

BFG Wealth Management LLC Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of BFG Wealth Management LLC. If you have any questions about the contents of this brochure, please contact us at (808) 800-4122 or by email at: alexis@bfgwm.com. 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 BFG Wealth Management LLC is also available on the SEC's website at www.adviserinfo.sec.gov. BFG Wealth Management LLC's CRD number is: 299406.

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Registration as an investment adviser does not imply a certain level of skill or training.

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Item 2: Material Changes

There are no material changes to report.

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Item 4: Advisory Business

A. Description of the Advisory Firm

BFG Wealth Management LLC (hereinafter "BFGWM") is a Limited Liability Company organized in the State of Texas. The firm was formed in August 2018, and the principal owners are Alexis M-H Buchholz and Shahla H Buchholz. The firm holds two offices, one in Honolulu, HI and one in Dallas, TX.

B. Types of Advisory Services

Portfolio Management Services

BFGWM offers ongoing portfolio management services to Private Clients (generally defined as individuals and entities with a net worth under \$50 million) and Institutions (generally defined as entities with a net worth over \$50 million). A special Hold and Service option is available for existing clients with concentrations of equity securities that are not traded on a regular basis, but who want advice and cost basis tracking on those securities. Services and portfolio selection are based on the specific goals, objectives, time horizon, and risk tolerance of each client. Portfolio management services include, but are not limited to, the following:

- Investment strategy development
- Asset allocation & selection
- Risk tolerance maintenance
- Regular portfolio monitoring and rebalancing

BFGWM evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. BFGWM requires discretionary authority from all clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

BFGWM seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of BFGWM's economic, investment or other financial interests. To meet its fiduciary obligations, BFGWM attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, BFGWM's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is BFGWM's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent, including initial public offerings ("IPOs") and other investment opportunities that might have a limited supply, among its clients on a fair and equitable basis over time.

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

Services Limited to Specific Types of Investments

BFGWM generally limits its investment advice to common stock, exchange traded funds & products (ETFs and ETPs) and cash equivalents. BFGWM constructs client account portfolios based on these three categories.

C. Client Tailored Services and Client Imposed Restrictions

BFGWM offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent BFGWM from properly servicing the client account, or if the restrictions would require BFGWM to deviate from its standard suite of services, BFGWM reserves the right to end the relationship.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, and certain other administrative fees. BFGWM does not participate in wrap fee programs.

E. Assets Under Management

BFGWM has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$27,837,454	\$0	December 2021

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Fees-Private Client

Total Assets Under Management	Annual Fees
\$0 - \$500,000	1.50%
\$500,000.01 - \$1,000,000	1.25%
\$1,000,000.01 - \$5,000,000	1.13%
\$5,000,000.01 - \$10,000,000	1.00%
\$10,000,000.01 - \$20,000,000	0.90%
\$20,000,000.01 - AND UP	0.80%

Portfolio Management Fees-Institutional

Total Assets Under Management	Annual Fees
\$0 - \$500,000	1.50%
\$500,000.01 - \$1,000,000	1.25%
\$1,000,000.01 - \$5,000,000	0.80%
\$5,000,000.01 - \$10,000,000	0.70%
\$10,000,000.01 - \$20,000,000	0.60%
\$20,000,000.01 - AND UP	0.50%

Hold and Service Fees

Total Assets Under Management	Annual Fees
\$0 - AND UP	0.35%

BFGWM uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

These fees are generally negotiable and the final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of BFGWM's fees within five business days of signing the Investment Advisory

Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 30 days' written notice.

BFGWM uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

These fees are generally negotiable and the final fee schedule will be memorialized in the client's advisory agreement.

Financial Planning Fees

Fixed Fees

The negotiated fixed monthly rate for creating client financial plans is between \$150 and \$500.

Clients may terminate the agreement without penalty, for full refund of BFGWM's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

B. Payment of Fees

Payment of Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a monthly basis. Fees are paid in arrears.

Payment of Financial Planning Fees

Financial planning fees are paid via Electronic Funds Transfers and Credit Card. BFGWM does not directly bill clients nor hold any information on client bank accounts, transactions are handled by a third-party company AdvicePay.

Fixed financial planning fees are paid as a month-to-month arrangement.

C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by BFGWM.

For trades made outside of our BFG series investment strategies, Folio charges \$3.95 per trade for market orders, limit, stop, or stop-limit orders. A client will be charged the Folio

Brokerage Fee according to the following tiered fee schedule, subject to a minimum fee of \$100/year: Account Size Folio Brokerage Fee: \$0-\$500k is 0.20%; \$500-\$1,000k is 0.15%; \$1,000k and up is 0.10%. If a client does not supply Folio with a valid email address, Folio is required to send the client paper statements, for which the client will be billed \$150 per year (\$12.50 monthly). Client will not be billed for paper statement if electronic statement delivery is chosen.

D. Prepayment of Fees

BFGWM collects its fees in arrears. It does not collect fees in advance.

E. Outside Compensation For the Sale of Securities to Clients

Neither BFGWM nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

BFGWM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

BFGWM generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ Trusts
- ❖ Business entities

There is no account minimum for any of BFGWM's services; however, a total of \$500,000 investable account size is recommended. BFGWM management reserves the right to refuse service to new clients for any reason.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

BFGWM's methods of analysis include Fundamental analysis, Modern portfolio theory and Quantitative analysis.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

Investment Strategies

BFGWM utilizes specialized investment strategies which are designed to provide diversification across a wide variety of client portfolios by reducing correlation and mitigating risk without sacrificing returns. The following strategies are currently being utilized within BFGWM client portfolios:

BFG Small/Mid Cap Growth

The objective of the BFG Small/Mid Cap Growth strategy is to achieve a return above that of the S&P 500 Index and Russell 2000 and to achieve this return objective with a portfolio that exhibits lower overall risk characteristics relative to the benchmark.

BFG Real Estate Income

The objective of the BFG Real Estate Income strategy is to provide high dividend income and long-term capital appreciation by investing in a concentrated portfolio of REITs (Real Estate Investment Trusts) and real estate-based companies.

BFG Equity Income

The objective of the BFG Equity Income strategy is to provide a stable dividend income and long-term capital appreciation by investing in a concentrated portfolio of profitable companies.

BFG Environmental Impact

The objective of the BFG Environmental Impact strategy is to invest into companies and organizations with the intention to generate a measurable environmental impact and long-term capital appreciation across industries focused on renewable energy, green technologies, and clean water.

BFG Blockchain Tech

The objective of this strategy is to provide long-term capital appreciation across companies involved in digital ledger distribution technologies used in

cryptocurrencies, banks, stock exchanges, and credit card companies. Investments are not made in digital currencies, only in technologies that make it possible.

BFG Metals & Commodities

The objective of the BFG Metals & Commodities strategy is to provide long-term capital appreciation through investing in select raw materials by actively managing positions of exchange-traded funds and products (ETFs and ETPs).

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Modern portfolio theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Quantitative analysis Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Selection of Other Advisers: Although BFGWM will seek to select only money managers who will invest clients' assets with the highest level of integrity, BFGWM's selection process cannot ensure that money managers will perform as desired and BFGWM will

have no control over the day-to-day operations of any of its selected money managers. BFGWM would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulatory breaches or fraud.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

Common Stock investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Exchange Traded Funds and Products (ETFs & ETPs): An ETF/ETP is an investment fund traded on stock exchanges, similar to stocks. Investing in ETF/ETPs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither BFGWM nor its representatives are registered as or have pending applications to become registered representatives of any broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither BFGWM nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Alexis Mikhail-Hirahara Buchholz is a licensed insurance agent with Buchholz Financial Group LLC, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser.

Alexis Mikhail-Hirahara Buchholz is the managing partner of BFG Capital Partners LLC, a business administration consulting firm, and generally does not offer clients advice or products from those activities.

BFGWM always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of BFGWM in connection with such individual's activities outside of BFGWM.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

BFGWM does not utilize third-party investment advisers.

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

A. Code of Ethics

BFGWM has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. BFGWM's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

BFGWM does not recommend that clients buy or sell any security in which a related person to BFGWM or BFGWM has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of BFGWM may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of BFGWM to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. BFGWM will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of BFGWM may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of BFGWM to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, BFGWM will never engage in trading that operates to the client's disadvantage if representatives of BFGWM buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on BFGWM's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and BFGWM may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in BFGWM's research efforts. BFGWM will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

BFGWM will require clients to use Folio Investments, Inc.

1. Research and Other Soft-Dollar Benefits

While BFGWM has no formal soft dollars program in which soft dollars are used to pay for third party services, BFGWM may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). BFGWM may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and BFGWM does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. BFGWM benefits by not having to produce or pay for the research, products or services, and BFGWM will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that BFGWM's acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. Brokerage for Client Referrals

BFGWM receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

BFGWM will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

B. Aggregating (Block) Trading for Multiple Client Accounts

If BFGWM buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, BFGWM would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients;

provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. BFGWM would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts for BFGWM's advisory services provided on an ongoing basis are reviewed at least Quarterly by Alexis M-H Buchholz, Managing Partner, with regard to clients' respective investment policies and risk tolerance levels. All accounts at BFGWM are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Alexis M-H Buchholz, Managing Partner. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, BFGWM's services will continue until the engaged client decides to disengage financial planning services.

C. Content and Frequency of Regular Reports Provided to Clients

Each client of BFGWM's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

Each financial planning client will receive the financial plan upon completion on an annual basis.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

Other than soft dollar benefits as described in Item 12 above, BFGWM does not receive any economic benefit, directly or indirectly from any third party for advice rendered to BFGWM clients.

B. Compensation to Non - Advisory Personnel for Client Referrals

BFGWM does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

BFGWM is not a broker-dealer and does not take possession of client assets. BFGWM client assets are housed in a nationally recognized brokerage firm, Folio Investments, Inc., a custodian. Folio will issue trade confirmations and monthly statements directly to clients, while the client's account will be managed by BFGWM. Clients are urged to carefully review those statements for accuracy provided by Folio.

Item 16: Investment Discretion

BFGWM provides discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, BFGWM generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share.

Item 17: Voting Client Securities (Proxy Voting)

BFGWM will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

BFGWM neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither BFGWM nor its management has any financial condition that is likely to reasonably impair BFGWM's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

BFGWM has not been the subject of a bankruptcy petition in the last ten years.

Item 19: Requirements For State Registered Advisers

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

BFGWM currently has two management persons: Alexis Mikhail-Hirahara Buchholz, Managing Partner and Shahla Hirahara Buchholz, Operations Director.

Alexis Mikhail-Hirahara Buchholz received his BBA in Investments from the University of Hawaii College of Business; his activities are focused on investment advisory and portfolio construction and management.

Shahla Hirahara Buchholz received her BBA in International Finance; her activities are focused on the development and management of workflow systems, audit processes, and policies and procedures.

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

C. Calculation of Performance-Based Fees and Degree of Risk to Clients

BFGWM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

D. Material Disciplinary Disclosures for Management Persons of this Firm

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

See Item 10.C and 11.B.