

# Form ADV

## Part 2A, Appendix 1 Wrap Brochure

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This wrap fee program brochure (“Wrap Brochure”) provides information about the qualifications and business practices of Cornerstone Financial, Inc. (“CF”) in connection with the wrap fee program(s) (“Program(s)”) we sponsor and/or manage. You should review this Wrap Brochure in conjunction with our separate general disclosure document (our “Brochure”), as well as our separate brochure supplement (“Supplement”) related to the persons who may be providing you with specific investment advisory services or those individuals who may contribute to the creation of the investment advice we provide to you. The information in this Wrap Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

If you have any questions about the contents of this Wrap Brochure, our general Brochure, or our Supplement(s), please contact us at 404-874-3111 or [ddusick@corstonefinancial.com](mailto:ddusick@corstonefinancial.com). Additional information about CF or any of our supervised persons (who are registered under our firm) is also available on the SEC’s Investment Adviser Public Disclosure (“IAPD”) which can be found at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

The format/layout of this Wrap Brochure has been dictated by the SEC and/or State of GA. As such, the Wrap Brochure’s table of contents can be found after the “Material Changes” section of this Wrap Brochure, not at the beginning of the Wrap Brochure. The subsections appearing under each heading shall follow the mandated ordering of the items required to be addressed in this Wrap Brochure as set forth in the instructions and guidance issued by the SEC and/or State of GA in regard to Part 2A Appendix 1 of the Form ADV. CF’s response to each such item shall immediately follow each numbered item. Throughout this Wrap Brochure, any references to “we,” “our,” “ours,” “us,” etc. are meant to refer to CF.

## **II. Material Changes**

Effective date of our most recently completed annual update to our Wrap Brochure was January 2018.

There were no material changes since our last update.

On July 28, 2010, the SEC published Release No. IA-3060, titled, “Amendments to Form ADV” which announced the approval of the new amendments to Form ADV. This Brochure is a new document prepared according to the new requirements and rules and as set forth in the ADV and its corresponding instructions. As such, this Brochure is materially different in structure and requires certain new information that our previous client disclosure document (i.e. Part II and Schedule F) did not require. In the future, this Material Changes section will discuss only specific material changes that are made to the Brochure and will provide you with a summary of such changes.

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## IV. Key Definitions

There are several terms used throughout this Brochure that are defined in the Glossary of the Form ADV. The full Form ADV and its glossary can be found on the SEC's web site at <http://www.sec.gov/about/forms/formadv.pdf>, however, several of the more important terms that are used throughout this Brochure are provided below for your reference. The definitions appear below as they appear in the glossary of the ADV so be mindful that all references made to "you," "your," or "yours" are intended to refer to CF. Each term is presented in alphabetical order, not necessarily its order of appearance or use in this Brochure.

**Management Persons:** Anyone with the power to exercise, directly or indirectly, a controlling influence over your firm's management or policies, or to determine the general investment advice given to the clients of your firm. Generally, all of the following are management persons: Your firm's principal executive officers, such as your chief executive officer, chief financial officer, chief operations officer, chief legal officer, and chief compliance officer; your directors, general partners, or trustees; and other individuals with similar status or performing similar functions; The members of your firm's investment committee or group that determines general investment advice to be given to clients; and If your firm does not have an investment committee or group, the individuals who determine general investment advice provided to clients (if there are more than five people, you may limit your firm's response to their supervisors).

**Person:** A natural person (an individual) or a company. A company includes any partnership, corporation, trust, limited liability company ("LLC"), limited liability partnership ("LLP"), sole proprietorship, or other organization.

**Related Person:** Any advisory affiliate and any person that is under common control with your firm.

**Self-Regulatory Organization or SRO:** Any national securities or commodities exchange, registered securities association, or registered clearing agency. For example, the Chicago Board of Trade ("CBOT"), FINRA and New York Stock Exchange ("NYSE") are self-regulatory organizations.

**Supervised Person:** Any of your officers, partners, directors (or other persons occupying a similar status or performing similar functions), or employees, or any other person who provides investment advice on your behalf and is subject to your supervision or control.

## V. Services, Fees, and Compensation

### IV.(A-D). Services and Fees

Service description:	<p>We do not offer or recommend third party wrap programs to you. A "wrap fee program" is a program that offers participants a suite of services such as asset allocation; portfolio management; trade execution; and certain administrative activities, all for a single fee – typically an annual, asset-based fee. A wrap fee program is designed to assist clients in obtaining professional asset management, brokerage, custodial, and administrative services for a convenient, "wrapped" fee.</p> <p>We do however, recommend CF's wrap program and would be considered the Lead Sponsor.</p> <p><b>Lead Sponsor</b> – The lead sponsor is the investment adviser firm that principally organizes the wrap program and determines which Program Managers will be made available in the wrap program; which broker-dealers and/or custodians will be used in the wrap program; as well as the overall fee structure for the wrap program. The lead sponsor would also generally coordinate the engagement of other investment advisers (referring parties, or solicitors) who may refer clients of their own to participate in the wrap program. The lead sponsor in some cases may and in some cases may not provide the hands on management of a wrap client's assets within the wrap program. In some</p>
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cases, the lead sponsor may be responsible for selecting the specific Program Manager that will be responsible for providing the hands on management of a wrap client's assets within the wrap program.

**Solicitor** – A solicitor generally does not serve as the lead sponsor and does not serve as a Program Manager within the wrap program. The solicitor simply recommends that its clients participate in the wrap program and in some cases, the solicitor may recommend one or more Program Managers made available within the wrap program. In certain circumstances, a solicitor may also be considered a sponsor but generally not the lead sponsor.

**Program Manager** – The Program Manager(s) (also referred to as “Portfolio Manager(s)”) are generally investment adviser firms that are responsible for the hands on management of a wrap client's assets within the wrap program. The Program Managers generally are selected by the lead sponsor as investment advisers available within the wrap program.

In relation to wrap programs, we participate in the following manner.

**Solicitor**

- Recommendation (not discretionary selection) of a wrap program(s) sponsored by another party.
- Recommendation (not discretionary selection) of specific Program Managers within a wrap program.
- Provide ongoing monitoring of the activities and performance of Program Managers selected to manage a wrap participant's program assets.

**Program Manager**

- Provide the hands on management (non-discretionary) of a wrap client's program assets. Our services in this regard will not differ materially from our non-discretionary, ongoing asset management services with the exception of the wrap fee component.

We will offer a wrap fee brochure or other appropriate disclosure document to any advisory clients who are recommended to participate in our wrap program;

The wrap fee brochure provides wrap program participants with important information about the wrap fee program itself.

In connection with the services described above, depending on your individual needs and the services you request of us, we may exercise full discretion as to the following elements.

Use of discretion:	<ul style="list-style-type: none"><li><input type="checkbox"/> Securities to be bought or sold</li><li><input type="checkbox"/> Amount of the securities to be bought or sold</li><li><input type="checkbox"/> Timing as to when such securities are to be bought or sold</li><li><input type="checkbox"/> The engagement of Sub-Advisers to provide the direct management of your assets. Although we may retain and exercise complete discretionary authority to hire and fire Sub-Advisers, each Sub-Adviser we engage to provide investment advisory services to you will be directly responsible for the ongoing, day-to-day investment management functions with respect to your assets.</li></ul>
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	<input type="checkbox"/> Broker-dealer and/or custodian to be used <input type="checkbox"/> Commission rates to be paid for securities brokerage activities <input type="checkbox"/> Other: <input checked="" type="checkbox"/> None								
<p>Service fees:</p>	<p>For the service described above, we will typically charge an asset-based fee. Our standard fee schedule is as follows.</p> <p>1% of the first \$250,000  0.75% on the next \$250,000  0.50% on the next \$250,000  0.25% on everything above \$750,000</p> <p><i>Referral Fees</i>  We do not accept referral fees of any kind .</p> <p>Wrap program fees may cost you more or less than purchasing the wrap program services separately. Factors that may impact the relative cost of the wrap program fees include, but would not be limited to, the following: the cost of the services if provided separately; the trading activity in your account; the specific broker-dealer(s) and/or custodian(s) used for execution, clearance, and settlement services with respect to your accounts; the level of service you may require with respect to your assets; etc.</p>								
<p>Other fees:</p>	<p>In addition to the wrap fees described above, your assets in a wrap program may experience the following types of fees:</p> <table border="1" data-bbox="490 1018 1417 1419"> <thead> <tr> <th>Type</th> <th>Circumstances</th> </tr> </thead> <tbody> <tr> <td>mutual fund expenses</td> <td>Generally charged only if a mutual fund lacks the operational capability of not charging or separating transaction fees for investments made in them on your behalf</td> </tr> <tr> <td>mark-ups, mark-downs, or spreads</td> <td>Generally only paid to market makers from whom securities were obtained by the wrap fee broker if the wrap fee broker was unable to execute the transaction itself.</td> </tr> <tr> <td>Account maintenance fees</td> <td>Generally only charged by the wrap fee broker and/or custodian that maintains your account(s) under the Program.</td> </tr> </tbody> </table> <p>Any such fees are exclusive of, and in addition to our compensation. You will be solely and directly responsible for all fees, including fees other than those we may bill directly to you.</p>	Type	Circumstances	mutual fund expenses	Generally charged only if a mutual fund lacks the operational capability of not charging or separating transaction fees for investments made in them on your behalf	mark-ups, mark-downs, or spreads	Generally only paid to market makers from whom securities were obtained by the wrap fee broker if the wrap fee broker was unable to execute the transaction itself.	Account maintenance fees	Generally only charged by the wrap fee broker and/or custodian that maintains your account(s) under the Program.
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<p>Fee frequency/timing/ collection:</p>	<p>For the service described above, the frequency and timing of our fee collection process occurs as follows: <input checked="" type="checkbox"/> quarterly, <input checked="" type="checkbox"/> monthly, <input checked="" type="checkbox"/> in advance, or <input type="checkbox"/> in arrears. Additionally, we receive our service fees by the following method(s):</p>								





automatic fee deduction via the custodian

*Billing Via Custodian.*

Contemporaneously with the execution of the Agreement, you will be asked to sign an authorization that will allow the custodian, (Fidelity Wealth Management) to debit the account(s) the amount of our service fees and remit the fee to us. The authorization will remain valid unless and until we receive a written revocation of such authorization from you. In connection with this fee deduction process, the custodian will send you a statement, at least quarterly, indicating:

- all amounts disbursed from the account, and
- the amount of advisory fees deducted on our behalf.

Advanced billing and refunds: As described above, our advisory fees may be charged in advance. Fees paid in advance will be considered earned and non-refundable to you up to the effective termination of the Agreement as the termination process is described in the Agreement. Upon receipt of a proper notice of termination ("Termination Notice") as described in the Agreement, we will calculate a prorata refund of any fees not yet earned by us after the effective termination date of the Agreement. The prorata refund will equal the total number of calendar days remaining in the billing period after the date of the termination of the Agreement to the end of that billing period divided by the total number of calendar days in that billing period. The result of that calculation will be multiplied by the total fee already paid for that billing period. The result of that calculation will represent the refund owed to you. Refunds of advance payments owed back to you shall be paid as soon as reasonably possible but not sooner than ten (10) business days after our receipt of a proper Termination Notice.

## VI. Account Requirements and Types of Clients

Any applicable wrap program account opening or maintenance requirements are addressed above in the “Service fees” subsection of Section IV.(A-D).

We will generally provide investment advice to the following types of clients.

- Individuals
- High net worth individuals
- Pension plans / profit sharing plans
- Foundations / charitable organizations
- Trusts for non-natural persons
- Trusts for natural persons
- Estates for natural persons
- Small business or corporate entities

## VII. Program Manager Selection and Evaluation

We do not recommend third party wrap accounts.

## VIII. Additional Information

This portion of the Wrap Brochure requires us to address certain information already covered in our primary Brochure. In an effort not to duplicate information disclosed elsewhere in our Form ADV and to limit the amount of information you need to review, the table below will identify where in our Form ADV you can find the information required by this Item VI.(C).

Topic/Issue Disciplinary Information	Location of Information	
	Source Document	Section Reference
	Form ADV, Part 2A (our “Brochure”)	IX
Other Financial Industry Activities and Affiliations	Form ADV, Part 2A (our “Brochure”)	X
Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	Form ADV, Part 2A (our “Brochure”)	XI
Review of Accounts	Form ADV, Part 2A	XIII
Client Referrals and Other Compensation	Form ADV, Part 2A (our “Brochure”)	XIV
Financial Information	Form ADV, Part 2A (our “Brochure”)	XVIII

