

The Asset Consulting Group, Inc.

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This Brochure provides information about the qualifications and business practices of The Asset Consulting Group, Inc. If you have any questions about the contents of this Brochure, please contact us at (208) 333-9922 or via email at drew@assetconsultinggroup.com. 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.

The Asset Consulting Group, Inc. (“ACG”) is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information that you may use to determine whether to hire or retain them.

Additional information about ACG is also available via the SEC’s website www.adviserinfo.sec.gov. You can search this site by using a unique identifying number, known as a CRD number. The CRD number for ACG is 173060. The SEC’s web site also provides information about any persons affiliated with ACG who are registered, or are required to be registered, as Investment Adviser Representatives of ACG.

Item 2 – Material Changes

Since our last annual filing on March 26, 2021, we have had no material changes to our Form ADV Part 2.

We will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year end which is December 31st. We will provide other ongoing disclosure information about material changes as they occur. We will also provide you with information on how to obtain the complete brochure. Currently, ACG's Brochure may be requested at any time, without charge, by contacting Drew Barton at (208) 333-9922.

Item 3 – Table of Contents

- Item 2 – Material Changes.....2**
- Item 3 – Table of Contents3**
- Item 4 – Advisory Business Introduction6**
 - Services 6
 - Retirement Plan Services 6
 - ERISA Fiduciary..... 7
 - Non-Discretionary 3(21) Fiduciary Services 7
 - Plan Structure 9
 - Investment Committee 9
 - Investment Policy Service..... 9
 - Investment Selection, Monitoring, and Replacement 10
 - Participant Meetings 11
 - Reporting..... 11
 - Other Services 11
 - Asset Management Services 11
 - Third Party Asset Management Services 13
 - Wrap Fee 14
 - Assets Under Management..... 14
- Item 5 – Fees and Compensation14**
 - Retirement Plan Advisory Fees 14
 - Other Fees 15
 - Benchmarking Fee Schedule 15
 - Asset Management Fees 15
 - Third-Party Asset Management Fee Schedule 15
- Item 6 – Performance Based Fee and Side by Side Management16**
- Item 7 – Types of Client(s)16**
- Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss16**
 - Fundamental Analysis 16
 - Risks..... 17
 - Bond Fund Risk 17
 - Fundamental Analysis Risk 17
 - Insurance Product Risk 18
 - Mutual Funds Risk 19

Overall Risks	19
Stock Fund Risk.....	20
Item 9 – Disciplinary Information	20
Item 10 – Other Financial Industry Activities and Affiliations.....	20
Broker-Dealer Relationship	20
Insurance Agent	20
Other Affiliations.....	21
Item 11 – Code of Ethics, Participation or Interest in Client Accounts and Personal Trading.....	21
General Information.....	21
Participation or Interest in Client Accounts	21
Personal Trading	21
Privacy Statement	22
Conflicts of Interest.....	22
Item 12 – Brokerage Practices	22
Soft Dollars	22
Best Execution.....	22
Brokerage for Client Referrals.....	22
Directed Brokerage	23
Trading	23
Item 13 – Review of Accounts.....	24
Reports.....	24
Item 14 – Client Referrals and Other Compensation	24
Item 15 – Custody	24
Item 16 – Investment Discretion.....	25
ERISA 3(21).....	25
Qualified Retirement Plan Advisory Services.....	25
Item 17 – Voting Client Securities	25
Item 18 – Financial Information.....	25
Item 19 – Requirements for State Registered Advisers	26
Principals.....	26
Performance Fees	26
Disclosable Events.....	26
Other Relationships.....	26
ADV Part 2B Brochure Supplement – Gary Lee Barton	27
Item 1- Cover Page	27

Item 2 – Educational Background and Business Experience	28
Item 3 – Disciplinary History	29
Item 4 – Other Business Activities	29
Item 5 – Additional Compensation	29
Item 6 – Supervision	30
ADV Part 2B Brochure Supplement – Andrew Melvin Barton.....	31
Item 1- Cover Page.....	31
Item 2 – Educational Background and Business Experience	32
Item 3 – Disciplinary History.....	32
Item 4 – Other Business Activities	32
Item 5 – Additional Compensation	32
Item 6 – Supervision	32

Item 4 – Advisory Business Introduction

The Asset Consulting Group, Inc. (“ACG” or “firm”) is a Registered Investment Adviser (“Adviser”) which offers investment advice, securities, and other financial services to qualified retirement plan sponsors and individual clients. We are a registered investment adviser in the State of Idaho.

We provide consulting and advisory services for employer-sponsored retirement plans in accordance with the Employee Retirement Income Security Act (“ERISA”). We also provide asset management services to individuals, high net worth individuals, trusts, estates, charitable organizations, foundations, endowments, corporations, and small businesses.

We provide investment advice and consulting services through representatives (“Advisors”) associated with us. These individuals provide advisory services on our firm’s behalf. In addition, all advisors are required to have a college degree, professional designation, or equivalent professional experience.

ACG is a registered investment adviser with the State of Idaho. ACG was founded in June 2000 by Gary Barton and Kathryn Barton. Andrew Barton is the owner of ACG as of 2019 and Chief Compliance Officer. The registered investment adviser began in 2014.

We are committed to the precept that by placing our clients’ interests first, we will add value to the asset management process and earn the client’s trust and respect. We value long term relationships with our clients whom we regard as strategic partners in our business.

Services

ACG defines excellence through what can be done to improve a plan sponsor’s fiduciary responsibilities and an individual’s investment decision-making process. The excellence is established by best practices which are intended to provide the framework of a disciplined investment process.

Retirement Plan Services

For our firm’s Retirement Plan accounts, our service begins with an analysis of the current retirement plan structure, custodian, third party administrator, daily record keeper, investments, managed investment models, and fees. The analysis is designed to determine if we are able to add value to the plan and what areas, if any, may be deficient from both a regulatory perspective and from a financial advisory perspective.

The services we offer to our clients include, but are not limited to the following:

- Plan design and asset selection consultation
- Develop and annually review Investment Policy Statement (“IPS”)
- Develop investment menu according to the IPS
- Review plan sponsor’s stated financial criteria for each investment option
- Monitor each investment option according to the IPS
- Quarterly portfolio statements, rate of return reports, asset allocation statements

- Provide investment research and performance information on investment options
- Investment option replacement guidance
- Personal consultations with the plan sponsor as necessary
- Develop Plan Investment Committee Charter, as needed
- Fiduciary due diligence assistance
- Attendance at Plan Committee and other meetings
- Annual Fiduciary Plan Review
- Fiduciary education services to Plan Committee
- Participant education, guidance, and enrollment
- Vendor coordination assistance
- Benchmarking services

ERISA Fiduciary

Both parties acknowledge that if the Account is subject to the Employee Retirement Income Security Act of 1974, as amended (ERISA), the following provisions will apply:

- The Adviser acknowledges that it is a “fiduciary” with respect to the Client as that term is defined under Section 3(21)(A) of ERISA.
- The person signing this Agreement on behalf of the Client acknowledges its status as a “named fiduciary” with respect to the control and management of the assets held in the Account, and agrees to notify the Adviser promptly of any change in the identity of the named fiduciary with respect to the Account;
- The Adviser agrees to obtain and maintain an ERISA bond satisfying the requirements of Section 412 of ERISA and include The Adviser and its members, agents and employees among those insured under that bond.

When delivering ERISA fiduciary services, we will perform those services for the retirement plan as a fiduciary under ERISA Section 3(21)(A)(ii) will act in good faith and with the degree of diligence, care and skill that a prudent person rendering similar services would exercise under similar circumstances. In our capacity as a 3(21)-plan fiduciary, we will conduct research to determine appropriate investment selections and allocations and to project potential ranges of returns and market values over various time periods and using various cash flows to assist the plan sponsor in determining the appropriate model(s) investment(s) for the retirement plan.

Non-Discretionary 3(21) Fiduciary Services

When the Adviser performs “3(21) Fiduciary Services,” the Adviser will act as a co-fiduciary “investment adviser” that provides “investment advice” as defined under Section 3(21) of ERISA. Under this arrangement the Adviser is appointed by the plan sponsor or trustee to determine a recommended lineup of investments to be included in the Plan. These recommendations are presented to the Plan Sponsor, who has the ultimate responsibility to accept or reject the recommendation. The Adviser will not have any further responsibility to communicate instructions to any third-party, including the custodian, and/or third-party administrator. The Adviser will communicate directly with the recordkeeper regarding

administrative and recordkeeping matters arising under the Adviser's investment advisory agreement with the Plan Sponsor, or more generally about the recordkeeper's services to the *Plan*.

We will act in good faith and with the degree of diligence, care and skill that a prudent person rendering similar services would exercise under similar circumstances. In our capacity as a 3(21) plan fiduciary, we will conduct research to determine appropriate investment selections and allocations to assist the plan sponsor in determining the appropriate model(s) investment(s) for the retirement plan.

We also encourage plan sponsors to consult with other professional advisors since we do not provide tax or legal advice that may affect asset classes or allocations. We will apply any restrictions or guidelines our client supplies, as directed, however, compliance with these restrictions or guidelines is our client's responsibility.

Past performance and the return estimates of the asset classes and the indices that correspond to these asset classes may not be representative of actual future performance. Actual results could differ, based on various factors including the expenses associated with the management of the portfolio, the portfolio's securities versus the securities comprising the various indices and general market conditions. Before a specific investment is selected, other factors such as economic trends, which may influence the choice of investments and risk tolerance, should be considered. The Adviser has the responsibility and authority to recommend the investment line up including evaluating investment managers and mutual fund companies, individual mutual funds, and money market funds which may be retained or replaced. The Plan Sponsor has the responsibility and authority to make the final decision regarding what investments to include and when to add or exclude a specific security.

The Client confirms that any instructions that have been given to the Adviser with regard to the Account are consistent with the governing plan documents and investment policy statements of the plan.

Except as otherwise provided under ERISA the Adviser shall not be liable for any error of judgment or mistake of law or for any loss suffered by the Client in connection with the matters to which this Agreement relates except a loss resulting from the Adviser's breach of its fiduciary duty, negligence, misconduct or bad faith.

The Adviser is not (i) the "administrator" of the Plan as defined in § 3(16)(A) of ERISA or (ii) the "plan administrator" of the Plan as defined in Section 414(g) of the Internal Revenue Code of 1986, as amended (the "Code");

The Adviser is neither a law firm nor a public accounting firm and Adviser will not provide legal or accounting advice.

The Client acknowledges that the services covered by this Agreement are consultative and give no investment authority ("discretion") or responsibility to the Adviser over any assets of the Plan or Participant regardless of how and where the assets are held. Throughout the term of this Agreement, the Plan or Participant retains full discretion to supervise, manage and direct the assets that may be held with any affiliated or unaffiliated third party.

Plan Structure

We will assist our client in evaluating the current plan's structure to determine if a change in the design of the plan better suits the needs of plan participants. We will facilitate any changes with the appropriate parties including the third-party administrator, record keeper, and custodian as well as facilitating the execution of the required plan document amendments or new plan documents. However, we will not draft any amendments as an attorney or a TPA will need to perform this service.

Investment Committee

We will assist you in the establishment of the Investment Committee (if a Committee is deemed appropriate) and the establishment of a formal investment committee charter, delineating committee responsibilities and fiduciary roles. We will also serve on the Committee in a non-fiduciary capacity if needed.

The Investment Committee may be charged with the fiduciary responsibility of the prudent management of the investment portfolio, selecting and retaining professional advisors to the portfolio including investment managers, investment consultants, custodians, attorneys, and clerical staff, and the establishment, execution, and interpretation of an Investment Policy Statement for the portfolio. We will assist the Investment Committee in meeting the committee's responsibilities according to the investment committee charter, and fulfilling its fiduciary duty to the plan, including their review of service providers, third party administration firms, daily record keeper, and custodian to ensure that their services, along with ours, remain competitive to other alternatives that are available to the client.

Investment Policy Service

ACG's Investment Policy Service is designed to assist you in creating a written investment policy statement ("IPS") to document the plan's investment goals and objectives as well as certain policies governing the investment of assets. The IPS also identifies an investment strategy that seeks to attain the plan's goals. The service is generally designed for corporate retirement plans that are managed on a non-discretionary basis.

We will assist the Investment Committee with the establishment, execution, and interpretation of the Investment Policy Statement. The Investment Policy Statement serves as a guide to assist the Investment Committee in effectively supervising, monitoring, and evaluating the investment of the plan's assets. We will prepare a draft of the IPS based upon information furnished by you and your firm designed to profile various factors for the account such as investment objectives, risk tolerances, projected cash flow, and demographics of your retirement plan participants. It is the client's responsibility to provide all necessary information for the preparation of the IPS, particularly any limitations imposed by law or otherwise. This draft IPS is then submitted to you for review and approval. We recommend that your professional advisors, such as an attorney, actuary, and/or accountant, also review the IPS. The review and acceptance of the IPS is the responsibility of the plan fiduciary and your retirement program's governing entity.

Upon client's final approval, the IPS is ready to be sent to client's Investment Committee. It is client's responsibility to confirm the Investment Committee's acceptance of the IPS, and it is the Investment Committee's responsibility to adhere to the IPS in managing the retirement program. We encourage client to review accounts periodically to verify investment committee's compliance with the IPS.

The Investment Policy Statement will be reviewed at least annually to determine whether stated investment objectives are still relevant and feasibility. However, the Investment Policy Statement is not expected to vary much from year to year and the IPS will not be updated to account for short term changes in market conditions or the economic environment.

Investment Selection, Monitoring, and Replacement

We will conduct research to determine allocations and to project potential ranges of returns and market values over various time periods and using various cash flows. As the financial advisor to the Plan, we will assist the Investment Committee in selecting the non-managed investment line up including evaluating investment managers and mutual fund companies, individual mutual funds, and money market funds which may be retained or replaced.

The data used to select the investment options is based on estimated, forward-looking performance of various asset classes and subclasses to create forward looking capital markets assumptions (e.g., expected return, expected standard deviation, correlation, etc.). Past performance and the return estimates of the asset classes and the indices that correspond to these asset classes may not be representative of actual future performance. Actual results could differ, based on various factors including the expenses associated with the management of the portfolio, the portfolio's securities versus the securities comprising the various indices and general market conditions. Before a specific investment is selected, other factors such as economic trends, which may influence the choice of investments and risk tolerance, should be considered. We have the responsibility and authority to recommend the investment line up including evaluating investment managers and mutual fund companies, individual mutual funds, and money market funds which may be retained or replaced. The plan sponsor has the responsibility and authority to make the final decision regarding what investments to include in the model portfolio and when to add or exclude a specific security.

It is client's responsibility to select the final mix and to determine whether to implement any strategy. We also encourage you to consult with your other professional advisors since ACG does not provide tax or legal advice that may affect asset classes or allocations used in the modeling. We will apply guidelines you supply, as directed; however, compliance with these restrictions or guidelines is client's responsibility.

We will also monitor the current non-managed investment line up including the investment's performance, performance compared to an applicable benchmark index, fees, management changes, style and fundamental investment strategy changes, and fund composition to determine if an investment no longer meets the criterion defined in the Investment Policy Statement. If the Investment Committee determines that a fund no longer meets the IPS criterion, we will advise the Investment Committee on possible alternatives and assist in the selection of a replacement investment.

If you decide to implement any of the firm's recommendations, we will help you open a custodial account(s) for the plan. The funds in this account will generally be held in a separate account, in the plan's name, at an independent custodian, not with us. We use many different vendors and custodians. The identity of your custodian will be communicated to you before the account is opened. The custodian will effect transactions, deliver securities, make payments, etc. You will at all times maintain full and complete ownership rights to all assets held in the account for the benefit of the plan participants.

We are available during normal business hours either by telephone, fax, email, or in person by appointment to answer your questions.

Participant Meetings

We will conduct plan participant meetings when a change is made either to the structure of the plan or if the investment lineup changes as a result of the decisions of the Investment Committee. We will detail the changes being made, how it affects the current participants, review the current investment opportunities, how participants may make changes to their investment selections, and will answer any and all questions a participant may have. We will review with the participants how to select the investments.

Reporting

We will send, on a quarterly basis, a performance report detailing the overall performance of the plan's assets and a detailed list of the investment holdings.

Other Services

We also offer consulting services for non-investment related matters.

Asset Management Services

Asset management is the professional management of securities (stocks, bonds and other securities) and assets in order to meet your specified investment goals. With an Asset Management Account, you engage us to assist you in developing a personalized asset allocation program and custom-tailored portfolio designed to meet your unique investment objectives. The investments in the portfolio account may include stocks, mutual funds, bonds, REITs, etc.

We will meet with you to discuss your financial circumstances, investment goals and objectives, and to determine your risk tolerance. We will ask you to provide statements summarizing current investments, income and other earnings, recent tax returns, retirement plan information, other assets and liabilities, wills and trusts, insurance policies, and other pertinent information.

Based on the information you share with us, we will analyze your situation and recommend an appropriate asset allocation or investment strategy. Our recommendations and ongoing management are based upon your investment goals and objectives, risk tolerance, and the investment portfolio you have selected. We will monitor the account, trade as necessary, and communicate regularly with you. Your circumstances shall be monitored in quarterly and annual account reviews. These reviews will be conducted in person, by telephone conference, and/or via a written inquiry/questionnaire. We will work with you on an ongoing basis to evaluate your asset allocation as well as rebalance your portfolio to keep it in line with your goals as necessary. We will be reasonably available to help you with questions about your account.

We will:

- Review your present financial situation
- Monitor and track assets under management
- Provide portfolio statements, periodic rate of return reports, asset allocation statement, rebalanced statements as needed

- Advise on asset selection
- Provide research and information on performance and fund management changes
- Assist you in setting and monitoring goals and objectives
- Provide personal consultations as necessary upon your request or as needed.

You are obligated to notify us promptly when your financial situation, goals, objectives, or needs change.

You shall have the ability to impose reasonable restrictions on the management of your account, including the ability to instruct us not to purchase certain mutual funds, stocks, or other securities. These restrictions may be a specific company security, industry sector, asset class, or any other restriction you request.

Under certain conditions, securities from outside accounts may be transferred into your advisory account; however, we may recommend that you sell any security if we believe that it is not suitable for the current recommended investment strategy. You are responsible for any taxable events in these instances. Certain assumptions may be made with respect to interest and inflation rates and the use of past trends and performance of the market and economy. Past performance is not indicative of future results.

If you decide to implement our recommendations, we will help you open a custodial account(s). The funds in your account will generally be held in a separate account, in your name, at an independent custodian, and not with us. The custodian we use for all accounts is TD Ameritrade.

You will enter into a separate custodial agreement with the custodian which authorizes the custodian to take instructions from us regarding all investment decisions for your account. We will select the securities bought and sold and the amount to be bought and sold, within the parameters of the objectives and risk tolerance of your account. You will be notified of any purchases or sales through trade confirmations and statements that are provided by the custodian. These statements list the total value of the account, itemize all transaction activity, and list the types, amounts, and total value of securities held. You will at all times maintain full and complete ownership rights to all assets held in your account, including the right to withdraw securities or cash, proxy voting and receiving transaction confirmations.

If you have not given us the authority to manage your account on a discretionary basis, then we cannot trade in your account without your express permission.

Trading may be required to meet initial allocation targets, after substantial cash deposits that require investment allocation, and/or after a request for a withdrawal that requires liquidation of a position. Additionally, your account may be rebalanced or reallocated periodically in order to reestablish the targeted percentages of your initial asset allocation. This rebalancing or reallocation will occur on the schedule we have determined together. You will be responsible for any and all tax consequences resulting from any rebalancing or reallocation of the account. We are not tax professionals and do not give tax advice. However, we will work with your tax professionals to assist you with tax planning.

Third Party Asset Management Services

We may determine that opening an account with a professional third-party money manager is in your best interests. We have contracts with several third-party money managers and will evaluate them on an ongoing basis.

These programs allow you to obtain portfolio management services that typically require higher minimum account sizes than ACG's management program. The money managers selected under these programs will have discretion to determine the securities they buy and sell within the account, subject to reasonable restrictions imposed by you. Due to the nature of these programs, each of the independent money managers is obligated to provide you with a separate disclosure document. You should carefully review this document for important and specific program details, including pricing.

Under these programs, we may:

- Assist in the identification of investment objectives
- Recommend specific investment style and asset allocation strategies
- Assist in the selection of appropriate money managers
- Quarterly review performance and progress
- Recommend reallocation among managers or styles within the program
- Recommend the hiring and firing of money managers utilized by you.

We will meet with you to discuss your financial circumstances, investment goals and objectives, and to determine your risk tolerance. We will ask you to provide statements summarizing current investments, income and other earnings, recent tax returns, retirement plan information, other assets and liabilities, wills and trusts, insurance policies, and other pertinent information. Based on the information you share with us, we will analyze your situation and recommend an appropriate strategy and third-party money manager. The firm's recommendations and ongoing management are based upon your investment goals and objectives, risk tolerance, and the investment portfolio you have selected. We will monitor the account, trade as necessary, and communicate regularly with you. Your circumstances shall be monitored in annual account reviews. These reviews will be conducted in person, by telephone conference, and/or via a written inquiry/questionnaire. We will work with you on an ongoing basis to evaluate your asset allocation as well as rebalance your portfolio to keep it in line with your goals as necessary. We will be reasonably available to help you with questions about your account. You will also receive ACG's Advisory Agreement which describes what services you will receive and what fees you will be charged.

You are obligated to notify us promptly when your financial situation, goals, objectives, or needs change.

You may have the ability to impose reasonable restrictions on the management of your account, including the ability to instruct us not to purchase certain mutual funds, stocks, or other securities. These restrictions may be a specific company security, industry sector, asset class, or any other restriction you request.

You should read the ADV Part 2 disclosure document of the money manager for complete details on the charges and fees you will incur.

Wrap Fee

The Adviser does not sponsor or participate in a third-party sponsored wrap fee program.

Assets Under Management

As of December 31, 2021, we had a total of \$7,400,000 in discretionary assets under management and \$112,380,000 in assets under advisement.

Item 5 – Fees and Compensation

We provide qualified retirement plan advisory services and asset management services for a fee.

All fees paid to us for investment advisory services or retirement plan services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These types of investment vehicles are commonly offered through 401(k), simple IRA, 403b, or 457 defined contribution retirement plans. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. Accordingly, the client should review both the fees charged by the funds and the fees charged by us to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

ACG's fees will not include brokerage commissions, transaction fees, and other related costs and expenses. You may incur certain charges imposed by custodians, third party investment companies and other third parties. These include fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. We do not receive any compensation from these fees. All of these fees are in addition to the management fee you pay us.

As an individual client, you could invest in a mutual fund directly, without our services. In that case, you would not receive the services provided by us which are designed, among other things, to assist you in determining which mutual fund or funds are most appropriate to your financial condition and objectives.

Either party may terminate the relationship with a thirty (30) day written notice. Upon termination of any account, any prepaid fees that are in excess of the services performed will be promptly refunded to you on a prorated basis from the date of termination. Any fees that are due, but have not been paid, will be billed to you and are due immediately.

Retirement Plan Advisory Fees

ACG's fee to a retirement plan client includes but is not limited to: drafting an investment policy statement, reviewing the plan design, investment management, investment selection and monitoring, fund changes, participant education and advice. Advisory fees for the plan are paid to ACG by the plan, or directly from the plan sponsor, or in some cases a combination of both. These fees are generally collected by the plan record keeper or vendor and paid directly to our firm. The fees consist of an initial

setup fee of \$375 to \$750 paid at the time contracts are signed. For initial and subsequent years, the fee paid for our services will range between .15% and .85% on assets under management. This fee includes services as an ERISA section 3(21) fiduciary with respect to client's plan. At times, we may also offer section 3(38) fiduciary services.

Fees will be charged quarterly, in arrears, and will be based upon assets in the plan at quarter end. ACG's advisory agreement with each plan sponsor outlines the timing of fees collected and the process of fee remittal to ACG.

Other Fees

We also offer consulting services for ERISA non-investment related matters. Our fees range from \$150 to \$350 per hour and the client's Consulting Agreement will describe all fees in detail, when appropriate.

Benchmarking Fee Schedule

ACG provides a documented process for regular benchmarking of retirement plan features, plan design, fees, and Plan Providers. The benchmarking services fee includes comparison of the incumbent provider and up to four competing vendors. The pricing also includes an Investment menu analysis from the selected providers. Fees range from \$150 to \$350 per hour depending upon number of vendor comparisons and comparison details desired by client.

Asset Management Fees

ACG charges an annual fee for its individual asset management services. This fee will be charged quarterly, in arrears. Fees are negotiable based upon certain circumstances. No increase in the annual fee shall be effective without prior written notification to client. We believe our advisory fees are reasonable considering the fees charged by other investment advisers offering similar services. Our fees will not be based upon a share of capital gains or capital appreciation of the funds in client's account.

Third-Party Asset Management Fee Schedule

The fees charged by third party managers will be disclosed in their ADV part 2A and the client paperwork you sign with them. ACG's fee will range between 0.10% to 1.0% of the value of the account on the last day of the month. This fee is in addition to any fee charged by the third-party money manager. All fees are paid monthly or quarterly, as negotiated. Client's advisory agreement with us will disclose the fees you will pay ACG for our services.

No increase in the annual fee shall be effective without prior written notification to client and without client written approval. We believe that ACG's fees are reasonable relative to the fees charged by other investment advisers offering similar services/programs.

The fees charged by ACG may be deducted directly from client's account at the custodian. If so, ACG will instruct the custodian to deduct the fees from your account at the end of the quarter. This fee will show up as a deduction on the following month's account statement from the custodian.

Management fees are prorated for each contribution and withdrawal made during the applicable calendar quarter (with the exception of small inconsequential contributions and withdrawals). You will be provided with a quarterly statement reflecting deduction of the advisory fees.

Item 6 – Performance Based Fee and Side by Side Management

We do not charge any performance-based fees. These are fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7 – Types of Client(s)

We provide institutional services to pension and profit-sharing plans, trusts, estates, charitable organizations, corporations, businesses, and governmental entities.

We also provide portfolio management services to individuals and high net worth individuals, trusts, estates, foundations, and endowments.

Additionally, the Adviser provides investment advisory services to the following types of clients:

- Tax-qualified retirement plans (both defined benefit and defined contribution) that are intended to receive favorable tax-treatment under section 401(a) or 403(b) of the IRC
- Non-qualified executive deferred compensation plans
- Other types of retirement plan types as may be introduced.

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

We use Fundamental Analysis as part of our overall investment management discipline; the implementation of these analyses as part of our investment advisory services to you may include any, all or a combination of the following:

Fundamental Analysis

Fundamental analysis is a technique that attempts to determine a security's value by focusing on the underlying factors that affect a company's actual business and its future prospects. Fundamental analysis is about using real data to evaluate a security's value. It refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements.

The end goal of performing fundamental analysis is to produce a value that we can compare with the security's current price, with the aim of determining the size of position, if any, to take with that security (underpriced = buy, overpriced = sell or short).

In order to perform this fundamental analysis, we use many resources, such as:

- Morningstar
- Financial newspapers and magazines (e.g. Wall Street Journal, Forbes, etc.)
- Annual reports, prospectuses, filings with the Securities and Exchange Commission

- Company press releases and websites

The investment strategies we use to implement any investment advice given to you include, but are not limited to:

- Long term purchases -securities held at least a year
- Short term purchases - securities sold within a year
- Trading -securities sold within 30 days
- Option writing, including covered options and option purchases.

Risks

We cannot guarantee our analysis methods will yield a positive return. In fact, a loss of principal is always a risk. Investing in securities involves a risk of loss that you should be prepared to bear. You need to understand that investment decisions made for your account by us are subject to various market, currency, economic, political, and business risks. The investment decisions we make for you will not always be profitable nor can we guarantee any level of performance.

A list of all risks associated with the strategies, products, and methodology we offer are listed below:

Bond Fund Risk

Bond funds generally have higher risks than money market funds, largely because they typically pursue strategies aimed at producing higher yields. The risks associated with bond funds include:

- Call Risk - The possibility that falling interest rates will cause a bond issuer to redeem—or call—its high-yielding bond before the bond's maturity date.
- Credit Risk — the possibility that companies or other issuers whose bonds are owned by the fund may fail to pay their debts (including the debt owed to holders of their bonds). Credit risk is less of a factor for bond funds that invest in insured bonds or U.S. Treasury bonds. By contrast, those that invest in the bonds of companies with poor credit ratings generally will be subject to higher risk.
- Interest Rate Risk — the risk that the market value of the bonds will go down when interest rates go up. Because of this, you can lose money in any bond fund, including those that invest only in insured bonds or Treasury bonds.
- Prepayment Risk — the chance that a bond will be paid off early. For example, if interest rates fall, a bond issuer may decide to pay off (or "retire") its debt and issue new bonds that pay a lower rate. When this happens, the fund may not be able to reinvest the proceeds in an investment with as high a return or yield.

Fundamental Analysis Risk

Fundamental analysis, when used in isolation, has a number of risks:

- There are an infinite number of factors that can affect the earnings of a company, and its stock price, over time. These can include economic, political, and social factors, in addition to the various company statistics.

- The data used may be out of date.
- It is difficult to give appropriate weightings to the factors.
- It assumes that the analyst is competent.
- It ignores the influence of random events such as oil spills, product defects being exposed, and so called “acts of God”, etc.

Insurance Product Risk

The rate of return on variable insurance products is not stable, but varies with the stock, bond, and money market subaccounts that you choose as investment options. There is no guarantee that you will earn any return on your investment and there is a risk that you will lose money. Before you consider purchasing a variable product, make sure you fully understand all of its terms. Carefully read the prospectus. Some of the major risks include:

- **Liquidity and Early Withdrawal Risk** – There may be a surrender charges for withdrawals within a specified period, which can be as long as six to eight years. Any withdrawals before a client reaches the age of 59 ½ are generally subject to a 10 percent income tax penalty in addition to any gain being taxed as ordinary income.
- **Sales and Surrender Charges** – Asset-based sales charges or surrender charges. These charges normally decline and eventually are eliminated the longer you hold your shares. For example, a surrender charge could start at 7 percent in the first year and decline by 1 percent per year until it reaches zero.
- **Fees and Expenses** – There are a variety of fees and expenses which can reach 2% and more such as:
 - Mortality and expense risk charges
 - Administrative fees
 - Underlying fund expenses
 - Charges for any special features or riders.
- **Bonus Credits** – Some products offer bonus credits that can add a specified percentage to the amount invested ranging from 1 percent to 5 percent for each premium payment. Bonus credits, however, are usually not free. In order to fund them, insurance companies typically impose high mortality and expense charges and lengthy surrender charge periods.
- **Guarantees** – Insurance companies provide a number of specific guarantees. For example, they may guarantee a death benefit or an annuity payout option that can provide income for life. These guarantees are only as good as the insurance company that gives them.
- **Market Risk** – The possibility that stock fund or bond fund prices overall will decline over short or even extended periods. Stock and bond markets tend to move in cycles, with periods when prices rise and other periods when prices fall.
- **Principal Risk** – The possibility that an investment will go down in value, or "lose money," from the original or invested amount.

Mutual Funds Risk

The following is a list of some general risks associated with investing in mutual funds.

- **Country Risk** - The possibility that political events (a war, national elections), financial problems (rising inflation, government default), or natural disasters (an earthquake, a poor harvest) will weaken a country's economy and cause investments in that country to decline.
- **Currency Risk** -The possibility that returns could be reduced for Americans investing in foreign securities because of a rise in the value of the U.S. dollar against foreign currencies. Also called exchange-rate risk.
- **Income Risk** - The possibility that a fixed-income fund's dividends will decline as a result of falling overall interest rates.
- **Industry Risk** - The possibility that a group of stocks in a single industry will decline in price due to developments in that industry.
- **Inflation Risk** - The possibility that increases in the cost of living will reduce or eliminate a fund's real inflation-adjusted returns.
- **Manager Risk** -The possibility that an actively managed mutual fund's investment adviser will fail to execute the fund's investment strategy effectively resulting in the failure of stated objectives.
- **Market Risk** -The possibility that stock fund or bond fund prices overall will decline over short or even extended periods. Stock and bond markets tend to move in cycles, with periods when prices rise and other periods when prices fall.
- **Principal Risk** -The possibility that an investment will go down in value, or "lose money," from the original or invested amount.

Overall Risks

- Clients need to remember that past performance is no guarantee of future results. All funds carry some level of risk. You may lose some or all the money you invest, including your principal, because the securities held by a fund fluctuate in value. Dividend or interest payments may also fluctuate, or stop completely, as market conditions change.
- Before you invest, be sure to read a fund's prospectus and shareholder reports to learn about its investment strategy and the potential risks. Funds with higher rates of return may take risks that are beyond your comfort level and are inconsistent with your financial goals.
- While past performance does not necessarily predict future returns, it can tell you how volatile (or stable) a fund has been over a period of time. Generally, the more volatile a fund, the higher the investment risk. If you will need your money to meet a financial goal in the near-term, you probably can't afford the risk of investing in a fund with a volatile history because you will not have enough time to ride out any declines in the stock market.

Stock Fund Risk

Overall "market risk" poses the greatest potential danger for investors in stocks funds. Stock prices can fluctuate for a broad range of reasons, such as the overall strength of the economy or demand for particular products or services.

Item 9 – Disciplinary Information

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to the client's evaluation of us or the integrity of ACG's management. We have no information to disclose here about the ACG or any of our investment advisors. We adhere to high ethical standards for all advisors and associates. We strive to do what is in the client's best interests.

Item 10 – Other Financial Industry Activities and Affiliations

The investment adviser representatives of ACG have the following outside business activities and/or affiliations to disclose.

Broker-Dealer Relationship

None of ACG's advisors are registered representatives of a broker-dealer.

Insurance Agent

Gary Barton & Drew Barton are licensed insurance agents/brokers with various companies. The sale of these products accounts for approximately 10% of his time.

Gary Barton may recommend insurance products and may also, as an independent insurance agent, sell those recommended insurance products to Clients. When such recommendations or sales are made, a conflict of interest exists as the Insurance licensed Investment Adviser Reps earn insurance commissions for the sale of those products, which may create an incentive to recommend such products. We require that all Investment Adviser Reps disclose this conflict of interest when such recommendations are made. Also, we require Investment Adviser Reps to disclose that Clients may purchase recommended insurance products from other insurance agents not affiliated with us.

Andrew Barton is a licensed insurance agent. Andrew may recommend insurance products and may also, as an independent insurance agent, sell those recommended insurance products to Clients. When such recommendations or sales are made, a conflict of interest exists as the Insurance licensed Investment Adviser Reps earn insurance commissions for the sale of those products, which may create an incentive to recommend such products. We require that all Investment Adviser Reps disclose this conflict of interest when such recommendations are made. Also, we require Investment Adviser Reps to disclose that Clients may purchase recommended insurance products from other insurance agents not affiliated with us.

Other Affiliations

Both Drew Barton and Gary Barton work with ESOPs of Idaho (E of I) a wholly owned subsidiary of The Asset Consulting Group, Inc. ESOP's of Idaho is in the business of educating corporate owners to the potential benefits of employee ownership. E of I is paid a finder's fee once a prospective company decides to put in an ESOP. Gary Barton spends approximately 5 to 10 hours per month in the management of this firm.

Item 11 – Code of Ethics, Participation or Interest in Client Accounts and Personal Trading

General Information

We have adopted a Code of Ethics for all supervised persons of the firm describing its high standards of business conduct, and fiduciary duty to you, our client. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts, the reporting of certain gifts and business entertainment items, and personal securities trading procedures. All of our supervised persons must acknowledge the terms of the Code of Ethics annually, or as amended.

Participation or Interest in Client Accounts

Our Compliance policies and procedures prohibit anyone associated with ACG from having an interest in a client account or participating in the profits of a client's account without the approval of the CCO.

The following acts are prohibited:

- Employing any device, scheme, or artifice to defraud
- Making any untrue statement of a material fact
- Omitting to state a material fact necessary in order to make a statement, in light of the circumstances under which it is made, not misleading
- Engaging in any fraudulent or deceitful act, practice, or course of business
- Engaging in any manipulative practices

You may request a copy of the firm's Code of Ethics by contacting Drew Barton.

Personal Trading

We may recommend securities to you that ACG will purchase for our own accounts. We may trade securities in our account that we have recommended to you as long as we place our orders after your orders. This policy is meant to prevent us from benefiting as a result of transactions placed on behalf of advisory accounts.

Certain affiliated accounts may trade in the same securities with your accounts on an aggregated basis when consistent with our obligation of best execution. When trades are aggregated, all parties will share the costs in proportion to their investment. We will retain records of the trade Order (specifying each

participating account) and its allocation. Completed Orders will be allocated as specified in the initial trade order. Partially filled Orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

We have established the following restrictions in order to ensure ACG's fiduciary responsibilities regarding insider trading are met:

- No securities for ACG's personal portfolio(s) shall be bought or sold where this decision is substantially derived, in whole or in part, from the role of Investment Advisory Representative(s) of ACG, unless the information is also available to the investing public on reasonable inquiry. In no case, shall we put ACG's interests ahead of client's.

Privacy Statement

We are committed to safeguarding client's confidential information and hold all personal information provided to us in the strictest confidence. These records include all personal information that we collect from you or receive from other firms in connection with any of the financial services they provide. We also require other firms with whom we deal with to restrict the use of your information. ACG's Privacy Policy is available upon request.

Conflicts of Interest

We may employ the same strategy for our personal investment account as we do for our clients. However, we do not place orders in a way to benefit from the purchase or sale of a client's security.

We act in a fiduciary capacity. If a conflict of interest arises between us and you, we shall make every effort to resolve the conflict in client's favor. Conflicts of interest may also arise in the allocation of investment opportunities among the accounts that we advise. We will seek to allocate investment opportunities according to what we believe is appropriate for each account. We strive to do what is equitable and in the best interests of all the accounts we advise.

Item 12 – Brokerage Practices

Soft Dollars

We do not receive any soft dollars for retirement plan accounts.

Best Execution

We have an obligation to seek best execution for you. In seeking best execution, the determinative factor is not the lowest possible commission cost but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, reputation, and responsiveness. Therefore, we will seek competitive commission rates, but we may not obtain the lowest possible commission rates for account transactions.

Brokerage for Client Referrals

We do not receive any compensation or incentive for referring you to broker-dealers for brokerage trades.

Directed Brokerage

Client may direct us to use the broker-dealer of their choice. We are independently owned and operated and not affiliated with any of the custodians that we recommend. It is the responsibility of the plan's Investment Committee to review custodial and service provider relationships. When evaluating a custodian or service provider, we analyze and compare custodians on both trade capabilities and execution and fees. We will also review the custodian's size, market share, ability to timely execute trades electronically as well as over the phone, the markets in which the custodian participates and its market making capabilities, the ability to negotiate fees, the custodian's trade error procedures, its ease of use, the availability of the sales, operations, and technology teams to improve our ability to serve our clients, the custodians financials, regulatory actions taken against the custodian, and general news about the custodian. We will also review the fee schedule of each custodian and service provider as well as those of other custodians and service providers currently not used by our client to compare fees and to ensure the reasonableness of the fees charged. We do not necessarily weight any particular capability of a custodian or service provider over another however trade execution and the ability to negotiate fees to reduce client's total costs are two very important factors.

If requested, we will arrange for the execution of securities brokerage transactions for your account through Broker-Dealers that we reasonably believe will provide "best execution." These transactions will take place through one of several broker-dealers depending upon where your account is custodied. In seeking best execution, the determinative factor is not the lowest possible commission cost but whether the transaction represents the best qualitative execution, taking into consideration the full range of a Broker-Dealer's services including the value of research provided, execution capability, commission rates, and responsiveness. Therefore, we will seek competitive commission rates, but we may not obtain the lowest possible commission rates for account transactions.

By directing brokerage, you may pay higher fees or transaction costs than those obtainable by other broker-dealers or custodians. In most cases, we believe you are paying a discounted and reasonable rate.

If client elects to select their own broker-dealer or custodian and direct ACG to use them, client may pay higher or lower fees than what is available through ACG's relationships. Generally, we will not negotiate lower rates below the rates established by the executing broker-dealer or custodian for this type of directed brokerage account, unless we believe that such rate is unfair or unreasonable for the size and type of transaction.

Trading

Transactions for each client account generally will be effected independently unless the third-party manager decides to purchase or sell the same securities for several clients at approximately the same time. They may (but are not obligated to) combine or "batch" such Orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among our clients' differences in prices and commission or other transaction costs. Under this procedure, transactions will be price-averaged and allocated among our clients in proportion to the purchase and sale orders placed for each client account on any given day.

We do not trade any qualified retirement plan accounts.

Item 13 – Review of Accounts

Reviews

For ACG's retirement plan clients, ACG will meet with the plan's Investment Committee and/or plan fiduciaries on a regular basis to review the current investments, custodial and service provider arrangements, and the Investment Policy Statement. The Investment Committee may decide to increase the frequency of its meetings. Should that occur, the IPS will be revised to denote such a change and we will begin reviewing the plan's investments at the intervals determined by the Investment Committee.

For ACG retail clients, reviews are conducted at least annually, or as mutually agreed upon by both parties. Reviews will be conducted by the client's Investment Advisor Rep. You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. Generally, we will monitor for changes and shifts in the economy, changes to the management and structure of a mutual fund or company in which client assets are invested, and market shifts and corrections.

Reports

We do not provide any other statements except the ones provided by client's custodian.

Item 14 – Client Referrals and Other Compensation

We do not receive any compensation for referring clients to another advisor nor do we pay any compensation to another advisor if they refer clients to us.

We do not receive an economic benefit for providing investment advice or other advisory services from someone that is not our client.

Item 15 – Custody

ACG does not have physical custody of any accounts or assets. However, we may be deemed to have custody of your account(s) if we have the ability to deduct your quarterly fees from the custodian. You should receive at least quarterly statements from the broker-dealer or custodian that holds and maintains your investment assets. We urge you to carefully review such statements and if you notice any discrepancies, please contact Drew Barton, CCO.

We do not debit the client fees directly from client's advisory account. We send information to client's custodian to debit your fees and to pay them to ACG. This happens only after client authorizes the custodian to pay ACG directly.

Item 16 – Investment Discretion

We provide services on both a discretionary and non-discretionary basis. We usually receive discretionary authority from clients at the beginning of an advisory relationship to select the identity and amount of securities to be bought or sold. This information is described in the Advisory Agreement clients sign with us. In all cases, however, this discretion is exercised in a manner consistent with the client's stated investment objectives for their account.

Prior to assuming discretionary authority, clients must execute the Advisory Agreement. Execution of the Advisory Agreement grants us the authority to determine, without obtaining specific client consent, both the amount and the type of securities to be bought and sold to help achieve the client account objectives.

ERISA 3(21)

As further described in Item 4 above, under 3(21) Fiduciary Services, the Adviser exercises limited discretion over Plan assets in that it makes investment recommendations to Plan Sponsors, but the Plan Sponsor may or may not implement the recommendation(s).

Qualified Retirement Plan Advisory Services

Our recommendations regarding our 3(21)-qualified retirement plan consulting services are made on a non-discretionary basis. The plan sponsor retains the decision-making authority over the plan. When recommending securities, we observe the investment policies, limitations, and restriction set by the plan and plan sponsor.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, we do not have any authority to and do not vote proxies on behalf of advisory clients. Client retains the responsibility for receiving and voting proxies for any and all securities maintained in their portfolios. We may provide advice to you regarding your voting of proxies. You may contact the Adviser to discuss any questions that you may have about a particular solicitation. The custodian will forward you copies of all proxies and shareholder communications relating to your account assets and any information regarding class action legal matters involving any security held in the Account.

Item 18 – Financial Information

ACG is required to provide our clients with certain financial information or disclosures about ACG's financial condition. ACG has no financial commitment that would impair our ability to meet any contractual and fiduciary commitments to our clients. We have not been the subject of any bankruptcy proceedings. In no event shall we charge advisory fees that are both in excess of five hundred dollars and more than six months in advance of advisory services rendered.

Item 19 – Requirements for State Registered Advisers

Principals

There are two principals of ACG, Drew Barton and Gary Barton. Drew Barton is Owner and Chief Compliance Officer and Gary Barton is Managing Member. Their education information, business background, and other business activities can be found in the Form ADV Part 2B Brochure Supplement below.

Performance Fees

We do not charge a performance-based fee (fees based on a share of capital gains on, or capital appreciation of, the assets of a client) for our normal asset management accounts.

Disclosable Events

Neither ACG nor Drew Barton or Gary Barton have reportable events to disclose here.

Other Relationships

Neither ACG nor Drew Barton or Gary Barton have any relationship with any issuer of securities.

ADV Part 2B Brochure Supplement – Gary Lee Barton

Item 1- Cover Page

Gary Lee Barton

CRD # 824042

The Asset Consulting Group, Inc.

410 S. Orchard

Suite 112

Boise, ID 83705

www.assetconsultinggroup.com

(208) 333-9922

March 30, 2022

This Brochure supplement provides information about Gary Barton and supplements the ACG (“ACG”) Brochure. You should have received a copy of that Brochure. Please contact Andrew Barton if you did not receive the Brochure or if you have any questions about the contents of this supplement.

Additional information about Gary Barton CRD# 824042 is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Full Legal Name: Gary Barton

Year of Birth: 1949

Education

Bachelor of Arts in Economics

Oregon State University

Oregon

Certified Retirement Counselor (CRC)

International Foundation for Retirement Education

Accredited Investment Fiduciary (AIF)

Center for Fiduciary Studies

Designations

Accredited Investment Fiduciary (AIF)

Designation Status Currently offered and recognized by the issuing organization

Acronym AIF

Issuing Organization Center for Fiduciary Studies

Prerequisites/Experience Required

Candidate must meet a point-based threshold based on a combination of education, relevant industry experience and/or professional development.

Educational Requirements Candidate must complete one of the following:

- Web-based program
- Capstone program

Examination Type Final certification exam, proctored closed book

Continuing Education/Experience Requirements 6 hours per year

Certified Retirement Counselor

Designation Status Currently offered and recognized by the issuing organization

Acronym CRC

Issuing Organization International Foundation for Retirement Education (InFRE)

Prerequisites

Bachelors degree or equivalent with two years relevant professional experience (within the past five years) or high school diploma or equivalent with five years relevant professional experience (within the past seven years)

Education Requirements None

Examination Type Certification exam (200-question, multiple choice, proctored)

Continuing Education Requirements 15 hours per year

Business History

August 2014– Present	Managing Member & Adviser at The Asset Consulting Group Inc.
August 2014– March 2021	Chief Compliance Officer at The Asset Consulting Group Inc.
February 2008 – August 2014	Representative at Financial Telesis Inc.
May 2004 – January 2008	Advisor at Mid Atlantic Capital Corporation
October 1998– May 2004	Advisor at London Pacific Securities, Inc.
May 1991- November 1998	Advisor Sanstrum & Associates, Inc.
January 1990 – May 1991	Advisor Goodlin Financial, Inc
November 1985 – February 1990	Advisor Shearson Lehman Hutton, Inc.
June 1976 – October 1977	Advisor Foster & Marshall Inc.

Item 3 – Disciplinary History

Neither ACG nor Gary Barton has any disciplinary history to disclose.

Item 4 – Other Business Activities

As noted in item 10 “Other Financial Industry Activities and Affiliations” above, Gary Barton has the following outside business activities and/or affiliations to disclose.

Gary Barton also works with ESOPs of Idaho, a wholly owned subsidiary of The Asset Consulting Group, Inc. The ESOP Plans are set up by an independent third party and ESOPs of Idaho receives a fee if the plan is established. Gary Barton spends 5 to 10 hours per month in the management of this firm.

Gary Barton may recommend insurance products and may also, as an independent insurance agent, sell those recommended insurance products to Clients. The sale of these products accounts for approximately 5% of his time. When such recommendations or sales are made, a conflict of interest exists as the Insurance licensed Investment Adviser Reps earn insurance commissions for the sale of those products, which may create an incentive to recommend such products. We require that all Investment Adviser Reps disclose this conflict of interest when such recommendations are made. Also, we require Investment Adviser Reps to disclose that Clients may purchase recommended insurance products from other insurance agents not affiliated with us.

Item 5 – Additional Compensation

Gary Barton may receive additional compensation for sales of insurance products. Gary Barton is eligible to receive incentive awards (including prizes such as trips or bonuses) for recommending certain types of insurance policies or other investment products that he recommends.

As part of our fiduciary duties, Gary Barton and all employees of ACG endeavor to put the interest of our clients first. It should be noted, however, that such rewards from insurance companies may present a potential conflict of interest and may thereby, affect judgment when making recommendations.

Item 6 – Supervision

Gary Barton is supervised by the CCO, Andrew Barton. Please contact him at (208) 333-9922 with questions regarding supervision.

ADV Part 2B Brochure Supplement – Andrew Melvin Barton

Item 1- Cover Page

Andrew Melvin Barton

CRD # 6387329

The Asset Consulting Group, Inc.

410 S. Orchard

Suite 112

Boise, ID 83705

www.assetconsultinggroup.com

(208) 333-9922

March 30, 2022

This Brochure supplement provides information about Andrew Barton and supplements the ACG (“ACG”) Brochure. You should have received a copy of that Brochure. Please contact Andrew Barton if you did not receive the Brochure or if you have any questions about the contents of this supplement.

Additional information about Andrew Barton CRD#6387329 is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Full Legal Name: Andrew Melvin Barton

Year of Birth: 1985

Education

Bachelor of Arts
College of Idaho, Caldwell, ID

2008

Business History

March 2021 – Present	Chief Compliance Officer of The Asset Consulting Group
January 2019 – Present	Owner of The Asset Consulting Group
February 2017 – Present	Investment Adviser Representative at The Asset Consulting Group
January 2011 – February 2017	Office Assistant at The Asset Consulting Group
February 2009 – March 2012	Warehouse Manager at Zamzows, Inc.
May 2008 – February 2009	Self-Employed
September 2004 – May 2008	Student at College of Idaho

Item 3 – Disciplinary History

Neither ACG nor Andrew Barton has any disciplinary history to disclose.

Item 4 – Other Business Activities

Andrew Barton is a licensed insurance agent. Andrew may recommend insurance products and may also, as an independent insurance agent, sell those recommended insurance products to Clients. When such recommendations or sales are made, a conflict of interest exists as the Insurance licensed Investment Adviser Reps earn insurance commissions for the sale of those products, which may create an incentive to recommend such products. We require that all Investment Adviser Reps disclose this conflict of interest when such recommendations are made. Also, we require Investment Adviser Reps to disclose that Clients may purchase recommended insurance products from other insurance agents not affiliated with us.

Item 5 – Additional Compensation

Andrew Barton may receive additional compensation for sales of insurance products. Andrew is eligible to receive incentive awards (including prizes such as trips or bonuses) for recommending certain types of insurance policies or other investment products that he recommends.

Item 6 – Supervision

Andrew Barton is the CCO and performs all supervisory duties for his firm.