

North Shore Capital Group Investment Advisors, Inc

Form ADV Part 2A – Disclosure Brochure

Effective: August 27, 2021

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of North Shore Capital Group Investment Advisors, Inc (“NSCGIA” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (847) 735-9200 or by email at info@nscgia.com.

NSCGIA is a registered investment advisor located in the State of Illinois. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about NSCGIA to assist you in determining whether to retain the Advisor.

Additional information about NSCGIA and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov by searching with Advisor’s firm name or CRD# 309269.

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Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of NSCGIA. For convenience, the Advisor has combined these documents into a single disclosure document.

NSCGIA believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. NSCGIA encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

Material Changes

The following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

- The Advisor is affiliated through common ownership and control with North Shore Capital Group, Inc. the general partner to pooled investment vehicles. Please see Items 4, 8, 10 and 15 for additional information.

Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 309269. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (847) 735-9200 or by email at info@nscgia.com.

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Item 4 – Advisory Services

A. Firm Information

North Shore Capital Group Investment Advisors, Inc (“NSCGIA” or the “Advisor”) is a registered investment advisor located in the State of Illinois. NSCGIA is organized as a Corporation under the laws of Illinois. NSCGIA was founded in May 2020, and is owned and operated by Jonathan M. Rigoni (Financial Advisor and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by NSCGIA.

B. Advisory Services Offered

NSCGIA offers investment advisory services to individuals, high net worth individuals, trusts, and estates (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. The Advisor’s fiduciary commitment is further described in the Advisor’s Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Investment Management Services

NSCGIA provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. NSCGIA works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. NSCGIA will then construct an investment portfolio, consisting of low-cost, diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize individual stocks, bonds, options contracts, unit investment trusts (“UIT”), and/or Real Estate Investment Trusts (“REITs”) to meet the needs of its Clients. The Advisor may retain certain types of investments based on a Client’s legacy investments based on portfolio fit and/or tax considerations.

Additionally, for Clients who meet certain qualifications, the Advisor will recommend an investment into a proprietary product managed by an affiliate of the Advisor (“Funds”). This creates a conflict of interest due to the fact that the principal of the Advisor derives a financial benefit when a Client makes such an investment. The Advisor will provide prospective investors into the Funds with detailed written disclosures that outline, among other things, the fees and compensation received by its affiliate. As a fiduciary, the Advisor will only recommend such an investment to a Client when it is believed to be beneficial and in the best interest of the Client.

NSCGIA’s investment strategies are primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. NSCGIA will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

NSCGIA evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. NSCGIA may recommend, on occasion, redistributing investment allocations to diversify the portfolio. NSCGIA may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. NSCGIA may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

At no time will NSCGIA accept or maintain custody of a Client's funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the advisory agreement. Please see Item 12 – Brokerage Practices.

Financial Planning Services

NSCGIA will offer financial planning services to Clients with at least \$500,000 under management as part of its overall investment management services at no additional fee. For Clients who do not meet this asset minimum and/or request a one-time engagement without investment management services, the Advisor will offer financial planning services on a standalone basis pursuant to a written financial planning agreement. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives.

Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client's financial goals and objectives. This planning may encompass one or more areas of need, including but not limited to, investment planning, retirement planning, personal savings, education savings, insurance needs, and other areas of a Client's financial situation. The Advisor will conduct an in-person or virtual meeting[s] to gather initial due diligence and subsequent delivery of the financial plan recommendations. Each financial planning engagement is customized to each Client's situation and/or needs. The Advisor estimates that the development of the financial plan or consultation will take up to 14 hours to complete depending on the complexity of the plan and the Client's financial situation.

A financial plan rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

NSCGIA may also refer Clients to an accountant, attorney or other specialists, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the Client's financial situation, observations, and recommendations. For ad-hoc engagements, the Advisor may not provide a written summary. Plans are typically completed within six (6) months of contract date, assuming all information and documents requested are provided promptly.

Financial planning recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the amount of advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

C. Client Account Management

Prior to engaging NSCGIA to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – NSCGIA, in connection with the Client, will develop a strategy that seeks to achieve the Client's goals and objectives.
- Asset Allocation – NSCGIA will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – NSCGIA will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.

- Investment Management and Supervision – NSCGIA will provide investment management and ongoing oversight of the Client’s investment portfolio.

D. Wrap Fee Programs

NSCGIA does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by NSCGIA.

E. Assets Under Management

As of December 31, 2020 NSCGIA manages \$23,838,663 in Client assets, all of which are managed on a discretionary basis.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into a written agreement with the Advisor.

A. Fees for Advisory Services

Investment Management Services

Investment advisory fees are paid monthly, in advance of each calendar month, pursuant to the terms of the agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior calendar month. Investment advisory fees range up to 2.00% annually based on several factors, including: the complexity of the services to be provided, the level of assets to be managed, and the overall relationship with the Advisor. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee but will not exceed 2.00%.

The investment advisory fee in the first month of service is prorated from the inception date of the account[s] to the end of the first month. Fees may be negotiable at the sole discretion of the Advisor. The Client’s fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by NSCGIA will be independently valued by the Custodian. NSCGIA will not have the authority or responsibility to value portfolio securities.

The Advisor’s fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses described in Item 5.C below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

NSCGIA may also provide investment advisory services with respect to affiliated non-custodial partnership/private fund investments, which are not held at the primary Custodian. In such instances, the Client shall be required to complete the applicable private placement and/or account opening documents to establish these investments. The Advisor will debit its fee for providing investment advisory services with respect to these relationships directly from an account designated by the Client held at the Custodian. For affiliated non-custodial private fund investments, the Advisor will bill the annual rate as defined above based on the lesser of the gross invested capital value or the fair market value of the investment as determined no less than annually.

Financial Planning Services

NSCGIA offers financial planning services to Clients with at least \$500,000 under management as part of its overall investment management services at no additional fee. For Clients who do not meet this asset minimum and/or request a one-time engagement without investment management services, NSCGIA offers financial planning services on an hourly basis at \$300 per hour. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. The Advisor estimates that a simple financial plan will take up to 6 hours and a complex financial plan will take up to 14 hours to complete. An estimate for total hours and overall costs will be provided to the Client prior to engaging for these services.

B. Fee Billing

Investment Management Services

Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning of the respective month. The amount due is calculated by applying the monthly rate (annual rate divided by 12) to the total assets under management with NSCGIA at the end of the prior month. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. In addition, the Advisor will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting advisory fees to be deducted by NSCGIA to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

Financial Planning Services

Financial planning fees may be invoiced up to fifty percent (50%) of the expected total fee upon execution of the financial planning agreement. The balance shall be invoiced upon completion of the agreed upon deliverable[s].

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than NSCGIA, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian, if applicable. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and individual stock trades in a Client's account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodian typically charges for mutual funds and other types of investments. The fees charged by NSCGIA are separate and distinct from these custody and execution fees.

In addition, all fees paid to NSCGIA for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of NSCGIA, but would not receive the services provided by NSCGIA which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by NSCGIA to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

D. Advance Payment of Fees and Termination

Investment Management Services

NSCGIA may be compensated for its services in advance of the month in which investment advisory services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the month. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

Financial Planning Services

NSCGIA requires an advance deposit as described above. Either party may terminate the financial planning agreement by providing advance written notice to the other party. The Client may also terminate the financial planning agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be billed for actual hours logged on the planning project times the contractual hourly rate. The Advisor will refund any unearned, prepaid planning fees from the effective date of termination. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

E. Compensation for Sales of Securities

NSCGIA does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Certain Advisory Persons are also licensed as independent insurance professionals. As an independent insurance professional, the Advisory Person will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to the Advisor's advisory fees. This practice presents a conflict of interest because the person providing investment advice on behalf of the Advisor who is also an insurance agent has an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any Advisory Person affiliated with the Advisor. Please see Item 10 – Other Financial Industry Activities and Affiliations.

Item 6 – Performance-Based Fees and Side-By-Side Management

NSCGIA does not charge performance-based fees for its investment advisory services. The fees charged by NSCGIA are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

NSCGIA does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

NSCGIA offers investment advisory services to individuals, high net worth individuals, trusts, and estates. The amount of each type of Client is available on NSCGIA's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. NSCGIA generally does not impose a minimum relationship size.

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

A. Methods of Analysis

NSCGIA primarily employs fundamental, technical, and cyclical analysis methods in developing investment strategies for its Clients. Research and analysis from NSCGIA are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. This criteria consists generally of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations

are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Technical analysis involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that NSCGIA will be able to accurately predict such a reoccurrence.

Cyclical analysis is similar to technical analysis in that it involves the analysis of market conditions at a macro (entire market/economy) or micro (company specific) level, rather than the overall fundamental analysis of the health of the particular company that NSCGIA is recommending. The risks with cyclical analysis are similar to those of technical analysis.

As noted above, NSCGIA generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. NSCGIA will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, NSCGIA may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. NSCGIA will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with certain components of the Advisor's investment approach:

Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading

risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

Bond Risks

Bonds are subject to specific risks, including the following: (1) interest rate risks, i.e. the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e. the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e. the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e. the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e. the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e. the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

Real Estate Investment Trusts ("REITs")

Investing in Real Estate Investment Trusts ("REITs") involves certain distinct risks in addition to those risks associated with investing in the real estate industry in general. For Example, equity REITs may be affected by changes in the value of the underlying property owned by the REITs, while mortgage REITs may be affected by the quality of credit extended. REITs are subject to heavy cash flow dependency, default by borrowers and self-liquidation. REITs, especially mortgage REITs, are also subject to interest rate risk (i.e., as interest rates rise, the value of the REIT may decline).

Alternative Investments

Investments in alternative assets, such as hedge funds, private equity funds or credit funds, will involve significant risks and other considerations and, therefore, may be undertaken by prospective investors capable of evaluating and bearing such risks. Prospective investors should carefully consider, among other factors, the risk factors set forth in the offering documents for the alternative investment vehicle. As a result of these factors, as well as other risks inherent in any investment, there can be no assurance that the alternative investment will meet their investment objectives or otherwise be able to successfully carry out their investment programs.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving NSCGIA or its owner. NSCGIA values the trust Clients place in the Advisor. The Advisor encourages you to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor and Advisory Persons are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the firm name or CRD# 309269.

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www.nscgia.com

Item 10 – Other Financial Industry Activities and Affiliations

North Shore Capital Group Insurance Solutions, LLC

As noted in Item 5, Mr. Rigoni is also licensed as an insurance professional with North Shore Capital Group Insurance Solutions, LLC (“NSCGIS”), which is under common ownership and control as the Advisor. Implementations of insurance recommendations are separate and apart from Mr. Rigoni’s role with NSCGIA. As an insurance professional, Mr. Rigoni will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Rigoni is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Rigoni or the Advisor.

North Shore Capital Group, Inc

The Advisor is affiliated and under common control with North Shore Capital Group, Inc (“NSCG”). NSCG serves as the General Partner to the Funds. Due to the affiliation, the principal owner has an incentive to recommend an investment in the Funds as the principal owner stands to benefit financially in their individual capacity. However, prior to recommending an investment into the Funds, the Advisor will conduct appropriate due diligence to ensure the recommendation to a Client to invest aligns with the Client’s investment needs and objectives. In addition, the Advisor will provide additional disclosure information to each Client, which will include relevant details regarding material financial interests and compensation as it relates to the . There is no requirement for the Advisor to recommend these Funds to Clients, nor are Clients obligated to invest into these Funds. Client’s should refer to the respective offering documents for the Funds to review the compensation arrangements.

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

A. Code of Ethics

NSCGIA has implemented a Code of Ethics (the “Code”) that defines our fiduciary commitment to each Client. This Code applies to all persons associated with NSCGIA (“Supervised Persons”). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor’s duties to the Client. NSCGIA and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of NSCGIA’s Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (847) 735-9200 or via email at info@nscgia.com.

B. Personal Trading with Material Interest

NSCGIA allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. NSCGIA does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. NSCGIA does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

NSCGIA allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more

advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by NSCGIA requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO"). The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

While NSCGIA allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterward. **At no time will NSCGIA, or any Supervised Person of NSCGIA, transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

NSCGIA does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize NSCGIA to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, NSCGIA does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where NSCGIA does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a Custodian not recommended by NSCGIA. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. NSCGIA may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and its reputation and/or the location of the Custodian's offices.

NSCGIA will generally recommend that Clients establish their account[s] at Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer and member SIPC. Schwab will serve as the Client's "qualified custodian". NSCGIA maintains an institutional relationship with Schwab, whereby the Advisor receives economic benefits from Schwab. Please see Item 14 below. The Advisor also recommends Clients with 529 Plans to establish their accounts at Union Bank & Trust.

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **NSCGIA does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 – Client Referrals and Other Compensation.**

2. Brokerage Referrals - NSCGIA does not receive any compensation from any third party in connection with the recommendation for establishing an account.

3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis", where NSCGIA will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). NSCGIA will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

B. Aggregating and Allocating Trades

North Shore Capital Group Investment Advisors, Inc
1 Westminster Place, Suite 100 B, Lake Forest, IL 60045
Phone: (847) 735-9200 * Fax: (847) 735-9222
www.nscgia.com

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. NSCGIA will execute its transactions through the Custodian as authorized by the Client. NSCGIA may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Client accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Jonathan M. Rigoni, Chief Compliance Officer of NSCGIA. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify NSCGIA if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by NSCGIA

NSCGIA does not receive commissions or other compensation from product sponsors, broker-dealers or any unrelated third party. NSCGIA may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, NSCGIA may receive non-compensated referrals of new Clients from various third-parties.

Participation in Institutional Advisor Platform

NSCGIA has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like NSCGIA. As a registered investment advisor participating on the Schwab Advisor Services platform, NSCGIA receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Services that Benefit the Client – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be

able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

Services that May Indirectly Benefit the Client – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

Services that May Only Benefit the Advisor – Schwab also offers other services to NSCGIA that may not benefit the Client, including: educational conferences and events, financial start-up support, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a potential conflict of interest. NSCGIA believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

B. Client Referrals from Solicitors

NSCGIA does not engage paid solicitors for Client referrals.

Item 15 – Custody

NSCGIA does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct NSCGIA to utilize that Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by NSCGIA to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

Item 16 – Investment Discretion

NSCGIA generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by NSCGIA. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by NSCGIA will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

NSCGIA does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 18 – Financial Information

Neither NSCGIA, nor its management, have any adverse financial situations that would reasonably impair the ability of NSCGIA to meet all obligations to its Clients. Neither NSCGIA, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. NSCGIA is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$500 or more for services to be performed six months or more in the future.

Item 19 – Requirements for State Registered Advisors

A. Educational Background and Business Experience of Principal Officer

North Shore Capital Group Investment Advisors, Inc
1 Westminster Place, Suite 100 B, Lake Forest, IL 60045
Phone: (847) 735-9200 * Fax: (847) 735-9222
www.nscgia.com

The Principal Officer of NSCGIA is Jonathan M. Rigoni. Information regarding the formal education and background of Mr. Rigoni is included in Item 2 – Educational Background and Business Experience of Part 2B below.

B. Other Business Activities of Principal Officer

Mr. Rigoni has additional business activities that are detailed in Item 10 - Other Financial Activities and Affiliations.

C. Performance Fee Calculations

NSCGIA does not charge performance-based fees for its investment advisory services. The fees charged by NSCGIA are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

D. Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding NSCGIA or Mr. Rigoni. Neither NSCGIA nor Mr. Rigoni has ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against NSCGIA or Mr. Rigoni.

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

E. Material Relationships with Issuers of Securities

Neither NSCGIA nor Mr. Rigoni has any relationships or arrangements with issuers of securities.

Form ADV Part 2B – Brochure Supplement

for

**Jonathan M. Rigoni
Financial Advisor and Chief Compliance Officer**

Effective: August 27, 2021

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Jonathan M. Rigoni (CRD# 5110312) in addition to the information contained in the North Shore Capital Group Investment Advisors, Inc (“NSCGIA” or the “Advisor”, CRD# 309269) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the NSCGIA Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (847) 735-9200 or by email at info@nscgia.com.

Additional information about Mr. Rigoni is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5110312.

North Shore Capital Group Investment Advisors, Inc
1 Westminster Place, Suite 100 B, Lake Forest, IL 60045
Phone: (847) 735-9200 * Fax: (847) 735-9222
www.nscgia.com

Item 2 – Educational Background and Business Experience

Jonathan M. Rigoni, born in 1982, is dedicated to advising Clients of NSCGIA as the Financial Advisor and Chief Compliance Officer. Mr. Rigoni attended both College of Lake County and the University of Phoenix. Additional information regarding Mr. Rigoni’s employment history is included below.

Employment History:

Financial Advisor and Chief Compliance Officer, North Shore Capital Group Investment Advisors, Inc	08/2020 to Present
Registered Representative, Cetera Advisor Networks LLC	09/2019 to 08/2020
Investment Advisor Representative, Summit Financial Group	11/2010 to 08/2020
Registered Representative, Summit Brokerage Services	11/2010 to 09/2019
Investment Advisor Representative, Cambridge Investment Research Advisors, Inc.	10/2008 to 11/2010
Registered Representative, Cambridge Investment Research, Inc	10/2008 to 11/2010
Registered Representative, Edward Jones	06/2006 to 10/2008

Item 3 – Disciplinary Information

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

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

However, we do encourage you to independently view the background of Mr. Rigoni on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5110312.

Item 4 – Other Business Activities

North Shore Capital Group Insurance Solutions, LLC

Mr. Rigoni is also licensed as an insurance professional with North Shore Capital Group Insurance Solutions, LLC (“NSCGIS”), which is under common ownership and control as the Advisor. Implementations of insurance recommendations are separate and apart from Mr. Rigoni’s role with NSCGIA. As an insurance professional, Mr. Rigoni will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Rigoni is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Rigoni or the Advisor. Mr. Rigoni spends approximately 25% his time per month in this capacity.

North Shore Capital Group Properties, LLC

Mr. Rigoni is the owner of North Shore Capital Group Properties, LLC, which owns a portfolio of residential rental properties. Mr. Rigoni does not offer the rental properties to any Clients. Mr. Rigoni spends less than 10% of his time per month in this capacity.

North Shore Capital Group, Inc

Mr. Rigoni is the CEO and shareholder of North Shore Capital Group, Inc (“NSCG”). NSCG serves as the General Partner to Funds offered through NSCG. In Mr. Rigoni’s role with NSCG he spends approximately 25% of his time per month in this capacity.

NSCG Golf, LLC

Mr. Rigoni is the managing member of NSCG Golf, LLC (“NSCG Golf”). In this role Mr. Rigoni is responsible for executive oversight of the operations of NSCG Golf. Mr. Rigoni spends less than 10% of his time per month in this capacity.

North Shore Marinas, LLC

Mr. Rigoni is the managing member of North Shore Marinas, LLC (“NSM”). In this role Mr. Rigoni is responsible for executive oversight of the operations of NSM. Mr. Rigoni spends less than 10% of his time per month in this capacity.

North Shore Capital Group Real Estate Services, Inc.

Mr. Rigoni is the CEO of North Shore Capital Group Real Estate Services, Inc. (“NSCGRES”). In this role Mr. Rigoni is responsible for executive oversight of the operations of NSCGRES. Mr. Rigoni spends less than 10% of his time per month in this capacity.

North Shore Capital Group Enterprises, LLC

Mr. Rigoni is the managing member of North Shore Capital Group Enterprises, LLC (“NSCGE”). In this role Mr. Rigoni is responsible for executive oversight of the operations of NSCGE. Mr. Rigoni spends less than 10% of his time per month in this capacity.

Item 5 – Additional Compensation

Mr. Rigoni has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Rigoni serves as the Chief Compliance Officer of NSCGIA. Mr. Rigoni can be reached at (847) 735-9200.

NSCGIA has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of NSCGIA. Further, NSCGIA is subject to regulatory oversight by various agencies. These agencies require registration by NSCGIA and its Supervised Persons. As a registered entity, NSCGIA is subject to examinations by regulators, which may be announced or unannounced. NSCGIA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Item 7 – Requirements for State Registered Advisors

A. Arbitrations and Regulatory Proceedings

State regulations require disclosure if any Supervised Person of the Advisor is subject to:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - a. an investment or an investment-related business or activity;
 - b. fraud, false statement(s), or omissions;
 - c. theft, embezzlement, or other wrongful taking of property;
 - d. bribery, forgery, counterfeiting, or extortion; or
 - e. dishonest, unfair, or unethical practices.
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

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

Mr. Rigoni does not have any disclosures to make regarding this Item.

B. Bankruptcy

If a Supervised Person has been the subject of a bankruptcy petition, that fact and the details must be disclosed.

Mr. Rigoni does not have any disclosures to make regarding this Item.

Form ADV Part 2B – Brochure Supplement

for

Dustin A. Decker
Investment Advisor Representative

Effective: August 27, 2021

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Dustin A. Decker (CRD# 7242397) in addition to the information contained in the North Shore Capital Group Investment Advisors, Inc (“NSCGIA” or the “Advisor”, CRD# 309269) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the NSCGIA Disclosure Brochure or this Brochure Supplement, please contact us at (847) 735-9200 or by email at info@nscgia.com.

Additional information about Mr. Decker is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 7242397.

Item 2 – Educational Background and Business Experience

Dustin A. Decker, born in 1971, is dedicated to advising Clients of NSCGIA as an Investment Advisor Representative. Mr. Decker did not attend a post-secondary school. Additional information regarding Mr. Decker's employment history is included below.

Employment History:

Investment Advisor Representative, North Shore Capital Group Investment Advisors, Inc	12/2020 to Present
Chief Draftsman, R.E. Decker PC	05/1991 to 08/2021

Item 3 – Disciplinary Information

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

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

However, we do encourage you to independently view the background of Mr. Decker on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 7242397.

Item 4 – Other Business Activities

Mr. Decker is dedicated to the investment advisory activities of NSCGIA's Clients. Mr. Decker does not have any other business activities.

Item 5 – Additional Compensation

Mr. Decker is dedicated to the investment advisory activities of NSCGIA's Clients. Mr. Decker does not receive any additional forms of compensation.

Item 6 – Supervision

Mr. Decker serves as a Investment Advisor Representative of NSCGIA and is supervised by Jonathan Rigoni, the Chief Compliance Officer. Mr. Rigoni can be reached at (847) 735-9200.

NSCGIA has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of NSCGIA. Further, NSCGIA is subject to regulatory oversight by various agencies. These agencies require registration by NSCGIA and its Supervised Persons. As a registered entity, NSCGIA is subject to examinations by regulators, which may be announced or unannounced. NSCGIA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Item 7 – Requirements for State Registered Advisors

A. Arbitrations and Regulatory Proceedings

State regulations require disclosure if any Supervised Person of the Advisor is subject to:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - a. an investment or an investment-related business or activity;
 - b. fraud, false statement(s), or omissions;
 - c. theft, embezzlement, or other wrongful taking of property;
 - d. bribery, forgery, counterfeiting, or extortion; or
 - e. dishonest, unfair, or unethical practices.

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a. an investment or an investment-related business or activity;
 - b. fraud, false statement(s), or omissions;
 - c. theft, embezzlement, or other wrongful taking of property;
 - d. bribery, forgery, counterfeiting, or extortion; or
 - e. dishonest, unfair, or unethical practices.

Mr. Decker does not have any disclosures to make regarding this Item.

B. Bankruptcy

If a Supervised Person has been the subject of a bankruptcy petition, that fact and the details must be disclosed.

Mr. Decker does not have any disclosures to make regarding this Item.

Form ADV Part 2B – Brochure Supplement

for

**Darrel P. Rolls
Branch Associate**

Effective: August 27, 2021

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Darrel P. Rolls (CRD# 6730133) in addition to the information contained in the North Shore Capital Group Investment Advisors, Inc (“NSCGIA” or the “Advisor”, CRD# 309269) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the NSCGIA Disclosure Brochure or this Brochure Supplement, please contact us at (847) 735-9200 or by email at info@nscgia.com.

Additional information about Mr. Rolls is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6730133.

Item 2 – Educational Background and Business Experience

Darrel P. Rolls, born in 1988, is dedicated to advising Clients of NSCGIA as a Branch Associate. Mr. Rolls earned a Bachelor's in Business Administration from Columbia College in 2018. Additional information regarding Mr. Rolls's employment history is included below.

Employment History:

Branch Associate, North Shore Capital Group Investment Advisors, Inc	01/2017 to Present
Sr Spec, Sales Support Admin, Cardinal Health	08/201 to 12/2016
Call Center Representative, Aon Hewitt	09/2013 to 04/2014
Machine Operator, Rexam	05/2011 to 03/2013

Item 3 – Disciplinary Information

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

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

However, we do encourage you to independently view the background of Mr. Rolls on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6730133.

Item 4 – Other Business Activities

Mr. Rolls is dedicated to the investment advisory activities of NSCGIA's Clients. Mr. Rolls does not have any other business activities.

Item 5 – Additional Compensation

Mr. Rolls is dedicated to the investment advisory activities of NSCGIA's Clients. Mr. Rolls does not receive any additional forms of compensation.

Item 6 – Supervision

Mr. Rolls serves as a Branch Associate of NSCGIA and is supervised by Jonathan Rigoni, the Chief Compliance Officer. Mr. Rigoni can be reached at (847) 735-9200.

NSCGIA has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of NSCGIA. Further, NSCGIA is subject to regulatory oversight by various agencies. These agencies require registration by NSCGIA and its Supervised Persons. As a registered entity, NSCGIA is subject to examinations by regulators, which may be announced or unannounced. NSCGIA is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Item 7 – Requirements for State Registered Advisors

A. Arbitrations and Regulatory Proceedings

State regulations require disclosure if any Supervised Person of the Advisor is subject to:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - a. an investment or an investment-related business or activity;
 - b. fraud, false statement(s), or omissions;
 - c. theft, embezzlement, or other wrongful taking of property;
 - d. bribery, forgery, counterfeiting, or extortion; or
 - e. dishonest, unfair, or unethical practices.

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a. an investment or an investment-related business or activity;
 - b. fraud, false statement(s), or omissions;
 - c. theft, embezzlement, or other wrongful taking of property;
 - d. bribery, forgery, counterfeiting, or extortion; or
 - e. dishonest, unfair, or unethical practices.

Mr. Rolls does not have any disclosures to make regarding this Item.

B. Bankruptcy

If a Supervised Person has been the subject of a bankruptcy petition, that fact and the details must be disclosed. Mr. Rolls does not have any disclosures to make regarding this Item.

Privacy Policy

Effective: March 31, 2021

Our Commitment to You

NSCGIA Capital Group Investment Advisors, Inc (“NSCGIA” or the “Advisor”) is committed to safeguarding the use of personal information of our Clients (also referred to as “you” and “your”) that we obtain as your Investment Advisor, as described here in our Privacy Policy (“Policy”).

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. NSCGIA (also referred to as “we”, “our” and “us”) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

NSCGIA does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered Investment Advisors (“RIAs”) must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Driver’s license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client’s personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
Marketing Purposes NSCGIA does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where NSCGIA or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
Information About Former Clients NSCGIA does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (847) 735-9200 or via email at info@nscgia.com.