses.
- Candidates must meet experience requirements and ethical standards, including three years of business experience immediately preceding the date of use of the designation are required.
- An undergraduate or graduate degree from an accredited educational institution qualifies as one year of business experience and, when using formal education as qualifying experience, the remaining two years must immediately precede the date of the award.

Chartered Financial Analyst (CFA)

- Bachelor degree from an accredited institution (or have equivalent education or work experience.
- Successful completion of three exams set by the CFA Institute
- Two years of qualified, professional work experience
- Adhere to a strict Code of Ethics and standards

Chartered Life Underwriter (CLU®)

- Candidates must pass an exam for five required courses and three elective courses.
- Candidates must meet experience requirements and ethical standards, including three years of business experience immediately preceding the date of use of the designation are required.
- An undergraduate or graduate degree from an accredited educational institution qualifies as one year of business experience and, when using formal education as qualifying experience, the remaining two years must immediately precede the date of the award.

Chartered Financial Consultant (ChFC®)

- Candidates must pass an exam for six required courses and two elective courses.
- Candidates must meet experience requirements and ethical standards, including three years of business experience immediately preceding the date of use of the designation are required.

- An undergraduate or graduate degree from an accredited educational institution qualifies as one year of business experience and, when using formal education as qualifying experience, the remaining two years must immediately precede the date of the award.

Chartered Advisor in Philanthropy (CAP®)

- Candidates must be engaged in the following professional activities three of the five years immediately preceding the application: 1) advising individuals or charitable organizations in wealth and estate planning, charitable planning, charitable giving, planned giving, nonprofit or foundation management or services, investment management of charitable assets or accounting or 2) Employed in the nonprofit sector in a capacity related to nonprofit management, development, planned giving or fundraising
- Three graduate level courses, equivalent of 9 semester credit hours
- Successful completion of the CAP Certification Exam

Juris Doctorate (JD):

- Successful completion of 90 hours of course work
- Passing score on the Maryland State Bar Exam

Registered Employee Benefits Consultant (REBC®)

- Candidates must pass an exam for three required courses and two elective courses.
- Candidates must meet experience requirements and ethical standards, including three years of business experience immediately preceding the date of use of the designation are required.
- An undergraduate or graduate degree from an accredited educational institution qualifies as one year of business experience and, when using formal education as qualifying experience, the remaining two years must immediately precede the date of the award.

Registered Health Underwriter (RHU®)

- Candidates must pass an exam for two required courses and one elective course.
- Candidates must meet experience requirements and ethical standards, including three years of business experience immediately preceding the date of use of the designation are required.
- An undergraduate or graduate degree from an accredited educational institution qualifies as one year of business experience and, when using formal education as qualifying experience, the remaining two years must immediately precede the date of the award.