

Firm Brochure
(Part 2A of Form ADV)

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This brochure provides you with information about the qualifications, business practices and nature of advisory services of JPG Wealth Management, LLC, all of which should be considered before becoming an advisory Client of our firm. Please contact Joseph Giambrone, Managing Member, if you have any questions about this narrative brochure.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC"), or by any state securities authority.

We are registered as an Investment Adviser with the Georgia Securities Division. Registration with any regulatory agency should not imply a certain level of skill or training. Additional information about our firm is available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number known as a CRD number. Our firm's CRD number is 174818.

February 27, 2023

Item 2: Material Changes

Due to a series of changes in securities regulation issued by the U.S. Securities and Exchange Commission in its final rule in October 2010, investment advisers are now required to provide disclosure information in this narrative “plain English” format. Material updates to the information contained within this brochure will be provided to clients on an immediate basis. This section is designed to reflect such changes in summary form. Questions regarding the brochure and/or the information contained herein may be directed to the Firm and its representative, Joseph Giambrone.

Material Changes Since the Last Update

This Brochure, dated **February 27, 2023**, serves as our annual amendment for 2023 and states the material changes since our last annual update Brochure filing, February 7, 2022. There are no material changes to report since our previous annual Brochure filing February 7, 2022.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at **678-404-0810** or by email at joseph@jpgwealthadvisor.com

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Item 4: Advisory Business

A. Firm Description

JPG Wealth Management, LLC (“JPG” or the “Firm”) is an investment management firm that is registered with the Georgia Division of Securities and Business Regulation as an investment adviser. JPG is organized as a Georgia limited liability company that was founded in 2015.

JPG provides personalized portfolio management and investment advisory services to individuals and high net worth individuals. Retirement, ERISA 3(38) advisory services.

Principal Owners: Joseph Giambrone is the Managing Member and owns 100% of the Firm.

B. Types of Advisory Services

JPG offers discretionary investment management services to its Clients based on the specific needs and objectives of such persons and the suitability of products and services.

With respect to discretionary investment management services, subject to any written guidelines or restrictions which the Client may provide, JPG shall be granted full discretion and authority to manage the Client’s account. Accordingly, JPG is authorized to perform various functions, at the Client’s expense, without further approval from the Client. Such functions include the determination of securities to be purchased or sold.

Once a Client’s portfolio is constructed, JPG will provide continuous supervision and rebalancing of the portfolio as changes in market conditions and as Client circumstances may require.

Financial Planning

JPG’s financial planning starts with clarifying client goals. Some common goals include the following: retirement, educational needs, and/or large purchases. The goal-based planning involves establishing a plan, including necessary savings and assumed return needed to meet the financial goals the client has established. The plan can be fairly complex, including tax, inflation and investment return assumptions, as well as stress testing in addition to straight-line growth projections. Financial plans may include: goal-based planning, cash flow projections, risk management and insurance planning, tax planning, and/or estate planning.

Educational Seminars/Workshops

JPG shall provide educational seminars/workshops for the purpose of helping prospective clients or clients to learn more about investing, financial planning and personal finance issues.

Plan Sponsor Services

JPG provides certain services to Plans including 401(k), 403(b), 457, and 401(a) Plans, Profit Sharing Plans, VEBAs, Defined Benefit Pension Plans, Cash Balance Plans, and HSA Plans. When acting as a fiduciary, JPG acts in accordance with the Investment Advisers Act of 1940, as amended (“Advisers Act”) and for Plans subject the Employee Retirement Income Security Act of 1974, as amended, (“ERISA”), JPG will act as either a 3(21) non-discretionary advisor or a 3(38) investment manager. In providing Plan Sponsor Services, JPG acts with the care, skill, prudence, and diligence that a prudent person, acting in the same capacity and with the same information, in a similar situation would utilize. For Plans not subject to ERISA, JPG will act to the standard of ERISA.

Plan Sponsors are able to select from a variety of services. Within the offerings, JPG provides the responsible Plan fiduciary with an investment policy statement (“IPS”) template. The goal of the IPS is to define processes and metrics used to evaluate the menu of investments which allows for the construction of diversified portfolios. JPG will review a Plan’s current investment alternatives using quantitative and qualitative analysis on a quarterly basis in order to determine the appropriateness of a Plan’s investment options. JPG will provide a quarterly communication to the Plan Sponsor confirming that the Plan investment option review resulted in either (1) a recommendation to maintain the existing Plan investment options, or (2) a recommendation (when acting as a non-discretionary fiduciary) or a change instruction (when acting as a discretionary manager) to replace one or more of the Plan investment options with an alternative investment.

JPG Plan Sponsor Services: Discretionary Fiduciary Services 3(38)

In the “Discretionary Fiduciary Services” JPG acts as an “investment manager” (as defined in Section 3(38) of ERISA for Plans subject to ERISA) with respect to the performance of discretionary fiduciary services. In the Discretionary Fiduciary Services, JPG reviews the investment options available through a Plan and notifies the Plan’s recordkeeper of its instructions to add, remove and/or replace specific “core” investment options offered to Plan participants, according to the criteria set forth in the IPS. JPG retains final decision-making authority with respect to removing and/or replacing investments in the core lineup, and communicates instructions to the appropriate third-party, including the Plan’s record keeper, custodian, and/or third-party administrator to facilitate investment changes.

JPG Plan Sponsor Services: Non-Discretionary Fiduciary Services 3(21)

In the “Non-Discretionary Fiduciary Services,” JPG acts as a fiduciary “investment adviser” as defined in Section 3(21) of ERISA. Unlike the Discretionary Fiduciary Services, in the Non-Discretionary Fiduciary Services, the Plan Sponsor has responsibility for the final decision-making authority with respect to removing and/or replacing Plan investments. JPG does not have any responsibility to communicate instructions to any third-party, including the Plan’s record keeper, custodian, and/or third-party administrator.

Custom Asset Allocation Services

Plan Sponsors can also elect for JPG to provide diversified asset allocated portfolios. If selected, JPG acts as an “investment manager” (as defined in Section 3(38) of ERISA for Plans subject to ERISA) with respect to the construction and performance of the portfolios. JPG constructs portfolios based on the funds available to the Plan on the recordkeeping or custodial system and is not responsible for advising on the funds available within the Plan unless JPG has been retained by the Plan Sponsor to provide Discretionary Fiduciary Services.

JPG retains final decision-making authority with respect to asset allocations of the portfolios and will make adjustments when necessary. The Plan Sponsor is relieved of any responsibility to communicate instructions to any third-party, including the Plan’s recordkeeper, custodian and/or third-party administrator.

Overlay Management Services with Third Party Strategists

If elected, JPG provides an investment strategy (“Strategist Model”) of a non-affiliated third-party investment manager (“Third Party Strategist”), whereby the Third-Party Strategist, acting as an investment model provider, constructs an asset allocation and selects the underlying investments for each portfolio. The Plan Sponsor is responsible for selecting the Third Party Strategist that it wishes to make available to its Plan. Acting as the “investment manager” (as defined in Section 3(38) of ERISA), JPG performs overlay management of the Strategist Model by monitoring the investment strategy and, in certain cases, facilitating the routing of trade orders to the recordkeepers for execution, and periodically updating and rebalancing each Strategist Model pursuant to the direction of the Third-Party Strategist. JPG may, from time-to-time, replace existing Third Party Strategists and cannot guarantee the continued availability of Strategist Models.

Limitations to Plan Sponsor Services

JPG does not make recommendations for the use of any specific recordkeeper, but will provide information regarding the recordkeepers that JPG has established relationships. JPG is limited to the investment options available through the Plan recordkeeper’s platform and does not have the authority, expectation or obligation to select any investment options that are not available through the Plan recordkeeper’s platform. The Plan Sponsor is solely responsible for determining the selection of the recordkeeper and for the share classes available to the Plan. JPG does not act as, nor has JPG agreed to assume the duties of, a trustee or the “Plan Administrator,” as defined by ERISA. JPG has no discretion to interpret the Plan documents, to determine eligibility or participation under the Plan, to provide participant disclosures or communications, to ensure contributions are timely received by the Plan, or to monitor overall fees of the Plan or exercise any other action with respect to the management, administration or any other aspect of the Plan.

JPG does not provide advisory services related to the following types of assets: employer securities (including derivatives of such); self-directed brokerage accounts; participant

loans; non-publicly traded partnership interests; other non-traded securities (other than mutual funds, collective investment trusts and similar vehicles); or other hard-to-value securities or assets.

Preferred Custodian for Qualified Retirement Plans

JPG prefers to use Vanguard/Ascensus as the custodian for most qualified retirement accounts.

<https://investor.vanguard.com/corporate-portal/>

We will act as an ERISA fiduciary in good faith and with the degree of diligence, care and skill that a prudent person rendering similar services would exercise under similar circumstances.

C. Tailored Relationships

After an initial meeting, each new Client's investment objective is determined and a portfolio is constructed in a manner considered to be consistent with the Client's objective. Prior to engaging JPG to provide any of the aforementioned investment advisory services, JPG requires a written Investment Advisory Agreement ("IA Agreement") signed by the Client prior to the engagement of services. The IA Agreement outlines the services rendered by JPG and the fees that will be charged to Clients.

The asset management services and recommendations offered by JPG are based on the individual needs of its Clients and the suitability of products and services. JPG makes a thorough assessment of its Client's goals, objectives, investment horizon, and risk tolerance. JPG manages its Clients' accounts on an individual basis. Portfolios within the same objective may, at any given time, differ as to specific securities and cash levels. Further retractions and guidelines imposed by Clients affect the composition and performance of the portfolios. For these reasons, performance of portfolios within the same objective may differ, and Clients should not expect that the performance of their portfolios be identical with the JPG average for that objective.

Subject to any written guidelines, which the Client will provide, JPG will be granted discretion and authority to manage the account. Accordingly, JPG is authorized to perform various functions, at the Client's expense, without further approval from the Client.

D. Wrap Fee Programs

Wrap Fee Programs are arrangements between broker-dealers, investment advisers, banks and other financial institutions and affiliated and unaffiliated investment advisers through which the Clients of such firms receive discretionary investment advisory,

execution, clearing and custodial services in a “bundled” form. In exchange for these “bundled” services, the Clients pay an all-inclusive (or “wrap”) fee determined as a percentage of the assets held in the wrap account.

JPG does not participate in and is not sponsor of wrap fee programs.

E. Assets under Management

JPG manages a total of \$6,000,000.00 in Client assets on a discretionary basis. This Asset under Management figure is based on calculations as of February 27, 2023.

Item 5: Fees and Compensation

A. Description of Advisory Fees and Billing Procedures

JPG’s compensation from Individual Clients may take the form of a fee based on a percentage of the Client’s assets under management (the “Management Fee”). The Management Fee shall be on a tier schedule based upon the value of a Client’s assets held in that Client’s account. See below:

Assets between \$0 and \$499,999: 1.0%
Assets between \$500,000 and \$999,999: 0.9%
Assets between \$1,000,000 and \$1,499,999: 0.8%
Assets between \$1,500,000 and \$2,000,000: 0.7%
Assets over \$2,000,000: 0.6%

JPG may waive or negotiate fees with any client.

The Management Fee will be paid by clients quarterly in arrears to JPG. The Management Fee may be deducted directly from the client’s account or it may be billed to the client.

JPG’s compensation from ERISA Plan Clients may take the form of a fee based on a percentage of the Plan’s assets under management (the “Management Fee”). The Management Fee shall be negotiable between the parties of this Agreement, however, fee agreed to shall be within the range of 0.05% - 1.5% of Plan's assets under management per year.

The Management Fee will be billed to your Plan quarterly in arrears by the Recordkeeper and then passed directly to JPG Wealth. Notwithstanding the aforementioned, if negotiated the Management Fee may be billed to client directly.

JPG may waive or negotiate fees with any client.

Financial Planning is either a fixed flat fee at \$1,000- \$15,000 per engagement or fee only and is \$200/hr. Fixed fees will be due and payable 0% at the time Client signs the agreement and 100% due at the time of delivery. Fee only will be billed and payable on a monthly basis.

B. Other Fees and Payments

There may be additional fees or charges that result from the maintenance of your account. These are fees are imposed by third parties in connection with investments made through your account, including but not limited to, no-load mutual fund 12(b)-1 distribution fees, certain deferred sales charges on previously purchased mutual funds, and IRA and Qualified Retirement Plan fees.

C. Refund Policy

The Client, or Adviser, may cancel the Agreement at any time by providing written notice to the other. Any refund of the prepaid Management fee shall be on a pro-rata basis. The refund shall be calculated by taking the number of days remaining in the quarter (following the date of account termination) for which prepaid fees have been charged and dividing it into the total number of days in that billing quarter. The result shall be multiplied by the total fee paid to determine the refund amount due to the terminating client account..

D. Other Compensation

JPG does not accept any compensation other than the Management Fees and/or Financial Planning fees.

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

A. Performance-Based Fees

Performance-Based Fees (“Performance Fees”) are based on a share of the capital gains or capital appreciation of the assets of a Client. Fees based on performance means JPG participates directly in the account’s results.

The Performance Fee may create an incentive for the advisor to recommend an investment that may carry a higher degree of risk to the Client. The Performance Fee may, indirectly, create an incentive for the Firm to make investments on behalf of the Client that are riskier or more speculative than would be the case in the absence of such allocation. To mitigate any conflicts of interests, the investments will be reviewed daily by the Chief Compliance Officer to ensure that investments are in line with fund objectives and investments do not incur extraordinary amount of risk.

At this time, JPG does not charge clients a performance fee.

B. Side-by-Side Management

“Side-by-Side Management” refers to a situation in which the same Adviser manages accounts that are billed based only on a percentage of assets under management (“Management Fee”) and at the same time manages other accounts for which fees are assessed on a performance fee basis (“Performance Fee”).

At his time, JPG does not conduct side-by-side management of dissimilar advisory accounts.

Item 7: Types of Clients

JPG provides discretionary investment management services to individuals through accounts managed separately. JPG also acts as an ERISA fiduciary 3(21) and/or 3(38) for retirement plans through Vanguard, however, this service does not provide discretionary investment management.

There is no minimum balance requirements for opening or maintaining an account.

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

A. Methods of Analysis

JPG employs several different methods of analysis including fundamental analysis and technical analysis. Fundamental analysis starts with the precept that no one knows a business as well as the people running it. Fundamental analysis consists of analyzing financial statements of companies, calculating financial ratios, and reviewing cyclical trends of industries in conjunction with other monetary policy indicators to assess the overall performance and profitability of companies. The technical analysis method of evaluating securities analyzes statistics generated by market activity, such as past prices and volume. Technical analysis aids in the decision of when to buy or sell, how much, and at what price.

B. Investment Strategies

JPG will manage separate accounts in a manner consistent with the objectives jointly identified with the account owner. The Firm will gather and analyze data concerning the Client’s goals, cash flow and debts, investments, insurance, estate issues, tax situation, employee benefits, risk tolerance, time horizon and personal preferences in addition to any other data the Client wishes to include that is deemed pertinent to the financial planning process.

This information is gathered through in-depth personal interviews designed to elicit the Client’s current financial status, family obligations, future goals and attitudes toward risk. Related documents supplied by the Client are carefully reviewed. We then help the Client

set realistic goals, identify key financial issues concerning those goals and prepare a list of recommendations and alternative strategies for achieving those goals.

Each strategy will be recommended in the context of other strategies to achieve the optimum overall results.

C. Material Risks of Methods of Analysis and Investment Strategies

Notwithstanding the method of analysis or investment strategy employed by our firm, the assets within your portfolio are subject to risk of devaluation or loss. JPG wants you to be aware that there are many different events that can affect the value of your assets or portfolio including, but not limited to, changes in financial status of companies, market fluctuations, changes in exchange rates, trading suspensions and delays, economic reports, and natural disasters.

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic, and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar will be worth more today than a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

While this information provides a synopsis of the events that may affect your investments, this listing is not exhaustive. We want you to understand that there are inherent risks associated with investing and depending on the risk occurrence; you may suffer LOSS OF ALL OR PART OF YOUR PRINCIPAL INVESTMENT.

Item 9: Disciplinary Information

The Firm is required to disclose whether there are legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management. JPG and its employees have not been involved in legal or disciplinary events related to past or present investment Clients.

Item 10: Other Financial Industry Activities and Affiliations

A. Financial Industry Activities

JPG is not a registered broker-dealer and does not have an application pending to register as a broker-dealer. JPG may provide financial planning services to clients in the normal course of advising those clients on their investments.

B. Financial Industry Affiliations

JPG is not a registered, Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor and does not have an application pending to register as such. Furthermore, none of JPG's management or supervised persons are registered as, or have applications pending to register as associated persons of the foregoing entities.

C. Other Material Relationships

The Managing Member, Joseph Giambrone is an attorney and may from time to time have clients who seek legal advice and investment advice. JPG does not have any other arrangements that are material to its advisory or its Clients with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, or an entity that creates or packages limited partnerships other than those already disclosed herein.

D. Other Investment Advisers

JPG does not have any arrangements that are material to its advisory or its Clients with other investment advisers.

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

A. Code of Ethics

All employees of JPG must act in an ethical and professional manner. In view of the foregoing and applicable provisions of relevant law, JPG has determined to adopt a Code of Ethics to specify and prohibit certain types of transactions deemed to create conflicts of interest (or at least the potential for or the appearance of such a conflict), and to establish reporting requirements and enforcement procedures relating to personal trading by JPG personnel. JPG's Code of Ethics, which specifically deals with professional standards, insider trading, personal trading, gifts and entertainment, and fiduciary duties, establishes ideals for ethical conduct based upon fundamental principles of openness, integrity, honesty, and trust. We will provide a copy of its Code of Ethics to any Client or prospective Client upon request.

B. Participation of Interest in Client Transactions

JPG does not recommend or effect transactions in securities which any related person may have material financial interest.

C. Proprietary/Simultaneous Trading

At times, JPG or related persons may buy or sell for our own accounts securities that have also been recommend for our clients. However, any purchase or sale of a security by JPG or a related person will be subject to JPG's fiduciary duty to our clients. JPG will always document any transactions that could be construed as a conflict of interest. To mitigate or remedy any conflicts of interest or perceived conflicts of interest, JPG will monitor trading reports for adherence to our Code of Ethics.

From time to time, representatives of JPG or related persons may buy or sell securities for themselves at or around the same time as clients. In any instance where similar securities are bought or sold, we will uphold our fiduciary duty by always effecting transactions that are in the best interest of our clients.

Item 12: Brokerage Practices

A. Selection and Recommendation

JPG will generally recommend broker-dealers or custodians that it has established arrangements or agreement. JPG will allow Clients to maintain accounts at any brokerage firm. Our Firm has pre-existing brokerage and custodian relationships with *Interactive Brokers* and *Vanguard/Ascensus*.

B. Soft Dollar Benefits

JPG does not generate “soft dollars” and, if and when it does, JPG intends to comply with the “safe harbor” of Section 28(e) of the Securities Exchange Act of 1934, as amended. Under “soft dollar” arrangements, one or more of the brokerage firms would provide or pay the costs of certain services, equipment, or other items for the benefit of JPG. These soft dollar arrangements may benefit JPG by reducing its expenses. Nonetheless, JPG believes that to the extent it makes allocations to brokerage business with soft dollar arrangements, this would generally enhance the ability to obtain research, optimal execution and other benefits on behalf of our Clients.

As of February 27, 2023, the Firm has not utilized any particular procedures direct Client transactions in return for products and research services.

C. Brokerage for Client Referrals

When selecting or recommending broker-dealers to Clients, the Firm does not consider whether it receives Client referrals from a broker-dealer or third party.

D. Directed Brokerage

JPG will recommend that Clients utilize the Firm’s recommended broker dealer(s) to execute transactions. This arrangement is designed to maximize efficiency, enhance the ability to monitor positions, and to be cost effective for our Clients.

In instances where JPG has discretion with respect to broker-dealer selection, JPG will seek “best execution” for each trade, which is a combination of price, quality of execution and other factors. In making brokerage determinations, JPG will consider a number of judgmental factors, including, without limitation: 1) clearance and settlement capabilities; 2) quality of confirmations and account statements; 3) the ability of the broker to settle the trade promptly and accurately; 4) the financial standing, reputation and integrity of the broker-dealer; 5) the broker-dealer’s access to markets, research capabilities, market knowledge, and any “value added” characteristics; 6) JPG’s past experience with the broker-dealer; 7) JPG’s past experience with similar trades; and 8) any other factors. Recognizing the value of these factors, Clients may pay a brokerage commission in excess of that which another broker might have charged for effecting the same transaction. JPG recognizes that “Best Execution” is not synonymous with lowest brokerage commission.

JPG will permit Clients to direct the use of a particular brokerage firm. If a Client directs brokerage, JPG cannot negotiate commission rates, JPG will however use its best efforts to negotiate the most favorable rates based on the size and the anticipated trading activity in the account. As a result of such directed brokerage, Clients may pay higher brokerage commissions than might otherwise be paid if JPG were granted discretion to select a broker to handle the account. In addition, Clients might lose the benefits of potentially better executions available through bunched transactions of the recommended broker-dealer custodian.

E. Order Aggregation

JPG may, at times, aggregate buy and sell orders of securities for the purpose of obtaining the best pricing averages and minimizing trading costs. This practice is reasonably likely to result in administrative convenience or an overall economic benefit to JPG. Clients also benefit relatively with better purchase or sell execution prices, lower commission expenses or beneficial timing of transactions or a combination of these and other factors. Our policies and procedures mandate aggregating multiple orders. Aggregate orders will be allocated to accounts in a systematic non-preferential manner.

Item 13: Review of Accounts

A. Periodic Reviews

JPG reviews its Client's account activity at least quarterly. Our Investment Adviser Representatives are responsible for conducting the review of Client accounts. The reviews consist of determining whether your investment goals and objectives are aligned with our investment strategies. If reallocation of investments is necessary, we sell underperforming investments or buy new investments that are more appropriate for your investment goals and objectives. Such review will be conducted by Joseph Giambrone.

B. Intermittent Review Factors

Intermittent reviews may be triggered by substantial market fluctuation, economic or political events, or by changes in your financial status (such as retirement, termination of employment, relocation, or inheritance). Clients are advised to notify JPG promptly if there are any material changes in their financial situation, investment objectives, or in the event they wish to place restrictions placed on their account.

C. Client Reports

Clients will receive a report at least quarterly from the custodian, detailing account performance and account holdings. In most cases, Clients will also have online access to view their account at any time.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits from Others

The Firm does not receive an economic benefit (such as sales awards or other prizes) from any third party for providing investment advice or other advisory services to its Clients.

B. Compensation to unaffiliated Third Parties

JPG Wealth may reach an agreement for a third-party Solicitor to facilitate introductions to potential clients. Clients originating from the Solicitor relationship will not be charged an extra fee. The fee paid to the third-party solicitor will be a percentage of the management fees payable to JPG Wealth. This share/split of investment management fees are negotiable between the parties of the Agreement, fee agreed to shall be within the range of 5%-20% of investment management fees payable and collected by Advisor per quarter. Third-party Solicitors will not advise clients on any investment, financial or plan related matters. The third-party Solicitors are not employed by JPG Wealth.

Item 15: Custody

A. Custodian of Assets

Custody means holding, directly or indirectly, client funds or securities, or having any authority to obtain possession of them.

JPG does not have direct physical custody of any Client funds or securities. JPG has indirect custody by virtue of its ability to deduct advisory fees payable to it. Client's funds and securities are held by a JPG preferred qualified custodian or account custodian selected by the Client. In certain jurisdictions, an Adviser's ability to withdraw management fees from the Client's account may be deemed custody.

Please refer to Item 12 for our information regarding our Brokerage Practices.

B. Account Statements

Although we are your adviser, your statements will be mailed or made available electronically by the broker-dealer or custodian. When you receive these statements, please review them carefully. Please compare asset values, holdings, and fees on your statement to that in the account statement issued the previous quarter.

Item 16: Investment Discretion

You may grant us full discretionary authority in order to supervise and direct the investments of your accounts. You grant this authority upon execution of our Investment Management Agreement. This authority is for the purpose of making and implementing investment decisions, without your prior consultation. All investment decisions are made in accordance with your stated investment objectives. You may inform our firm of restrictions that you would like to impose regarding investment strategies or types of securities transactions within your account(s). Our discretionary authority does not give

authority to take or have possession of any assets in your account or to direct delivery of any securities or payment of any funds held in the account to our firm. Furthermore, our authority by agreement does not allow us to direct the disposition of such securities or funds to anyone except the account owner.

Item 17: Voting Client Securities

Clients retain the right to vote all proxies which are solicited for securities held in their accounts. JPG will not be required to take any action or render any advice with respect to the voting of proxies solicited by nor with respect to the issuers of securities in which assets of the Client's account may be invested in occasionally. Furthermore, JPG will not take any action or render any advice with respect to any securities held in any Client's accounts that are named in or subject to class action lawsuits. JPG will however, forward to you any information received by our Firm regarding class action legal matters involving any security held in your account.

Clients may direct JPG to vote proxies that are solicited for securities held in Client accounts. The Firm may, but is not required to, take any action or render any advice with respect to the voting of proxies solicited by or with respect to the issuers of securities in which assets of the Account may be invested from time to time. JPG, may also, but is not required to, take any action or render any advice with respect to any securities held in any Accounts that are named in or subject to class action lawsuits.

Item 18: Financial Information

A. Balance Sheet Requirement

JPG is not the qualified custodian for Client funds or securities, and does not require prepayment of fees of more than \$500 per Client, six (6) months or more in advance.

JPG is in compliance with its home state's minimum capital net worth requirements. The Firm will comply with the balance sheet report filing which may be required by applicable state rules.

B. Financial Condition

JPG does not have any financial impairment that would preclude the firm from meeting contractual commitments to Clients.

C. Bankruptcy Petition

JPG has not been the subject of a bankruptcy petition at any time during the last 10 years.

Item 19: Requirements for State-Registered Advisers

A. Firm Management

JPG has a sole Managing Member, Joseph Giambrone. Mr. Giambrone is the Firm's investment adviser representative. The education and business background of Mr. Giambrone can be found in the Brochure Supplement (Part 2B of Form ADV).

B. Other Business Activities

JPG does not engage in any other business other than providing financial planning and investment advice.

C. Performance-Based Fees

As stated in Item 6, JPG does not assess Performance-Based Fees ("Performance Fees"). Performance Fees are based on a share of the capital gains or capital appreciation of the assets of a Client.

Performance-based compensation may indirectly create an incentive for the Firm to make investments on behalf of the Fund that are riskier or more speculative than would be the case in the absence of such allocation.

D. Disciplinary Reporting Disclosure

D.1. Arbitration Claims

Neither JPG nor its management persons has been found liable in any arbitration claim alleging damages in excess of \$2500 involving an investment or investment-related business or activity, fraud, false statements or omissions, theft, embezzlement or other wrongful taking of property, bribery, forgery, counterfeiting or extortion or dishonest, unfair or unethical practices.

D.2. Civil, Self-Regulatory Organization (SRO), or Administrative Proceeding

Neither JPG nor its management persons has been found liable in any civil, selfregulatory organization, or administrative proceeding involving an investment or investment related business or activity, fraud, false statements or omissions, theft embezzlement or other wrongful taking of property bribery, forgery, counterfeiting, or extortion; or dishonest, unfair or unethical practices.

E. Relationships or Arrangements with Securities Issuers

Neither JPG nor its employees has a relationship or arrangement with any issuer of securities.

Privacy Policy

JPG does not disclose nonpublic personal information about its Clients or former Clients to any persons other than as described below. JPG collects information about its Clients (such as a name, address, social security number, assets and income) from discussions with Clients, from documents that Clients may deliver to JPG (such as account applications) and in the course of providing services. In order to service its Client accounts and effect Client transactions, JPG may provide Client personal information to its affiliates and to firms that assist it in servicing Client accounts and which have a need for such information. JPG does not otherwise provide information about its Clients to outside firms, organizations or individuals except as required by law. Any party that receives this information will use it only for the services and as allowed by applicable law or regulations, and is not permitted to share or use this information for any other purpose.

Brochure Supplement
(Parts 2B of Form ADV)

JOSEPH GIAMBRONE

INVESTMENT ADVISER REPRESENTATIVE

JPG Wealth Management, LLC

Tower Place

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Atlanta, GA 30326

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NOTICE:

These brochure supplements provide information about the Investment Adviser Representatives of JPG WEALTH MANAGEMENT, LLC ("JPG"), CRD 174818. Registration with any regulatory agency should not imply a certain level of skill or training. You should have received a copy of the Brochure for JPG as well. Please contact Joseph Giambrone, Investment Advisor Representative, if you did not receive JPG's brochure. You can also contact Mr. Giambrone if you have any questions about the content of the attached supplements.

February 27, 2023

A. General Requirements

Generally, JPG requires employees to hold a college or advanced degree or have relevant working experience in the securities industry. Any employee of JPG acting in a representative capacity will be appropriately licensed or registered as such.

B. Investment Adviser Representative Information

We currently have one (1) investment adviser representative employed by JPG. This Brochure Supplement provides information about **Joseph Giambrone**.

Item 2 Education and Business Experience

CRD Number: 6306649

Year of Birth: 1985

EDUCATIONAL BACKGROUND:

Bachelors in Finance, Auburn University, 2009

Juris Doctor, John Marshall Law School, 2012

Masters in Taxation Law, University of Florida Levin College of Law, 2013

RELATED BUSINESS EXPERIENCE:

Managing Member/Investment Adviser Representative (2015 to Present)
JPG Wealth Management, LLC

Adviser (2014 to 2015)
Bolton Global Asset Management

Unemployed (2013 to 2014)

Masters of Taxation Law Student (2012 to 2013)
University of Florida

Law Student (2009 to 2012)
John Marshall Law School

Research Assistant (2011 to 2012)
Professor Beckett Cantley

Intern (2010 to 2011)
Kind Wade Law

Intern

Raymond James

(Summer 2009)

Student

Auburn University

(2004 to 2009)

Item 3 Disciplinary Information

Joseph Giambrone does not have any legal or disciplinary events material to a Client's or prospective Client's evaluation.

Item 4 Other Business Activities

Joseph Giambrone is also an attorney. In addition to financial services he provides through JPG, he engages in and provides estate planning legal services in the state of Georgia.

Item 5 Additional Compensation

Other than as noted in the above Item 4, Joseph Giambrone does not receive any additional compensation for providing financial planning services or investment advice beyond the compensation he receives through our Firm.

Item 6 Supervision

Joseph Giambrone is the Managing Member and Investment Adviser Representative of JPG. Mr. Giambrone is responsible for providing advice to the Clients. He is also responsible for the administration of the firm's operations

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Item 7 Requirements for State-Registered Advisers**A.1 Arbitration Claims.**

None. Joseph Giambrone has not been found liable in any arbitration claim alleging damages in excess of \$2,500 involving an investment or investment-related business or activity, fraud, false statements or omissions, theft, embezzlement or other wrongful taking of property, bribery, forgery counterfeiting or extortion or dishonest, unfair or unethical practices.

A.2 Self-Regulatory Organization or Administrative Proceedings

None. Joseph Giambrone has not been found liable in any civil, self-regulatory organization, or administrative proceeding involving an investment or investment related business or activity, fraud, false statements or omissions, theft embezzlement or other wrongful taking of property bribery, forgery, counterfeiting, or extortion; or dishonest, unfair or unethical practices.

B. Bankruptcy Petitions

Joseph Giambrone has not been the subject of a bankruptcy petition at any time during the last 10 years.