

**FORM ADV PART 2A
DISCLOSURE BROCHURE**



IMG

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This brochure provides information about the qualifications and business practices of IMG Wealth Management, Inc. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 904-731-9955. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about IMG Wealth Management, Inc. (IARD/CRD #285966) is available on the SEC's website at www.adviserinfo.sec.gov

JANUARY 26, 2022

Item 2: Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of IMG Wealth Management, Inc.'s Brochure.

Material Changes since the Last Update

This update is in accordance with the annual required update for investment advisors. Since the last filing on October 28, 2021 the following changes have been made:

- Item 4 has been updated with a recent asset under management calculation.
-

Full Brochure Available

This Firm Brochure being delivered is the complete brochure for IMG.

Item 3: Table of Contents

Form ADV – Part 2A – Firm Brochure

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Item 4: Advisory Business

Firm Description

IMG Wealth Management, Inc. ("IMG") is a registered investment adviser in the State of Florida. IMG is organized as a S Corp under the laws of the State of Florida. Nick Edwards is 100% owner. Nathan Edwards is the Chief Compliance Officer.

IMG is a fee based financial planning and investment advisory firm. IMG does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products, but IMG's Managing Member and other investment advisor representatives sell insurance products through an independent insurance firm.

Investment advice is an integral part of financial planning. In addition, IMG advises clients regarding cash flow, college planning, retirement planning, tax planning and estate planning.

Other professionals (e.g., lawyers, accountants, tax preparers, insurance agents, etc.) are engaged directly by the client on an as-needed basis and may charge fees of their own. Conflicts of interest will be disclosed to the client in the event they should occur.

Types of Advisory Services

ASSET MANAGEMENT

IMG offers discretionary and non-discretionary direct asset management services. IMG will offer clients ongoing portfolio management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors.

Discretionary

When the client provides IMG discretionary authority the client will sign a limited trading authorization or equivalent. IMG will have the authority to execute transactions in the account without seeking client approval on each transaction.

Non-discretionary

When the client elects to use IMG on a non-discretionary basis, IMG will determine the securities to be bought or sold and the amount of the securities to be bought or sold. However, IMG will obtain prior client approval on each and every transaction before executing any transactions.

FINANCIAL PLANNING AND CONSULTING

IMG offers financial planning and consulting services on an hourly fee basis. Financial planning will typically involve providing a variety of advisory services to clients regarding the management of their financial resources based upon an analysis of their individual needs. If you retain IMG for financial planning and consulting services, IMG will meet with you to gather information about your financial circumstances and objectives. Once IMG reviews and analyzes the information you provided, IMG may deliver a plan to you, designed to help you achieve your stated financial goals and objectives.

Financial plans and/or consulting are based on your financial situation at the time IMG presents the plan to you, and on the financial information you provided to IMG. You must promptly notify IMG if your financial situation, goals, objectives, or needs change.

You are under no obligation to act on our financial planning recommendations. Should you

choose to act on any of our recommendations, you are not obligated to implement the financial plan through any of our other investment advisory services. Moreover, you may act on our recommendations by placing securities transactions with any brokerage firm.

Financial plans will be completed and delivered inside of thirty (30) days. Clients may terminate advisory services with five (5) business days written notice.

SEMINARS AND EDUCATIONAL WORKSHOPS

IMG holds seminars and educational workshops to educate the public on different types of investments and the different services they offer. The seminars and educational workshops are educational in nature and no specific investment or tax advice is given. IMG does charge a fee for attendance to the educational workshops, this is disclosed in Item 5 of this brochure.

Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without written client consent.

Wrap Fee Programs

IMG does not sponsor a wrap fee program.

Client Assets under Management

As of December 31, 2021, IMG had approximately \$99,433,807 in client assets under management on a discretionary basis and \$0 of assets under management on a non-discretionary basis.

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

ASSET MANAGEMENT

IMG offers discretionary and non-discretionary direct asset management services to advisory clients. IMG charges an annual investment advisory fee based on the total assets under management as follows:

EQUITY/EQUITY BLENDED PORTFOLIOS		
Assets Under Management	Annual Fee	Quarterly Fee
Less than \$250,000	1.50%	0.375%
\$250,000 - \$500,000	1.25%	0.3125%
\$500,001 - \$1,000,000	1.00%	0.25%
\$1,000,001 - \$5,000,000	1.00%	0.25%
Greater than \$5,000,000	Negotiated flat fee, not to exceed an annual fee of 0.25%	

FIXED INCOME PORTFOLIO ASSET-BASED FEE SCHEDULE		
Assets Under Management	Annual Fee	Quarterly Fee
\$1,000,000 - \$5,000,000	0.25%	0.0625%
Greater than \$5,000,000	Negotiated flat fee, not to exceed an annual fee of 0.25%	

² Portfolios with allocations in excess of 90% to debt and/or other fixed-income securities will be considered fixed income portfolios.

IMG's annual fee may be negotiable based on a number of factors, which include but are not limited to "grandfathered" accounts, related accounts, and other structures that we may consider in special situations. In limited situations, we may also manage accounts for family without charge. Fees are billed quarterly in advance based on the amount of assets managed as of the last business day of the previous quarter. If margin is utilized, the fees will be billed based on the net asset value of the account. Initial fees for partial quarters are pro-rated. Quarterly advisory fees deducted from the clients' account by the custodian will be reflected in a provided fee invoice as fees are withdrawn. For clients that are referred by a third party, the fee will be split in half between IMG and the third party. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation. Clients may terminate advisory services with thirty (30) days written notice. The client will be entitled to a pro rata refund for the days service was not provided in the final quarter. Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

FINANCIAL PLANNING AND CONSULTING

IMG charges financial planning and consulting on a negotiable hourly rate of \$150. An estimate of the total time/cost will be determined at the start of the advisory relationship. In limited circumstances, the cost/time could potentially exceed the initial estimate. In such cases, IMG will notify you in advance and request that you approve the additional fee. If a client decides to place assets with IMG, IMG reserves the right to lower or waive the planning/consulting fee.

The payment is due upon delivery of the completed plan. Client may cancel within five (5) days of signing Agreement for a full refund. If the client cancels after five (5) days, IMG will charge a pro rata fee for the time spent working on the plan.

SEMINARS AND EDUCATIONAL WORKSHOPS

IMG holds seminars and educational workshops to educate the public on different types of investments and the different services they offer. The educational workshops will have a fee of \$100. Seminars that are held by IMG to give an overview of the services of IMG, are offered at no cost.

Client Payment of Fees

Investment management fees are billed quarterly in advance, meaning we bill you within the first or second week of the quarter. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Fees for financial plans are due upon delivery of the plan. All plans are delivered inside of thirty (30) days.

Additional Client Fees Charged

Custodians may charge transaction fees on purchases or sales of certain mutual funds, equities, and exchange-traded funds. These charges may include mutual fund transactions fees, postage and handling, margin interest, and miscellaneous fees (fee levied to recover costs associated with fees assessed by self-regulatory organizations).

For more details on the brokerage practices, see Item 12 of this brochure.

Prepayment of Client Fees

Investment management fees are billed quarterly in advance.

External Compensation for the Sale of Securities to Clients

IMG does not receive any external compensation for the sale of securities to clients, but investment advisor representatives of IMG may receive commissions for the sale of securities as registered representatives of unaffiliated broker dealers.

This represents a conflict of interest because it gives an incentive to recommend products based on the commission received. As registered representatives, investment advisor representatives of IMG do not charge advisory fees for the services offered through unaffiliated broker dealers. This conflict is mitigated by the fact that investment advisor representatives of IMG have a fiduciary responsibility to place the best interest of the client first and clients are not required to purchase any products or services. Clients have the option to purchase these products through another registered representative of their choosing.

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

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

IMG does not use a performance-based fee structure because of the conflict of interest. Performance based compensation may create an incentive for IMG to recommend an investment that may carry a higher degree of risk to the Client.

Item 7: Types of Clients

Description

IMG provides investment advice to individuals and high net worth individuals. Client relationships vary in scope and length of service.

Account Minimums

IMG requires an account minimum of \$250,000 to open an account, but reserves the right to waive the minimum at its discretion.

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

Methods of Analysis

Security analysis methods may include fundamental analysis, technical analysis, and macroeconomic research performed both internally and by third parties. Investing in securities involves risk of loss that clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis involves evaluating a stock or basket of stocks using real data such as company revenues, earnings, return on equity, and profits margins to determine underlying value and potential growth. Technical analysis involves evaluating securities based on past prices and volume. Macroeconomic analysis examines the factors that influence the economy as a

whole in an attempt to determine the impact that changes in the macroeconomic factors might have on the various characteristics of a security, asset class, or broader securities market.

When creating a financial plan, IMG utilizes client provided personal financial information such as tax documents, investment and banking statements, statements of debt, and insurance related statements and policies to develop an understanding of the client's current financial condition and ability to assume financial risk. IMG will also gather information from the client to help determine the client's willingness to assume risk, and the client's financial objectives and related time horizons.

In developing a financial plan for a client, our analysis may include cash flow analysis, investment planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the client's specific situation.

The main sources of information include financial periodicals, third-party independent research providers, internally conducted research, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

Investment Strategy

The investment strategy for a specific client is based upon the objectives, time horizons, and risk tolerance stated or developed by the client during consultations. Circumstances change and the client may alter these core factors at any time, at which point IMG should be immediately informed of any changes in the client's circumstances. Each client executes an Investment Policy Statement or similar document that outlines their objectives and their desired investment strategy.

Security Specific Material Risks

The biggest risk inherent to securities investment is the risk of monetary loss. The investment strategies of IMG are generally designed for long-term investors unless otherwise outlined in the Investment Policy Statement. Individual stocks and bonds tend to be more volatile than many other investment choices.

Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with IMG:

- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Market Risk:* The price of a security may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market-wide reactions not necessarily associated with any given individual security's underlying fundamentals or other investment characteristics. Regardless of how well individual companies or securities perform, the value of a client's investment portfolio may decline due to deterioration within broader economic market conditions.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.

- *Currency Risk*: Non-domestic investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk*: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Business Risk*: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- *Liquidity Risk*: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Financial Risk*: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- *Manager Risk*: It is possible that poor security selection on the part of an investment manager will cause a client's investments to underperform relative to a benchmark or other investment options with similar investment objectives.
- *Short-term investments*: Short-term investments are typically undertaken for one year or less, and are often tactical in nature – attempting to take advantage of near-term changes in economic factors. Short-term investments may be undertaken to increase an investment portfolio's value, but are generally undertaken to insulate an investment portfolio from some degree of decline in value. Short-term investing inherently requires investment or broader market timing. Poor timing can result in significant declines in investment value.
- *Trading risk*: Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.
- *Options Trading*: Options are derivative securities. The value of an option is based upon the value of an underlying security or security index. The risks involved with trading options are that they are very time sensitive investments, and price volatility is generally much higher for an option than for the underlying security the option contract is based upon. An options contract generally spans a few months, but can extend out across multiple years. The buyer or seller of an option could lose his or her entire investment even with a correct prediction about the direction and magnitude of a particular price change if the price change does not occur within the relevant time period (i.e., before the option expires). The pricing and valuation of an option contract is more complex than some other securities, and a particular contract's value may not be directly correlated to the underlying security's value. Additionally, options are less

tangible than some other investments. An option is a “book-entry” only investment without a paper certificate of ownership.

Item 9: Disciplinary Information

Criminal or Civil Actions

IMG and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

IMG and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

IMG and its management have not been involved in legal or disciplinary events related to past or present investment clients.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

Affiliated representatives of IMG may also be registered representatives of a broker-dealer. The outside business activity for each investment advisor representative is disclosed in their Form ADV Part 2B supplement to this broch.

Futures or Commodity Registration

Neither IMG nor its employees are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Managing member, Nick Edwards, and investment advisor representatives, Nathan Edwards and Nick Riscigno, of IMG, are licensed insurance agents of Pension Management Advisors Group, LLC. From time to time, they will offer clients products and/or services from this activity.

Chief Compliance Officer, Nathan Edwards is also a licensed insurance agent. Approximately 10% of his time is spent in this practice. From time to time, he will offer clients products and/or services from this activity.

This represents a conflict of interest because it gives an incentive to recommend products and services based on the commission and/or fee amount received. This conflict is mitigated by disclosures, procedures, and the firm’s Fiduciary obligation. Clients have the option to purchase these products or services through another insurance agent of their choosing.

In addition, Nathan Edwards is President of Edwards Retirement Planning, Inc. Edwards Retirement Planning, Inc. is a pass through company for Nathan’s insurance and investment advisory business.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

IMG does not select or recommend other investment advisors.

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

Code of Ethics Description

The employees of IMG have committed to a Code of Ethics (“Code”). The purpose of our Code is to set forth standards of conduct expected of IMG employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of IMG. The Code reflects IMG and its supervised persons’ responsibility to act in the best interest of their client.

One area the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our clients. IMG does not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our clients.

Our policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of IMG may recommend any transaction in a security or its derivative to advisory clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Our Code is based on the guiding principle that the interests of the client are our top priority. Our officers, directors, advisors, and other employees have a fiduciary duty to our clients and must diligently perform that duty to maintain the complete trust and confidence of our clients. When a conflict arises, it is our obligation to put the client’s interests over the interests of either employees or the company.

The Code applies to “access” persons. “Access” persons are employees who have access to non-public information regarding any clients’ purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to clients, or who have access to such recommendations that are non-public.

IMG will provide a copy of the Code of Ethics to any client or prospective client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

IMG and its employees do not recommend securities to clients in which IMG has a material financial interest.

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

IMG and its employees may buy or sell securities that are also held by clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide us with copies of their brokerage statements.

The Chief Compliance Officer of IMG is Nathan Edwards. He reviews all employee trades each quarter. The personal trading reviews helps mitigate that the personal trading of employees does not affect the markets and that clients of IMG have received preferential treatment over employee trade.

Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

IMG does not maintain a firm proprietary trading account and do not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist. However, employees may buy or sell securities at the same time they buy or sell securities for clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide us with copies of their brokerage statements.

The Chief Compliance Officer of IMG is Nathan Edwards. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of IMG receive preferential treatment over employee transactions.

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

IMG may recommend the use of a particular broker-dealer such as TD Ameritrade Institutional, a Division of TD Ameritrade, Inc., Member FINRA/SIPC, or may utilize a broker-dealer of the client's choosing. IMG will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. IMG relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by IMG.

IMG participates in the TD Ameritrade Institutional program. TD Ameritrade, Inc. ("TD Ameritrade") is an independent SEC-registered broker-dealer and is not affiliated with IMG. TD Ameritrade offers to independent investment Advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under Item 14). There is no direct link between IMG's participation in the program and the investment advice it gives to clients, although IMG receives economic benefits through its participation in the program.

- *Directed Brokerage*

In circumstances where a client directs IMG to use a certain broker-dealer, IMG still has a fiduciary duty to its clients. The following may apply with Directed Brokerage: IMG's inability to negotiate commissions, to obtain volume discounts, there may be a disparity in commission charges among clients, and conflicts of interest arising from brokerage firm referrals.

- *Best Execution*

Investment advisors who manage or supervise client portfolios have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is effected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such

broker and the financial strength and stability of the broker. The firm does not receive any portion of the trading fees.

- *Soft Dollar Arrangements*

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by Advisor from or through a broker-dealer in exchange for directing client transactions to the broker-dealer. As permitted by Section 28(e) of the Securities Exchange Act of 1934, IMG receives economic benefits as a result of commissions generated from securities transactions by the broker-dealer from the accounts of IMG. These benefits include both proprietary research from the broker and other research written by third parties.

A conflict of interest exists when IMG receives soft dollars. This conflict is mitigated by the fact that IMG has a fiduciary responsibility to act in the best interest of its clients and the services received are beneficial to all clients.

Aggregating Securities Transactions for Client Accounts

IMG may aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of IMG. All clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis.

Item 13: Review of Accounts

Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

Account reviews are performed quarterly by Nathan Edwards, Chief Compliance Officer. Mr. Edwards will review accounts for such things as:

- client objectives are in line with the investments;
- securities held in the accounts are performing to IMG and client's expectations; and
- asset allocation is balanced in the correct proportion with the strategy.

Account reviews are performed more frequently when market conditions dictate.

Review of Client Accounts on Non-Periodic Basis

Other conditions that may trigger a review of clients' accounts are changes in the tax laws, new investment information, and changes in a client's own situation.

Content of Client Provided Reports and Frequency

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by the IMG's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs. Clients will receive performance reports at their review appointments, as well as upon request.

Under financial planning services, the client will receive a one-time written financial plan.

Item 14: Client Referrals and Other Compensation

Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest

As disclosed under Item 12 above, IMG participates in TD Ameritrade's institutional customer program and IMG may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between IMG's participation in the program and the investment advice it gives to its Clients, although IMG receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving IMG participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to IMG by third party vendors.

TD Ameritrade may also have paid for business consulting and professional services received by IMG's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit IMG but may not benefit its Client accounts. These products or services may assist IMG in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help IMG manage and further develop its business enterprise. The benefits received by IMG or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, IMG endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by IMG or its related persons in and of itself creates a conflict of interest and may indirectly influence the IMG's choice of TD Ameritrade for custody and brokerage services.

Advisory Firm Payments for Client Referrals

IMG may, from time to time, enter into agreements with individuals and organizations, which may be affiliated or unaffiliated with IMG, that refer clients to IMG in exchange for compensation. All such agreements will be in writing and comply with the requirements of Federal or State regulation. If a client is introduced to IMG by a solicitor, IMG may pay that solicitor a fee. While the specific terms of each agreement may differ, generally, the compensation will be based upon IMG's engagement of new clients and is calculated using a varying percentage of the fees paid to IMG by such clients. Any such fee shall be paid solely from IMG's investment management fee, and shall not result in any additional charge to the client.

Each prospective client who is referred to IMG under such an arrangement will receive a copy of this brochure and a separate written disclosure document disclosing the nature of the relationship between the solicitor and IMG and the amount of compensation that will be paid by IMG to the solicitor. The solicitor is required to obtain the client's signature acknowledging receipt of IMG's disclosure brochure and the solicitor's written disclosure statement.

Item 15: Custody

Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to the performance reports prepared by IMG.

Item 16: Investment Discretion

Discretionary Authority for Trading

IMG accepts discretionary authority to manage securities accounts on behalf of clients. IMG has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. IMG allows clients to place limitations and restrictions on accounts, if any, these will be documented in the client file. The client will authorize Advisor discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

The client approves the custodian to be used and the commission rates paid to the custodian. Advisor does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Item 17: Voting Client Securities

Proxy Votes

IMG does not vote proxies on securities. Clients are expected to vote their own proxies. The client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, IMG will provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client.

Item 18: Financial Information

Balance Sheet

A balance sheet is not required to be provided because IMG does not serve as a custodian for client funds or securities and IMG does not require prepayment of fees of more than \$500 per client and six months or more in advance.

Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

IMG has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

Bankruptcy Petitions during the Past Ten Years

There are no bankruptcy petitions to report.

Item 19: Requirements for State Registered Advisors

Principal Executive Officers and Management Persons

The education and business background for all management and supervised persons can be found in the Part 2B of this Brochure.

Outside Business Activities

The outside business activities for all management and supervised persons can be found in the Part 2B of this Brochure.

Performance Based Fee Description

Neither IMG nor its management receive performance based fees. Please see Item 6 of the ADV 2A for more information.

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

None to report.

Item 1 Cover Page
SUPERVISED PERSON BROCHURE
FORM ADV PART 2B

Nick A. Edwards, CFP®



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This brochure supplement provides information about Nick Edwards and supplements the IMG Wealth Management, Inc.'s brochure. You should have received a copy of that brochure. Please contact Nick Edwards if you did not receive the brochure or if you have any questions about the contents of this supplement. Additional information about Nick Edwards (CRD #4451511) is available on the SEC's website at www.adviserinfo.sec.gov

JANUARY 26, 2022

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure - Nick A. Edwards, CFP®

- Year of birth: 1976

Item 2 Educational Background and Business Experience

Educational Background:

- Florida State University; Bachelor of Science – Communication for Business; 1999

Business Experience:

- IMG Wealth Management, Inc.; President/Investment Advisor Representative; 03/2017 – Present
- Allen Edwards & Associates; President; 03/2003 – Present
- IMG Wealth Management, Inc.; Chief Compliance Officer; 03/2017 – 07/2021
- Allen Edwards & Associates dba Pension Management Advisors Group, LLC; Insurance Agent; 03/2003 – Present
- PlanMember Securities Corporation dba Investment Management Group, LLC; Registered Representative/Investment Advisor Representative; 10/2013 – 03/2017
- Veritrust Financial, LLC dba Investment Management Group, LLC; Investment Advisor Representative; 04/2004 – 10/2013
- Veritrust Financial, LLC; Registered Representative; 04/2002 – 10/2013
- Equity Management Group; Advisor; 08/2008 – 10/2008

Professional Certifications

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;

- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Item 3 Disciplinary Information

Criminal or Civil Action: None to report.

Administrative Proceeding: None to report.

Self-Regulatory Proceeding: None to report.

Item 4 Other Business Activities

Managing member Nick Edwards is also a licensed insurance agent. Approximately 25% of his time is spent in this practice. From time to time, he will offer clients products and/or services from this activity.

This represents a conflict of interest because it gives an incentive to recommend products and services based on the commission and/or fee amount received. This conflict is mitigated by disclosures, procedures, and the firm’s Fiduciary obligation. Clients have the option to purchase these products or services through another insurance agent of their choosing.

Nick Edwards is President of Allen Edwards & Associates. Allen Edwards & Associates is a pass through company for Nick’s insurance and investment advisory business.

Item 5 Additional Compensation

Nick Edwards receives additional compensation in his capacity as an insurance agent, and he does not receive any performance based fees.

Item 6 Supervision

Nick Edwards is supervised by Nathan Edwards, Chief Compliance Officer. He reviews Nick’s work through client account reviews, quarterly personal transaction reports as well as face-to-face and phone interactions.

Nathan Edwards can be contacted at; 904-731-9955 or by email at: nate@IMGWealthManagement.com.

Item 7 Requirements for State-Registered Advisors

Arbitration Claims: None to report.

Self-Regulatory Organization or Administrative Proceeding: None to report.

Bankruptcy Petition: None to report.

Item 1 Cover Page
SUPERVISED PERSON BROCHURE
FORM ADV PART 2B

Philip J. Detlefs



IMG
WEALTH MANAGEMENT INC.

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philip@IMGWealthManagement.com

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This brochure supplement provides information about Philip Detlefs and supplements the IMG Wealth Management, Inc.'s brochure. You should have received a copy of that brochure. Please contact Philip Detlefs if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Philip Detlefs (CRD #4572116) is available on the SEC's website at www.adviserinfo.sec.gov

JANUARY 26, 2022

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure -Philip J. Detlefs

- Year of birth: 1978
-

Item 2 Educational Background and Business Experience

Educational Background:

- Florida State University; Bachelor of Science – Finance and Marketing; 2000

Business Experience:

- IMG Wealth Management, Inc.; Investment Advisor Representative; 09/2017 – Present
 - Madison Avenue Securities, LLC dba Investment Management Group; Registered Representative; 09/2017 – Present
 - Detlefs and Associates, Inc.; Owner; 12/2002 - Present
 - Detlefs and Associates, Inc. dba Pension Management Advisors Group; Insurance Agent; 10/2001 – Present
 - PlanMember Securities Corporation; Registered Representative; 10/2013 – 09/2017
 - Advisors Excel; Investment Advisor Representative; 04/2013 – 09/2017
 - Veritrust Financial, LLC; Investment Advisor Representative; 06/2007 – 10/2013
 - Veritrust Financial, LLC; Registered Representative; 08/2002 – 10/2013
-

Item 3 Disciplinary Information

Criminal or Civil Action: In March of 1998, Mr. Detlefs was found guilty of a misdemeanor for failing to pay for a meal at a local Denny's.

Administrative Proceeding: None to report.

Self-Regulatory Proceeding: None to report.

Item 4 Other Business Activities

Philip Detlefs is also a licensed insurance agent and registered representative of a broker dealer. Approximately 50% of his time is spent on these practices. From time to time, he will offer clients products and/or services from these activities.

This represents a conflict of interest because it gives an incentive to recommend products and services based on the commission and/or fee amount received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation. Clients have the option to purchase these products or services through another insurance agent or broker dealer of their choosing.

Mr. Detlefs is President of Detlefs and Associates, Inc., a pass through company for Philip's insurance and investment advisory business.

Item 5 Additional Compensation

Philip Detlefs receives additional compensation in his capacity as an insurance agent and registered representative, and he does not receive any performance based fees.

Item 6 Supervision

Philip Detlefs is supervised by Nathan Edwards, Chief Compliance Officer. He reviews Philip's work through client account reviews, quarterly personal transaction reports as well as face-to-face and phone interactions.

Nathan Edwards can be contacted at; 904-731-9955 or by email at:
nate@IMGWealthManagement.com.

Item 7 Requirements for State-Registered Advisors

Arbitration Claims: None to report.

Self-Regulatory Organization or Administrative Proceeding: None to report.

Bankruptcy Petition: None to report.

Item 1 Cover Page
SUPERVISED PERSON BROCHURE
FORM ADV PART 2B

Michael J. Steele



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mike@imgwealthmanagement.com

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This brochure supplement provides information about Michael J. Steele and supplements the IMG Wealth Management, Inc.'s brochure. You should have received a copy of that brochure. Please contact Michael J. Steele if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Michael J. Steele (CRD #6634658) is available on the SEC's website at www.adviserinfo.sec.gov

JANUARY 26, 2022

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure – Michael J. Steele

- Year of birth: 1967

Item 2 Educational Background and Business Experience

Educational Background:

- Regis University; Master of Business Administration – Accounting & Finance; 2018
- Regis University; Bachelor of Science – Business; 2017

Business Experience:

- IMG Wealth Management, Inc.; Investment Advisor Representative; 01/2019 – Present
- WTL Enterprises, LLC.; Owner/Insurance Agent; 10/2014 – Present
- Legal Shield; Associate; 10/2010 - Present
- Virtue Capital Management, LLC; Investment Advisor Representative; 04/2016 – 01/2019
- Gerson Lehman Group Inc.; Consultant; 09/2016 – 12/2018
- Pal-Fit Colorado, LLC dba Planet Fitness; Club Manager; 06/2009 – 07/2015
- Michael James Fitness, LLC; Owner; 11/2007 – 06/2009
- Michael James Custom Homes, LLC; Owner; 02/2005 – 06/2009

Item 3 Disciplinary Information

Criminal or Civil Action: None to report.

Administrative Proceeding: None to report.

Self-Regulatory Proceeding: None to report.

Item 4 Other Business Activities

Michael Steele has a financial affiliated business, WTL Enterprises, LLC, as a licensed insurance agent. Approximately 50% of his time is spent in this practice. From time to time, he will offer clients products and/or services from this activity. In addition, Mr. Steele is an associate with Legal Shield. Through this business he offers the sale of legal benefits and theft protection services. Approximately 5% of his time is spent in this practice. From time to time, he will offer clients products and/or services from this activity.

These represent a conflict of interest because it gives an incentive to recommend products and services based on the commission and/or fee amount received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation. Clients have the option to purchase these products or services through another insurance provider or legal benefits consultant of their choosing.

Item 5 Additional Compensation

Michael Steele receives additional compensation in his capacity as an insurance agent and sales associate. He does not receive performance based fees.

Item 6 Supervision

Michael Steele is supervised by Nathan Edwards, Chief Compliance Officer. He reviews Mike's work through client account reviews, quarterly personal transaction reports as well as face-to-face and phone interactions.

Nathan Edwards can be contacted at; 904-731-9955 or by email at:
nate@IMGWealthManagement.com.

Item 7 Requirements for State-Registered Advisors

Arbitration Claims: None to report.

Self-Regulatory Organization or Administrative Proceeding: None to report.

Bankruptcy Petition: None to report.

Item 1 Cover Page
SUPERVISED PERSON BROCHURE
FORM ADV PART 2B

Nathan A. Edwards, CFA, CFP®



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nate@IMGWealthManagement.com

Website:
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This brochure supplement provides information about Nathan Edwards and supplements the IMG Wealth Management, Inc.'s brochure. You should have received a copy of that brochure. Please contact Nathan Edwards if you did not receive the brochure or if you have any questions about the contents of this supplement. Additional information about Nathan Edwards (CRD #5219718) is available on the SEC's website at www.adviserinfo.sec.gov

JANUARY 26, 2022

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Nathan A. Edwards, CFP®, CFA

- Year of birth: 1984
-

Item 2 Educational Background and Business Experience

Educational Background:

- Kaplan University; Bachelors in Business Management; 2007

Business Experience:

- IMG Wealth Management, Inc.; Chief Compliance Officer; 07/2021 - Present
 - IMG Wealth Management, Inc.; Investment Advisor Representative; 03/2017 - Present
 - Edwards Retirement Planning, Inc.; President; 01/2013 - Present
 - Edwards Retirement Planning, Inc. dba Pension Management Advisors Group, LLC; Insurance Agent; 01/2013 - Present
 - PlanMember Securities Corporation dba Investment Management Group, LLC; Registered Representative/Investment Advisor Representative; 10/2013 - 03/2017
 - Veritrust Financial dba Investment Management Group, LLC; Registered Representative/Investment Advisor Representative; 06/2011 - 10/2013
 - Nathan A. Edwards, Sole Proprietor; Insurance Agent; 09/2008 - 05/2011
 - GWN Securities, Inc.; Administrative Assistant; 02/2007 - 09/2008
 - Investment Management Group; Administrative Assistant; 07/2006 - 09/2008
-

Professional Certifications

Employees have earned certifications and credentials that are required to be explained in further detail.

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits

planning, investment planning, income tax planning, retirement planning, and estate planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Chartered Financial Analyst (CFA): Chartered Financial Analysts designation is awarded by the CFA Institute. CFA certification requirements:

- Hold a bachelor’s degree from an accredited institution or have equivalent educational or work experience.
- Successful completion of all three exam levels of the CFA Program.
- Have 48 months of acceptable professional work experience in the investment decision-making process.
- Fulfill society requirements, which vary by society. Unless you are upgrading from affiliate membership, all societies require two sponsor statements as part of each application; these are submitted online by your sponsors.
- Agree to adhere to and sign the Member's Agreement, a Professional Conduct Statement, and any additional documentation requested by CFA Institute.

Item 3 Disciplinary Information

Criminal or Civil Action: None to report.

Administrative Proceeding: None to report.

Self-Regulatory Proceeding: None to report.

Item 4 Other Business Activities

Nathan Edwards is also a licensed insurance agent. Approximately 10% of his time is spent in this practice. From time to time, he will offer clients products and/or services from this activity.

This represents a conflict of interest because it gives an incentive to recommend products and services based on the commission and/or fee amount received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation. Clients have the option to purchase these products or services through another insurance agent of their choosing.

Nathan Edwards is President of Edwards Retirement Planning, Inc. Edwards Retirement Planning, Inc. is a pass through company for Nathan's insurance and investment advisory business.

Item 5 Additional Compensation

Nathan Edwards receives additional compensation in his capacity as an insurance agent, he does not receive any performance based fees.

Item 6 Supervision

Nathan Edwards is the Chief Compliance Officer of IMG Wealth Management, Inc. and therefore he is responsible for all supervision and formulation and monitoring of investment advice offered to clients. He will adhere to the policies and procedures as described in IMG's compliance manual.

Item 7 Requirements for State-Registered Advisors

Arbitration Claims: None to report.

Self-Regulatory Organization or Administrative Proceeding: None to report.

Bankruptcy Petition: None to report.

Item 1 Cover Page
SUPERVISED PERSON BROCHURE
FORM ADV PART 2B

Nick M. Riscigno



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This brochure supplement provides information about Nick Riscigno and supplements the IMG Wealth Management, Inc.'s brochure. You should have received a copy of that brochure. Please contact Nick Riscigno if you did not receive the brochure or if you have any questions about the contents of this supplement. Additional information about Nick Riscigno (CRD #5405804) is available on the SEC's website at www.adviserinfo.sec.gov

JANUARY 26, 2022

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Nick Riscigno

- Year of birth: 1966
-

Item 2 Educational Background and Business Experience

Educational Background:

- Florida State University; Bachelors of Science in Finance and Real Estate; 1990

Business Experience:

- IMG Wealth Management, Inc.; Investment Advisor Representative; 03/2017 – Present
 - Riscigno & Associates, Inc.; President; 03/2006 – Present
 - Riscigno & Associates, Inc. dba Pension Management Advisors Group, LLC; Insurance Agent; 03/2006 – Present
 - PlanMember Securities Corporation dba Investment Management Group, LLC; Registered Representative/Investment Advisor Representative; 10/2013 – 03/2017
 - Veritrust Financial dba Investment Management Group, LLC; Registered Representative/Investment Advisor Representative; 09/2007 – 10/2013
-

Item 3 Disciplinary Information

Criminal or Civil Action: None to report.

Administrative Proceeding: None to report.

Self-Regulatory Proceeding: None to report.

Item 4 Other Business Activities

Managing member Nick Riscigno is also a licensed insurance agent. Approximately 10% of his time is spent in this practice. From time to time, he will offer clients products and/or services from this activity.

This represents a conflict of interest because it gives an incentive to recommend products and services based on the commission and/or fee amount received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation. Clients have the option to purchase these products or services through another insurance agent of their choosing.

Nick Riscigno is President of Riscigno & Associates, Inc. Riscigno & Associates, Inc. is a pass through company for Nick's insurance and investment advisory business.

Item 5 Additional Compensation

Nick Riscigno receives additional compensation in his capacity as an insurance agent, he does not receive any performance based fees.

Item 6 Supervision

Nick Riscigno is supervised by Nathan Edwards, Chief Compliance Officer. He reviews Nick Riscigno's work through client account reviews, quarterly personal transaction reports as well as face-to-face and phone interactions.

Nathan Edwards can be contacted at: 904-731-9955 or by email at: nate@IMGWealthManagement.com.

Item 7 Requirements for State-Registered Advisors

Arbitration Claims: None to report.

Self-Regulatory Organization or Administrative Proceeding: None to report.

Bankruptcy Petition: None to report.

Item 1 Cover Page
SUPERVISED PERSON BROCHURE
FORM ADV PART 2B

David Blake Barnes



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blake@IMGWealthManagement.com

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www.imgwealthmanagement.com

This brochure supplement provides information about David Blake Barnes and supplements the IMG Wealth Management, Inc.'s brochure. You should have received a copy of that brochure. Please contact Blake Barnes if you did not receive the brochure or if you have any questions about the contents of this supplement. Additional information about David Blake Barnes (CRD #6984464) is available on the SEC's website at www.adviserinfo.sec.gov

JANUARY 26, 2022

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

David Blake Barnes

- Year of birth: 1986
-

Item 2 Educational Background and Business Experience

Educational Background:

- University of Georgia; Bachelors of Arts - History; 2011

Business Experience:

- IMG Wealth Management, Inc.; Investment Advisor Representative; 10/2021 – Present
 - Squire Technologies; Account Executive; 05/2021 – Present
 - Jones Scientific; Sports Liaison Director; 12/2018 - Present
 - Fidelity Personal and Workplace Advisors; Investment Advisor Representative; 08/2020 – 12/2020
 - Fidelity Brokerage Services LLC; Registered Representative; 08/2020 – 12/2020
 - Morgan Stanley Private Bank, N.A.; Investment Advisor Representative; 10/2018 – 05/2020
 - Morgan Stanley; Registered Representative; 09/2018 – 05/2020
 - Providence School; High School Teacher; 04/2014 – 08/2018
 - Unemployed; 01/2014 – 04/2014
 - Munich Cowboys; Assistant Head Coach; 01/2012 – 12/2013
 - Calanda Broncos; Professional Athlete; 01/2011 – 12/2011
-

Item 3 Disciplinary Information

Criminal or Civil Action: None to report.

Administrative Proceeding: None to report.

Self-Regulatory Proceeding: None to report.

Item 4 Other Business Activities

Blake Barnes is a software sales Account Executive. Approximately 50% of his time is spent in this practice. Mr. Barnes is also a Sports Liaison Director and spends less than 10% of his time in this practice. These business practices do not present a conflict of interest as there will not be any crossover clients.

Item 5 Additional Compensation

Blake Barnes receives additional compensation in his capacity as an Account Executive with Squire Technologies. He does not receive performance-based fees.

Item 6 Supervision

Blake Barnes is supervised by Nathan Edwards, Chief Compliance Officer. He reviews Blake Barnes' work through client account reviews, quarterly personal transaction reports as well as face-to-face and phone interactions.

Nathan Edwards can be contacted at: 904-731-9955 or by email at: nate@IMGWealthManagement.com.

Item 7 Requirements for State-Registered Advisors

Arbitration Claims: None to report.

Self-Regulatory Organization or Administrative Proceeding: None to report.

Bankruptcy Petition: None to report.