

# Form ADV

July 10, 2018

Part 2A

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## Wealth Management Partners, Inc. d/b/a U.S. Advisory Group

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This brochure (“Brochure”) provides information about the qualifications and business practices of US Advisory Group (“USAG”). You should review this Brochure in conjunction with our separate brochure supplement (“Supplement”). The Supplement(s) has been prepared for the purpose of providing information about the qualifications and background of the supervised person(s) working with you on our behalf or who may otherwise participate in the advisory services provided to you.

If you have any questions about the contents of this Brochure or our Supplement(s), please contact us at 781-246-0222 or [rick@usadvisory.com](mailto:rick@usadvisory.com). Additional information about USAG or any of our supervised persons (who are registered under our firm) is also available on the SEC’s Investment Adviser Public Disclosure (“IAPD”) which can be found at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

The format/layout of this Brochure has been dictated by the SEC. As such, the Brochure’s table of contents can be found after the “Material Changes” section of this Brochure, not at the beginning of the Brochure. The subsections appearing under each heading shall follow the mandated ordering of the items required to be addressed in this Brochure as set forth in the instructions and guidance issued by the SEC in regard to Part 2A of the Form ADV. USAG’s response to each such item shall immediately follow each numbered item. We encourage any reader of this Brochure to also refer to the SEC’s instructions and guidance related to Part 2A of the Form ADV. Throughout this Brochure, any references to “we,” “our,” “ours,” “us,” etc. are meant to refer to USAG.

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.

## **II. Material Changes**

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Filing date of last annual ADV update: March 30, 2017

There have been no material changes since the last update.

### III. Table of Contents

II. Material Changes .....	2
III. Table of Contents .....	3
IV. Advisory Business .....	6
Firm Profile .....	6
Years in Business .....	6
Direct Principal Owners.....	6
IV.(B). USAG’s Advisory Services.....	6
Product Type Limitations .....	6
Specialized Services .....	7
Our Services .....	7
Ongoing Asset Management .....	7
Financial Planning / Consulting Services .....	8
IV.(C). Customization of Advisory Services .....	9
IV.(D). Wrap Fee Program Participation.....	9
IV. (E). Assets Under Management (“AUM”).....	9
V. Fees and Compensation .....	10
V.(A). USAG Advisory Fees .....	10
V.(B). Fee Collection Process.....	10
V.(C). Other Fee/Expenses.....	10
V.(D). Fees Charged in Advance.....	10
V.(E). Additional Compensation .....	10
V.(E).(2). Client-Directed Brokerage.....	10
V.(E).(3). Brokerage Compensation.....	10
VI. Performance-Based Fees and Side-By-Side Management .....	10
VII. Types of Clients .....	11
VIII. Methods of Analysis, Investment Strategies and Risk of Loss.....	11
VIII.(A). Methods of Analysis .....	11
VIII. (B) Investment Strategies .....	12
VIII.(B). (continued) Risk Disclosures .....	12
VIII.(C). Investment-Specific Risks .....	14
IX. Disciplinary Information .....	15
IX.(A). Criminal or Civil Action .....	15
IX.(B). Administrative Proceedings.....	15
IX.(C). SRO Proceedings .....	16
X. Other Financial Industry Activities and Affiliations .....	16

X.(A). Broker-Dealers.....	16
X.(B). Futures Commission Merchants, Introducing Brokers, Commodity Trading Advisors, Commodity Pool Operators .....	16
X.(C). Related Persons.....	17
X.D Use of Other Investment Advisers.....	17
XI. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....	17
XI.A Code of Ethics.....	18
XI.(B) Participation in Client Trading .....	18
XI.(C) Trading Alongside Our Clients.....	18
XII. Brokerage Practices .....	19
XII.(A).(1). Research and Soft Dollar Benefits .....	20
XII.(A).(2). Brokerage for Client Referrals.....	20
XII.(A).(3). Directed Brokerage .....	20
XII.(B). Order Batching .....	20
XIII. Review of Accounts.....	21
XIII.(A). Review of Accounts or Financial Plans .....	21
Review of client accounts. ....	21
XIII.(B). Non-Periodic Account Reviews .....	21
XIII.(C). Reports to Clients .....	21
XIV. Client Referrals and Other Compensation .....	21
XIV.(A). Compensation we Receive .....	21
XIV.(B). Compensation we Pay.....	22
XV. Custody .....	22
XVI. Investment Discretion.....	22
XVII. Voting Client Securities.....	22
XVII.(A). Proxy Voting .....	22
Proxy Voting Policies and Procedures and Client Instruction.....	22
XVIII. Financial Information.....	23
XVIII.(A). Balance Sheet.....	23
XVIII.(B). Adverse Financial condition.....	23
XVIII.(C). Bankruptcy-Related Matters.....	23
XIX. Requirements for State-Registered Advisers.....	23
Part 2B Supplemental Brochure for...Rick McDonald.....	24
II. Educational Background and Business Experience .....	25
III. Disciplinary information.....	25
IV. Other Business Activity.....	26
IV.(A). Other Investment-Related Activities .....	26

IV.(B). Other Activities .....	26
V. Additional Compensation .....	27
VI. Supervision .....	27
VII. Requirements for State-Registered Advisers.....	27
Part 2B Supplement for Tucker McDonald .....	29
II. Educational Background and Business Experience .....	30
III. Disciplinary information .....	30
IV. Other Business Activity.....	30
IV.(A). Other Investment-Related Activities .....	30
IV.(B). Other Activities.....	31
V. Additional Compensation .....	32
VI. Supervision .....	32
VII. Requirements for State-Registered Advisers.....	33

## IV. Advisory Business

### Firm Profile

USAG provides investment management and financial planning services. Our investment management services are provided on a non-discretionary basis.

### Years in Business

Date of formation: February 1998

Date of initial investment adviser registration: Prior to its registration with the State of Massachusetts, USAG was registered with the SEC from 1/29/1999 until 10/24/2016. USAG became registered with the State of Massachusetts on 7/21/2016.

### Direct Principal Owners

The following parties maintain at least 100% direct ownership in USAG.

- Frederick McDonald

### IV.(B). USAG's Advisory Services

In this section, we will describe the services we offer as well as the fees that correspond to those services. As far as investment products on which we may provide advice, those product types are identified in the grid below.

### Product Type Limitations

We generally provide investment advice in relation to the following specific types of securities/investments.

<input checked="" type="checkbox"/>	Exchange Listed Equities	<input checked="" type="checkbox"/>	Mutual funds (closed-end and open-end funds)
<input checked="" type="checkbox"/>	Over the counter equities	<input checked="" type="checkbox"/>	Real Estate Investment Trusts ("REITs")
<input type="checkbox"/>	Equities of foreign issuers	<input checked="" type="checkbox"/>	Exchange traded funds
<input checked="" type="checkbox"/>	Interests in privately offered securities (hedge funds, venture capital funds, private equity funds, etc.) involving any of the following: <ul style="list-style-type: none"> <li>• Real estate</li> <li>• Oil and gas</li> <li>• Mortgages or other receivables/assets</li> </ul>	<input checked="" type="checkbox"/>	U.S. government securities
<input type="checkbox"/>	Warrants	<input checked="" type="checkbox"/>	Options on securities
<input checked="" type="checkbox"/>	Corporate Debt Securities (other than commercial paper)	<input type="checkbox"/>	Options on commodities
<input checked="" type="checkbox"/>	Commercial paper	<input type="checkbox"/>	Options of Futures
<input checked="" type="checkbox"/>	Certificates of deposit	<input type="checkbox"/>	Futures contracts (tangibles)
<input checked="" type="checkbox"/>	Municipal Securities	<input type="checkbox"/>	Futures contracts (intangibles)
<input checked="" type="checkbox"/>	Variable life insurance	<input type="checkbox"/>	Other:
<input checked="" type="checkbox"/>	Variable annuities	<input type="checkbox"/>	Other:

## Specialized Services

As designated below, we specialize in the following services. As applicable, a description of each such service is also included below.

- 1. Financial planning.
- 2. Quantitative analysis.
- 3. Market timing services.
- 4. Other:
- 5. None. Although we may offer one or more of the services mentioned immediately above, we do not limit our services to specializing in any single service area. In the following grid(s), we will describe both the services we offer as well as other key issues related to those services.

## Our Services

Service:	<b>Ongoing Asset Management</b>																		
Service Description:	USAG provides investment management services to individuals and high net worth accounts. These services are implemented in conjunction with the client's investment objectives, risk tolerance level, liquidity needs, tax and/or legal implications and other concerns where applicable. Portfolios are designed with the optimal asset allocation mix of ETFs and mutual funds for each client. USAG will honor any reasonable restrictions on investing in certain securities or types of securities imposed by the client in writing.																		
Use of discretion:	The Firm does not offer discretionary management																		
Service Fees:	<p>For the service described above, we will charge fees in the following manner:</p> <p><input checked="" type="checkbox"/> Annual, asset-based fee</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="2" style="text-align: center;">Asset-Based Fee Schedule</th> </tr> <tr> <th style="text-align: center;">Account(s)/Portfolio Value</th> <th style="text-align: center;">Annual Percentage</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">First \$1,000,000</td> <td style="text-align: center;">1.5%</td> </tr> <tr> <td style="text-align: center;">1,000,000 – 2,000,000</td> <td style="text-align: center;">1.25%</td> </tr> <tr> <td style="text-align: center;">\$2,000,001 and up</td> <td style="text-align: center;">1.0%</td> </tr> <tr> <th colspan="2" style="text-align: center;">Other fee/account maintenance conditions...</th> </tr> <tr> <td style="text-align: center;">Minimum account / portfolio balance (initial):</td> <td><input type="checkbox"/> None <input checked="" type="checkbox"/> \$500,000.00</td> </tr> <tr> <td style="text-align: center;">Minimum account / portfolio balance (ongoing):</td> <td><input type="checkbox"/> None <input checked="" type="checkbox"/> \$500,000.00</td> </tr> <tr> <td style="text-align: center;">Minimum annual fee:</td> <td><input checked="" type="checkbox"/> None <input type="checkbox"/> \$</td> </tr> </tbody> </table> <p>All fee arrangements and minimum account sizes are negotiable at our sole discretion. Specific fee arrangements will be set forth in your service agreement ("Agreement") with us.</p>	Asset-Based Fee Schedule		Account(s)/Portfolio Value	Annual Percentage	First \$1,000,000	1.5%	1,000,000 – 2,000,000	1.25%	\$2,000,001 and up	1.0%	Other fee/account maintenance conditions...		Minimum account / portfolio balance (initial):	<input type="checkbox"/> None <input checked="" type="checkbox"/> \$500,000.00	Minimum account / portfolio balance (ongoing):	<input type="checkbox"/> None <input checked="" type="checkbox"/> \$500,000.00	Minimum annual fee:	<input checked="" type="checkbox"/> None <input type="checkbox"/> \$
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Minimum annual fee:	<input checked="" type="checkbox"/> None <input type="checkbox"/> \$																		
Other fees:	In addition to our service fees, you may be assessed other fees by parties independent from us. You may also incur, relative to certain investment products (such as mutual funds), charges imposed directly at the investment product level (i.e. advisory fees, administrative fees, and other fund expenses). Brokerage fees/commissions charged to you for securities trade executions may be billed to you by the broker-dealer or custodian of record for your account, not us. Any such fees are exclusive of, and in																		

	<p>addition to our compensation. You will be solely and directly responsible for all fees, including fees other than those we may bill directly to you.</p> <p>Refer to Item V.(E) and Item 12 for additional information regarding other fees such as sales compensation, brokerage fees, custodial fees, etc.</p>
Fee collection:	<p>For the service described above, we receive our service fees by the following method(s):</p> <p>Contemporaneously with the execution of the Agreement, you will be asked to sign an authorization that will allow the custodian of any of your account(s) to debit the account(s) the amount of our service fees and remit the fee to us. The authorization will remain valid unless and until we receive a written revocation of such authorization from you. In connection with this fee deduction process, the custodian will send you a statement, at least quarterly, indicating:</p> <ul style="list-style-type: none"> <li>• all amounts disbursed from the account, and</li> <li>• the amount of advisory fees paid directly to us.</li> </ul> <p>Our fees are computed by Envestnet, our service provider and then deducted by Pershing, the custodian</p> <p>Specific fee arrangements will be set forth in your Agreement with us.</p>
Fee frequency/timing:	<p>For the service described above, the frequency and timing of our fee collection process occurs as follows: <input checked="" type="checkbox"/> quarterly, <input type="checkbox"/> monthly, <input checked="" type="checkbox"/> in advance, or <input type="checkbox"/> in arrears. Specific fee arrangements will be set forth in your Agreement with us.</p>
Advanced billing and refunds:	<p>In any partial calendar quarter, fees are pro-rated based on the number of days in which the account is open during the quarter.</p>

Service:	<b>Financial Planning / Consulting Services</b>
Service Description:	<p>We may prepare a written Investment Policy Statement (“IPS”) for our clients. Our financial planning services may involve consultation, analysis, and recommendations in the six areas of financial planning, which include (1) financial situation; (2) income taxes; (3) insurance; (4) investments; (5) retirement planning; (6) estate planning and (7) time horizon.</p> <p>The completed IPS lays out the risk/reward characteristics for the investable assets, performance benchmarks, as well as the control procedures and guidelines for the total portfolio. Our asset optimization program is designed to provide an understanding of the trade-offs between investment risk and return. These simulations assist us in determining a set of optimal asset allocation strategies which have the highest probability of meeting client needs.</p>
Use of discretion:	<p>The Firm will not use discretion in regards to this service offering.</p>
Service Fees:	<p>For the service described above, we may charge fees in the following manner:  <input checked="" type="checkbox"/> Flat/fixed fee</p> <p>Our fixed/flat fee for our financial planning services ranges from \$2,000 to \$10,000. The fixed fee is determined based on whether planning is for individuals, or as an ongoing retainer. The amount may be higher for corporations.</p>



	All fees are negotiable at our sole discretion. Specific fee arrangements will be set forth in your Agreement with us.
Fee collection:	For the service described above, we receive our service fees by the following method(s): <input checked="" type="checkbox"/> direct invoice to you  Specific fee arrangements will be set forth in your Agreement with us.
Fee frequency/timing:	These fees are limited to no more than 6 months of engagement, or, where projects are deemed to go longer than 6 months, fees will be charged in 6-month increments.
Advanced billing and refunds:	USAG and/or the client may terminate the investment advisory agreement, in whole or in part, at any time with 30 days written notice. Upon termination, any fees paid in advance will be prorated to the date of termination and any excess shall be refunded to the client. The client advisory agreement with the firm is non-transferable without the client's written approval.

#### **IV.(C). Customization of Advisory Services**

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To the fullest extent possible, we will endeavor to tailor our advisory services to meet the specific needs of each and every client. In order to determine a suitable course of action for an individual client, we will perform a review of our clients' financial circumstances. Such review may include, but would not necessarily be limited to, investment objectives, consideration of a client's overall financial condition, income and tax status, personal and business assets, risk profile, and other factors unique to a client's particular circumstances.

In making investment recommendations on behalf of a client, we will rely on a data gathering document or other questionnaire, which would be completed based on information provided by a client.

Our clients are free to impose any restrictions or other conditions with regard to how we provide our advisory services. If we agree to such restrictions and/or conditions, please be advised that restrictions and guidelines imposed by a client may affect the composition and performance of custom portfolios (as a result, performance of custom portfolios within the same investment objective may differ and a client should not expect that the performance of a custom portfolio will be identical to any other individual's portfolio performance) as well as any recommendations provided to the client.

#### **IV.(D). Wrap Fee Program Participation**

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None of our investment advisory services involve the use of wrap programs.

#### **IV. (E). Assets Under Management ("AUM")**

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AUM (discretionary):	0
AUM (non-discretionary):	\$58,800,420
Total AUM:	\$58,800,420
Date of AUM calculation:	December 31, 2017

## **V. Fees and Compensation**

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### **V.(A). USAG Advisory Fees**

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Refer above to Item IV.(B).

### **V.(B). Fee Collection Process**

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Refer above to Item IV.(B).

### **V.(C). Other Fee/Expenses.**

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Refer above to Item IV.(B).

### **V.(D). Fees Charged in Advance**

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Refer above to Item IV.(B).

### **V.(E). Additional Compensation**

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Item V.(E) requires us to address situations in which we or any of our supervised persons accepts compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds. Some of our supervised persons are registered with a broker dealer, and may receive compensation as a result of the sale of any securities or other investment products .

#### **V.(E).(2). Client-Directed Brokerage**

You have the ability to purchase investment products that we recommend through any broker-dealer or other financial institution you choose. If you choose to use a firm other than the broker-dealer(s) we may normally recommend, we may not be able to properly monitor your assets and therefore we cannot be held responsible for the success or failure of any investment products or strategies that you implement at firms other than those we recommend. In other words, our services and responsibilities will not apply to transactions you effect on your own whether through firms you choose on your own or through any broker-dealer we may recommend.

#### **V.(E).(3). Brokerage Compensation**

USAG is not registered as a broker-dealer and thus, it does not receive transaction-based compensation for securities-related activities.

## **VI. Performance-Based Fees and Side-By-Side Management**

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We do not charge performance-based fees.

## VII. Types of Clients

We will generally provide our services to the following types of clients.

- Individuals
- High net worth individuals

For information on any minimum fees, minimum initial/ongoing account balances, or other conditions we may impose, please refer to Item IV.(B).

## VIII. Methods of Analysis, Investment Strategies and Risk of Loss

### VIII.(A). Methods of Analysis

In the course of our management process and as appropriate on a case by case basis, we will employ some or all of the following methods of analysis. For a description of the risks related to each particular method of analysis, see the information following each analysis method description. A description of each key risk appears later in this section.

#### **Fundamental**

Fundamental analysis is generally the considered the opposite approach to technical analysis. Fundamental analysis involves the attempt to identify the intrinsic value (i.e. the actual, true/real value) of an investment instrument by examining any related economic, financial, and other quantitative/qualitative factors relevant to that instrument. Fundamental analysis can take into account anything that may impact the underlying value of the instrument. Examples of such things may include large-scale economic issues such as the overall condition or current cycle of the economy, industry-specific or sector-specific conditions, etc. Other company/issuer-specific factors may also be taken into consideration such as the company's/issuer's current financial condition, management experience and capabilities, legal/regulatory matters, the overall type and volume of current and expected business, etc.

One of the goals of fundamental analysis is to attempt to derive a value that can be compared to the current market price for a particular financial instrument in hopes of determining whether the instrument is overpriced (time to sell) or underpriced (time to buy).

Key risk(s): Economic Risk, Financial Risk, Inflation Risk, and Interest Rate Risk.

Investing in securities or other investment products involves the risk of loss and you should be prepared to bear such losses.

#### **Charting / Technical**

The terms "charting" and "technical" analysis are generally used synonymously and therefore, for the purpose of this document, we will use the term, "technical analysis." In most cases, technical analysis involves the evaluation of historical market data such as price and volume of a particular security or investment instrument. Technical analysis often times involves the use of charts, graphs, and other tools to evaluate historical factors relating to the investment instrument and perhaps the market as a whole. The goal of technical analysis is to try to identify historical trading patterns that suggest future trading activity or price targets.

Key risk(s): Economic Risk, Financial Risk, Inflation Risk, Interest Rate Risk, Legal/Regulatory Risk, Market Risk, Operational Risk, and Strategy Risk.

## **VIII. (B) Investment Strategies**

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### **Long-Term Purchases**

Long-term purchases generally involve the acquisition of an investment instrument and holding it for a period of at least one year.

Key risk(s): Capital Risk, Economic Risk, Financial Risk, Inflation Risk, Interest Rate Risk, Legal/Regulatory Risk, Liquidity Risk, Market Risk, Operational Risk, Strategy Risk.

### **Short-Term Purchases**

Short-term purchases generally involve the acquisition of an investment instrument and holding it for a period of not more than one year.

Key risk(s): Capital Risk, Economic Risk, Financial Risk, Higher Trading Costs, Interest Rate Risk, Legal/Regulatory Risk, Liquidity Risk, Market Risk, Operational Risk, Strategy Risk.

### **Margin Trading**

Margin trading, or “trading on margin,” as it is generally stated, involves the ability to purchase a dollar value of securities that is greater than the dollar value of funds you have available for the purchase. Essentially, trading on margin means that you can borrow additional funds, generally from the firm that holds your brokerage account, to purchase investment instruments that exceed the amount with which you have funded your account.

Key risk(s): Capital Risk, Credit Risk, Currency Risk, Higher Trading Costs, Inflation Risk, Legal/Regulatory Risk, and Margin Risk.

Investing in securities or other investment products involves the risk of loss and you should be prepared to bear such losses.

## **VIII.(B). (continued) Risk Disclosures**

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### **Capital Risk**

Capital risk is one of the most basic, fundamental risks of investing; it is the risk that you may lose 100 percent of your money. All investments carry some form of risk and the loss of capital is generally a risk for any investment instrument.

### **Credit Risk**

Credit risk can be a factor in situations where an investment’s performance relies on a borrower’s repayment of borrowed funds. With credit risk, an investor can experience a loss or unfavorable performance if a borrower does not repay the borrowed funds as expected or required. Investment holdings that involve forms of indebtedness (i.e. borrowed funds) are subject to credit risk.

### **Currency Risk**

Fluctuations in the value of the currency in which your investment is denominated may affect the value of your investment and thus, your investment may be worth more or less in the future. All currency is subject to swings in valuation and thus, regardless of the currency denomination of any particular investment you own, currency risk is a realistic risk measure. That said, currency risk is generally a much larger factor for investment instruments denominated in currencies other than the most widely used currencies (U.S. dollar, British pound, German mark, Euro, Japanese yen, French franc, etc.).

## **Economic Risk**

The prevailing economic environment is important to the health of all businesses. Some companies, however, are more sensitive to changes in the domestic or global economy than others. These types of companies are often referred to as cyclical businesses. Countries in which a large portion of businesses are in cyclical industries are thus also very economically sensitive and carry a higher amount of economic risk. If an investment is issued by a party located in a country that experiences wide swings from an economic standpoint or in situations where certain elements of an investment instrument are hinged on dealings in such countries, the investment instrument will generally be subject to a higher level of economic risk.

## **Financial Risk**

Financial risk is represented by internal disruptions within an investment or the issuer of an investment that can lead to unfavorable performance of the investment. Examples of financial risk can be found in cases like Enron or many of the dot com companies that were caught up in a period of extraordinary market valuations that were not based on solid financial footings of the companies.

## **Higher Trading Costs**

For any investment instrument or strategy that involves active or frequent trading, you may experience larger than usual transaction-related costs. Higher transaction-related costs can negatively affect overall investment performance.

## **Inflation Risk**

Inflation risk involves the concern that in the future, your investment or proceeds from your investment will not be worth what they are today. Throughout time, the prices of resources and end-user products generally increase and thus, the same general goods and products today will likely be more expensive in the future. The longer an investment is held, the greater the chance that the proceeds from that investment will be worth less in the future than what they are today. Said another way, a dollar tomorrow will likely get you less than what it can today.

## **Interest Rate Risk**

Certain investments involve the payment of a fixed or variable rate of interest to the investment holder. Once an investor has acquired or has acquired the rights to an investment that pays a particular rate (fixed or variable) of interest, changes in overall interest rates in the market will affect the value of the interest-paying investment(s) they hold. In general, changes in prevailing interest rates in the market will have an inverse relationship to the value of existing, interest paying investments. In other words, as interest rates move up, the value of an instrument paying a particular rate (fixed or variable) of interest will go down. The reverse is generally true as well.

## **Legal/Regulatory Risk**

Certain investments or the issuers of investments may be affected by changes in state or federal laws or in the prevailing regulatory framework under which the investment instrument or its issuer is regulated. Changes in the regulatory environment or tax laws can affect the performance of certain investments or issuers of those investments and thus, can have a negative impact on the overall performance of such investments.

## **Liquidity Risk**

Certain assets may not be readily converted into cash or may have a very limited market in which they trade. Thus, you may experience the risk that your investment or assets within your investment may not be able to be liquidated quickly, thus, extending the period of time by which you may receive the proceeds from your investment. Liquidity risk can also result in unfavorable pricing when exiting (i.e. not being able to quickly get out of an investment before the price drops significantly) a particular investment and therefore, can have a negative impact on investment returns.

## **Margin Risk**

- You can lose more funds than you deposit in a margin account. A decline in value of securities that are purchased on margin may require you to provide additional funds to the custodian holding your margin account in order to avoid a forced sale of those securities or other securities in your account.
- The custodian holding your margin account can force the sale of securities in your margin account. If the

equity in your account falls below the margin maintenance level required by law or below the custodian's "house" requirement, the custodian can sell the securities in your account to cover the margin deficiency. You will be responsible for any shortfall in the account after such sale.

- Securities can be sold without contacting you prior to sale. Some investors mistakenly believe they must be contacted before a margin call becomes valid and that securities in their accounts cannot be liquidated to meet the call unless they have been contacted ahead of time. Most firms will attempt to notify you of margin calls, however, they are not required to do so. Even if the custodian has contacted you to provide a specific date by which you can meet a margin call, the custodian can still take necessary steps to protect its financial interests, including immediately selling the securities without notice to you.
- You are not entitled to choose which securities in your margin account are liquidated or sold to meet your margin call. Because the securities are used as collateral for the margin loan, the custodian has the right to decide which securities to sell in order to protect its interests.
- The custodian can increase its "house" maintenance requirement at any time and is not required to provide you with advance, written notice. These changes in policy can take effect immediately and may result in the issuance of a margin maintenance call. Your failure to satisfy this call may cause a forced liquidation in your account.
- You are not entitled to an extension of time on a margin call. While an extension of time to meet margin requirements may be available to clients under certain conditions, a client does not have the right to the extension.

#### **Market Risk**

The market value of an investment will fluctuate as a result of the occurrence of the natural economic forces of supply and demand on that investment, its particular industry or sector, or the market as a whole. Market risk may affect a single issuer, industry or sector of the economy or may affect the market as a whole. Market risk can affect any investment instrument or the underlying assets or other instruments held by or traded within that investment instrument.

#### **Operational Risk**

Operational risk can be experienced when an issuer of an investment product is unable to carry out the business it has planned to execute. Operational risk can be experienced as a result of human failure, operational inefficiencies, system failures, or the failure of other processes critical to the business operations of the issuer or counter party to the investment.

#### **Past Performance**

Charting and technical analysis are often used interchangeably. Technical analysis generally attempts to forecast an investment's future potential by analyzing its past performance and other related statistics. In particular, technical analysis often times involves an evaluation of historical pricing and volume of a particular security for the purpose of forecasting where future price and volume figures may go. As with any investment analysis method, technical analysis runs the risk of not knowing the future and thus, investors should realize that even the most diligent and thorough technical analysis cannot predict or guarantee the future performance of any particular investment instrument or issuer thereof.

#### **Strategy Risk**

There is no guarantee that the investment strategies discussed herein will work under all market conditions and each investor should evaluate his/her ability to maintain any investment he/she is considering in light of his/her own investment time horizon. Investments are subject to risk, including possible loss of principal.

### **VIII.(C). Investment-Specific Risks**

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There is no single type of investment instrument that we predominantly recommend, however, please be mindful that all investments carry some form and degree of risk. Certain types of investments carry greater types and levels

of risk than others and you should make sure that you fully understand not only the investment product itself but also the attendant risk factors associated with such products.

## IX. Disciplinary Information

The purpose of this section is for us to disclose to you any legal, disciplinary, or other events that you may consider material in your evaluation of our firm or the integrity of our management. Following each of the numbered items below, we shall provide details as to each applicable matter or we will answer “No” or “N/A.” This information is presented in a question and answer format. The time period required to be covered by our answers in this section is ten years from the date of the events requiring disclosure.

### IX.(A). Criminal or Civil Action

In any domestic, foreign, or military court of competent jurisdiction, has USAG, or any of its management persons...		
Been convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Been identified as the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Been found to have been involved in a violation of an investment-related statute or regulation; or	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Been the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, your firm or a management person from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

### IX.(B). Administrative Proceedings

Has USAG or any of its management persons been the subject of an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which USAG or any of its management persons...		
Was found to have caused an investment-related business to lose its authorization to do business; or	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority...		

denying, suspending, or revoking the authorization of USAG or one of its management persons to act in an investment-related business;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
barring or suspending USAG or one of its management person's association with an investment-related business;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
otherwise significantly limiting USAG or one of its management person's investment-related activities; or	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
imposing a civil money penalty of more than \$2,500 on USAG or one of its management persons?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

### IX.(C). SRO Proceedings

Has USAG or any of its management persons been involved in a SRO proceeding in which USAG or any of its management persons ...		
Was found to have caused an investment-related business to lose its authorization to do business; or	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Was found to have been involved in a violation of the SRO's rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; (ii) otherwise significantly limited from investment-related activities; or (iii) fined more than \$2,500?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

## X. Other Financial Industry Activities and Affiliations

The following information will address any active or pending financial industry affiliations that you need to know about for the purpose of identifying any related conflicts of interest that you might consider material in regard to letting us handle your investment advisory needs.

### X.(A). Broker-Dealers

Neither USAG nor any of its management persons is registered as a broker-dealer nor do they have an application pending or otherwise in process for the purpose of seeking registration as a broker-dealer. Certain of our management persons, however, are currently or may become registered as registered representatives of a broker-dealer.

### X.(B). Futures Commission Merchants, Introducing Brokers, Commodity Trading Advisors, Commodity Pool Operators

Neither USAG nor any of its management persons is registered as a futures commission merchant, an introducing broker, a commodity trading adviser, or a commodity pool operator, nor do either parties have an application pending or otherwise in process for the purpose of seeking registration as any of these types of firms. Further, none of our management persons are registered as or currently seeking registration as associated persons of any of these types of firms.



## **X.(C). Related Persons**

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The purpose of this section is to address any relationship or arrangement (that is material to (1) our advisory business or (2) our clients) that we or any of our management persons have with any of our related persons that meet certain categories as identified by the Form ADV.

### **Broker-dealer, municipal securities dealer, or government securities dealer or broker**

Related Person: Frederick McDonald III

Conflict: Frederick McDonald III are registered representatives of Private Client Services, LLC. From time to time, they will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser.

How we address the Conflict(s): First and foremost, we address the conflicts described in the preceding section by disclosing them to you in this Brochure Supplement as well as in USAG's separate Brochure. As a matter of general policy, we aggressively discourage activities that put your interests anywhere but first. Additionally, we have instituted a comprehensive supervisory process, detailed in our Policies and Procedures ("P&Ps") that was designed to address, among other things, conflicts of interest such as this one. In addition, we have designated a Chief Compliance Officer, as set forth on Schedule A of our Form ADV, to be the party responsible for the overall application and oversight of our supervisory process and our P&Ps. Our Chief Compliance Officer has the authority to delegate certain supervisory responsibilities to other supervised persons within our firm in order to ensure that our overall system of supervision is being adequately carried out and in a timely manner.

### **Sale of Insurance Products**

Conflict: Frederick V. McDonald Jr., and Frederick McDonald III sell insurance products.

How we address the Conflict(s): First and foremost, we address the conflicts described in the preceding section by disclosing them to you in this Brochure Supplement as well as in USAG's separate Brochure. As a matter of general policy, we aggressively discourage activities that put your interests anywhere but first. Additionally, we have instituted a comprehensive supervisory process, detailed in our Policies and Procedures ("P&Ps") that was designed to address, among other things, conflicts of interest such as this one. In addition, we have designated a Chief Compliance Officer, as set forth on Schedule A of our Form ADV, to be the party responsible for the overall application and oversight of our supervisory process and our P&Ps. Our Chief Compliance Officer has the authority to delegate certain supervisory responsibilities to other supervised persons within our firm in order to ensure that our overall system of supervision is being adequately carried out and in a timely manner. The firm maintains a fiduciary obligation to place its clients' interests first. However, clients should be aware that the receipt of additional compensation itself can create a conflict of interest, and may affect the judgment of this individual when making investment recommendations. In order to properly handle such potential conflicts of interest, the firm has adopted a Code of Ethics. Please see Item 11 (below) for further discussion related to the firm's Code of Ethics.

## **X.D Use of Other Investment Advisers**

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We do not use or otherwise recommend the use of other investment advisers in connection with our investment advisory services.

## **XI. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

## **XI.A Code of Ethics**

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We take great pride in our commitment to serving our clients' needs and the integrity with which we conduct our business. In our recent history, the financial services industry has come under significant scrutiny, especially in the area of the inherent responsibility of financial professionals to behave in the best interests of their clients. We have developed a Code of Ethics ("Code") as a means of memorializing our vision of appropriate and professional conduct in carrying out the business of providing investment advisory services. Our Code addresses issues such as the following:

- Standards of conduct and compliance with applicable laws, rules, and regulations
- Protection of material non-public information
- The addressing of conflicts of interest
- Employee disclosure and reporting of personal securities holdings and transactions
- The firm's IPO and private placement policy
- The reporting of violations of the Code
- Educating employees about the Code
- Enforcement of the Code

Each of our representatives has been furnished with a copy of our Code. A copy of our Code is available to all current and/or prospective clients upon request.

## **XI.(B) Participation in Client Trading**

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Neither USAG nor any of its related persons buys or sells with clients securities in which we have a financial interest. (transactions where we act as principal or take the other side of the client's trade).

## **XI.(C) Trading Alongside Our Clients**

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USAG and/or its representatives may purchase or sell investments for their personal accounts that they have similarly recommended to clients. As required by Rule 204A-1 of the Investment Advisers Act of 1940, USAG has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the firm. The Code of Ethics describes the firm's fiduciary duties and obligations to clients, and sets forth the firm's practice of supervising the personal securities transactions of employees who maintain access to client information.

The firm and related persons of the firm may invest in the same securities (or related securities, e.g., warrants, options or futures) that USAG or any of its related persons recommend to clients. Some of these investments may be placed at, or about the same time as, the placement of client securities transactions. This presents a conflict of interest, as the firm and its related persons may be incented to benefit from client transactions by placing their own interests ahead of those of the firm's clients. USAG requires that client transactions in Reportable Securities (as this term is defined in the Code of Ethics) be placed ahead of those of the firm or its related persons. USAG collects and maintains records of securities holdings and transactions made by employees. The firm reviews the personal trading practices of its employees to identify and resolve any potential or realized conflicts of interest.

### Firm Procedures

In order to implement our Investment Policy, the following procedures have been put into place.

- 1) If we are recommending that any of our clients buy any security, no associated person may purchase that security prior to a client's purchase of that security; and

2) If we are recommending that any of our clients sell any security, no associated person may sell that security prior to a client's sale of that security.

As an alternative to the procedures described in the preceding points, we may include our own order(s) in a batch order with other client orders that would involve average pricing for the entire batch such that we would receive the same pricing as all other clients participating in the batch.

It is the primary intent of these procedures to ensure that the best interests of our clients are always served over that of our own. Trading on our own behalf that results in our own interests being served over that of our clients could be considered a breach of our fiduciary duty and thus, is aggressively discouraged.

## **XII. Brokerage Practices**

The purpose of this Item is to present to you the factors that we take into consideration when (1) selecting or recommending broker-dealers to you for the purpose of effecting transactions on your behalf and (2) for determining the reasonableness of such broker-dealers' compensation related to such transactions.

Unless the client directs otherwise, USAG shall generally recommend that all client accounts be maintained at, by, or through certain other firms that are unaffiliated with USAG. Such firms shall generally be broker-dealers that may also maintain registrations that allow such firms to engage in other types of businesses outside of their broker-dealer activities.

Clients may direct USAG to place transactions through a brokerage firm not generally recommended by USAG. If a client directs such transactions, such client should be aware that this instruction may cost the client more money and the client may pay higher brokerage commissions, as USAG may not be able to achieve the most favorable pricing.

Any such other firm may act in the capacity of "broker of record" for the client's accounts, in which case, another firm may serve as the custodian for the Client account(s). Alternatively, any such other firm may serve as both the "broker of record" and "custodian" for the client's accounts. In no case shall USAG act or attempt to act in the capacity of "broker of record" or "custodian" of the client's account, funds, or other assets.

USAG may recommend the following brokers of record and their corresponding custodian:

<b>Broker of Record</b>	<b>Custodian</b>
Transamerica Financial Advisors, Inc.	Pershing
Private Client Services, LLC	Pershing

Factors that USAG considers in recommending certain broker-dealers or custodians to clients may include such entity's:

- the broker's capital depth,
- the broker's market access,
- the nature and character of the markets for the security to be purchased or sold,
- the execution,
- clearance and settlement capabilities of the broker selected and others considered, and
- reasonableness of the commission or its equivalent for the specific transaction.

USAG, through its independent relationship with PCS and TFA, has entered into agreements with Pershing, LLC, an independent self-directed brokerage and custodial agent. USAG utilizes Pershing because it believes it to be the single most efficient and cost effective wholesale brokerage firm in the industry. USAG has no financial ties or re-enumeration for introducing client accounts into Pershing, other than company described within this agreement.

## **XII.(A).(1). Research and Soft Dollar Benefits**

Soft dollar benefits are items such as research or other products or services (other than the typical execution and other brokerage services available to all other investment advisers) that we may receive from a broker-dealer or other party in connection with the client securities transactions we direct to that/a broker-dealer(s). We do not participate in any soft dollar arrangements.

## **XII.(A).(2). Brokerage for Client Referrals**

In certain circumstances, firms like ours may receive client referrals as a result of recommending particular broker-dealers or other service providers. We, however, do not participate in any formal arrangements wherein we receive client referrals from any particular broker-dealer in return for selecting or recommending such broker-dealer.

## **XII.(A).(3). Directed Brokerage**

This item is intended to address situations where we may recommend, request, or require you to provide us instructions as to how to direct brokerage activity on your behalf.

### ***XII.(A).(3)(a). Directed Brokerage – Recommended, Requested, or Required***

Not all investment advisers require their clients to direct brokerage activity through any particular broker-dealer. We do not routinely recommend, request, or require that you direct us as to how to execute brokerage transactions on your behalf (i.e. using a particular broker-dealer for execution purposes). You are free to choose one of the firm's that are mentioned previously in this section or you may direct us to another broker-dealer.

The Firm does not have a broker-dealer affiliate or another economic relationship that may cause a conflict of interest.

### ***XII.(A).(3)(b). Directed Brokerage – Permitted***

Not all investment advisers require their clients to direct brokerage activity through any particular broker-dealer, however, you may direct us to use a particular broker-dealer (subject to our right to decline such a request) to execute some or all transactions for your account or otherwise on your behalf. In such an event, we will not negotiate terms and arrangements for the account with the other broker-dealer, and we will not seek better execution services or prices from other broker-dealers or be able to "batch" the transactions for execution through other broker-dealers with orders for other accounts we manage. As a result, you may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

## **XII.(B). Order Batching**

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Where the firm predominately invests in ETF's and mutual funds, all accounts are managed separately. The firm does not participate in any aggregation or block trading practices. Additionally, the firm does not receive any research, products, client referrals, or other services from a broker-dealer or third part in connection with client-based securities transactions (i.e. no soft dollars)

## **XIII. Review of Accounts**

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### **XIII.(A). Review of Accounts or Financial Plans**

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#### **Review of client accounts.**

Accounts will be monitored on a monthly basis by firm manager Frederick McDonald Jr. Accounts will be reviewed more frequently as necessary to respond to significant changes in client circumstances or changes in market conditions. Triggering factors to warrant more in depth review may include the following;

- a change in a client's investment objective
- a change in market conditions
- change in your employment status
- re-balancing of assets to maintain proper asset allocation
- other activity discovered as the account is normally reviewed.

### **XIII.(B). Non-Periodic Account Reviews**

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Events that may trigger further client account reviews in addition to the standard monthly review process may include, but would not be limited to, a notable increase in the volume of requests by the client to effect transactions in his/her accounts, where such transactions may appear to be inconsistent with the client's previously stated investment objectives. Other factors may include requests by the client to liquidate certain securities positions/contracts where such transactions may appear to be inconsistent with the client's previously stated investment objectives. Additional triggering factors could be the performance on an individual account being an outlier to the performance of accounts with similar investment objectives, and a very important trigger would be customer complaints. This last trigger would be a prime example of a trigger for an intermittent review of a client account.

### **XIII.(C). Reports to Clients**

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Clients will receive written brokerage statements each month from the custodian. Clients are encouraged to notify the firm of changes to their personal finances, especially those changes that might materially affect their investment plan.

USAG will provide quarterly holdings reports in addition to the monthly statements that clients receive from the custodian. The reports will generally include a portfolio appraisal, realized and unrealized gains/losses, income and expenses, contributions and withdrawals, and account performance history. Clients are encouraged to compare the reports received from USAG to those received from the custodian and immediately report any unexplained differences to USAG and/or the custodian, as appropriate.

## **XIV. Client Referrals and Other Compensation**

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### **XIV.(A). Compensation we Receive**

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USAG does not receive any economic benefit from a non-client for the provision of advisory services to the firm's clients.

#### **XIV.(B). Compensation we Pay**

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Under certain circumstances, firms like ours may compensate other parties for having referred clients or potential investment advisory clients them. These sorts of arrangements are generally referred to as "solicitor" arrangements. USAG does not participate in any such arrangements

#### **XV. Custody**

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We engage in certain activities that result in us being deemed to have custody of certain of our client's funds and/or securities.

- Automatic fee deduction from your brokerage or other trading accounts
- Physical possession or control (even temporary) of client funds or securities
- The ability to gain access to any client funds and/or securities
- One of our related persons has custody of funds and/or securities subject to our investment advisory services
- We or one of our related persons serves as the general partner, managing member, or other similar type of control person to an investment fund to which we provide investment advisory services.

As stated previously in Item XIII.(C)., your account statements will be provided by the qualified custodian that maintains physical possession of your accounts/assets. In the event that we also provide you information related to your accounts, you are urged to review that information to the information contained on the account statements or other statements received from the qualified custodian.

#### **XVI. Investment Discretion**

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USAG does not maintain discretion. All transactions must be authorized by the client.

#### **XVII. Voting Client Securities**

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##### **XVII.(A). Proxy Voting**

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##### **Proxy Voting Policies and Procedures and Client Instruction**

We do not vote proxies on behalf of any securities you own.

## **XVIII. Financial Information**

### **XVIII.(A). Balance Sheet**

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Under Rule 206(4)-4 of the Investment Advisers Act of 1940, investment advisers are required to disclose certain and financial information about their business practices that might serve as material to the client's decision in choosing an investment adviser.

As of the date of this filing, USAG does not require the pre-payment of more than \$500 in fees per client six months or more in advance, nor does it maintain any financial hardships or other conditions that might impair its ability to meet its contractual obligations to clients.

### **XVIII.(B). Adverse Financial condition**

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In the event that we have discretionary authority or custody of any of our clients' assets or if we require or solicit prepayment of more than \$500 in fees per client, six months or more in advance, we are required to disclose any financial condition that is reasonably likely to impair our ability to meet contractual commitments with our clients.

No such conditions exist.

### **XVIII.(C). Bankruptcy-Related Matters**

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During the past ten years, USAG has not been the subject of a bankruptcy petition.

## **XIX. Requirements for State-Registered Advisers**

Our principal executive officer is Frederick McDonald.

Additional information about Mr. McDonald can be found in the Part 2B supplement below.

Our Firm is not involved in any additional businesses.

Our Firm does not collect any performance-based fees.

USAG and Mr. McDonald have not been involved in any activity that would require disclosure here.

Mr. McDonald serves as the managing member of the General Partner of Kettle Black II GP, LLC.

## Part 2B Supplemental Brochure for...Rick McDonald

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### **Wealth Management Partners, Inc. d/b/a U.S. Advisory Group**

152 Conant St.  
Suite 201  
Beverly, MA 01915  
781-246-0222  
781-246-9096 ...fax  
rick@usadvisory.com  
<http://www.usadvisory.com>

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This brochure supplement ("Supplement") has been prepared by US Advisory Group. ("USAG") and it provides information about the qualifications and background of the supervised person named above, hereinafter referred to as "Mr. McDonald." You should review this Supplement in conjunction with Part 2A of our Form ADV, also known as our "Brochure." You should have already received a copy of our brochure and if not or if you have questions about anything in this Supplement, please contact us at 781-246-0222 or rick@usadvisory.com. Additional information about USAG or any of our supervised persons (who are registered under our firm) is also available on the SEC's Investment Adviser Public Disclosure ("IAPD") which can be found at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

The format/layout of this Supplement has been dictated by the SEC. The subsections appearing under each heading shall follow the mandated ordering of the items required to be addressed in this Supplement as set forth in the instructions and guidance issued by the SEC in regard to Part 2B of the Form ADV. USAG's response to each such item shall immediately follow each numbered item. We encourage any reader of this Supplement to also refer to the SEC's instructions and guidance related to Part 2B of the Form ADV. Throughout this Supplement, any references to "we," "our," "ours," "us," etc. are meant to refer to HFS.

The information in this Brochure has not been approved or verified by the SEC or by any state securities authority.



## II. Educational Background and Business Experience

Investment Advisor Representative	Rick McDonald	
Year of Birth:	1956	
<b>Formal Education After High School:</b>		
<b>Institution</b>	<b>Degree / Major</b>	<b>Year</b>
Boston College	BS	1978
<b>Business Background for the previous 5 years:</b>		
<b>Entity</b>	<b>Title</b>	<b>Dates</b>
US Advisory Group	President	1982 to present

## III. Disciplinary information

There are no legal, civil or disciplinary events to disclose regarding Mr. McDonald. Mr. McDonald has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. McDonald.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. McDonald.

However, we do encourage you to independently view the background of Mr. McDonald on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter 706872 in the field labeled "Individual Name or CRD Number".

## IV. Other Business Activity

### IV.(A). Other Investment-Related Activities

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Mr. McDonald is not engaged in any investment-related business activities outside the scope of his investment advisory activities on behalf of USAG. He does not have any pending applications to register as a broker-dealer, futures commission merchant, commodity pool operator, commodity trading advisor or an associated person of any of the listed entities.

### IV.(B). Other Activities

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Mr. McDonald is licensed to sell insurance products. Mr. McDonald's insurance sales activity is separate from his activities as an investment advisor representative of USAG.

Mr. McDonald may receive additional compensation in relation to the sale of insurance products. Such compensation is in the form of cash. The instructions in the Form ADV require us to tell you that the receipt or potential for the receipt of this other compensation gives Mr. McDonald an incentive to recommend insurance products based on the compensation received, rather than on your specific needs. Although we are obligated to tell you this, Mr. McDonald's and our objective as a firm is to place nothing before your best interests.

Mr. McDonald, in his capacity as an insurance agent may recommend insurance services to clients who have or are utilizing USAG's investment advisory services. USAG's clients are free to implement advisory recommendations through any firm. There is no obligation for you to effect transactions through Mr. McDonald, however, if you choose to do so, commissions may be earned by Mr. McDonald which may be higher or lower than those you might pay at another insurance agency. USAG does not warrant or represent that commissions for transactions implemented through Mr. McDonald will be lower than commission available if you use another insurance agency, USAG believes, however, that the overall level of services and support provided to clients by Mr. McDonald outweighs the potentially lower transaction cost available under other insurance arrangements.

USAG may make conflicting or differing recommendations with respect to the same insurance products to different advisory clients. All such recommendations are based on each individual client's financial circumstances, needs, risk tolerances, objectives, etc.

#### *How we Address the Conflict:*

First and foremost, we address the conflicts described in the preceding section by disclosing them to you in this Brochure Supplement as well as in USAG's separate Brochure. As a matter of general policy, we aggressively discourage activities that put your interests anywhere but first. Additionally, we have instituted a comprehensive supervisory process, detailed in our Policies and Procedures ("P&Ps") that was designed to address, among other things, conflicts of interest such as this one. In addition, we have designated a Chief Compliance Officer, as set forth on Schedule A of our Form ADV, to be the party responsible for the overall application and oversight of our supervisory process and our P&Ps. Our Chief Compliance Officer has the authority to delegate certain supervisory responsibilities to other supervised persons within our firm in order to ensure that our overall system of supervision is being adequately carried out and in a timely manner.

The potential conflicts of interest described in the preceding section are commonplace in the investment industry and we believe that they are not only appropriate but that they are proper in light of the added examination, licensing, registration, and other regulatory oversight that also takes place in the insurance and investment advisory industries. Mr. McDonald has satisfied various regulatory examination, registration, licensing, and continuing education requirements that allow not only for the offering of insurance products as well as the receipt of the normal and customary compensation that any similarly registered, licensed, and qualified person could receive in the form of sales compensation for those same products.

Bear in mind that even if Mr. McDonald was not registered/licensed to sell insurance products, the majority of your transactions involving such products would still result in you paying some sort of commission for those products. In Mr. McDonald's case, his active licensing allows him to be able to receive those commissions as opposed to the executing insurance agency keeping them for themselves.

The added compensation received by Mr. McDonald in connection with any insurance activities is deemed routine and customary compensation for such activities and is not believed to be inappropriate.

## V. Additional Compensation

Mr. McDonald does not receive any additional compensation other than that which is disclosed above

## VI. Supervision

As part of our overall compliance and supervisory process, we monitor the advisory activities of all of our supervised persons. As part of the supervisory process over the advisory activities of all of our supervised persons, Mr. McDonald serves the role of Designated Supervisor for USAG and in that capacity Mr. McDonald shall carry out the following general supervisory steps.

- Periodic review of customer account activity
- Observation during client meetings and/or phone calls
- On-site inspection of each of our supervised person's office location (if other than the our main office)

In order to ensure that we are effectively and consistently carrying out our supervisory process over all of our supervised persons' advisory activities, we maintain a set of Written Supervisory Procedures ("WSP") that, among other things, address matters such as supervision of the activities of our supervised persons like Mr. McDonald. Our WSP manual is the guiding force behind all of our supervisory functions and is subject to the regular inspection by any regulatory bodies having jurisdiction over our investment advisory activities.

### Mr. McDonald's contact information:

Rick McDonald  
Chief Compliance Officer  
781-246-0222  
rick@usadvisory.com

## VII. Requirements for State-Registered Advisers

Mr. McDonald has not been the subject of an award nor has he been found liable in any arbitration claim which alleged damages in excess of \$2,500 which alleged any of the following:

- (a) an investment or an *investment-related* business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

Mr. McDonald has not been the subject of an award nor has he been found liable in any civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) an investment or an *investment-related* business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

Additionally, Mr. McDonald has not been the subject of a bankruptcy proceeding.

## Part 2B Supplement for Tucker McDonald

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**Wealth Management Partners, Inc.**  
**d/b/a U.S. Advisory Group**  
152 Conant St.  
Suite 201  
Beverly, MA 01915  
781-246-0222  
781-246-9096 ...fax  
rick@usadvisory.com  
<http://www.usadvisory.com>

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This brochure supplement (“Supplement”) has been prepared by US Advisory Group. (“USAG”) and it provides information about the qualifications and background of the supervised person named above, hereinafter referred to as “Mr. Tucker McDonald.” You should review this Supplement in conjunction with Part 2A of our Form ADV, also known as our “Brochure.” You should have already received a copy of our brochure and if not or if you have questions about anything in this Supplement, please contact us at 781-246-0222 or rick@usadvisory.com.

Additional information about USAG or any of our supervised persons (who are registered under our firm) is also available on the SEC’s Investment Adviser Public Disclosure (“IAPD”) which can be found at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

The format/layout of this Supplement has been dictated by the SEC. The subsections appearing under each heading shall follow the mandated ordering of the items required to be addressed in this Supplement as set forth in the instructions and guidance issued by the SEC in regard to Part 2B of the Form ADV. USAG’s response to each such item shall immediately follow each numbered item. We encourage any reader of this Supplement to also refer to the SEC’s instructions and guidance related to Part 2B of the Form ADV. Throughout this Supplement, any references to “we,” “our,” “ours,” “us,” etc. are meant to refer to HFS.

The information in this Brochure has not been approved or verified by the SEC or by any state securities authority.

## II. Educational Background and Business Experience

Investment Advisor Representative	Tucker McDonald	
Year of Birth:	1984	
<b>Formal Education After High School:</b>		
<b>Institution</b>	<b>Degree / Major</b>	<b>Year</b>
Boston College	BA	2007
<b>Business Background for the previous 5 years:</b>		
<b>Entity</b>	<b>Title</b>	<b>Dates</b>
US Advisory Group	Financial Advisor	2013 to present
PCS Financial Advisors, Inc.	Registered Representative	2013 to present
John Hancock Financial Services	Consolidations Specialist	2007 - 2013

## III. Disciplinary information

There are no legal, civil or disciplinary events to disclose regarding Mr. Tucker McDonald. Mr. Tucker McDonald has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Tucker McDonald.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Tucker McDonald.

However, we do encourage you to independently view the background of Mr. Tucker McDonald on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter 5135064 in the field labeled "Individual Name or CRD Number".

## IV. Other Business Activity

### IV.(A). Other Investment-Related Activities

Mr. Tucker McDonald is securities licensed to sell certain securities and investment products through PCS. Mr. McDonald's activities through PCS are independent from and in addition to those of USAG. USAG and PCS are not affiliated entities.

Mr. Tucker McDonald, in his capacity as a registered representative of PCS, may recommend PCS's brokerage services to clients who have or are utilizing USAG's investment advisory services. USAG's clients are free to implement advisory recommendations through any firm. There is no obligation to effect transactions through PCS or Mr. Tucker McDonald; however, if you choose to do so, commissions may be earned by Mr. Tucker McDonald which may be higher or lower than those you might pay at another broker-dealer. USAG does not warrant or represent that commissions for transactions implemented through PCS will be lower than commission available if you use another brokerage. USAG believes, however, that the overall level of services and support provided to clients by PCS outweighs the potentially lower transaction cost available under other brokerage or insurance arrangements.

Additionally, Mr. Tucker McDonald may receive trail commissions such as 12b-1 fees on mutual fund sales. Load and no-load mutual funds may pay annual distribution charges, sometimes referred to as 12b-1 fees. 12b-1 fees may be initially paid to PCS and then a portion of those fees could be passed on to Mr. Tucker McDonald. The receipt of such fees could represent an incentive for the advisory representative to recommend mutual funds with 12b-1 fees over funds that have no fees or lower fees. As a result, there is a potential conflict of interest.

USAG may make conflicting or differing recommendations with respect to the same securities to different advisory clients. All such recommendations are based on each individual client's financial circumstances, needs, risk tolerances, objectives, etc.

*How we Address the Conflict:*

First and foremost, we address the conflicts described in the preceding section by disclosing them to you in this Brochure Supplement as well as in USAG's separate Brochure. As a matter of general policy, we aggressively discourage activities that put your interests anywhere but first. Additionally, we have instituted a comprehensive supervisory process, detailed in our Policies and Procedures ("P&Ps") that was designed to address, among other things, conflicts of interest such as this one. In addition, we have designated a Chief Compliance Officer, as set forth on Schedule A of our Form ADV, to be the party responsible for the overall

## **IV.(B). Other Activities**

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Mr. Tucker McDonald is licensed to sell insurance products. Mr. Tucker McDonald's insurance sales activity is separate from his activities as an investment advisor representative of USAG.

Mr. Tucker McDonald may receive additional compensation in relation to the sale of insurance products. Such compensation is in the form of cash. The instructions in the Form ADV require us to tell you that the receipt or potential for the receipt of this other compensation gives Mr. Tucker McDonald an incentive to recommend insurance products based on the compensation received, rather than on your specific needs. Although we are obligated to tell you this, Mr. Tucker McDonald's and our objective as a firm is to place nothing before your best interests.

Mr. Tucker McDonald, in his capacity as an insurance agent may recommend insurance services to clients who have or are utilizing USAG's investment advisory services. USAG's clients are free to implement advisory recommendations through any firm. There is no obligation for you to effect transactions through Mr. Tucker McDonald, however, if you choose to do so, commissions may be earned by Mr. Tucker McDonald which may be higher or lower than those you might pay at another insurance agency. USAG does not warrant or represent that commissions for transactions implemented through Mr. Tucker McDonald will be lower than commission available if you use another insurance agency, USAG believes, however, that the overall level of services and support provided to clients by Mr. Tucker McDonald outweighs the potentially lower transaction cost available under other insurance arrangements.

USAG may make conflicting or differing recommendations with respect to the same insurance products to different advisory clients. All such recommendations are based on each individual client's financial circumstances, needs, risk tolerances, objectives, etc.

*How we Address the Conflict:*

First and foremost, we address the conflicts described in the preceding section by disclosing them to you in this Brochure Supplement as well as in USAG's separate Brochure. As a matter of general policy, we aggressively discourage activities that put your interests anywhere but first. Additionally, we have instituted a comprehensive supervisory process, detailed in our Policies and Procedures ("P&Ps") that was designed to address, among other things, conflicts of interest such as this one. In addition, we have designated a Chief Compliance Officer, as set forth on Schedule A of our Form ADV, to be the party responsible for the overall application and oversight of our supervisory process and our P&Ps. Our Chief Compliance Officer has the authority to delegate certain supervisory

responsibilities to other supervised persons within our firm in order to ensure that our overall system of supervision is being adequately carried out and in a timely manner.

The potential conflicts of interest described in the preceding section are commonplace in the investment industry and we believe that they are not only appropriate but that they are proper in light of the added examination, licensing, registration, and other regulatory oversight that also takes place in the insurance and investment advisory industries. Mr. Tucker McDonald has satisfied various regulatory examination, registration, licensing, and continuing education requirements that allow not only for the offering of insurance products as well as the receipt of the normal and customary compensation that any similarly registered, licensed, and qualified person could receive in the form of sales compensation for those same products.

Bear in mind that even if Mr. Tucker McDonald was not registered/licensed to sell insurance products, the majority of your transactions involving such products would still result in you paying some sort of commission for those products. In Mr. Tucker McDonald's case, his active licensing allows him to be able to receive those commissions as opposed to the executing insurance agency keeping them for themselves.

The added compensation received by Mr. Tucker McDonald in connection with any insurance activities is deemed routine and customary compensation for such activities and is not believed to be inappropriate.

## V. Additional Compensation

Mr. Tucker McDonald does not receive any additional compensation other than that which is disclosed above

## VI. Supervision

As part of our overall compliance and supervisory process, we monitor the advisory activities of all of our supervised persons. As part of the supervisory process over the advisory activities of all of our supervised persons, Mr. Rick McDonald serves the role of Designated Supervisor for USAG and in that capacity Mr. Rick McDonald shall carry out the following general supervisory steps.

- Periodic review of customer account activity
- Observation during client meetings and/or phone calls
- On-site inspection of each of our supervised person's office location (if other than the our main office)

In order to ensure that we are effectively and consistently carrying out our supervisory process over all of our supervised persons' advisory activities, we maintain a set of Written Supervisory Procedures ("WSP") that, among other things, address matters such as supervision of the activities of our supervised persons like Mr. Tucker McDonald. Our WSP manual is the guiding force behind all of our supervisory functions and is subject to the regular inspection by any regulatory bodies having jurisdiction over our investment advisory activities.

### **Mr. Rick McDonald's contact information:**

Rick McDonald  
Chief Compliance Officer  
781-246-0222  
rick@usadvisory.com



## VII. Requirements for State-Registered Advisers

Mr. Tucker McDonald has not been the subject of an award nor has he been found liable in any arbitration claim which alleged damages in excess of \$2,500 which alleged any of the following:

- (a) an investment or an *investment-related* business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

Mr. Tucker McDonald has not been the subject of an award nor has he been found liable in any civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) an investment or an *investment-related* business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

Additionally, Mr. Tucker McDonald has not been the subject of a bankruptcy proceeding.