Item 1 Cover Page

# Assured Advisory Group, LLC Firm CRD #316449

Form ADV Part 2A – Disclosure

Brochure Effective: August 7, 2024



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This brochure provides information about the qualifications and business practices of Assured Advisory Group, LLC. If you have any questions about the contents of this brochure, please contact us at (847) 426-1077.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Registration as a registered investment advisor does not imply a certain level of skill or training.

Additional information about Assured Advisory Group, LLC., CRD #316449 also is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>

# **Item 2 Material Changes**

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of Assured Advisory Group, LLC.

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

The last annual updating amendment of Assured Advisory Group, LLC was on 03/11/2024.

- Material changes relate to Assured Advisory Group, LLC policies, practices or conflicts of interest.
  - Assured Advisory Group, LLC provides Estate Planning services. (Items 4 & 5)

# Future Changes

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

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at <u>www.adviserinfo.sec.gov.</u>

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# Item 4 Advisory Business A. Description of Advisor Firm.

Assured Advisory Group, LLC. was formed as a Limited Liability Company in the state of Illinois as of August 31, 2021. As of the date of this Brochure, Assured Advisory Group, LLC. isregistered as an independent investment advisor firm in the states of Illinois and Texas. The principal owner and President of the firm is David M. Schlossberg. The firm offers discretionary investment supervisory and management services, financial planning and educational seminars/workshops. For more complete details about our services see Item 4B.

# B. Description of Advisory Services Offered

### **Investment Supervisory and Management**

# Services

Assured Advisory Group, LLC, ("Advisor") principal service is providing fee-based investment advisory services. The Advisor offers investment supervisory and management services based on the individual goals, objectives, time horizons, and risk tolerance of each client. Once established, an Investment Policy Statement is created for each client, which outlines the client's current financial situation (age, income, tax levels, and risk tolerance). The Advisor evaluates the current investments of each client, and then constructs an investment plan and recommended portfolio that matches each client's specific situation. The Advisor requires discretionary authority from clients in order to select securities and the custodian will execute transactions without permission from the client prior to each transaction.

Clients may engage the Advisor to manage and/or offer investment advice on certain investments that are not maintained at their primary custodian, such as assets held in employer sponsored retirement plans, and/or assets held in qualified tuition plans (e.g., 401(k)'s, 529 plans). In these situations, the Advisor directs or recommends the allocation of client assets among the various investment options available in each plan/custodian.

The Advisor's recommended portfolios generally consist of exchange-listed securities, Certificates of Deposit, Exchange Traded Funds (ETFs), mutual funds, United States government securities, options contracts on securities, and variable annuities and variable life insurance. Investing in these types of securities helps to diversify an investment portfolio.

The Advisor will provide investment supervisory and management services and will not provide securities custodial or other administrative services. At no time will the Advisor accept or maintain custody of a client's funds or securities.

### **Advisor Agreements**

Investment supervisory and management services are provided under the terms of a written advisor agreement executed by the Advisor and the client.

### **Financial Planning**

In addition to investment supervisory and management services, the Advisor provides financial planning services to some of its clients. The Advisor's financial planning services will include a consultation with the client to discuss the client's financial goals and objectives whereby the Advisor will then develop or amend a written financial plan for the client. The Advisor will discuss recommendations, that include, but not be limited to, topics such as retirement needs, investments, taxes, insurance, estate planning, business planning and other relevant topics with the client. The Advisor's recommendations for portfolio customization are based on the client's investment objectives, goals, financial situation, and risk tolerance. In addition to tailored investment advice financial planning services also includes recommendations relating to investment, budgeting, and asset management strategies.

The Advisor does not charge clients for a financial plan if the client has engaged the Advisor to manage their account. Rather, the financial plan provided to clients is inclusive in the asset management fee paid to the Advisor.

Clients who have not engaged the Advisor for portfolio management, will be charged a fixed fee for a financial plan. See Item 5A. & B. for details.

# **Estate Planning Services**

With our purchase of a software subscription with an independent third-party technology company, Wealth, Inc., Assured Advisory Group, LLC can offer web-based software for Clients to facilitate the preparation of various estate planning documents. Wealth, Inc's software subscription allows Assured Advisory Group, LLC to provide client access to Wealth, Inc's estate planning software.

Neither Assured Advisory Group, LLC, nor Wealth, Inc. renders legal advice or services. However, Wealth, Inc., through their software, offers the ability to consult with licensed attorneys in various jurisdictions that are affiliated with Wealth.Com at an additional charge, and subject to additional terms and conditions.

Such services are generally separate from any investment management and/or financial planning services that Assured Advisory Group, LLC may render to a client, and the exact scope of such estate planning services will depend on the nature of a client's specific estate planning needs. Clients are not required to engage the services of Wealth, Inc. for Assured Advisory Group, LLC to render estate planning advice.

Assured Advisory Group is not an attorney firm and has no attorneys on staff. Assured Concept Group is merely providing access to interested parties in self-preparing their own legal documents through the Wealth.com website along with the affiliated services of notary, online vault storage, and beneficiary notices.

# Seminars/Workshops

The Advisor also offers educational seminars or workshops on topics including but not limited to, general information concerning investing, financial planning, economic conditions, business Assured Advisory Group, LLC Page 5

and tax planning, as well as the services provided by the Advisor. The Advisor will not charge a fee for these educational seminars but may charge for multi-day workshops. The cost of the workshop will be dependent upon, but not limited to, location expenses, cost of curriculum materials, mailings, etc. and will not exceed \$100 per attendee.

# C. Clients Tailored Services and Client Imposed Restrictions

The Advisor will tailor its advisory services to its client's individual needs based on meetings and conversations with the client. If clients wish to impose certain restrictions on investing in certain securities or types of securities, the Advisor will address those restrictions with the client to have a clear understanding of the client's requirements.

# D. Wrap Fee Programs

The Advisor does not provide portfolio management services to wrap fee programs.

# E. Assets Under Management

As of December 2023, Assured Advisory Group, LLC manages assets of \$69,355,241.00 on a discretionary basis and \$5,620,107.00 on a non-discretionary basis.

# Item 5 Fees and Compensation

A. & B. Method of Compensation and Fee Schedule and Client Payment of Fees

# Asset Management Fees

Pursuant to an investment advisory contract signed by each client, the client will pay the Advisor a quarterly management fee, payable in advance, based on the value of portfolio assets of the account on the first business day of each quarter. The annual management fee will not exceed 2.00%.

This fee is negotiated at the sole discretion of the Advisor. The fee may be negotiated based on anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc. Asset management fees will be automatically deducted from the client account on a quarterly basis by the qualified custodian. The client will give written authorization permitting the firm to be paid directly from their account held by the custodian. The custodian will send a quarterly statement to the client and the Advisor will also send a quarterly invoice to the client, as well as the custodian, outlining the fee calculation and the amount withdrawn from the client account. The fee was based, and the specific manner in which the fee was calculated. Clients need to be aware that it is their responsibility to verify the accuracy of the fee calculation and that the custodian will not determine whether the fee is properly calculated. Any discrepancies should be immediately brought to the firm's attention.

### Fixed Fees

The Advisor will charge a fixed fee for a written financial plan. The range of that fixed fee is

Assured Advisory Group, LLC

\$600 (minimum) to \$6,000. The fixed fee charged to the client for the financial plan will be based on, but not limited to, the complexity beyond the client's assets, the number and type of assets for consideration within the plan, the future goals of the client, succession planning considerations, business and tax planning, gifting for future generations, review of insurance policies and estate planning considerations. Fixed fees are negotiable at the discretion of the Advisor. The Advisor offers a 100% satisfaction guarantee to clients, if the client is not satisfied for any reason with the financial plan, a full refund is offered to the client. The Advisor will complete the financial plan within 60 days of the start of the engagement.

# Estate Planning Fees

For an annual subscription of \$495.00, Assured Advisory Group, LLC will provide Client's access to the Wealth, Inc. web-based software for the self-preparation of various estate planning documents such as: Living Trusts, Pour over Wills, Health Care Directives, Financial Powers of Attorney, among others. Notarial and/or witness services, archiving and storage of executed documents, printing of documents will also be included in the subscription. As a condition of utilizing Wealth, you must agree to the terms and conditions available at wealth.com. Annual renewals will entitle the clients/prospects to unlimited amendments/updates to all the documents at any time, our witness and notary service, and perpetual access to the vault with emergency contact access. The renewal is not necessary for the documents to have merit. In the event of nonrenewal, clients will be provided 30 days access to retrieve documents from the vault.

# C. Additional Client Fees Charged

All fees paid to the Advisor for investment advisory services are separate and distinct from the expenses charged by mutual funds to their shareholders and the product sponsor in the case of variable insurance products. These fees and expenses are described in each fund's or variable product's prospectus. These fees will generally include a management fee and other fund expenses.

At no time will the Advisor accept or maintain custody of a client's funds or securities except for authorized fee deduction. Client is responsible for all custodial, securities and brokerage execution fees charged by the custodian and executing broker-dealer. The Advisors fee is

separate and distinct from the custodian and execution fees. See Item 12 Brokerage Practices, for further information of brokerage and transaction costs.

# **D.** Prepayment of Client Fees

The Advisor's asset management fee is payable in advance. Upon termination, any fees paid in advance will be prorated to the date of termination and any excess will be refunded to the client.

# E. External Compensation for the Sale of Securities to Clients

Where acting in the capacity of a registered representative, investment advisory representatives of the Advisor will, as broker or agent effect securities transactions for typical and customary compensation. Clients are not obligated to use investment advisory representatives of the Advisor to execute such securities transactions.

This practice presents a conflict of interest by creating an incentive to recommend investment products based on the compensation received, rather than on a client's needs. All fees for the recommended products will be disclosed to the client in advance. Clients always have the right to choose who they want to engage for the purpose of purchasing security products. To the extent mutual funds are recommended to the client, the investment advisor representative will act in their fiduciary duty and recommend the product that best meets the client's needs informing the client of the fees associated with that recommendation.

A client will be able to invest in products recommended by the firm directly, without the services of the Advisor. In that case, the client would not receive the services provided by the Advisor which are designed, among other things, to assist the client in determining which products or services are most appropriate to each client's financial condition and objectives.

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

The Advisor does not charge performance-based fees and therefore does not engage in side-byside management.

### Item 7 Types of Clients and Minimum Account Size

The Advisor will offer its services to individuals, pension and profit-sharing plans, trusts, estates, or charitable organizations, corporations or business entities.

The Advisor's minimum requirement is \$500,000 of invested assets for the household for opening or maintaining an account(s) for the household, although exceptions may be made based on the circumstances.

# Item 8 Methods of Analysis, Investment Strategies and Risk of Loss A. Methods of Analysis and Investment Strategies

The Advisor utilizes fundamental, technical or cyclical analysis techniques in formulating investment advice or managing assets for clients.

Fundamental analysis of businesses involves analyzing its financial statements and health, its management and competitive advantages and its competitors and markets. Fundamental analysis is performed on historical and present data but with the goal of making financial forecasts. There are several possible objectives; to conduct a company stock valuation and predict its probable price evolution; to make a projection on its business performance; to evaluate its management and make internal business decisions and to calculate its credit risk. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis is a method of evaluating securities by relying on the assumption that market data, such as charts of price, volume and open interest can help predict future (usually short-term) market trends. Technical analysis assumes that market psychology influences trading in a way that enables predicting when a stock will rise or fall. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

Cyclical analysis of economic cycles is used to determine how these cycles affect the returns of an investment, an asset class or an individual company's profits. Cyclical risks exist because the broad economy has been shown to move in cycles, from periods of peak performance followed by a downturn, then a trough of low activity. Between the peak and trough of a business or other economic cycle, investments fall in value to reflect the uncertainty surrounding future returns as compared with the recent past. The risks with this strategy are two-fold 1) the markets do not always repeat cyclical patterns and 2) if too many investors begin to implement this strategy, it changes the very cycles they are trying to take advantage of.

Computer-driven analytics (AI) may be used to anticipate individual securities uptrends as an additional method of analysis and investment strategy.

The investment strategies the Advisor will implement include long term purchases of securities held at least for one year; short term purchases for securities sold within a year; option writing, including covered options, uncovered options or spreading strategies.

*Clients need to be aware that investing in securities involves risk of loss that clients need to be prepared to bear.* 

# **B.** Investment Strategy and Method of Analysis Material Risks

The methods of analysis and investment strategies followed by the Advisor are utilized across all of the Advisors clients, as applicable. One method of analysis or investment strategy is not more significant than the other as the Advisor is considering the client's portfolio, risk tolerance, time horizon and individual goals. However, the client should be aware that with any trading that occurs in the client account, the client will incur transaction and administrative costs.

# C. Security Specific Material Risks

The Advisor does not primarily recommend a particular type of security.

Every type of investment, including mutual funds, involves risk. Risk refers to the possibility that you will lose money (both principal and any earnings) or fail to make money on an investment. A fund's investment objective and its holdings are influential factors in determining how risky a fund is. Reading the prospectus will help you to understand the risk associated with that particular fund.

Generally speaking, risk and potential return are related. This is the risk/return trade-off. Higher risks are usually taken with the expectation of higher returns at the cost of increased volatility. While an investment with higher risk has the potential for higher return, it also has the greater potential for losses or negative returns. The school of thought when investing suggests that the longer your investment time horizon is the less affected you should be by short-term volatility. Therefore, the shorter your investment time horizon, the more concerned you should be with short-term volatility and higher risk.

Below is a list of some of the risks to consider when:

**Call Risk**. The possibility that falling interest rates will cause a bond issuer to redeem—or call—its high-yielding bond before the bond's maturity date.

**Country Risk**. The possibility that political events (a war, national elections), financial problems (rising inflation, government default), or natural disasters (an earthquake, a poor harvest) will weaken a country's economy and cause investments in that country to decline.

**Credit Risk**. The possibility that a bond issuer will fail to repay interest and principal in a timely manner. Also called default risk.

**Currency Risk**. The possibility that returns could be reduced for Americans investing in foreign securities because of a rise in the value of the U.S. dollar against foreign currencies. Also called exchange-rate risk.

**Income Risk**. The possibility that a fixed-income fund's dividends will decline as a result of falling overall interest rates.

**Industry Risk**. The possibility that a group of stocks in a single industry will decline in price due to developments in that industry.

**Inflation Risk**. The possibility that increases in the cost of living will reduce or eliminate a fund's real inflation-adjusted returns.

**Interest Rate Risk**. The possibility that a bond fund will decline in value because of an increase in interest rates.

**Manager Risk**. The possibility that an actively managed mutual fund's investment adviser will fail to execute the fund's investment strategy effectively resulting in the failure of stated objectives.

**Market Risk**. The possibility that stock fund or bond fund prices overall will decline over short or even extended periods. Stock and bond markets tend to move in cycles, with periods when prices rise and other periods when prices fall.

**Principal Risk**. The possibility that an investment will go down in value, or "lose money," from the original or invested amount.

**Pandemic Risk.** Large-scale outbreaks of infectious disease that can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption.

**Asset Class Risk**. Securities in your portfolio(s) or in underlying investments such as mutual funds may underperform in comparison to the general securities markets or other asset classes.

**Concentration Risk**. To the extent that the Advisor recommends portfolio allocations that are concentrated in a particular market, industry or asset class, your portfolio is susceptible to loss due to adverse occurrences affecting that market, industry, or asset class.

**Equity Securities Risk.** Equity securities are subject to changes in value that are attributable to market perception of a particular issuer or general stock market fluctuations that affect all issuers. Investments in equity securities are more volatile than other types of investments.

**Growth Securities Risk.** Growth companies are companies whose earnings growth potential appears to be greater than the market, in general, and whose revenue growth is expected to continue over an extended period. Stocks of growth companies or "growth securities" have market values that are more volatile than those of other types of investments. Growth securities typically do not pay a dividend, which helps cushion stock prices in market downturns and reduce potential losses.

**Issuer Risk.** Your account's performance depends on the performance of individual securities in which your account invests. Any issuers performing poorly, causing the value of its securities to decline. Poor performance is caused by poor management decisions, competitive pressures, changes in technology, disruptions in supply, labor problems or shortages, corporate restructurings, fraudulent disclosures, or other factors. Changes to the financial condition or credit rating of an issuer of those securities causes the value of the securities to decline.

Political Risk. Government decisions can damage the value of your investments. Changes to

social security, benefits law, and tax law impact your financial decisions. Any foreign investments are impacted by the decision of their local governments.

**Passive Investment Risk**. The Advisor uses a passive investment strategy that is not actively managed where we do not attempt to take defensive positions in declining markets.

**Larger Company Securities Risk.** Securities of companies with larger market capitalizations underperform securities of companies with smaller and mid-sized market capitalizations in certain economic environments. Larger, more established companies might be unable to react as quickly to new competitive challenges, such as changes in technology and consumer tastes. Some larger companies are unable to grow at rates higher than the fastest growing smaller companies, especially during extended periods of economic expansion.

**Liquidity Risk.** A security is not able to be sold at the time desired without adversely affecting the price.

**Regulatory Risk.** Changes in government regulations adversely affect the value of a security. An insufficiently regulated industry or market might also permit inappropriate practices that adversely affect an investment.

**Smaller Company Securities Risk.** Securities of companies with smaller market capitalizations, historically, tend to be more volatile and less liquid than larger company stocks. Smaller companies have no or relatively short operating histories or be newly public companies. Some of these companies have aggressive capital structures, including high debt levels, or are involved in rapidly growing or changing industries and/or new technologies, which pose additional risks.

Value Style Investment Risk. Value stocks perform differently from the market as a whole and from other types of stocks. Value stocks purchased based upon the belief that a given security is out of favor. Value investing seeks to identify stocks that have depressed valuations, based upon a number of factors which are thought to be temporary in nature, and to sell them at superior profits when their prices rise when the issues which caused the valuation of the stock to be depressed are resolved. While certain value stocks increase in value more quickly during periods of anticipated economic upturn, they also lose value more quickly in periods of anticipated economic downturn. Furthermore, there is a risk that the factors which caused the depressed valuations are longer term or even permanent in nature, and that there will not be any rise in value. Finally, there is the increased risk in such situations that such companies will not have sufficient resources to continue as ongoing businesses, which would result in the stock of such companies potentially becoming worthless.

**Exchange-Traded Funds (ETFs).** ETFs are investment companies that are legally classified as open-end mutual funds or UITs. However, they differ from traditional mutual funds, in particular, in that ETF shares are listed on a securities exchange. Shares can be bought and sold throughout the trading day like shares of other publicly-traded companies. ETF shares trade at a discount or premium to their net asset value. This difference between the bid price and the ask

price is often referred to as the "spread." The spread varies over time based on the ETF's trading volume and market liquidity, and is generally lower if the ETF has a lot of trading volume and market liquidity and higher if the ETF has little trading volume and market liquidity. Although many ETFs are registered as an investment company under the Investment Company Act of 1940 like traditional mutual funds, some ETFs, in particular those that invest in commodities, are not registered as an investment company.

**Options.** Certain types of option trading are permitted in order to generate income or hedge a security held in the program account; namely, the selling (writing) of covered call options or the purchasing of put options on a security held in the program account. Client should be aware that the use of options involves additional risks. The risks of covered call writing include the potential for the market to rise sharply. In such cases, the security is called away and the program account will no longer hold the security. The risk of buying long puts is limited to the loss of the premium paid for the purchase of the put if the option is not exercised or otherwise sold by the program account.

**Variable Annuities.** If you purchase a variable annuity that is part of a program, you will receive a prospectus and need to rely solely on the disclosure contained in the prospectus with respect to the terms and conditions of the variable annuity. You need to also be aware that certain riders purchased with a variable annuity limit the investment options and the ability to manage the subaccounts.

If you are investing in a variable annuity through a tax advantaged retirement plan (such as a 401(k) plan or an IRA), you will get no additional tax advantage from the variable annuity. Under these circumstances, consider buying a variable annuity only if it makes sense because of the annuity's other features, such as lifetime income payments and death protection. The tax rules that apply to variable annuities can be complicated—before investing, you will want to consult a tax adviser about the tax consequences to you of investing in a variable annuity.

Variable annuities are designed to be long-term investments, to meet retirement and other longrange goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

**Margin Accounts.** Clients need to be aware that margin borrowing involves additional risks. Margin borrowing will result in increased gain if the value of the securities in the account go up, but will result in increased losses if the value of the securities in the account goes down. The custodian, acting as the client's creditor, will have the authority to liquidate all or part of the account to repay any portion of the margin loan, even if the timing would be disadvantageous to the client. For performance illustration purposes, the margin interest charge will be treated as a withdrawal and will, therefore, not negatively impact the performance figures reflected on the quarterly advisory reports.

**Money Market Funds.** Money Market Funds can lose value in volatile market conditions and if interest rates drop, but they can produce more income too. Because they are considered

investments, not deposits, money market funds are not insured against loss by the FDIC.

It is important to note that no methodology or investment strategy is guaranteed to be successful or profitable. Investing in securities involves the risk of loss that clients should be prepared to bear.

# **Item 9 Disciplinary Information**

There are no legal, regulatory or disciplinary events involving the Advisor or any of its employees. The Advisor and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at http://adviserinfo.sec.gov. To review the firm information contained in ADV Part 1, select the option for Investment Adviser Firm and enter CRD NO. 316449 in the field labeled "Firm IARD/CRD Number". This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions. You may also research the background of David M. Schlossberg, Lawrence P. Strzelecki, or Anthony L Feucht by selecting the Investment Adviser Representative tab and entering the Individuals CRD #3038857 and/or #4711489 and/or #7702587 in the field labeled "Individual CRD Number".

# Item 10 Other Financial Industry Activities and Affiliations A. Broker-Dealer or Representative Registration

The Advisor is not registered as a Broker Dealer firm; however, David M. Schlossberg is a Registered Representative with Purshe Kaplan Sterling Investments, CRD #35747, SEC #8- 46844, a FINRAregistered broker-dealer.

# **B.** Futures or Commodity Registration

The Advisor does not have an application pending as a futures commission merchant, commodity pool operator, or a commodity trading advisor, or as an associated person of the foregoing entities.

# C. Material Relationships Maintained by this Advisory Business and Conflicts of Interest

David M. Schlossberg, President of the Advisor is also the owner of Tax Plan for Wealth, Inc. that offers tax preparation and planning services. Clients of the Advisor may be solicited for the services of Tax Plan for Wealth, Inc. This creates a conflict of interest. A conflict of interest exists because of the receipt of compensation by Mr. Schlossberg as the President of the Advisor and the owner of the affiliated entity, Tax Plan for Wealth, Inc. Clients always have the right to decide whether to utilize the tax services recommended by Mr. Schlossberg. In recommending tax services, Mr. Schlossberg will always act in the client's best interest under his fiduciary duty. Clients are not obligated to use Tax Plan for Wealth, Inc. or its representatives for tax services. Mr. Schlossberg will spend approximately 20 hours per month of his time on tax related

activities.

Mr. Schlossberg is also a registered representative with Purshe Kaplan Sterling Investments, CRD #35747, SEC #8-46844, a FINRA registered broker-dealer. Clients who use the services of Mr. Schlossberg as a registered representative may incur transactional costs in lieu of a management fee for services. This creates a conflict of interest. Mr. Schlossberg addresses this conflict of interest by disclosing to their clients prior to the initiating of any transactional related business where transactional expenses occur in lieu of management fees for services. Clients always have the right to select the registered representative they want to work with when purchasing products. Clients are not obligated to utilize Mr. Schlossberg or the broker dealer firm in this capacity.

Mr. Schlossberg, Mr. Strzelecki and Mr. Feucht are Investment Advisor Representatives for the Advisor. They are also licensed and registered as insurance agents to sell life, long term care and other lines of insurance for various insurance companies. Therefore, they will be able to purchase insurance products for any client in need of such services and will receive separate, yet typical compensation in the form of commissions for the purchase of insurance products. This creates a conflict of interest. A conflict of interest exists because Mr. Schlossberg, Mr. Strzelecki, and Mr. Feucht can recommend products for which they can receive additional compensation, i.e. insurance. Clients always have the right to decide whether to purchase insurance recommended by Mr. Schlossberg, Mr. Strzelecki or Mr. Feucht and if they do purchase insurance, clients have the right to decide from whom to purchase insurance. In recommending insurance products, Mr. Schlossberg, Mr. Strzelecki and Mr. Feucht will always act in the client's best interest under their fiduciary duty. Clients are not obligated to use the Advisor or its representatives for insurance product services. Mr. Schlossberg will spendapproximately 10 hours per month of his time on insurance related activities, Mr. Strzelecky will spend approximately 1 to 2 hours per month of his time on insurance related activities and Mr. Feucht will spend approximately 1 hour of his time per month on insurance related activities.

# D. Recommendation or Selection of Other Investment Advisers and Conflicts of Interest

The Advisor does not recommend or select other investment advisors for clients.

# Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading A. Code of Ethics Description

The Advisor is registered as a state registered investment advisor with the Illinois and Texas securities regulators and has adopted as an industry best practice a Code of Ethics. The Advisor has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the Advisor. In addition, the Code of Ethics governs personal trading by each employee of the Advisor deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of the Advisor are conducted in a manner that avoids any conflict of interest between such persons and clients of the Advisor or its affiliates. The Advisor collects and maintains records of securities holdings and securities transactions effected by Access Persons. These records are reviewed to identify and resolve conflicts of interest. The Advisor maintains a code of ethics and will provide a copy to any client or Assured Advisory Group, LLC Page 15

prospective client upon request.

# B. Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

# Registered Representative

Where acting in the capacity of a registered representative, or investment advisory representative, David M. Schlossberg, Lawrence P. Strzelecki and Anthony L. Feucht of the Advisor, as broker or agent effect securities transactions for typical and customary compensation. This creates a conflict of interest. Clients are not obligated to use investment advisory representatives of the Advisor to execute such securities transactions. If client elects to use the investment advisory representatives of the Advisor in this capacity, fees associated with these types of transactions will be disclosed to the client, in advance.

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

The Advisor and/or its investment advisory representatives from time to time purchase or sell products that they recommend to clients. This practice presents a conflict where, because of the information the Advisor has, the Advisor or its related person are in a position to trade in a manner that adversely affect clients (e.g. place their own trades before or after client trades are executed in order to benefit from any price movements due to the clients' trades). In addition to affecting the Advisor's or its related person's objectivity, these practices by the Advisor or its related person also harm clients by adversely affecting the price at which the clients' trades are executed. To mitigate this conflict, the Advisor and/or its investment advisory representatives have a fiduciary duty to put the interests of their clients ahead of their own. The Advisor has adopted the following procedures in an effort to minimize such conflicts: The Advisor requires its related persons/access persons to preclear all transactions in their personal accounts with the Chief Compliance Officer, (Stacey A. Lech), who may deny permission to execute the transaction if such transaction will have any adverse economic impact on one of its clients. All of the Advisor's related persons are required to disclose their securities transactions on a quarterly basis and holdings on an annual basis. All of the Advisor's related persons are also required to provide broker confirmations of each transaction in which they engage and a monthly certification of such transactions. Trading in employee accounts will be reviewed by the Chief Compliance Officer and compared with transactions for the client accounts. Also, the investment advisory representatives are required to adhere to the Advisor's Code of Ethics as outlined above in Item 11A.

# **D.** Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

See the response to Item 11C above.

# Item 12 Brokerage Practices A. Factors Used to Select Broker-Dealers for Client Transactions

The Advisor will suggest brokers or dealers to be used based on execution and custodial services offered, cost, quality of service and industry reputation. The Advisor will consider factors such as commission price, speed and quality of execution, client management tools, and convenience of access for both the Advisor and client in making its suggestion.

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

The Advisor does not receive research or other products or services other than execution from a broker- dealer or third party as a result of client securities transactions.

# **Brokerage for Client Referrals.**

The Advisor does not receive client referrals from any broker-dealer or third party as a result of the firm selecting or recommending that broker-dealer to clients.

# **Directed Brokerage.**

The Advisor recommends that all clients use a particular custodian for execution and/or custodial services. The custodian is recommended based on criteria such as, but not limited to, reasonableness of commissions charged to the client, tools and services made available to the client and the Advisor, and convenience of access to the account trading and reporting. The client will provide authority to the Advisor to direct all transactions through that broker-dealer in the investment advisory agreement.

As an investment advisory firm, the Advisor has a fiduciary duty to seek best execution for client transactions. While best execution is difficult to define and challenging to measure, there is some consensus that it does not solely mean the achievement of the best price on a given transaction. Rather, it appears to be a collective consideration of factors concerning the trade in question. Such factors include the security being traded, the price of the trade, the speed of the execution, apparent conditions in the market, and the specific needs of the client. The Advisor's primary objectives when placing orders for the purchase and sale of securities for client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. The Advisor may not necessarily pay the lowest commission or commission equivalent as specific transactions involve specialized services on the part of the broker.

# If the firm permits a client to direct brokerage, describe your practice.

The Advisor does not permit directed brokerage; therefore, this question is not applicable.

# **B.** Aggregating Securities Transactions for Client Accounts

The Advisor combines orders into block trades when more than one account is participating in the trade. This blocking or bunching technique must be equitable and potentially advantageous for each such account (e.g. for the purposes of reducing brokerage commissions or obtaining a more favorable execution price). Block trading is performed when it is consistent with the duty to seek best execution and is consistent with the terms of the Advisor's investment advisory agreements. Equity trades are blocked based upon fairness to client, both in the participation of their account, and in the allocation of orders for the accounts of more than one client. Allocations of all orders are performed in a timely and efficient manner. All managed accounts participating in a block execution receive the same execution price (average share price) for the securities purchased or sold in a trading day. Any portion of an order that remains unfilled at the end of a given day will be rewritten on the following day as a new order with a new daily average price to be determined at the end of the following day. Due to the low liquidity of certain securities, broker availability can be limited. Open orders are worked until they are completely filled, which can span the course of several days. If an order is filled in its entirety, securities purchased in the aggregated transaction will be allocated among the accounts participating in the trade in accordance with the allocation statement. If an order is partially filled, the securities will be allocated pro rata based on the allocation statement. The Advisor could allocate trades in a different manner than indicated on the allocation statement (non-pro rata) only if all managed accounts receive fair and equitable treatment.

### Item 13 Review of Accounts

# A. Indicate whether your firm periodically reviews client accounts or financial plans. If you do, describe the frequency and nature of the review and the titles of the supervised persons who conduct the review.

Investment advisory client accounts are monitored on a monthly basis. Financial Plans, once prepared and delivered to the client are not reviewed again unless the client requests a financial plan be updated. Client accounts (and/or financial plans) are reviewed by David M. Schlossberg, President. The nature of the review is to determine if the client account is still in line with the client's stated objectives.

The client is encouraged to notify the Advisor and Investment Advisor Representative if changes occur in his/her personal financial situation that might materially affect his/her investment plan.

# B. If the firm reviews client accounts on other than a periodic basis, describe the factors that trigger a review.

See the response to Item 13A.

# C. Describe the content and indicate the frequency of regular reports the firm provides to clients regarding their accounts. State whether these reports are written.

The client will receive written statements no less than quarterly from the custodian. In addition, Assured Advisory Group, LLC Page 18

the client will receive other supporting reports from mutual funds, asset managers, trust companies or other custodians, insurance companies, broker-dealers and others who are involved with client accounts.

The Advisor provides written reports to clients on a quarterly basis.

# Item 14 Client Referrals and Other Compensation

# A. Economic Benefits Provided to the Advisory Firm From External Sources and Conflicts of Interest

The Advisor does not currently have any such arrangements therefore this question is not applicable.

# **B.** Advisory Firm Payments for Client Referrals

The Advisor does not currently have any such arrangements therefore this question is not applicable.

# Item 15 Custody

Under state regulations, the Advisor is deemed to have custody of client assets if you authorize us to instruct the qualified custodian to deduct our advisory fees directly from your account. The qualified custodian utilized by the Advisor maintains actual custody of your assets. The client will receive written statements no less than quarterly from the custodian. The custodian will send a quarterly statement to the client and the Advisor will also send a quarterly invoice to the client, at the same time the Advisor sends an invoice to the custodian, outlining the fee calculation and the amount withdrawn from the client account. The Advisor encourages clients to carefully review/compare their account statements and firm invoice for any inaccuracies. Any discrepancies should be immediately brought to the firm's attention.

### Item 16 Investment Discretion

The Advisor has discretion over the selection and the amount of securities to be bought or sold in client accounts without obtaining prior consent or approval from the client for each transaction. However, these purchases or sales will be subject to specified investment objectives, guidelines, or limitations previously set forth by the client and agreed to by the Advisor.

Discretionary authority will only be provided upon full disclosure to the client. The granting of such authority will be evidenced by the client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by the Advisor will be in accordance with each client's investment objectives and goals.

# Item 17 Voting Client Securities

The Advisor will not vote, nor advise clients how to vote, proxies for securities held in client accounts. The client clearly keeps the authority and responsibility for the voting of these proxies. Also, the Advisor cannot give any advice or take any action with respect to the voting of these proxies. The client and the Advisor agree to this by contract. Clients will receive proxy solicitations from their custodian and/or transfer agent.

# Item 18 Financial Information A. Balance Sheet

The Advisor does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance, therefore a Balance Sheet is not included with this Brochure.

# **B.** Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

The Advisor has discretionary authority over client accounts and is not aware of any financial condition that will likely impair its ability to meet contractual commitments to clients. If the Advisor does become aware of any such financial condition, this brochure will be updated and clients will be notified.

# C. Bankruptcy Petitions During the Past Ten Years

Not applicable to the Advisor.

# Item 19 Requirements for State-Registered Advisers

David M. Schlossberg, born 1959, graduated from Boston University from their Financial Planning Program in 2006. Mr. Schlossberg is the President and an Investment Advisor Representative of Assured Advisory Group, LLC as of August2021 to Present. He is also the President of Assured Concepts Group, Ltd. for the saleof insurance products, from February 1997 to Present. Mr. Schlossberg, is also the owner of Tax Plan for Wealth, Inc. that offers tax preparation and planning services, from November 2018 to Present. He is also a Registered Representative with Purshe Kaplan Sterling Investments from December 2021 to present.

Stacey A. Lech, born 1972, college courses taken, no degree received. Ms. Lech is the Chief Compliance Officer with Assured Advisory Group, LLC from August 2021 to Present. Ms. Lech is also the Operations Manager of Assured Concepts Group, Ltd. from April 2019 to Present. Prior to that, Ms. Lech was the Operations Manager at ADH Insurance Agency, Inc. from January 2010 to December 2018.

### **B.** Other Business Activities

David M. Schlossberg, President of the Advisor is also the owner of Tax Plan for Wealth, Inc. that

offers tax preparation and planning services. Clients of the Advisor may be solicited for the services of Tax Plan for Wealth, Inc. This creates a conflict of interest. A conflict of interest exists because of the receipt of compensation by Mr. Schlossberg as the President of the Advisor and the owner of the affiliated entity, Tax Plan for Wealth, Inc. Clients always have the right to decide whether to utilize the tax services recommended by Mr. Schlossberg. In recommending tax services, Mr. Schlossberg will always act in the client's best interest under his fiduciary duty. Clients are not obligated to use Tax Plan for Wealth, Inc. or its representatives for tax services. Mr. Schlossberg will spend approximately 20 hours per month of his time on tax related activities.

Mr. Schlossberg is a registered representative with Purshe Kaplan Sterling Investments, CRD #35747, SEC #8-46844, a FINRA registered broker-dealer. Clients who use the services of Mr. Schlossberg as a registered representative will incur transactional costs in addition to the management fee for advisory services. This creates a conflict of interest. Mr. Schlossberg addresses this conflict of interest by disclosing to his clients prior to initiating any transactional related business that by utilizing him or his broker dealer firm in this capacity the client will incur additional expenses. Clients always have the right to select the registered representative they want to work with when purchasing products. Clients are not obligated to utilize Mr. Schlossberg or the broker dealer firm in this capacity.

Mr. Schlossberg, Investment Advisor Representative for the Advisor is also the President of Assured Concepts Group, Ltd. and is licensed and registered as an insurance agent to sell life, long term care and other lines of insurance for various insurance companies. Therefore, he will be able to purchase insurance products for any client in need of such services and will receive separate, yet typical compensation in the form of commissions for the purchase of insurance products. This creates a conflict of interest. A conflict of interest exists because Mr. Schlossberg can recommend products for which he can receive additional compensation, i.e. insurance. Clients always have the right to decide whether to purchase insurance recommended by Mr. Schlossberg and if they do purchase insurance, clients have the right to decide from whom to purchase insurance. In recommending insurance products, Mr. Schlossberg will always act in the client's best interest under his fiduciary duty. Clients are not obligated to use the Advisor or its representatives for insurance product services. Mr. Schlossberg will spend approximately 10 hours per month of his time on insurance related activities.

# C. Performance Based Fee Description

Not applicable to the Advisor or its supervised person.

# D. Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons

Management of the Advisor have not been found liable in any arbitration, civil or disciplinary actions or administrative proceedings.

# E. Material Relationships Maintained by this Advisory Business or Management Persons with Issuers of Securities

Where acting in the capacity of either a registered representative of the affilitated Broker Dealer or an investment advisory representative of the Advisor, David M. Schlossberg may effect securities transactions for typical and customary compensation. This creates a conflict of interest. Clients are not obligated to use investment advisory representatives of the Advisor to execute such securities transactions. If client elects to use the investment advisory representatives of the Advisor in this capacity, fees associated with these types of transactions will be disclosed to the client, in advance.

# **Privacy Policy**

Assured Advisory Group, LLC

Effective: October 25, 2021

### Our Commitment to You

Assured Advisory Group, LLC ("Advisor") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. The Advisor (referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell your non-public personal information to anyone. Nor does the Advisor provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account as discussed below.

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

### The Information We Collect About You

You typically provide personal information when you complete the paperwork required to become our Client. This information includes the following:

Driver's License number	Date of Birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

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

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

# Information about You That Advisor Shares

The Advisor works to provide products and services that benefit our customers. We share nonpublic personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We also disclose non- public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account. In addition, your non-public personal information will also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy Advisor's regulatory obligations, and is otherwise required or permitted by law. Lastly, we will disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

To repeat, we do not sell your non-public personal information to anyone.

# **Information about Former Clients**

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

# **Confidentiality and Security**

Our employees are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. Additionally, we maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

### We'll keep you informed

We will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy policy and will provide you with a revised policy if the changes materially alter the previous privacy policy. We will not, however, revise our privacy policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing. You can obtain a copy of our current privacy policy by contacting us at (847) 426-1077.