

## Customer Relationship Summary

### TLG Advisors, Inc.

A Registered Investment Advisor, Registered with the United States Securities and Exchange Commission (SEC)

Please be aware that Brokerage and investment advisory services and fees differ and it is important for an investor to understand the difference. Free and simple tools are available to research firms and financial professionals are available at [www.investor.gov/CRS](http://www.investor.gov/CRS) , which also provides educational materials about broker-dealers, investment advisers and investing.

#### **“What investment services and advice can you provide me?”**

TLG Advisors offers accounts managed through various third-party money managers and in some cases your accounts will be managed by your advisor through a third-party custodian such as TD Ameritade, Charles Schwab or Fidelity. We make recommendations based on your investment objectives, your risk tolerance, your time horizon and the amount of money you plan on investing. Different managers may have different minimums to open an account, but most range from \$5,000 to \$25,000 as minimum investment. Please see additional information on our website and the money manager website for more specific information. We will review your accounts at least annually and will meet with you in person or over the phone to discuss your investments. We will not make changes to your account without your authorization unless you have given us discretionary authority to do so. You may enter into an agreement for financial planning services for a specified hourly amount or flat fee, details of which will be discussed with your advisor and will be outlined in your financial planning agreement. It is your responsibility to notify us if anything in your situation changes that could change your risk tolerance, time horizon or objectives. Additional information references are available at [www.tlgadvisors.net](http://www.tlgadvisors.net) under Customer Information.

#### **Questions you should ask your financial professional:**

*Given my financial situation, should I choose an investment advisory service? Why or why not?  
How will you choose investments to recommend to me?  
What is your relevant experience, including your licenses, education and other qualifications?  
What do these qualifications mean?*

#### **What fees will I pay?**

Fees vary by sub-advisor and/or investment manager used, according to sub-advisor's or investment manager's fee schedule. Advisory fees on accounts managed by TLG Advisors generally run .80% to 1.75% per year of total assets under management, but may have additional transaction, custody, money manager and/or platform fees. Please see your advisory agreement for breakdown of fees and compensation paid to your advisor. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. For a financial planning service, you may pay a one-time fee up front, or if it's an ongoing planning agreement you may pay more than one fee. The fees you will pay are outlined in your financial planning agreement. Please make sure you understand what fees and costs you are paying. More information about fees is available at [www.tlgadvisors.net](http://www.tlgadvisors.net) under Customer Information or within our ADV Part 2A on our website.

**Questions you should ask your financial professional:**

*Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

**What are your legal obligations to me when providing recommendations? How else does your firm make money and what conflicts of interest do you have?**

When we provide you with a recommendation, we have to act in a fiduciary capacity which means putting your interests ahead of our own. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the recommendations we provide you. Here are some examples to help you understand what this means. Our firm receives a percentage of the compensation your financial professional receives. We also receive marketing fees from some product sponsors to appear at our educational events and advertise in our internal communications.

How might your conflicts of interest affect me and how will you address them? We have analyzed our conflicts of interest and have eliminated, mitigated or are disclosing these conflicts. We have an inherent conflict of interest as we are a for-profit company that offers financial products for sale to retail consumers.

**Specific references:** Please see our website for specific conflicts and how we are addressing them.

**How do your financial professionals make money?**

Our financial professionals receive a fee from the product sponsor when you purchase an investment. Some of these are one-time fee or may be recurring based on your investment amount or additional investments.

**Do you or your financial professionals have legal or disciplinary history?**

No, we do not, but your financial professional may. Please visit [www.investor.gov/CRS](http://www.investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

**Questions you should ask your financial professional:**

*As a financial professional, do you have any disciplinary history? For what type of conduct?*

*Additional information: You may find additional information about our firm and services at [www.tlgadvisors.net](http://www.tlgadvisors.net) . You may call us at (877) 460-0254 to request up-to-date information and a copy of the relationship summary.*

*Who is my primary contact person? Is he or she a representative of an investment adviser or broker-dealer? Who can I talk to if I have concerns about how this person is treating me?* Your primary contact is your financial professional. He or she is a representative of our investment advisor. Should you have concerns about how this person is treating you, please contact [customerservice@tlgadvisors.net](mailto:customerservice@tlgadvisors.net)

**TLG Advisors, Inc.**  
**26 West Dry Creek Circle, Suite 800**  
**Littleton, Colorado 80120**  
**(888) 371-0013**  
[www.tlgadvisors.net](http://www.tlgadvisors.net)

**March 2023**

**FORM ADV Part 2A**



**This brochure provides information about the qualifications and business practices of TLG Advisors, Inc. If you have any questions about the contents of this brochure, please contact us at 888-371-0013 or [compliance@tlgadvisors.net](mailto:compliance@tlgadvisors.net). 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 does not imply a certain level of skill or training.**

**Additional information about TLG Advisors, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and be searched by CRD # 111052.**

## **ITEM 2 – Summary of Material Changes**

We did not have any material changes since the last update.

Pursuant to SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We will provide other ongoing disclosure information about material changes as necessary.

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

Currently, our Brochure is available online at [www.tlgadvisors.net](http://www.tlgadvisors.net) or may be requested by contacting the compliance department, at 888-371-0013 or [compliance@tlgadvisors.net](mailto:compliance@tlgadvisors.net)

Additional information about TLG Advisors, Inc. is also available via the SEC's web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's web site also provides information about any persons affiliated with TLG Advisors, Inc. who are registered, or are required to be registered, as investment adviser representatives of TLG Advisors, Inc.

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## **ITEM 4 – Advisory Business**

TLG Advisors, Inc. (TLGA) is a U.S. Securities and Exchange Commission Registered Investment Adviser. We provide investment supervisory services, manage investment advisory accounts, financial planning, and furnish investment advice to individuals, retirement plans, pension and profit-sharing plans, trusts, estates, charitable organizations, businesses and corporations. We provide these services through independent Investment Advisor Representatives who are affiliated with TLG Advisors, Inc. and sub-advisors (money managers), program sponsors and platform affiliates.

The firm has been in business since 1997. It is owned by trusts controlled by the Wickersham family.

### **The services we provide include:**

- Investment policy planning
- Computer-based investment advisory accounts
- Evaluation of your investment needs and objectives
- Development of an investment strategy and asset allocation for you
- Identification of appropriate managers and investment vehicles for you
- Ongoing monitoring of individual asset manager's performance for you
- Review of your accounts to ensure proper asset allocations and investments
- Recommendations for account rebalancing if necessary
- Comprehensive financial planning
- Estate planning
- Business planning and business continuation planning
- Investment fiduciary services for ERISA qualified retirement plans

### **Starlight Portfolios**

Starlight Portfolios is a division of TLG Advisors that provides web-based advisory services direct to consumer and through solicitors. The portfolios are composed of passive and active mutual funds. Portfolio recommendations are made based upon answers to a risk tolerance questionnaire, with the investment objectives falling into capital appreciation, capital preservation or income. Starlight Portfolios manages its portfolios across six to 12 risk classes depending on custodian, and three fund management styles (active, passive, or a blend). The portfolio a client invests in is contingent on their answers to the risk questionnaire and their preferences, if any, to active or passive management with respect to the fund managers. The portfolios themselves are reviewed and may be updated quarterly based on changes in investment research and fund performance. The research used to determine the allocations is based on strategic allocations with tactical moves as prescribed by market conditions. Each fund chosen for the portfolio is screened for several factors including expense ratio, standard deviation, fiduciary score, sharp ratio, alpha, and return.

### **Types of Investments**

The programs used by TLG Advisors, Inc. advisors include asset management programs, using primarily mutual funds, collective trust funds, exchange traded funds, exchange-listed securities, over-the-counter securities, private equity, United States government securities, Municipal securities, variable and fixed

life insurance and variable and fixed annuities, but is certainly capable of providing advice on a host of other investment types as well. Advisors may prepare written financial plans for Clients for a fee.

**Client Assets**

The Firm advises approximately \$1,620,000,000 in client assets as of December 31, 2022. Regulatory Assets managed are approximately \$1,274,000,000. All of that amount is discretionary at the advisor or sub-advisor level, meaning each client gives permission for the advisor or sub-advisor to make purchase and sell decisions.

**Non-managed courtesy account services**

In some circumstances, TLGA may enter into a relationship with the Client to facilitate the custody of Client assets at a TLGA-approved custodian without providing investment management services or advice. Such accounts are referred to as Non-Managed Courtesy Accounts. In these cases, TLGA and its IARs help facilitate the opening and maintenance of the Client’s account, including transfers of securities and cash or cash equivalents, as directed by Client. Advisor will not direct the investment or reinvestment of the assets in Client’s account, nor exercise any discretion on the account. Any trades placed by Advisor in the Account will be solely on a non-solicited, non-discretionary basis, as requested by Client.

Because of Advisor’s limited role, Advisor is not responsible for ensuring that the investments made in the Account conform to the Client’s financial circumstances, investment objectives, investment time horizon, and risk tolerance, even if such information is available to Advisor within the TLGA New Account Form. However, the Advisor may assist Client procedurally in imposing guidelines and/or restrictions (if any) that have been provided by the Client below. Such guidelines and restrictions may be amended or supplemented from time to time by agreement of the parties and in accordance with the terms of this Agreement.

**ITEM 5 - Fees and Compensation**

TLG Advisors is compensated for services based on assets under management. TLG Advisors also charges fixed or hourly fees for financial planning and consulting. Fees vary by sub-advisor and/or investment manager used, according to sub-advisor’s or investment manager’s fee schedule. Advisory fees on accounts managed by TLG Advisors generally run .80% to 1.75% per year of total assets under management, but may have additional transaction, custody, money manager and/or platform fees that are charged by outside managers and custodians and may not be negotiable and are outside of the control of TLGA. Clients should review their advisory agreement for breakdown of fees and compensation paid to their advisor.

Fees for Starlight Portfolios are .70%- 1.3% to TLG Advisors for portfolio management and advisory fees, .10% to Advisor Engine, the technology platform provider, and .15% to the custodian for asset based custodial services.

**Starlight Portfolios Fees**

Fee	Min (bps)	Max (bps)
Starlight Advisory Fee to TLG Advisors, Inc.*	30	

Advisor Engine*	10	
Custodian Fee	15	15
Advisor Fee	40	100
<b>Total Fee Paid</b>	<b>95</b>	<b>155</b>

\* These are flat fees regardless of investment amount  
 All fees expressed in basis points (bps). 1 bps = 0.01%

Discretionary Account Fees

Minimum Invested Amount	Maximum Invested Amount	Advisor Fee*	Basis Points (bps)
\$ 0	\$1,000,000	Not to exceed	175
Over	\$1,000,000	Not to exceed	100

\* You may be charged an asset-based fee or transaction fees by the custodian of your assets in addition to the advisory fee

Fees are due on the first day of the quarter. Normally, fees are paid in arrears, but some accounts may negotiate paying in advance or a different calendar basis. Fees may be calculated on a daily basis per quarter (account balance times fee divided by days in the year times days in the quarter); or average daily balance (balance each day of the quarter totaled and divided by the number of days times the fee divided by 4); or annual fee divided by the quarter (balance times fee divided by 4). Additional money added to accounts will be billed on a pro-rated basis. Fees on managed accounts are deducted from assets unless directed otherwise by the Client. Fees may be negotiable. Accounts may be aggregated by household to discount fees. Some accounts may be billed on a monthly basis instead of quarterly. This will be disclosed in the advisory agreement for those accounts.

A contract between TLG Advisors, Inc. and the Client may be cancelled at any time with thirty days prior written notice. Clients will be given this brochure form ADV Part 2A, forty-eight hours in advance of signing an agreement or the Client will have five business days to unconditionally cancel the agreement.

Any fees paid to TLG Advisors, Inc. for financial planning services and collected in advance will be refunded unconditionally to the Client if a request termination is delivered in writing, on a pro-rata basis, taking into account the percentage of services rendered to the Client up to the time of termination.

Additional compensation may be received by the advisor should the Client implement the recommendations of the advisor as outlined in the financial plan. The Client has the option of purchasing those recommended securities through other agents or brokers not associated with TLG Advisors, Inc. On occasion, TLG Advisors, Inc. receives transaction-based compensation from The Leaders Group, Inc. and other broker-dealers.

Retirement Plans regulated under ERISA (Employee Retirement Income Security Act) will receive a complete breakdown of all costs associated with their plan as required under ERISA 408(b) (2). These



costs may include direct compensation; indirect compensation; compensation paid among related parties (such as 12b-1 fees); or compensation for termination of arrangement (surrender fees).

If the Client owns mutual funds as part of their portfolio, please be aware that the funds often have internal fees built into their pricing. The Client will receive a prospectus from each fund, and full details of all internal fees are provided in the prospectus.

The agreements for financial planning and portfolio/investment management services shall continue in effect until terminated by either party by giving to the other party written notice at least thirty (30) days prior to the date on which the termination is to be effective (“Effective Termination”), and any prepaid, unearned fees will be promptly refunded. (The Client will be charged only a pro-rated portion of the prepaid quarterly fee, calculated from the first day in the quarter up until the date of Effective Termination.)

There will be no termination fee; however, Client accounts are subject to a cost of reimbursement of fees, charged by the custodian, related to transferring the account and the custodian may impose a fee to close the account. Client has the right to terminate the contract without penalty within five (5) business days after entering into the agreement. If the Client terminates the contract on this basis, all fees paid by the Client will be refunded.

Upon termination of the agreement, neither TLG Advisors nor its IARs will have any obligation to recommend or take any action regarding the securities, cash, or other investments in the account. If Client is a natural person, the death, disability, or incompetency of Client will not terminate or change the terms of the agreement. However, Client’s executor, guardian, attorney-in-fact, or other authorized representative may terminate the agreement by giving written notice to the IAR.

We believe TLG Advisors, Inc. fees are competitive with those fees charged by other investment advisors for comparable services; however, comparable services may be available from other sources for lower fees.

### **Conflicts of Interest**

Certain IARs of TLG Advisors are also registered representatives of an affiliated broker-dealer, as well as insurance agents offering insurance products and services. These representatives and agents may recommend securities, insurance, variable annuities, or other investment products that could potentially generate commissions and other forms of compensation rather than generating advisory fees. Clients should be aware that the receipt of broker-dealer commissions and other forms of compensation creates a conflict that impairs the objectivity of the persons making the recommendations.

TLG Advisors continuously monitors and reviews such activities and transactions to try to ensure that the securities transacted on behalf of Clients are selected for the appropriate reasons. However, it should be noted nonetheless that a conflict of interest does exist.

TLG Advisors and the IAR may be compensated differently depending on the Platform selected. There is a conflict of interest for TLG Advisors and the IAR to recommend the services that offer a higher level of compensation due to either higher management fees or reduced administrative expenses. TLG Advisors mitigates this conflict through its procedures of reviewing Client accounts relative to the Clients’ financial situation to ensure the investment management service provided is appropriate. Furthermore, TLG

Advisors is committed to its obligation to ensure associated persons adhere to its Code of Ethics and to ensure that TLG Advisors and its associated persons fulfill their fiduciary duty to clients or investors.

#### **ITEM 6 - Performance-Based Fees and Side-By-Side Management**

We do not accept any performance-based or Side-By-Side Management accounts.

#### **ITEM 7 - Types of Clients**

We offer services to individuals, trusts, charitable organizations, foundations, corporations, pension and retirement plans, and institutional investors. TLG Advisors has an account minimum of \$25,000 which may be reached by combining the individual accounts associated with a household. Starlight Portfolios has no minimum account size. TLG Advisors, Inc. does not open accounts for those accounts that may be restricted under the PATRIOT ACT or Foreign Corrupt Practices Act.

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

Our advisors will use multiple methods and sources in the process of researching and analyzing securities and managers to be used. Securities are analyzed using primarily the Fundamental Method of analysis, using financial research services, research materials prepared by others, corporate rating services, annual reports and other public filings, and company press releases as sources of information. Managers are evaluated using data and information from several sources, including the manager and independent databases. Among the types of information analyzed are historical performance, investment philosophy, investment style, historical volatility and correlation across asset classes. Also reviewed are the manager's Form ADV Part 2A, as well as portfolio holdings reports that help demonstrate the manager's securities selection process. The risk associated with fundamental analysis is that past results do not guarantee future performance. Clients should be aware that all investments carry risk of loss of part or all the principal. The majority of portfolios will be managed using Modern Portfolio Theory (MPT). MPT says that it is not enough to look at the expected risk and return of one particular stock. By investing in more than one stock, an investor can reap the benefits of diversification - primarily, a reduction in the riskiness of the portfolio. MPT quantifies the benefits of diversification, also known as not putting all of your eggs in one basket. For most investors, the risk they take when they buy a stock is that the return will be lower than expected. In other words, it is the deviation from the average return. Each stock has its own standard deviation from the mean, which MPT calls "risk". The risk in a portfolio of diverse individual stocks will be less than the risk inherent in holding any one of the individual stocks by itself (provided the risks of the various stocks are not directly related). Sub-advisors may use other analysis and management techniques that will be explained in their brochures. Please review their brochures.

#### **ITEM 9 - Disciplinary Information**

TLG Advisors is not now, nor has been in the past the subject of any disciplinary proceeding.

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

The management persons of TLG Advisors, Inc. are registered principals with The Leaders Group, Inc. an SEC registered and FINRA member broker-dealer. Most investment advisor representatives of TLG Advisors, Inc. are also registered representatives of The Leaders Group. TLG Advisors and The Leaders Group are under common ownership and management and share personnel under a service agreement TLG Advisors, Inc. has with The Leaders Group. The Leaders Group is also licensed as an insurance

agency in several states. Asset Management Group, Inc. and Garlikov Advisors, Inc are affiliated with TLG Advisors through agreements and common investment advisor representatives. These affiliations may create a conflict of interest with clients. Certain advisors may also be related to a law firm, insurance agency, accounting firm, or other financial firm. This will be disclosed in the Brochure Supplement Clients will receive with information concerning their advisor.

The Client's advisor may select other advisors for Clients to work with. TLG Advisors and the advisor may receive a referral fee or solicitor's fee for recommending a Client. This can be considered a conflict of interest because they may select an advisor that will compensate them. If they are compensated, it will be disclosed to the Client.

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

We require that all affiliated persons accept and abide by the Code of Ethics listed below. A copy of the code may be requested by calling TLG Advisors at any time.

*TLG Advisors, Inc. ("TLGA") places high importance on the practice of high ethical standards in the Advisor-Client relationship. This section, together with the entire manual, comprises TLG Advisors Code of Ethics.*

#### **a. Duty to Clients**

*A TLGA IAR has a duty to exercise his/her authority and responsibility for the benefit of the client, to place the interests of the client first, and to refrain from having outside interests that conflict with the interests of the client. The TLGA IAR must avoid any circumstance that might adversely affect or appear to affect its duty of complete loyalty to his/her client.*

#### **b. Legal Standards**

*It is unlawful for any IAR in connection with the purchase or sale, directly or indirectly, of a security held or to be acquired:*

- 1. To employ any device, scheme, or artifice to defraud;*
- 2. To make any untrue statement of a material fact or to omit to state a material fact necessary in order to make the statements, in light of the circumstances under which they are made, not misleading;*
- 3. To engage in any act, practice, or course of business that operates or would operate as a fraud or deceit; or*
- 4. To engage in any manipulative practice.*

#### **c. Conflicts of Interest**

*Every TLGA IAR has a duty to disclose potential and actual conflicts of interest to their clients. IARs and solicitors have a duty to report potential and actual conflicts of interest to their advisory firms. Advisors should not accept gifts (other than de minimis gifts) from persons or companies doing business with the IAR.*

#### **d. Use of Disclaimers**

*Advisors should not attempt to limit their liability for willful misconduct or gross negligence through use of disclaimers.*

#### **e. Suitability**

*Each TLGA IAR has a fiduciary duty to recommend only those investments that are suitable for a client based upon the client's particular situation and circumstances.*

#### **f. Duty to Supervise**

*TLGA has a duty to supervise the activities of persons who act on its behalf under section 203(e)(5). To satisfy its duty to supervise, TLGA must:*

- 1. Establish procedures that could be reasonably expected to prevent and detect violations of the law by its advisory personnel;*
- 2. Create a system of controls to assure compliance with applicable securities laws;*
- 3. Ensure that all advisory personnel fully understand the TLGA policies and procedures; and*
- 4. Establish a review system to assure that TLGA's policies and procedures are effective and are being followed.*

***g. Personal Securities Transactions***

*All publicly-traded personal securities transactions must be reviewed and approved by the Firm's Chief Compliance Officer or designee post-trade. Each IAR must have duplicate copies of any personal trading accounts sent to the firm.*

***h. Violations of Code of Ethics***

*Any IAR aware of any violations of this code of ethics should report them promptly to the compliance officer.*

On occasion, an advisor may buy or sell for a Client's account a security in which they or a related person may have a financial interest. This would occur when the advisor owns the same position in their personal or business portfolio. In these cases, Client securities must always be traded before or coincidentally with the advisors' accounts. At no time will the advisor receive a more favorable trade than the client.

**ITEM 12 - Brokerage Practices**

Except for accounts with Starlight Portfolios, Clients may choose to enter a separate contractual relationship with a custodian for the assets invested. We will not act as custodian for any accounts. We may be affiliated with one or more of the brokers that are used. Many accounts are custodied at Fidelity Investments, TD Ameritrade, Charles Schwab, Pershing or other recommended broker-dealer. This relationship may benefit the advisor. Clients will generally pay an asset-based fee for the services provided by the broker/custodian (however, the executing broker-dealer may charge a transaction fee) and the brokerage/custody/clearing fees are generally included in the Program fee for the Client. TLG Advisors may receive a portion of the disclosed platform fee. Any fees not included will be disclosed in writing. Custodians that charge transaction fees for trades appear as a commission on the custodian statement. This is a commission to the brokerage company, and no part of this compensates the advisor or TLG Advisors.

We do not direct brokerage business to other brokers to obtain research or other "soft dollar" benefits. When we subscribe to research or other services made available by other brokers or third parties, we pay for such services with our own funds, not those of our clients. We will direct brokerage to a particular broker if we receive written instructions to do so from the Client. When a Client instructs us to direct all transactions for execution to a specific broker, we do not independently determine whether the commissions charged or execution effected thereafter are done at rates or prices higher or lower than those which could have been obtained had another broker acted as the broker. We do not negotiate brokerage commissions with other brokers on behalf of our advisory clients who designate other brokers. If this is the case, the Client will receive trade confirmations directly from the designated broker (or its clearing broker) and pay brokerage commissions in accordance with their schedule of rates or whatever

arrangement the Client has negotiated with them. The brokerage commissions charged by other brokers may be higher or lower than that of TLG Advisors, Inc. negotiated rates.

#### **ITEM 13 – Review of accounts**

Each account will be reviewed periodically, and no less than annually, by the investment advisor representative for performance, allocation and investment objectives. The custodians of Client monies will provide reports to Clients on at least a quarterly basis. In some instances, these reports are only provided electronically.

#### **ITEM 14 - Client Referrals and Other Compensation**

On occasion, a referral fee may be paid to an individual for referring Clients to TLG Advisors, Inc. Clients will receive additional disclosure if this happens.

#### **ITEM 15 - Custody**

Client money is in the custody of a broker-dealer or other qualified custodian. That custodian will send account statements directly to the Client. Clients should carefully review those statements.

#### **ITEM 16 - Investment Discretion**

Clients are requested to grant discretionary authority to their advisory rep, and in some cases to TLG Advisors, Inc. This discretion may include the authority to choose money managers, to rebalance Client accounts as agreed upon by Advisor and Client, to sell enough assets to pay the program fees when necessary and the authority to sell and purchase holdings. The brokerage application will contain a limited power of attorney assigning this right to the advisor.

#### **ITEM 17 - Voting Client Securities**

TLG Advisors, Inc. does not vote the proxies on items related to Client securities. If a sub-advisor does accept this authority, it will be fully disclosed in the agreement Clients sign upon opening the account. Clients may obtain a copy of that advisor's proxy voting procedures from the sub-advisor. In most cases Clients will receive proxies directly from the custodian or transfer agent. Should Clients have questions about the solicitation, Clients may contact their advisor.

#### **ITEM 18 - Financial Information**

TLG Advisors, Inc. does not have any financial condition that is likely to impair our ability to meet contractual commitments to Clients.

#### **ITEM 19 - Glossary**

**ERISA** - The Employee Retirement Income Security Act of 1974 (ERISA) protects the retirement assets of Americans by implementing rules that qualified plans must follow to ensure that plan fiduciaries do not misuse plan assets.

**Side by Side Management**- Managing two accounts with the same portfolio but charging different types of fees for them.

**IAR** (Investment Advisory Representative) – Personnel that work for investment advisory companies whose main responsibility is to provide investment related advice. According to regulations, IARs can only provide advice on topics on which they have passed the appropriate examinations. In addition to passing the appropriate exams, an IAR also must be registered with the proper state authorities. In order to expand their knowledge about financial products and principles, many IARs hold either the Certified Financial Planner (CFP®) or Charter Financial Consultant (ChFC) designations.

**Professional Designations –**

**AIF** – Accredited Investment Fiduciary

Issued by: Center for Fiduciary Studies

Prerequisites/Experience Required:

- successfully complete the program;
- pass the final examination; and
- comply with the Code of Ethics

Educational Requirements: Combination of degree, other designations and industry experience

Examination Type: Proctored exam

Continuing Education/Experience Requirements: 6 hours of CE credits annually

**C(k)P** – Certified 401(k) Professional

Issued by: The Retirement Advisor University in collaboration with UCLA Anderson School of Management Executive Education

Prerequisites/Experience Required:

- 3 years of experience in financial services
- 10 defined contribution plans under management
- \$30,000,000 in assets under management

Educational Requirements: Approximately 57 hours of coursework

Examination Type: Combination of Online and Proctored exams

Continuing Education/Experience Requirements: 12 hours of CE credits annually

**ChFC** - Chartered Financial Consultant

Issued by: The American College

Prerequisites/Experience Required:

- 3 years of full-time business experience within the five years preceding the awarding of the designation

Educational Requirements: 7 core and 2 elective courses, equivalent of 27 semester credit hours

Examination Type: Final proctored exam for each course

Continuing Education/Experience Requirements: 30 CE credits every 2 years

**CFA**- Chartered Financial Analyst

Issued by: CFA Institute

Prerequisites/Experience Required:

Prospective candidate must meet one of the following requirements:

- Be in the final year of a bachelor's degree program, OR

- Have four years of professional work experience, OR
- Have a combination of professional work and university experience that totals at least four years.

Examination Type: Three six-hour course exams

Continuing Education: None

### **CFP - Certified Financial Planner**

Issued by: Certified Financial Planner Board of Standards, Inc.

Prerequisites/Experience Required: Candidate must meet the following requirements:

- A bachelor's degree (or higher) from an accredited college or university, and
- 3 years of full-time personal financial planning experience or the equivalent part-time experience (2,000 hours equals one year full-time).

Educational Requirements: Candidate must complete a CFP-board registered program, or hold one of the following:

- CPA
- ChFC
- Chartered Life Underwriter (CLU)
- CFA
- Ph.D. in business or economics
- Doctor of Business Administration
- Attorney's License

Examination Type: CFP Certification Examination

Continuing Education/Experience Requirements: 30 hours every 2 years

### **CFS –Certified Fund Specialist**

Issued by: Institute of Business & Finance

Prerequisites/Experience Required: Candidate must meet one of the following requirements:

- Bachelor's degree or
- 2,000 hours of financial services work experience

Educational Requirements: Candidate must complete a self-study program of six modules

Examination Type: Three proctored, online exams and a case study

Continuing Education/Experience Requirements: 30 hours every two years

### **CRPS - Chartered Retirement Plans Specialist**

Issued by: College for Financial Planning

Prerequisites/Experience Required: Candidate must meet the following requirements:

- successfully complete the program;
- pass the final examination; and
- comply with the Code of Ethics, which includes agreeing to abide by the Standards of Professional Conduct and Terms and Conditions. Applicants must also disclose of any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct. Conferment of the designation is contingent upon the College for Financial Planning's review of matters either self-disclosed or which are discovered by the College that are required to be disclosed.

Examination Type: Proctored, online examination

Continuing Education: 16 hours every 2 years.

**CLU- Chartered Life Underwriter**

Issued by: The American College

Prerequisites/Experience Required:

- 3 years of full-time business experience within the five years preceding the awarding of the designation

Educational Requirements: 5 core and 3 elective courses, equivalent of 24 semester credit hours

Examination Type: Final proctored exam for each course

Continuing Education: 30 hours every 2 years

**CSA – Certified Senior Advisor**

Issued by: Society of Certified Senior Advisors

Prerequisites/Experience Required:

- Complete a candidate information profile
- Complete a disclosure questionnaire
- Pass a criminal background check
- Pass the Roles, Rules, and Responsibilities Ethics Exam
- Complete and submit the signed Certified Senior Advisors Application for Certification, which includes agreeing to the CSA Terms of awarding and maintaining certification

Examination Type: Proctored Examination

Continuing Education: 30 CSA credits every three years

**CSCP- Certified Securities Compliance Professional®**

Issued by: The National Society of Compliance Professionals

Prerequisites:

- Bachelors degree plus 3 years securities compliance experience or
- minimum of five years in securities compliance, and
- CSCP Credential Application approval.

Examination Type: Successful completion of self-study program, successfully pass CSCP exam

Continuing Education: 20 hours every 2 years.



### **TLG Advisors, Inc. Privacy Statement**

TLG Advisors, Inc. is a Securities and Exchange Commission Registered Investment Advisor. As a client, you should be aware of our firm's policies regarding our use of the information you provide us when establishing or while maintaining a relationship with us.

#### **Privacy Policy**

TLG Advisors, Inc. does not sell personal information about our clients to anyone. We will not share personal information about our clients with other companies unless we need to share the information in order to provide a product or service a client has requested. Unless we tell clients otherwise, these other companies do not have the right to use clients' personal information obtained from our firm in any manner beyond what is required to provide a client's requested product or service. Our firm limits the collection of personal information to what is necessary to administer our business and to deliver our products and services to our clients. We do reserve the right to disclose or report personal information in limited circumstances where we believe in good faith that disclosure is required under law, to cooperate with regulators or law enforcement authorities, to perform necessary credit checks or collect or report debts owed to us, to protect our rights or property, or upon reasonable request by the sponsor or provider of a product in which you have chosen to invest. Listed below is the information we do collect and how we use that information: Forms you fill out to interact with our companies such as: New account forms; agreements; contracts; questionnaires and miscellaneous forms. The forms may request personal information such as your telephone number, mailing address, financial information, employment information, investment objectives and financial needs, for example. How we use this information: To conduct business with you. At no time do we sell your information or share it unless necessary to conduct business with you.

If you wish to opt out of having your adviser take your personal information upon leaving TLG Advisors, Inc., please send a written request to: TLG Advisors, Inc. 26 W. Dry Creek Circle, Suite 575, Littleton, CO 80120.

#### **Protection of Client Information**

Our firm's policy requires that employees with access to confidential client information may not use or disclose the information except for business use. Access to client information is restricted to our employees and representatives with a business reason for access to such information. We safeguard information according to established security standards and procedures and train our employees and representatives to understand and comply with these protections.

#### **Changes to Firm Privacy Policies**

From time to time the firm may update its privacy policies. All new clients will receive the firm's most current privacy policy upon entering into an agreement or opening an account with the firm.

#### **Maintaining the Accuracy of Client Information**

Keeping client account information accurate and up-to-date is very important to us. If you ever find that your account information is incomplete, inaccurate or not current, please write us at the location listed above or email us at the address listed below. We will correct any inaccurate or outdated information as soon as possible.

#### **Business Continuity Statement**

TLG Advisors, Inc. is responsible for creating and maintaining business continuity plans for all aspects of its business. In the event of a business disruption, we have plans designed to allow us to continue operations of critical business functions, such as entering of client orders, completing securities transactions and providing clients access to their cash and securities. We accomplish this in part by: Relocating impacted businesses to designated recovery locations; Using redundant processing capacity; Designing our technology and systems to support the recovery processes for critical business functions; Using business and technology teams that are responsible for activating and managing the recovery process; Adopting a communication plan to ensure TLG Advisors employees receive emergency notifications and instructions via a variety of sources; Rehearsing our recovery procedures and testing those procedures on a regular basis. As part of our plans, we have identified the applications critical to each of our departments. With regard to client assets, nearly all market-traded securities are held in central depositories (such as the Depository Trust Co.) or with custodian banks, rather than in physical certificates. TLG Advisors, Inc. does not hold any customer assets. Ownership of the securities is reflected on a book-entry record-keeping basis with our custodian banks or depositories' participants, maintaining on their records the beneficial ownership positions of their customers. This structure is recognized worldwide as providing investors with an unsurpassed level of liquidity and security for the assets they choose to custody with major financial institutions. Although we have taken significant steps to develop and implement sound business recovery plans, we cannot guarantee that systems will always be available or recoverable after a disaster or significant business disruption. However, we believe that our planning for such events is robust and consistent with many of the best practices established within the industry. Any material changes to the above information will be available upon request.